



University College Dublin

UCD feedback to the QQI White Paper:

Statutory QA Guidelines for Flexible and Distributed Learning

Key General Points

- There is confusion around the definition of “flexible and distributed learning” (hereinafter referred to as FDL) provided in the White Paper. Some of the definitions provided (in the glossary on p.27 and also the final sentence in section 3.1.1d) would seem to exclude strategies or programmes which might involve significant face-to-face elements (that is, contain a mix of face-to-face and so-called FDL), even though elsewhere in the document (section 1.2 (p.3-4), the top of page 7, section 3.3.1a) there is an indication that FDL can relate more broadly to engagement with ‘remote’ learners ‘for all *or part of* their programme of study’ [emphasis added], including where there may be some face-to-face tuition. This represents an inconsistency in how face-to-face teaching and learning is being treated in the White Paper. It may therefore be necessary to consider broadening the definition to account for a combination of delivery strategies (often referred to in UCD as ‘online’ and ‘blended’ learning and there is some use of the term ‘blended’ throughout the White Paper) inclusive of at least some face-to-face elements. Some feedback indicated that the term ‘distributed learning’ itself was an unusual one – perhaps ‘online and blended learning’ or ‘flexible and distance learning’ would better capture the type of activity that the White Paper would appear to be addressing. However, on the other hand, there was some recognition that FDL was terminology that was being used outside of Ireland (it is commonly used throughout the UK, for example). Related to this though, it is unclear in the White Paper whether transnational type programmes would be included under the definitions provided, especially where there is a significant face-to-face component in such programmes.
- A full table of contents, with sub-section headings, would be useful. An accompanying user tool, summarising the various indicators in a “tick the box” format, would be useful (and perhaps such a tool could be made available on-line). At one level the current organisation of sections (Organisation Context; Programme Context; Learning Experience Context) is helpful in terms of directing different stakeholders (e.g. institution leaders, managers, policy makers, programme directors, lecturers, support staff, etc.) to the guidelines most relevant to them. However, there is significant overlap and repetition of indicators across the three sections which makes the document difficult to follow and very lengthy. For example there are indicators in all three sections on assessment and feedback; as there are on staff training & development. There may be merit in considering a thematic approach drawing attention to the key dimensions, and therein (or elsewhere) referencing the level(s) of responsibility (Organisation; Programme; Module).
- Template / sample reliable evaluation questions or other checklists for ensuring quality on FDL programmes could be useful, as it makes little sense for everyone to design their own bespoke evaluation questions if good international ones have been designed and validated.

- From the point of view of IT Services at UCD, guidelines such as those provided in this White Paper will have to keep pace with the changing technology landscape, especially the move to a "Cloud" service which will mean that various systems (like Blackboard, for example) will not have a physical system located on campus. The level of quality assurance which will be undertaken during a site visit and what access the visiting group will require to these services would be significantly impacted by this change of approach. Contracts may have to be amended in order to facilitate access to these systems when they move to a "Cloud" delivery model. Furthermore, UCD support a 'bring-your-own-device' policy (BYOD) as students expect to access FDL from their devices which are not owned by the institution, and so the guidelines in the White Paper should also account for this.
- It would be useful to clarify what is meant by the statement made in the White Paper to the effect that all FDL "is required to have regard to these guidelines" – how is that requirement manifested?
- When the White Paper gets to a final draft stage, it should be tested against an FDL programme so as to surface some of the assumptions included in the guidelines.

Key Points on Specific Provisions in the White Paper

- In Section 3, which contains the substantive content of the White Paper, some indicators address a multiplicity of different concepts within the one indicator making it difficult for the reader to identify the key message. By way of illustration indicator 3.2.1b touches on quality assurance measures to enhance curriculum design; student support; resource planning and cost implications. Similarly 3.2.3e starts with a statement on the need for staff induction and training for their role in FDL and leads-on to feedback on assessment practices.
- Section 3.1 (Organisational Context):
 - Section 3.1.1b – "Policies and processes that may have been designed for face-to-face provision will not always be appropriate and/or effective in the FDL context. Considerations will include..." In the list included herein it would be useful to add 'pre-assessment/planning assessment strategies' and the 'conduct of assessment, marking/grading' as other areas that would require consideration for a governance review in the context of FDL.
 - Section 3.1.1f – "it may be possible (and more appropriate) to make changes and enhancements to aspects of FDL delivery during presentation rather than waiting for end-of-module or end-of-year review". It's not clear why there should be a different approach for FDL, compared to face-to-face.
 - Section 3.1.2b – regarding the verification of the identity of learners (relating to participation in online activity, submission of work for assessment, and arrangements for supervision of examinations), it would be useful to expand this section. This is a critical issue which relates to plagiarism, academic integrity and intellectual property also, and further guidance would be useful. Also, is it a requirement that systems and processes for supporting FDL are scale-able, or is it more appropriate that each HEI has the autonomy to decide whether this approach is appropriate in its strategic context? Although scale-ability is relevant, the life expectancy of

relevant technologies might mean that it is for each HEI to decide on the scale to which it adopts FDL as part of its core educational offerings.

- Section 3.1.3, Guideline 3 – more clarity on how the indicators map to the guideline (*...approved and published expectations ...*) would be useful.
- Section 3.1.4a and 3.1.4d – there seems to be overlap, on “local recognition”, for example.
- Section 3.1.2a – It suggests there should be a planned approach to the procurement of hardware and software to support FDL. In UCD for example we don't buy hardware and software for FDL, instead we purchase a service from Blackboard as they manage and host the infrastructure in Amsterdam. There is a big move to Cloud services which these guidelines will need to account for. Also, the idea that there might be standard hardware and software for the student to use in accessing FDL is not in keeping with where the technology landscape is today, especially in relation to UCD's ‘bring-your-own-device’ policy (BYOD).
- Section 3.1.2b – this will need to be road tested as again the student will more than likely be using their own equipment which will be extremely difficult to manage so as to ensure against “cheating”, for example.
- Section 3.1.2d – there are a lot of issues that will need to be ironed out here as the guidelines are quite vague on some of the issues and they give an impression that technology will solve these issues, which in some cases it may not. This area needs much more detailed analysis (e.g. confirming that the student work is original where the assessment is conducted through remote methods will need careful consideration).
- Section 3.2 (Programme Context) places insufficient emphasis on the curriculum design process and doesn't specifically address key concepts such as programme structure, coherence and sequencing.
 - Section 3.2.3, Guideline 8 – not clear if this is “validation” as instead of, or in addition to, “approval” of new programmes. Much of what follows relates to validation of existing programmes as opposed to approval of new ones.
 - Section 3.2.3a bullet points 1 and 3 would fit better in section 3.1 (Organisational Context) and bullet points 2 and 4 would fit well within 3.2.2 Guideline 7. This section also appears to relate to the degree to which an FDL programme itself is “fit-for-purpose” as opposed to the fit-for-purpose-ness of the “approval processes” themselves.
 - Section 3.2.3c addresses a number of concepts and the overall key message is unclear.
- Section 3.3 (Learner Experience Context):
 - 3.3.1, Guideline 9 might work better if it was sub-divided into two guidelines – one on pre-enrolment and the other on student progress support.
 - 3.3.1e would benefit from the addition of an illustrative example.

- 3.3.1f – it is understandable that this requirement is included as it impacts upon institutional reputation and demonstrates to students that the University has robust quality control systems in place to ensure that any assessed work which is conducted through FDL is properly attributed to them. Nevertheless, it does potentially place an additional burden of responsibility on an institution, without highlighting the responsibility of the student to ensure that they are honest and transparent in submitting assessed work of which they are the originator. QQI may wish to reconsider the wording in this regard, so that it is high level and overarching without being overly prescriptive, to enable responsibility for the attribution of assessment to be appropriately shared between the student and the institution.
- 3.3.2, Guideline 10 should reference ‘assessment’ (i.e. learning, teaching and assessment activities, etc.). There is also some overlap between 3.3.2 and 3.3.1f.

For Information

- UCD Teaching and Learning (Dr Geraldine O’Neill and Diane Cashman) are currently completing a research study which aims to design a staff self and peer review tool to foster dialogue around best practices in the design of online or blended programmes in the Irish higher education sector. The study identifies high-level categories relevant to the systematic review of online/blended programme and module design. These categories may be useful in structuring the White Paper guidelines. Irish expertise has been leveraged in the development of this tool. Final analysis and write-up is underway and the authors would be happy to share final output of the research (tool) once completed (Jan/Feb 2016).