Thank you for the opportunity to provide input to the consultation on the White Paper on Blended Learning, which is an important strand of provision in higher education. Below we have set out some comments and observations that we believe may be helpful in finalising the guidelines.

Overall, while the guidelines may provide a useful framework within which providers can begin to address several challenges associated with implementing blended learning, most of the feedback in DIT suggests that academic staff may find the guidelines overly prescriptive and many of the targets difficult to attain. At the moment nearly all of DIT programmes are supported by some form of on-line learning and therefore applying these new guidelines could be onerous. It is suggested that a clearer definition of blended learning might be employed, so that the guidelines are applicable in situations where a programme has a certain percentage (e.g. 30%) of face-to-face contact. It is further suggested that what we need is a guiding set of principles for offering on-line learning rather than diluting it to cover blended learning (which at present seems to cover nearly all our teaching). Additionally, training will be required in a number of areas to ensure best practice informs the pedagogy, and student handbooks will require updating to deal with these guidelines.

Specific points raised include:

1. Section 3.4 *Learners outside Ireland*: some confusion was expressed surrounding legal jurisdiction to operate, which should be in the guidelines for Transnational Delivery and not specific to blended learning. For example if we offer a 100% on-line programme from Ireland, and students from different parts of the world opt to take it, we operate under Irish law – it is only when we wish to set up a base in another country would this requirement kick in.

2. Section 3.5 *Collaboration and other partners*: Ensuring supports are in place in relation to collaborative and linked partners is and should be covered in proposals towards developing MOAs and are probed through the validation process.

3. It is not necessary for "*Programme Teams to be alert to the cost implications in designing online delivery mechanisms*" (section 4.1.2), once their development is consistent with the provider's Strategic Plan. Obviously, management are free to set parameters during all curriculum development - whether virtual or otherwise - based on available resources, but this should not need to be explicitly stated as a concern for the Programme Team.

4. Section 4.1.4 requires that procedures are in place for "*curriculum development teams with appropriate representation of subject, educational technology, instructional design and other key internal stakeholder expertise*", which essentially requires how our programme teams operate to change significantly. It may be more appropriate to state this as "*curriculum development teams with appropriate representation of, or support from, subject, educational technology, instructional design and other key internal stakeholder expertise*", given the typical involvement of our Learning, Teaching and Technology Centre as a support for, rather than member of, Programme Committees during the curriculum development process.

5. A concern was raised by several people regarding the requirement that "*all media and materials...are subject to informed peer comment at one or more draft stages*" (section 4.2.1). Why is this a requirement for online material when is it not a requirement during the development of learning materials used in the (non-virtual) classroom?

6. Sections 5.2.4 and 5.2.5 refer to accessibility. A specific guideline should be provided for the level of accessibility (e.g. WCAG 1.0 / WCAG 2.0 https://www.w3.org/WAI/intro/wcag). 5.2.5 refers to "*blended learning alternatives*" being made available to people with disabilities. Well-designed blended learning experiences should incorporate redundant channels which make them accessible to as many people as possible. As an example, *captioning* on video content shouldn't be considered an *alternative* channel for people with disabilities – it should be a feature of well-designed online materials which enhance the experience for all users e.g. people who cannot raise the sound on their device due to being in the library; people who cannot hear, people in noisy environments such as train stations etc. An *alternative* can sometimes be considered stigmatising – e.g. the *normal version* and the *version for people with disabilities*. It may be preferable to reword section 5.2.5 to "*arrangements that make reasonable effort to ensure blended learning experiences are accessible to all users, including users with disabilities*.