

**NALA stakeholder feedback for  
QQI *in-review* whitepaper, *Topic  
Specific Quality Assurance  
Guidelines: Statutory Quality  
Assurance Guidelines for Blended  
Learning, Version2.***

**DRAFT for discussion: Version 1, October 23 2017**

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## Introduction

This document has been produced by The National Adult Literacy Agency (NALA) in response to the call by QQI for stakeholder feedback regarding the in-review whitepaper, *Topic Specific Quality Assurance Guidelines: Statutory Quality Assurance Guidelines for Blended Learning, Version 2*.

Briefly, this document will forward a set of critical comments under two headings. The Policy Comments section directly attends to the policy itself and its potential direct interpretation as it is applied to the related set of contexts. The Technical Comments section attends to the technical *completeness or rightness* of a number of statements presented, particularly as viewed through the lens of a provider, as it relates to the NALA context.

Generally speaking, the whitepaper is seen as very useful as a reference point to inform practice in blended learning programmes. It strongly reflects the inclusive and collaborative approach to the production and publication of the policy. This sets of comments are offered in that same spirit.

## Policy Comments

Upon initial analysis, several readers noted that the scope of the guidelines seem to have shifted to some extent from the previous, similarly focused document, *The Statutory Quality Assurance Guidelines for Flexible and Learning*, and that it now reflects a more narrowed view of blended learning programmes. Specifically, in section 1.2 (page 4) it states that the guidelines are not intended:

- to cover any programmes where the sole connection between the provider and the learner is online learning; and
- to refer to programme provision for exclusively online learning but online learning as previously defined as part of the blended learning context.

Page 7 of the previous document notes that those guidelines cover a wider spectrum of providers including FDL providers that operate wholly or primarily online (QQI, 2016). Furthermore, there was a sense that this new document should deal more explicitly with the different educational contexts within which it applies i.e., it could benefit from improved clarity on how the guidelines are applied within the higher education (HE) sector, for example, in contrast to its application within the Further Education and Training (FET) sector.

There were several observations about the clarity, or rather occasional lack thereof, regarding how QA is defined and contextualized. For example, in section 2 (page 6), there is reference to being “... neutral on the technology and face-to-face methodology used to support the remote interaction”

which seems at odds with the assertion that this whitepaper aims to guide the quality of service delivered. Perhaps neutral isn't the most appropriate nor clear wording here?

In regard to how the QA guidelines apply to various providers, there is a lack of clarity about why there would be a variance in the legal context between providers as mentioned in section 1.1 (page 3). Perhaps some better level of detail here might prove informative for providers endeavouring to understand how the new guidelines help to shape their program delivery and the subsequent practice.

Throughout the document, there is little reference to the ongoing monitoring of providers from the learners perspective, and while the *Learner Experience Context* gets a full section (section 5, page 24), there is no mention of the mechanics of how a learner would pursue an issue, should one arise i.e., if they are not happy with the quality of the service they are receiving.

Section 3.1.5 mentions how "Regulation and processes are fit for purpose in the case of learners located outside Ireland" but it is unclear how this would be definable as blended learning within the context of the guidelines and how QA would be ensured in this context. Furthermore, there was a general feeling among some readers that a more contemporary, qualified and more nuanced definition of blended learning (perhaps one that refers to issues such as generational and technical literacy concerns, the composition and quality of the blend, etc.) might better position the whitepaper to more accurately reflect and contextualise the current context in Ireland.

Section 5.1.3 (page 25) refers to the QA applicable to hardware and software but isn't clear on how this would address the very broad range of deployable software possible in the diverse set of learning contexts covered. Furthermore, there is little content on addressing the QA procedures and processes for the management of IT assets, pedagogical or otherwise (i.e. backup of student information databases, accessibility of screen based media, student data-protection, etc.)

## Technical Comments

There was a sense that, for the most part, the document is well structured and positioned from a technical perspective. However, there are several small points that emerged during analysis that may help to better situate the policy within the educational context. On page 9, the reader is informed that "Although all learning is learner-centred, blended learning is learner-centred in a way that means providers must be aware and prepared ...". However, we would contend that, at the least, all learning is not learner-centred, whether by design or by default.

In relation to the approval and programme validation processes, in section 4.3.4 (page 22), the reader is informed that "In many remote contexts, learners will rely primarily on electronic learning

resources and [sic] library. All of these examples will require quality assurance arrangements to be developed or adapted ... ” (QQI, 2017). Several readers considered this point to be poorly defined at best and potentially troublesome for providers in the sense that it offers an overly loose set of QA guidelines for a poorly defined set of resources and processes. Furthermore, in a similar sense, there was a general notion that the whitepaper was too broad at times in terms of implementation. Aside from the point above, several other points (such as 5.1.8) may prove overly open to a wide set of interpretations by the provider. Perhaps an accompanying reference to examples, contrived or otherwise, might help to better define these processes and how they manifest in real world scenarios for providers.

Finally, there was some discussion about the impact that these new guidelines will have on existing CPD plans and operations within implementing organizations and whether this whitepaper (or indeed a secondary document) might better explore these impacts and the potential mitigations within the provider’s organization and more broadly within the sector.

## References

QQI. (2016). *Statutory Quality Assurance Guidelines for Flexible and Distributed Learning*. Retrieved from [https://www.qqi.ie/Publications/Publications/QA Guidelines for Flexible and Distributed Learning.pdf](https://www.qqi.ie/Publications/Publications/QA%20Guidelines%20for%20Flexible%20and%20Distributed%20Learning.pdf)

QQI. (2017). *STATUTORY QUALITY ASSURANCE GUIDELINES FOR BLENDED LEARNING VERSION 2*. Retrieved from [http://www.qqi.ie/Downloads/White paper QAG Blended Learning.pdf](http://www.qqi.ie/Downloads/White%20paper%20QAG%20Blended%20Learning.pdf)