Quality and Qualifications Ireland (QQI)

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Ireland.

5   February 2016.

Re: Response from Letterkenny Institute of Technology (LYIT) to the following consultation documents/white papers: Statutory QA Guidelines for Flexible and Distributed Learning; Core Statutory QA Guidelines; Towards a White Paper on Sector Specific Quality Assurance (QA) Guidelines

Statutory QA Guidelines for Flexible and Distributed Learning

The Institute welcomes the fact that QQI is examining QA guidelines for 'Flexible and Distributed Learning' (FDL) and acknowledges that FDL represents an educational space possessing unique elements and considerations that do not apply elsewhere.

Terminology

- While the phrase 'Flexible and Distributed Learning' (FDL) is described in the Glossary and in the section detailing the background to the document (Section 2), these definitions of FDL are not consistent and there is a need for greater definitional clarity. The concept of 'Distributed Learning' is broad in scope and, as such, is capable of a number of differing interpretations. The adoption of this terminology should be reconsidered, or the specific contours and scope of FDL should be further defined and clarified.
- The concept of 'Flexible Learning' is itself broad in scope and, similar to above, it is suggested that it be further defined and clarified.
- It is important to have consistency with regard to the use of terminology. Whatever terminology is adopted, there must be consistency of use and interpretation at the national level (in particular, between QQI and the HEA).

Structure of the Document

- The overall structure of the document would benefit from the inclusion of a Table of Contents, an Executive Summary, and the use of additional sub-headings. The document should reference the inclusion of a glossary.
- There is also some repetition in the document which would benefit from closer editing.
- It is suggested that 3.1.3 Guideline 3 [pp.14-15] is closely aligned with 3.2.2 Guideline 7 [p.19] and, as such, these guidelines should be positioned closer to one another.

Fitness for Purpose and User-Friendliness

- The overall user-friendliness of the document would (as stated above) benefit from the inclusion of a Table of Contents, an Executive Summary, and the use of additional sub-headings.

Other Comments

- While the range of existing QQI policies and guidelines is acknowledged in the present document and its stated purpose is to fill the perceived gap in relation to FDL; however, it is important to ensure the present document confines itself to dealing only with those requirements that are unique and/or additional to FDL. The guidelines should in effect be supplementary guidelines to the approved QA policies for full-time programmes and contain details relating to the specific FDL QA requirements.

- The document is perhaps overly-restrictive and prescriptive in parts, which might hamper the development of the ideas contained therein (e.g., 3.1.3 Guideline 3 [pp.14-15]). Should stipulations regarding the actual procurement of hardware and software (Guideline 3.1.2a, p.13), for example, fall within the remit of the document?

- We welcome the recognition of the need for extra robustness when it comes to content delivered outside Ireland.

- Further consideration should be given to the necessity for staff CPD in respect of FDL.

Core Statutory Quality Assurance Guidelines

- LYIT welcomes the production of the new QA guidelines document and the fact that the draft document has been circulated for consultation.

- The document would benefit from the inclusion of an Executive Summary.

- Clarify what previous HETAC/QQI documents/policies this is proposed to replace.

- Question the necessity to include section 2.4 referencing Staff Recruitment, Management and Development.

Towards a White Paper on Sector Specific Quality Assurance (QA) Guidelines

- Concern over the necessity to have a separate document for QA guidelines for bodies operating in the context of delegation of authority to make awards versus other designated awarding bodies. The context of this paper contributes to the idea of the creation of an unnecessary differentiation between the Institute of Technology sector and other elements of the Irish higher education system.

- There should be one set of QA guidelines for all providers and only separate statutory obligations that arise from DA should be included. Where there are QA requirements which arise from delegation of authority these should form an addendum to the QA main document.

- One would expect that procedures for certification and maintenance of records would apply to both designated awarding bodies and bodies operating in the context of delegation of authority to make awards.

Billy Bennett, Registrar.