

# QQI White Paper for Consultation: Statutory Quality Assurance Guidelines for Flexible and Distributed Learning

---

## Stakeholder Submission:

iScoil  
Acorn Centre  
Blackpitts  
Dublin 8  
<http://www.iscoil.ie>

## Responding on behalf of iScoil:

Marianne Checkley  
Chief Executive  
[marianne@iscoil.ie](mailto:marianne@iscoil.ie)  
t: 01 4537570  
m: 086 3822203

## Introduction:

iScoil is an online learning community set up in 2009 to address the need for alternatives to mainstream education for young early school leavers. We work with young people aged between 13-16 years and provide accredited learning opportunities in a range of QQI Level 3 Certificates. We have a strong record of success in working with this group of 'at-risk' young people and there is a high demand for our service. One of the identified success factors of our approach is our flexible model of accreditation facilitated by the framework of QQI awards.

We received recognition as an approved provider of FETAC programmes in 2010. During the application and Quality Assurance process we worked to ensure our policies, procedures and programmes, were fit for purpose for an online and blended learning model and also met the required standards to allow us to provide approved accreditation for our learners. We very much welcome the introduction of *Statutory Quality Assurance Guidelines for Flexible and Distributed Learning*. As a provider of an online and blended service with policy, programme development and instructional experience, we consider iScoil to be well placed to provide constructive feedback that would support the development of a robust Quality Assurance framework.

## Feedback On Quality Assurance Guidelines:

The following outlines recommendations along with some observations and suggestions according to areas where specific feedback was requested:

### 1. Terminology

#### 1.1 Flexible and Distributed Learning

While the term Flexible and Distributed Learning (FDL) allows the guidelines to be relevant to a wide range of context, programme development and delivery method it does appear often to be the case that in using the term, institutions and qualification bodies still need to qualify that FDL guidelines include e-learning, online learning and/or blended learning. In defining parameters the document includes:

‘providers offering FDL that is neither credit-bearing nor leading to a qualification, are advised to be guided by the expectations and good practice captured here. This may mitigate the risk of reputational damage. MOOCs and other less formal kinds of FDL, for example, may be a learner’s first experience of FDL. It is important, therefore that the learning experience is of good quality and that quality assurance, improvement and enhancement is in place’. (p7)

It is worth noting that the definitions of and distinctions between the different types of online course are often blurred, for example the definition of Open Online Educational Resources as free access to content is thought to imply

‘a narrow view of educational practice which centres on the production of content. A broader definition would encompass all activities that open up access to educational opportunity, in a context where freely available online content and services (whether 'open', 'educational' or not) are taken as the norm.<sup>1</sup>

With a rapid increase of various types of open online courses and as Open Education is gaining traction and growing in confidence as a field in itself<sup>2</sup>, it is suggested that the overarching term used should future-proof the guidelines in a way that places QQI at the forefront of quality assurance for new emerging models and innovations in learning.

Suggestions:

- Flexible, Distributed and Open Learning
- Flexible and Open Learning

---

<sup>1</sup> Lou McGill in UKOER Synthesis and evaluation (2013)  
<https://oersynth.pbworks.com/w/page/63860065/OPEN-COURSES>

<sup>2</sup> Bayne, Knox & Ross *Open education: the need for a critical approach* (2015) Learning Media and Technology  
<http://www.tandfonline.com/doi/abs/10.1080/17439884.2015.1065272?journalCode=cjem20>

## **1.2 Defining by the ‘other’**

Throughout the document there is an emphasis on creating a distinction of what FDL is through comparison with other forms of learning and teaching. For example:

*‘The guidelines provide information to all stakeholders on what is expected of providers of FDL. The guidelines offer benchmarks to inform choices and decisions by learners, teachers and assessors (for example) by indicating how FDL may differ from other forms of learning and teaching’. (p4)*

In taking this approach there is a danger of relying on what FDL is not rather than placing the emphasis on a clear definition of what it is. In our experience on iScoil this approach can lead to uncertainty and confusion in the development and delivery of programmes. We would suggest that whatever terminology is used, (currently FDL), that a clear definition and Key Principles follow. This enables providers to benchmark using new and relevant criteria and avoids constant comparison with other forms of teaching and learning. It also supports student centred approaches at the core of FDL to become embedded more naturally through procedures and programme development and instructional strategy without the need for relativism to other approaches and models.

## **1.3 Glossary**

To support clarity of definition the glossary could be placed at the start and expanded to define more terms used. This would support a more consistent use of terminology throughout.

## **2. Structure of Document**

The structure of the document into clear headings relating to organisational, programme and learner experience is thought to work well.

Some observations:

### **Organisational Context (3.1)**

#### **2.1 Separate Introductory Section**

The introduction on page 10 outlines the main considerations with regard to FDL, however it might be better placed in the Background Section where providers would place themselves in the space of FDL. Relating back to the point on distinctiveness and comparison above, it would then follow that each heading clearly outlines the guidelines specific to FDL without a need to provide constant reference points to face-to-face models.

#### **2.2 Leadership**

While the importance of leadership is implied for example, *‘a decision to deliver some or all provision through FDL should therefore be part of provider’s vision, supported by a deliberate and approved strategy’* (p10) it is not explicit. A move towards new forms of teaching and learning involves change and transformation and leadership is seen as an integral element to an effective change process.

### **2.3 Consistency**

There is some inconsistency with regard to organisational policy and practice considerations, for example relating to the area of assessment. As a result it follows that overlap continues through other sections of the document and takes away from the clarity of indicators and where responsibility lies to ensure quality and standards.

#### **Programme Context (3.2)**

### **2.4 Key Components**

An introduction that outlines the key components for developing FDL programmes would work well here. This would allow a more coherent flow into the indicators for quality assurance:

For example

3.2.1e:

*Key Component*

Pedagogy informing learning and teaching is demonstrably learner centred

*Indicator*

Each FDL element provides the learner with an interactive learning experience and academic content appropriate to its level, credit rating and academic subject area.

3.21b:

*Key Component*

Resource planning at programme level includes budget for updating and programme teams are alert to the cost implications in designing FDL.

*Indicators*

All online content is subject to approval and to ongoing quality assurance.

The design of curriculum and student support can accommodate enhancement or updating, for example in response to feedback or other quality assurance mechanisms.

### **2.5 Crossover Learning**

Considering the range of QQI providers, many of whom are in a local or community context, it may be beneficial to introduce the concept of 'Crossover Learning'<sup>3</sup> where a blend of formal and non-formal learning can result in learning outcomes and evidence for accreditation. On iScoil we find this very beneficial when working with our blended centre partners based in a range of settings to encourage interest led content and project based learning. It also supports cross accreditation and a focus on learning outcomes that can be reached through a variety of diverse subject areas e.g. digital literacy, critical thinking.

### **2.6 E-Portfolios**

The use of online or e-portfolios for summative assessment should be included and explored further. This could be especially relevant in the context of cross accreditation and project-based learning.

---

<sup>3</sup> Crossover learning experiences exploit the benefits of learning in both formal and informal settings by creating links between the educational content delivered in the classroom setting and real-world settings and experiences. Open University Innovating Pedagogy Report [http://proxima.iet.open.ac.uk/public/innovating\\_pedagogy\\_2015.pdf](http://proxima.iet.open.ac.uk/public/innovating_pedagogy_2015.pdf)

## **Learner Experience Context (3.3)**

### **2.7 Learner Preparedness**

The preamble rightly points out that FDL requires ‘autonomy, commitment and self-regulation’ (p22). Learners should also be able to pre-assess their own motivation and circumstance in order to ensure ‘readiness’ to engage with an FDL course. Some examples of rubrics to prepare students for success are available. <sup>4</sup>

### **2.8 Critical Success Factors**

Again it would be helpful to outline critical success factors for learner achievement in FDL programmes to allow for a better flow to indicators and quality assurance.

For example:

3.3.1h

*Critical Success Factor*

Pro-active interventions and mechanisms are in place to identify FDL learners who may be struggling.

*Indicator*

Progress is regularly monitored and learners are provided with prompt and helpful comments on their progress in relation to learning guideline and goals.

### **2.9 Mentoring and Individual Support**

The provision of mentoring and one:one support to learners who are identified as at-risk is recognized as a key component for online and blended learning programmes with a focus on inclusion and access. It would be important to highlight the benefit of teaching teams and a collaborative instructional approach as an indicator of quality assurance. Also bearing in mind learners returning to education or requiring specific needs.

## **3. Fitness for Purpose and User Friendliness**

### **3.1 Structural Clarity**

Overall the document comes across as comprehensive, thorough and strongly relevant. Structural changes as outlined above may enhance it’s readability i.e. if there is a breakdown under each heading that clearly presents Key Principles/Components/Critical Success Factors based on evidence informed research and reinforces these with indicators that benchmark quality assurance. This may also allow for an edit of content as there is some unnecessary overlap and repetition.

---

<sup>4</sup> Michigan Virtual University Student Levels of Readiness  
[https://micourses.org/resources/pdf/toolkit/Interactive\\_OnlineLearningReadinessRubric.pdf](https://micourses.org/resources/pdf/toolkit/Interactive_OnlineLearningReadinessRubric.pdf)  
National Forum for Teaching and Learning Enhancement Ireland Student Success Toolbox  
<http://unesdoc.unesco.org/images/0021/002134/213475e.pdf>

#### **4. Complementary resources to support good and effective practice in FDL.**

The document would benefit from supporting and complementary resources that allow providers to see practical examples and charted guidelines represented visually.

- Case studies or references to real world examples of FDL in action from the perspective of organizational leadership, instructional roles, learner experience.
- Templates for programme development, curriculum design, module descriptors, assessment briefs, e-portfolios.
- Evaluation templates for ongoing programme and course development.
- Quality standards checklist for content and resources both technical and pedagogical.
- Teaching and instructional roles competency frameworks.
- Quality standards for synchronous tutorials.
- Organisational flow charts that outline the areas of responsibility and collaboration between roles.

As an organisation that strives to provide a quality learning experience iScoil very much welcomes Quality Assurance Guidelines that will allow providers to explore the possibilities of FDL, grow and improve standards. It is hoped that the above suggestions and recommendations can contribute to the development of a document that supports a high standard of process and practice in FDL, online, blended and open learning programmes. We have worked in this space since 2009 and conducted research in the area, the above observations are a general overview based on our experience, knowledge sharing and professional network. We would be glad to provide feedback or contribute further observations in the development of the document.

Submission may be published.