



# WHITE PAPER

## Statutory Quality Assurance Guidelines for Flexible and Distributed Learning

### FOR CONSULTATION

This White Paper contains proposed topic specific statutory quality assurance guidelines for use in the development, quality assurance and enhancement of programmes where provision is intended to be available to learners through flexible and distributed learning (FDL).

The White Paper has been developed with the assistance of an expert reference group, membership of which is contained in *Appendix 1*.

QQI is seeking feedback from stakeholders on the proposed policy contained in this White Paper.

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Submissions may be emailed to  
**[consultation@QQI.ie](mailto:consultation@QQI.ie)**

The closing date for submissions  
is **Friday 5 February 2016**.

In your submission please clearly indicate:

1. *Your contact details.*
  2. *Whether you are responding as an individual or on behalf of an organisation.*
  3. *If you do not wish your submission to be published.*
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**QQI is seeking feedback from stakeholders on the proposed Quality Assurance Guidelines contained in this White Paper.**

**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.
- 2 The structure of the document into sections focussing on organisational, programme and learner experience context.
- 3 Fitness for purpose and user-friendliness.

**Please propose preferred alternatives for any of the above that you offer comment on.**

- 4 Any complementary resources that might be published to support good and effective practice in FDL. This might include (for example) case study material, templates or checklists relevant to FDL.

## 1 INTRODUCTION

### 1.1 LEGAL AND POLICY CONTEXT

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This document is issued under Section 27(1a) of the Qualifications and Quality Assurance (Education and Training) Act 2012 (the 2012 Act). The 2012 Act requires providers to have due regard to QQI Quality Assurance (QA) guidelines in the development of their own QA procedures and in the development of their programmes of education and training, in particular where these programmes lead to QQI awards following validation by QQI.

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.

### 1.2 PURPOSE

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A wide range of existing QQI policies and guidelines have been established through consultation and published as external reference points for all learning and teaching contexts. FDL is not exempt from these but some of its distinctive features may not be sufficiently recognised in them. This document is intended to support the education sector by filling a perceived gap. It offers additional specialist guidance to stakeholders on good practice in the quality assurance and enhancement of delivery models for education and training where learners may be remote from:

- » other learners,
- » teachers and assessors,
- » the provider institution, or
- » learning resources and support services,

for all or part of their programme of study.

The document presents high level guidelines that are followed by indicators that can be used to judge how each guideline is met. The indicators are to be interpreted as more detailed good practice guidance. They are not necessarily exhaustive and providers may be able to offer other or additional evidence to demonstrate how each guideline is met. *The guidelines set out in Section 3 are, however to be regarded as the core Quality Assurance Guidelines for Flexible and Distributed Learning.*

Providers will have regard to the guidelines in this document to inform the establishment or renewal of their quality assurance procedures for flexible and distributed learning. It is anticipated that such procedures will be proportionate to the nature, scale and complexity of their FDL or their aspirations. Attention is drawn to the European Association of Distance Teaching Universities (EADTU) self-assessment tool for providers of e-Learning<sup>1</sup> E-excellence benchmarks, which offer providers both threshold and excellence benchmarks for effective e-learning.

This document is intended for use by all providers required to have regard to QQI statutory Guidelines who wish to offer FDL. The primary stakeholder audience is:

### **Learners, teachers, assessors and other stakeholders**

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.

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<sup>1</sup> [Quality Assessment for E-learning: a Benchmarking Approach \(second edition\) \(EADTU, 2012\)](#)

## **Institutions/organisations and programme teams**

The guidelines highlight the issues, challenges and opportunities that can be expected in relation to managing, developing, delivering and quality assuring FDL provision.

## **QQI Panels, programme validation and effective quality assurance and enhancement**

The guidelines will be a reference point:

- » When assessing an institution for initial access to programme validation or re-engagement.
- » When making an assessment in respect of an application for programme validation under Section 45 of the 2012 Act for a programme of education and training that uses FDL for all or part of the programme.
- » When assessing the fitness-for-purpose and effective implementation of providers' QA arrangements in respect of any provision delivered through FDL.

## 2 BACKGROUND

FDL of various kinds has been around for a very long time. More recently, innovation in educational technology has expanded options and learning experiences. For example, online and e-learning, mobile and digital technologies, social media, and Massive Open Online Courses (MOOCs) are all harnessed to a greater or lesser extent by many providers, offering opportunities for flexible and distributed delivery of learning. Such learning may or may not be credit bearing or certificated. In this document, the term ‘Flexible and Distributed Learning’ is used as a shorthand to include all such delivery models<sup>2</sup>.

It can be expected that innovation will continue and that new flexible and distributed models of learning will evolve. It is important, therefore, that the guidance provided here concentrates on broad principles of good practice that will continue to be relevant; and which do not constrain innovation.

Most of the questions, issues or principles that provide assurance of quality and standards for other modes of delivering education are equally relevant to FDL. What has at times been problematic for FDL providers has been the application of benchmarks and indicators originally conceived for face-to-face provision. For example, indicators related to teaching (contact time), accommodation (classrooms) or physical library facilities and buildings will not be appropriate in making judgements about FDL provision. Funding models may also be challenged by FDL. Internationally, the emphasis in quality assurance and enhancement, and in funding methodologies, is shifting to a more nuanced approach. Expectations (or intended outcomes) are published and providers determine how best to meet them.

In so far as it is possible to do so, this document focuses on what is distinctive in the FDL context. In order to avoid duplication, confusion, or version control issues, it does not replicate the other QQI policy and guidance that is already available and generic to all teaching and learning or curriculum design (for example) – whatever the mode of delivery.

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<sup>2</sup> Internationally there is no common currency in terminology. However, FDL has gained currency across many places and organisations including ENQA, ICDE and the UK’s QAA.

FDL is, fundamentally, a mode of learning characterized by a distinctive relationship between the provider and the learner. In designing curricula, FDL providers (in common with all others) look for the most effective and efficient means that will support learners to achieve intended learning outcomes. Often, this will require a blend of different learning and teaching strategies. It is commonplace that a programme described as FDL will include a combination of, for example:

- » Learning materials in hard or electronic copies
- » Virtual learning spaces and forums
- » Online activities to support formative assessment
- » Face-to-face tuition
- » Block study (e.g. workplace, campus-based and distance)
- » Assessment submitted, marked and returned to learners with feedback through electronic or other media

This document recognises that there is a wide spectrum of providers, learners, programmes and (therefore) appropriate blends. Some FDL providers may operate wholly or primarily online. Within institutions, FDL options may be offered in all or few programmes, to small or large numbers of learners; and may form a substantive or small proportion of the learner's overall experience. Increasingly, many face-to-face providers offer learners some part of their learning experience through virtual learning environments (VLE) or through some blend of learning. The intention is that the good practice principles underlying this document will provide a reference point to inform practice across this spectrum.

However, there is a distinction between the use of VLE and other tools to support what is predominantly a face-to-face mode and FDL. Providers and QQI panels will be directed to use these guidelines where FDL is used for supporting core teaching and learning activities and/or in relation to achieving learning outcomes that learners cannot achieve by alternative means. All FDL that is:

- » credit bearing and/or
- » contributes towards an award of QQI or another state awarding body

is required to have regard to these guidelines and indicators. Nevertheless, 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.

As noted above, FDL is not new. Many other quality agencies or bodies internationally have guidelines, benchmarks, or Codes of Practice in place. This document has taken careful account of the work already undertaken and reflects the consensus on the key features of good practice for FDL. It represents a synthesis of existing guidance and reproduces some of what is already available across a range of existing publications, most notably those publicly available from:

- » [Quality Assurance Agency for Higher Education in the UK \(QAA\)](#)
- » [European Association of Distance Teaching Universities \(EADTU\)](#)
- » [The Open University \(OU\)](#)
- » [The Open and Distance Learning Quality Council \(ODLQC\)](#)

It has been informed by publications from:

- » [British Accreditation Council \(BAC\)](#)
- » [European Association for Quality Assurance in Higher Education \(ENQA\)](#)
- » [International Council for Open and Distance Education \(ICDE\)](#)
- » **A range of accrediting bodies in the United States of America**
- » [National Adult Literacy Agency \(NALA\)](#)

## 3 GUIDELINES

The guidelines are organised in sections as follows:

### **SECTION 3.1 ORGANISATIONAL CONTEXT**

The focus of this section is on the strategic and institution-wide aspects of managing quality for FDL, including human resources and administrative/technical infrastructure.

### **SECTION 3.2 PROGRAMME CONTEXT**

The focus of this section is on the key issues and principles of good practice in providers' responsibility for assuring quality in the design, development, delivery and evaluation of programmes and modules that include FDL. In this context, 'programme' is inclusive of any structured learning opportunity offered by providers in FDL mode, irrespective of duration, level, volume of credit, or accreditation.

### **SECTION 3.3 LEARNER EXPERIENCE CONTEXT**

The focus of this section is on the key issues and principles in providers' responsibility for supporting learners, as groups/ cohorts or as individuals.

The focus throughout is on raising awareness of issues that are particularly pertinent to the FDL context, rather than other kinds of learning and teaching.

### 3.1 ORGANISATIONAL CONTEXT

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At the organisational level, it is necessary to demonstrate an understanding of the distinctive demands that FDL will make on infrastructure and systems that are different to face-to-face contexts. Where the nature of high quality FDL is not properly understood, provision that was originally designed for a face-to-face learning environment may be poorly adapted for FDL learners. For example, teaching staff with no knowledge or experience of FDL delivery may not appreciate the pedagogical opportunities and challenges. Learners will not generally have a good experience if what they receive are essentially learning materials, lectures, and other resources that have been designed for face-to-face learners and made available through the internet, for example. Even where FDL is not credit-bearing – for example MOOCs – the responsibility of providers to offer a good learning experience, and the potential reputational risk of not doing so, is significant. In many ways, since non-credit-bearing and bite-sized learning opportunities may be a learner's first experience of FDL, the imperative to offer a high quality experience is even more important. FDL is intrinsically learner-centred and providers must be aware and prepared for its opportunities and its challenges.

Similarly, Information Technology (IT) and administrative systems and infrastructure that have been designed for face-to-face delivery contexts are unlikely to be effective and efficient for FDL. Specialist, reliable and accessible computer hardware and software applications are required for FDL. Tracking learner progress and achievement, marking and returning assessed elements, providing feedback to learners and assessors are just a few of the areas where existing policies, systems and processes are unlikely to be fit for FDL purposes.

A decision to deliver some or all provision through FDL should therefore be part of a provider's vision, supported by a deliberate and approved strategy. The enthusiasm and expertise of a few people should not be the driver for such a decision, although it can be harnessed, recognised and valued. A provider wishing to deliver through FDL will need to fully understand the implications of FDL delivery. It should be able to demonstrate how FDL relates to its mission and approved strategy; and that there is a plan and appropriate investment of time, money and other resources to develop its capacity and resources to deliver high quality FDL that will offer learners a consistent, enjoyable and effective learning experience.

### 3.1.1 Guideline 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.*

Indicators include:

- 3.1.1a A strategic approach to FDL is explicit and is shared with staff, learners and other stakeholders. A strategic plan includes appropriate investment in infrastructure and contingency arrangements to support FDL. Accountable key roles have been identified. Strategic plans at departmental, faculty and provider level are consistent in respect of the provider's strategy for FDL. Approved strategies and implementation plans are clear about the provider's aspirations and timetable in relation to FDL.
- 3.1.1b Policies, regulations and processes (including administrative) are fit-for-purpose in the context of FDL. 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:
  - » FDL developments are subject to business case approval for viability and sustainability. For example, are there robust costing models in place which take into account the additional costs associated with IT support; developing and updating learning materials; induction, training and support for staff and learners? Does market intelligence demonstrate that the scale of demand and income will ensure viability and sustainability?
  - » Recruitment and admissions policies and process
  - » Registration arrangements
  - » Appeals and complaints policies and process
  - » Fees policy and process
  - » Regulations and arrangements for Boards of Examiners and External Examiners
- 3.1.1c The strategies and processes for the appointment, induction, training, professional development and appraisal arrangements for staff supporting FDL are appropriate and

specific to FDL. Thus, for example, staff engaged to support FDL learners can either demonstrate previous experience of FDL or they are provided with induction and training. Subject expertise and academic standing remain important criteria in recruiting appropriate staff; but they may also need to be competent, for example, in designing curriculum for VLE, using virtual environments effectively, and to understand the pedagogical differences of supporting learners in FDL. There is a planned approach to the appointment of (or access to) specialist staff to support the provider's FDL strategy. Examples include specialist staff with academic, technical or professional expertise in the pedagogy/assessment appropriate to FDL; and in educational technology.

- 3.1.1d Arrangements for assuring compliance with any legal or statutory obligations are appropriate to the FDL context. Examples may include child protection; data protection; protection for enrolled learners; applicable professional or statutory body requirements; and local regulatory considerations in the context of transnational provision. In the case of learners being located outside Ireland, regulations and processes are fit-for-purpose. Examples where regulations and institutional processes that may be appropriate in the face-to-face context can be a challenge in the FDL context include those governing Boards of Examiners and External Examiners; appeals and complaints; and student disciplinary arrangements. Processes that require learners to attend face-to-face meetings, for example, are unlikely to be feasible in the FDL context.
- 3.1.1e Arrangements for collaboration or partnership of any kind that may be involved in the development, delivery, assessment or evaluation of FDL are approved by the provider and subject to appropriate and clear formal agreements that specify respective responsibilities and obligations.
- 3.1.1f The provider can demonstrate that it has understood, planned and approved any differences in its quality management that may be appropriate for FDL. It has reviewed its policies and regulations to ensure they are fit-for-purpose in FDL contexts. Quality management arrangements for FDL provision are supported by fit-for-purpose organisational infrastructure and processes. For example, the collection and evaluation of feedback from internal and external stakeholders may require different arrangements to those in place for face-to-face provision. For example, 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. Data collection and analysis is appropriate and relevant to the monitoring and quality enhancement of FDL. Technology

employed to deliver FDL can offer some significant advantages for quality assurance and enhancement and the organisation harnesses these in its quality assurance and enhancement arrangements for FDL. For example, FDL providers will have direct access to some engagements between learners and between learners and teachers and/or assessors. The way in which learning resources are used by learners can also be more easily monitored and evaluated than is the case with face-to-face contexts. Learning materials will also need to be quality assured in a different way (see section 3.2 2). The provider's arrangements for validation of FDL provision will focus on some additional issues such as mechanisms for approving and updating learning materials; arrangements for student support and guidance in the FDL elements; and the availability and accessibility of appropriate library resources.

### *3.1.2 Guideline 2*

*The infrastructure and resources required to support good quality FDL are understood, planned, and routinely monitored and evaluated.*

Indicators include:

- 3.1.2a There is a planned approach to the procurement of hardware and software to support FDL and a clear policy on a common platform for approval of exceptions. Contingency arrangements are in place in the event of platform, hardware or software failures.
- 3.1.2b Robust and consistent systems and processes are in place across the organisation to manage the submission, receipt, marking and return of assessed elements. FDL learners are likely to be geographically remote from the provider and from teachers and/or assessors. It will be necessary, for example, to ensure that systems and processes are capable of: verifying the identity of learners; guarding against cheating, plagiarism or other kinds of unfair advantage; and being reliable and scale-able. Provision that is offered across different time zones, for example, may offer particular challenges. Cultural or religious calendars will also be a factor in timing and synchronizing assessment opportunities. There is a whole institution approach to these matters.
- 3.1.2c The provider's student record system has been designed or adapted to support FDL programmes and learners and the quality assurance of a more flexible learning experience.

- 3.1.2d There are effective institutional arrangements to provide assurance that:
- » Any FDL provision has had the reliability of its delivery systems tested and signed off in advance, and confirms that appropriate technical support and contingency plans are in place.
  - » Intellectual property rights and software licencing issues are addressed in the development and delivery of FDL.
  - » The delivery system for each FDL programme, module or element of study is fit for its purpose.
  - » The availability and life expectancy of the technology is appropriate to the nature of the FDL provision, numbers of learners and duration of programmes. Institutionally approved transitional arrangements are in place to support any migration to new or different technology (hardware or software), taking account of the need to maintain compatibility with the technology that learners are using.
  - » There is a common policy and process for ensuring that learners' assessed work is properly attributed to them, particularly in cases where the assessment is conducted through remote methods that might be vulnerable to interception or other interference.
  - » Those with responsibility for assessment have the means and authority to confirm that a learner's assessed work is the original work of that learner only, particularly in cases where the assessment is conducted through remote methods.
  - » 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.

### 3.1.3 Guideline 3

*The provider has approved and published expectations for the effectiveness and accessibility of learning materials and other learning resources to support FDL provision. It also has approved and published expectations for the effective delivery of teaching, learning and assessment opportunities in all media (for example, digital, online, paper, audio-visual) adopted for FDL, which are available to stakeholders.*

Indicators include:

- 3.1.3a Benchmark or specification documents for learning materials; a validation and review process that includes consideration of those aspects specific to FDL (outlined in section 3.2.3 below); monitoring and evaluation of the effectiveness of learning resources and the learning environment.
- 3.1.3b Close collaboration between academic subject specialists and those responsible for the educational technology and/or instructional design in the development and delivery of FDL. FDL developments are subject-led rather than technology-led. Organisational structures and processes ensure that technology is in the service of pedagogy.
- 3.1.3c Assessment practice and process provides consistent, equitable and fair arrangements for the setting, marking and return of feedback on assessment tasks to learners. Learners are provided with consistent, secure and reliable means for submitting work to be assessed and confirmation of receipt. There are robust arrangements in place across the organisation to confirm the identity of remote learners and eliminate fraudulent practices, attempts to gain unfair advantage, or academic malpractice. There are institutional regulations and protocols to ensure confidentiality and security in feedback to individual learners on assessment; and for the recording of marks or scores.

#### 3.1.4 Guideline 4

*Where the FDL provision is to be offered to learners outside Ireland, due diligence and risk management arrangements are robust and fit-for-purpose.*

Indicators include:

- 3.1.4a Internal approval processes include confirmation that any relevant legal or regulatory requirements (e.g. in each jurisdiction) are met. Examples include requirements for local accreditation or recognition by statutory or regulatory bodies, which may be at programme and/or institutional level; permission for foreign providers to operate; regulations that may prohibit or inhibit the charging of fees; requirements that may influence the blend of learning permitted in FDL.

- 3.1.4b Business models and risk management are subject to appropriate scrutiny and approval to ensure viability and sustainability of quality. Matters that are specific or heightened in the FDL context include taxation, definitions of ‘student’ that may impact funding streams, the location of servers, employment law that may inhibit the ability to employ local tutors or other support functions, recognition of qualifications gained through FDL.
- 3.1.4c Appropriate legal advice is sought to ensure that, for example:
- » the location of servers will meet the needs of stakeholders in each jurisdiction.
  - » Provider’s software or learning resources licences will be valid; or other arrangements are in place.
  - » Due regard is paid to local financial regulations or taxation issues.
  - » Due regard is paid to local employment law.
  - » Due regard is paid to local law or expectations on consumer protection.
  - » Intellectual property rights or copyright are not compromised.
  - » Learners’ interests are safeguarded.
- 3.1.4d Local recognition of providers, programmes and/or qualifications.
- 3.1.4e The provider can demonstrate that, before offering FDL to learners outside Ireland, it has tested delivery systems to ensure that learners outside Ireland will have equal access to support and to learning resources.

### 3.1.5 Guideline 5

*FDL provision delivered in partnership by two or more organisations is covered by a written agreement which clearly specifies the respective rights and division of responsibilities between the partners. (For providers seeking QQI awards further policies apply in this regard<sup>3</sup>).*

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3 [QQI Policy on Collaborative Programmes, Transnational Programmes and Joint Awards \(QQI, 2013\)](#)

Indicators include:

- 3.1.5a Learners and staff are made aware which organisation carries legal responsibility for delivery or support of defined elements of the FDL provision.
- 3.1.5b Arrangements for quality management are consistent with the expectations QQI has of Irish providers. For example, the principles and integrity underpinning boards of examiners and external examiners are aligned with the provider's approved regulations. As a general principle, the policies and regulations of the organisation(s) that will award its certificate to learners will apply and they will be accountable for their proper implementation. Where any functions are shared or delegated to a partner, the awarding partner remains ultimately responsible.
- 3.1.5c Where one provider offers a course that aims to enhance or provide additional (usually face-to-face) support for FDL programmes offered by a different provider, the relationship (or absence of it) between the two providers is made clear to stakeholders. Responsibility for the effectiveness and quality assurance of such complementary provision rests with the providers of it.

## 3.2 PROGRAMME CONTEXT

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The development and delivery of a programme of study wholly or partly by FDL will need to clearly demonstrate the value of FDL in enabling learners to meet intended learning outcomes. The teaching, learning and assessment strategies and the delivery mechanisms adopted in FDL should be explicitly designed for the FDL context recognising, for example, that learning, teaching and assessment may be asynchronous, that FDL learners should be empowered to track and check their own progress, learning and achievement (as well as the provider), and that the quality of learning materials play a distinctive and critical role in FDL.

### 3.2.1 Guideline 6

*The design and delivery of curriculum by FDL is determined by the intended learning outcomes for the programme.*

Indicators include:

- 3.2.1a Learning and teaching practices are informed by best practice in FDL delivery. Subject-specific and educational scholarship informs the pedagogy and instructional design.
- 3.2.1b The design of curriculum and student support can accommodate enhancement or updating, for example in response to feedback or other quality assurance mechanisms. All online content is subject to approval and to on-going quality assurance. Resource planning at programme level includes budget for updating to ensure currency. Programme teams are alert to the cost implications in designing FDL.
- 3.2.1c Assessment strategies include opportunities for learners to engage in formative assessment activities that will check and reinforce learning in FDL.
- 3.2.1d Curriculum development teams include an appropriate representation of subject, educational technology, instructional design and other key internal stakeholder expertise. For example, specialist student support advisers and administrators, library and information professionals play significant roles in effective FDL as well as the teaching staff who will support learners.
- 3.2.1e Each FDL element provides the learner with an interactive learning experience and academic content appropriate to its level, credit rating and academic subject area. Pedagogy informing learning and teaching is demonstrably learner-centred.
- 3.2.1f Individuals developing FDL elements use the platform the institution has committed to and are bound by the institutional policies, systems, hardware and processes for FDL.

## 3.2.2 Guideline 7

*Learning resources, materials and delivery mechanisms are appropriate and fit-for-purpose.*

Indicators include:

- 3.2.2a All materials and media (for example audio-visual, printed or digitised assets) that will be used to deliver FDL are subject to informed peer comment at one or more draft stages and allow for the incorporation of feedback into subsequent and final versions of the learning materials. Such informed peer review might be both internal and external, and enable commentary to be made on both academic content and pedagogical approach. The aim is to ensure that:
- » The materials produced are of sufficient quality.
  - » The different media used are integrated so that they support and complement each other in enabling learners' achievement of the stated learning outcomes. Programme design is learner-centred and provides a consistent and accessible experience for all learners.
  - » The FDL programme is managed and owned by a designated academic department. There is clarity in the information provided to learners and staff about communication channels and the availability of advice and support. In FDL programmes learners often study independently and flexibly and there may be expectations of 24/7 communication with the provider. If this is not deliverable, it is important to specify what learners may reasonably expect.
  - » The whole learning environment for FDL used in conjunction with the learning materials requires active engagement by the learners; and that learners can test and monitor their progress at appropriate points.
  - » The relationship between the materials and other components of learner support activity such as face-to-face tutorials and residential schools is defined.
  - » Protocols and information are provided to learners and staff on the use of forums in their learning. There are nominated academic moderators who understand and have the authority to intervene in, for example, cyber bullying that may constitute risk to learners and/or the provider.

### 3.2.3 Guideline 8

*Approval processes for FDL programmes or modules are appropriate and fit-for-purpose.*

Indicators include:

- 3.2.3a A robust programme development process designed for FDL that includes explicit consideration of, for example:
- » Staff qualifications and experience in relation to FDL.
  - » The use to be made of external consultants and experts in FDL, including in critical review and appraisal of draft learning materials.
  - » Arrangements for the induction and continuing professional development (CPD) for staff undertaking a) the development and support of FDL materials; b) FDL teaching, where such experience is lacking; c) support services of all kinds for FDL learners.
  - » Testing of delivery mechanisms for FDL elements. For example, confirming that (where appropriate) it will be possible to access learning on a pc or on a Smart phone or other as appropriate.
- 3.2.3b Appropriate implementation of the QQI *Core policy and criteria for the validation of education and training programmes*. These may require some adaptation to create appropriate arrangements for the formal approval of any FDL modules or learning materials. Points of difference with more traditional programmes include:
- » The detailed content of all modules to be delivered through FDL and the learning resources to support them will not be available at initial approval but indicative module outlines can be approved.
  - » If the programme will be dependent on local tutors for support, confirmation will need to be provided at an early stage of anticipated staffing resources, demonstrable local supply of appropriate staff, and the criteria for their appointment.
  - » Timescale for subsequent development and approval of FDL elements and associated learning materials at the various levels in the programme, and the identification of the external assessors who will be involved (if relevant). The timescale will be influenced by factors such as pre-requisites, progression rules, applicable professional or statutory body requirements, and programme flexibility.

- » Contingency arrangements in the event of subsequent stages of the validation process not occurring or FDL elements not achieving validation must be subject to formal approval.

- 3.2.3c Robust arrangements are in place for the quality assurance of learning materials, the learning environment and other learning resources. Depending on the blend of learning involved, there may be differential focus on the effectiveness and quality of the learning experience. For example, in many FDL contexts it may be more appropriate to focus equal QA scrutiny on learners' engagement with the learning materials as on their engagement with teaching staff. The nature of the learning materials will also be different for FDL learners. For example, interactivity and the empowerment of learners to monitor their own progress are both distinctive requirements for FDL materials. The availability and timeliness of feedback to learners is common to good practice in all contexts, but in FDL it is likely to be achieved virtually so that benchmarks and expectations will be different. In many FDL contexts, learners will rely primarily on electronic learning resources and library. All of these examples will require quality assurance arrangements to be developed or adapted in order to gather feedback and evidence to demonstrate quality and inform enhancement.
- 3.2.3d Sufficient, accurately maintained and up-to-date learner records are available for monitoring progression and achievement and in facilitating timely intervention for FDL learners who may be struggling. Where learning opportunities are flexible and allow learners to stop and start the programme, the student record arrangements are able to support the level and nature of flexibility that is permitted. Learners' concerns about the confidentiality of their records are respected. 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.
- 3.2.3e Staff employed to support or assess learners are appropriately inducted and trained for their role in FDL. In a face-to-face context, the nature of feedback on assessment might be only partially achieved through comments on a script or written feedback sheet. In FDL, the feedback on assessment is more typically an intrinsic part of the learning and teaching strategy for the FDL programme. There are other aspects of the assessment process that are distinctive (or at least more prominent) for FDL. For example, it is commonplace in FDL for assessors to assess, grade or mark learner assessment:

- » Where assignments have been set by someone else
- » Submitted and returned electronically
- » From learners they have never met face-to-face

Where more than one tutor is employed to support or assess more than one group of learners, moderation arrangements are in place to ensure consistency and share good practice.

## 3.3 LEARNER EXPERIENCE CONTEXT

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The benefits of flexibility offered by FDL for learners is balanced by its demands for autonomy, commitment and self-regulation. It is important that learners understand how FDL may differ from previous learning experience; that they are appropriately prepared for it; and that their progress and engagement is monitored, encouraged and supported.

### 3.3.1 Guideline 9

*Learners are supported to make informed choices about participating in a FDL programme; and to develop the necessary independent study skills to successfully progress towards becoming an autonomous learner.*

Indicators include:

- 3.3.1a Learners receive sufficient and appropriate information from the provider to understand the FDL elements and assess the suitability of a programme. Prospective learners receive a clear explanation of the blend of learning that they will experience and the realistic commitment required to complete the programme; and of the nature and extent of autonomous, collaborative and supported aspects of learning. The level and nature of support available to FDL learners is clear and explicit. For example, there is published information about the hours when academic, technical or pastoral support is available; on the hardware and software required; and on how much time learners are expected to commit to independent

learning in order to successfully complete the programme. The extent to which face-to-face attendance is part of the blend is made clear to learners and/or other stakeholders such as funding or recognition bodies. A service level agreement, or equivalent, is in place.

- 3.3.1b Prior to enrolment on a particular programme, the prospective FDL learner is made properly aware of all terms and conditions relevant to that programme, either in the prospectus or similar material, by correspondence, or in discussion with the provider. This might include any specified timings for synchronous learning or assessment; deadlines and the consequences of not meeting them; the rules governing flexibility for learners, such as the regularity of presentation or re-assessment opportunities. Learners are made aware of the regulations that will provide them with a unique learner identity to be used by the provider; and those in place to protect learners and the provider against fraud, plagiarism or other forms of cheating.
- 3.3.1c Requirements for access to the required broadband specification; and any prescribed hardware or software are appropriate, kept to the necessary minimum, and published.
- 3.3.1d The delivery of any study materials direct to learners remotely through, for example, online, e-learning methods or correspondence, is secure and reliable, and there is a means of confirming its safe receipt.
- 3.3.1e Deliberate steps are taken to assist every learner to understand their responsibility to engage with the learning opportunities provided and to shape their learning experience.
- 3.3.1f Learners have access to:
- » Descriptions of the FDL components, programme, or element of study, to show the intended learning outcomes and teaching, learning and assessment methods of the unit or module.
  - » A clear schedule for the delivery of their FDL study materials, learner support (local and/or remote), and for the submission and assessment of their work.
  - » Information on the ways in which their achievements will be judged, and the relative weighting of FDL elements of the programme in respect of assessment overall.
  - » Timely formative assessment on their academic performance in the FDL elements or programme to provide a basis for constructive individual feedback and guidance.

- » Information about the quality assurance processes in place to give confidence that the assessed work conducted through FDL is properly attributed to them, particularly in cases where the assessment is conducted through remote methods that might be vulnerable to interception or other interference; assurance that those with responsibility for assessment conducted through FDL are capable of confirming that a learner's assessed work is the original work of that learner only, particularly in cases where the assessment is conducted through remote methods; that any mechanisms used in FDL, such as web-based methods of correspondence, for the transfer of their work directly to teachers and/or assessors, are secure and reliable; and there is a means of proving or confirming the safe receipt of their work.
  - » Unique identifiers that will enable them to access learning resources in good time at the start of their FDL programme and form part of the validation of their identity. Learners are made aware of all the mechanisms the provider has in place to test and confirm learner identity.
  - » Appropriate and sufficient learning resources to support FDL study.
  - » Induction or other support to access these effectively and efficiently (technical and academic support and guidance, as appropriate).
  - » Identified and available contacts (academic, administrative, technical).
  - » Information about the intended life-span of all FDL elements of their programme and the arrangements in place to phase in or out new FDL components without disadvantaging learners.
  - » Appropriate opportunities to give formal feedback of their experience of the programme, including the effectiveness of FDL arrangements.
  - » (Where appropriate) information about the respective responsibilities of the provider and any third parties – such as local study centres or administrative offices - that may be involved in supporting the provider's FDL.
- 3.3.1g Every learner undertaking FDL is supported in monitoring their own progression and achievement through the provision of regular opportunities to test their knowledge and understanding, reflect on feedback and engage in dialogue with staff and/or their peers.
- 3.3.1h Learners are encouraged to complete their FDL programme. Progress is monitored, and learners are provided with prompt and helpful comments on their progress in relation to learning guideline and goals. The need to be more pro-active in identifying FDL learners who may be struggling is recognised with appropriate interventions and mechanisms.

### 3.3.2 Guideline 10

*Learning and teaching activities and associated resources provide every learner with an equitable, fair and effective opportunity to achieve the intended learning outcomes.*

Indicators include:

- 3.3.2a Teaching and learning resources for FDL, howsoever delivered, meet the provider's specified expectations. These include equality of opportunity, interactivity, and the empowerment of autonomous learning.
- 3.3.2b Assessment arrangements conducted through FDL are reliable, secure and provide learners with appropriate confidential feedback on their progress. Quality assurance mechanisms are in place to monitor and/or moderate standards (both in terms of learner outcomes and teachers and/or assessors' practice).
- 3.3.2c Every learner is provided with information about the intended life-span of all FDL elements of their programme and the arrangements in place to phase in or out new FDL components without disadvantaging learners.
- 3.3.2d Every learner is provided with clear and current information about the FDL elements of the programme, specifying the learning opportunities and support available to them. This includes information about the submission and return of assessed work.
- 3.3.2e There are arrangements in place to provide assurance that all those involved in teaching or supporting learning are appropriately qualified, supported and developed to provide effective FDL. For example, induction is provided for learners and staff on all aspects of the FDL experience.
- 3.3.2f All FDL learning environments are safe, accessible and reliable for every learner, promoting dignity, courtesy and respect in their use.
- 3.3.2g There are arrangements in place to make reasonable FDL alternatives available to learners with disabilities.

## APPENDIX 1

# MEMBERSHIP OF THE EXPERT REFERENCE GROUP

The external reference group for the project is as follows:

- » Kate Clarke, Independent External Chair (Higher Education Partnerships and Quality (HEPAQ))
- » Walter Balfe (QQI, FET)
- » Mark Brown (DCU and TEL expert)
- » Naomi Jackson (Hibernia)
- » Colin McLean (IT Sligo)
- » Stephen McManus (former DKIT and Transnational/distributed expert)
- » Frances Morton (The Open University)
- » Tom O'Mara (UCC and FET expert)
- » Roisin Smith (TCD, IUA nominee)
- » Hugh Sullivan (Education Policy Services)
- » Roisin Sweeney (QQI, FET)

In attendance - Karena Maguire (QQI)

## GLOSSARY OF TERMS USED

The definitions below are drawn from the available literature, practice and currency. However, since there is some variability in what is understood by some of this terminology, the main purpose of this glossary is to clarify how they are to be understood *in the context of this document*.

Definitions are provided in the order in which terms appear in the document.

### Flexible and distributed learning (FDL)

A programme or module that offers a wholly at a distance, on-line, or blended learning experience, rather than requiring the learner only to attend classes or events at particular times and locations. Typically, it may not involve face-to-face contact between learners and tutors but instead uses technology such as the internet, intranets, broadcast media, CD-ROM and video, or traditional methods of correspondence - learning 'at a distance'.

### Educational Technology

The study and ethical practice related to the creation, use and management of appropriate technology for the design and delivery of education – including learning platforms, hardware, software and processes.

### e-learning

Learning that is delivered or supported through the use of technology.

### Massive Open On-line Courses (MOOCs)

An online course made freely available over the internet to potentially large numbers of learners at no charge. There are no entry criteria. MOOCs are not normally credit-bearing.

### **Learning materials**

The specific and/or specialist resources made available to learners through which the FDL course or programme is taught and learning opportunities are facilitated. Learning materials may be in any media such as hard copy, electronic, digital, audio or visual.

### **Provider**

The organisation that delivers FDL to learners and to whom fees are paid. In Ireland they may be an awarding body or another organisation that offers FDL on behalf of one or more awarding bodies.

### **Instructional design**

The translation of pedagogical research into the design and testing of curriculum for FDL that is specifically centred on supporting the achievement of learning outcomes. Developing and implementing content (provided by academics) teaching and learning strategies and assessments for effective FDL delivery.