QQI Consultation on the draft Quality Assurance Guidelines for providers of programmes supported by digital education

NALA written input

9 June 2023

NALA

National Adult Literacy Agency
Áisíneacht Náisiúnta Litearthachta do Aosaigh

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Introduction to NALA

The National Adult Literacy Agency (NALA), is a charity and member organisation with over 2,300 members. We believe literacy is a human right. We are committed to making sure people with unmet literacy, numeracy and digital literacy needs can fully take part in society, and have access to quality learning opportunities that meet their needs.

According to the last international literacy survey, one in six people in Ireland has an unmet literacy need. One in four people has an unmet numeracy need and one in two people has an unmet digital skills need.

These unmet needs have devastating consequences for individuals, communities and the economy. People at the lowest literacy and numeracy levels earn less income, have poorer health and are more likely to be unemployed.

Since we were set up by volunteers in 1980, we have been a leading campaigning and lobbying force on adult literacy issues. We have been involved in national policy, tutor training and teaching resources, research and campaigns to support people with these unmet needs. For more see, NALA 1980-2000 A Living History.

NALA as a provider

For over 20 years NALA has directly provided supports to adults with unmet literacy, numeracy and digital literacy needs. NALA's Distance Learning Service launched in the year 2000 and, between the year 2000 and 2008, was delivered through correspondence courses, over-the-phone tuition and national radio and TV series. Learners were supported in their learning through a range of workbooks as well as a national Freephone service. Between 2000 and 2019 10,000+ adult literacy learners received over the phone tuition in literacy, numeracy and digital literacy from a NALA tutor.

In 2008, NALA launched a new support, WriteOn.ie, an online learning website, which offered both unaccredited online learning courses as well as programmes leading to QQI level 2 and 3 awards. Between 2008 and 2019, 31,000+ adult literacy learners achieved 42,000+ level 2 and 3 QQI minor awards in literacy, numeracy and digital literacy through WriteOn.ie. For more see, Leading the way in online learning - The story of NALA's eLearning website from 2009-2019.

In 2020, NALA launched its new provider website, [Learn with NALA](). As a provider, through Learn with NALA, NALA offers adult literacy learners:

- Standardised online learning courses in literacy, numeracy and digital literacy at level 1-3 with options for QQI certification at level 2 and 3. We offer a range of courses from reading, writing and maths to career preparation and computer skills. Adults can learn at a pace that suits them and can get a national QQI qualification.
- Customised unaccredited over the phone tuition and support to adult literacy learners through our Tutoring Service.
- A National helpline to support learners availing of NALA's services.

Since 2020, 2,910 learners have achieved 6,266 QQI level 2 and 3 minor awards in literacy, numeracy and digital literacy through Learn with NALA. In addition, 1,000+ learners have received 1:1 personalised support from a NALA tutor over the phone.

NALA recently participated in a pilot programme to validate programmes as fully online offerings to inform the online learning guidelines that QQI is developing. Following the review by an independent panel in November 2022, NALA's Level 2 Writing programme was recommended for full online delivery.

NALA response to the draft guidelines

NALA notes the publication of the draft Quality Assurance Guidelines for providers of programmes supported by digital education (draft guidelines) and welcomes the opportunity to give feedback on these draft guidelines.

NALA used the online survey to give feedback on the questions asked on the draft guidelines.

In addition to this feedback, we note in this document the following four significant areas of concern and fourteen questions that we would like answered.

1. Overlap with the Core Statutory Quality Assurance Guidelines

2. Additional policies, systems and mechanisms.

3. Ensuring the fair and consistent use of these guidelines

4. Guidelines are limited in their reference to the Further Education context

These four areas of concern and fourteen questions are discussed below:

Four areas of concern

1. Overlap with the Core Statutory Quality Assurance Guidelines

There is significant overlap between these drafted guidelines and QQI's Core Statutory Quality Assurance Guidelines (Core Guidelines). Areas that are already covered in the Core Guidelines are now also covered in the draft guidelines. These areas include:

- learner support,

- programme approval, development, evaluation and review,

- assessment of learners,

- governance and management of quality,

- external parties involved in education and training.

On page 7, it states that the draft guidelines are topic-specific QA Guidelines and that they

'supplement and are in addition to the core QA guidelines. They aim to support providers in assuring quality, establishing internal QA procedures, and undertaking quality reviews and continuous improvements.'

On page 51, it states that private providers are:
> 'advised to review their existing quality assurance procedures and update them where necessary in accordance with the relevant good practice indicators in these guidelines for digital education.'

NALA's Quality Assurance policies and procedures were approved in 2019 through the re-engagement process with QQI. These policies and procedures are continually updated through our review system.

The draft guidelines have a significant overlap in areas that have already been approved by QQI. This may prove to be confusing and incur significant additional work in mapping our existing Quality Assurance to the new structure and updating policies and procedures to reflect the draft guidelines.

We are seeking answers from QQI on the following questions:

1. Does QQI expect that each provider will now review their existing quality assurance policies and procedures and update them against the new guidelines?

2. If so, what processes, guidance or frameworks will QQI be putting in place for this? For example, will it mean a new Quality Assurance re-engagement process?

3. How will providers be supported and resourced to meet these new standards?

4. What standards will QQI use for further / future reviews or any that take place in the period pending finalisation of the draft guidelines?

5. Will the Core Guidelines be phased out or will they co-exist with these new updated standards? If the intention is for them to co-exist, what is the rationale for the significant overlap?

2. Additional policies, systems and mechanisms

The guidelines note in several places the need for explicit policies, protocols, systems and mechanisms by a provider. For example:

> 2.7 'An **explicit workload model for teaching staff** recognises preparation time, goes beyond measuring direct contact hours and supports flexible learning through the substitution of traditional teaching methods with online synchronous and/or asynchronous engagement'.

These guidelines may require providers to create or adopt a number of new policies, procedures and mechanisms.

We are seeking answers from QQI on the following questions:

6. How has QQI determined that this level of specification is necessary?

7. How does QQI plan to resource and support providers to meet these additional requirements?

8. How will these additional policies, procedures and mechanisms be assessed by QQI? Will this be completed through a new re-engagement process?

3. Ensuring the fair and consistent use of these guidelines

The draft guidelines aim to build on the previous Blended Learning Guidelines from QQI which had 49 individual guidelines. The new document includes over 200 very detailed guidelines. The draft guidelines acknowledge that there are a wide range of providers with different contexts. The guidelines note that providers can choose which of the guidelines apply to their context.

We are seeking answers from QQI on the following questions:

9. Will the appropriate guidelines that apply to a provider be agreed between QQI and the provider? We strongly suggest that agreement on which guidelines apply to a provider context are made between the provider and QQI. We do not support this agreement being delegated to programme validation panels.

10. If the agreement is made between QQI and the provider, how will QQI support providers to determine and agree which guidelines are appropriate for their context? Will this be done through stakeholder meetings and, or guidelines for providers at relevant NFQ levels?

11. In the context of a programme validation panel, what role will the panel have in deciding which guidelines are appropriate for the providers' particular context?

12. How will QQI ensure that the guidelines will not be used as a definitive guide when panels are reviewing providers that are from a different context to their own? For example, will a panel see two factor identity verification as a requisite for all online programmes?

13. How will this be communicated to validation panels in order to ensure that the guidelines are interpreted fairly and consistently for the particular provider context? What role, guidance or support will QQI provide to panels?

4. The guidelines are limited in their reference to the Further Education context

The draft guidelines are overly focused on the higher education context and do provide not an appropriate balance from the perspective of further education providers. Given that 75% of all awards achieved in 2022 through QQI were between level 1-5 (see: https://infographics.qqi.ie/), we suggest that is important to strike an appropriate balance that reflects the diversity of providers and learner contexts. For example:

- The guidelines appear to have been written from the perspective of programmes that are delivered in the standard institution academic calendar year with:
  - a set group who are taking part in the programme at the same pace
  - a set start and finish date
  - defined group teacher and peers.

  This is not applicable to situations where learners have autonomy in their learning and can set the start and finish time as well as the pace as is best practice in adult literacy. For example:

  Guideline 13.9:

  'For online programmes, learners **must** be able to participate in a virtual welcome or orientation event at the start of their study and this should be digitally recorded for those unable to join any live synchronous event.'

  Definition of asynchronous online learning on page 6

> 'Learners accessing online materials at their own pace and interacting with their peers other over longer periods'.

- The draft guidelines assume a linear approach to learning where a set number of hours is required by all persons to achieve a learning outcome. This does not account for the spiky nature and profile of learning that is characteristic of adult literacy learners[1]. For example, on page 29,

  > 'Approval procedures…. need to ensure that direct and indirect contact hours offered through synchronous and asynchronous teaching methods… reflect the credit value and modules of the programme'

- There are a number of references to on-campus instruction which assumes a tertiary setting. We suggest that such references are changed to 'in-person' which is more reflective of a wider variety of settings and diversity of providers.

- Other language used within the guidelines also relates to higher education (lectures, tutorials, labs, libraries). We suggest that the language is broadened to include a wider range of contexts and future proof them for a lifelong, life wide educational sector.

We are seeking answers from QQI on the following questions:

14. How this imbalance in the draft guidelines will be addressed to ensure that the diversity of provider, programme and learner contexts from level 1 to 10 are reflected?

Conclusion

NALA welcomes the opportunity to contribute to the consultation process on these drafted guidelines.

We have identified the following four key areas of concern with the guidelines as drafted:

1. Overlap with the Core Statutory Quality Assurance Guidelines
2. Additional policies, systems and mechanisms
3. Ensuring the fair and consistent use of these guidelines
4. Guidelines are limited in their reference to the Further Education context

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[1] National Adult Literacy Agency (NALA) (2022) Briefing Papers to support inclusion in the Adult Literacy Services during the implementation of 'Future FET: Transforming Learning', the Further Education and Training Strategy 2020-2024, page 9. Available from: https://www.nala.ie/publications/briefing-papers/

We request a meeting with QQI to discuss and further explain these 4 areas of concern and responses to the 14 specific questions that relate to them.

Additionally, we have a number of recommendations on specific guidelines, such as those outlined in Appendix 1.

Further information

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Appendix 1 – Some additional feedback

Student involvement

It's positive to see the reference to student involvement (page 15) that states that 'providers need to work closely with learners as partners in their own learning and in consultation with industry and community stakeholders.' Further references to and advice on best practice to ensure student involvement would strengthen the guidelines.

Language and sentences

In general, the guidelines are clearly written. Some of the sentences are too long and have over 40 words in them. For example:

> 15.15 Learning support and development services are actively promoted to the student body, group or union through appropriate channels, and they are represented in the monitoring of such initiatives, with opportunities to partner with the provider, where appropriate, in offering specific services such as the development of digital skills or academic integrity.

To reduce ambiguity and confusion, as per our Plain English guidelines, we recommend no more than 20 words per sentence.

Terms

It is positive to see the glossary of terms in the document. Some terms used in the body of the document are not clear or explained and are at risk of incorrect interpretation during panel meetings. For example:

- purposeful consideration (page 57)
- platform solutionism (page 12)

Choice of pronouns

We welcome guideline 15.5 which outlines that learners should be able to choose their pronouns. NALA reports learner data, including gender, to QQI through the QQI Business System (QBS) for certification. QBS only accepts male or female for gender which is a required field. Will QBS be updated to reflect this guideline?

NALA reports learner data, including gender, to the SOLAS Programme Learner Support System (PLSS) for funding purposes. PLSS only accepts male or female for gender which is a required field. Does QQI plan to engage with SOLAS to update its system?

The National Adult Literacy Agency (NALA) is a charity and membership based organisation. We work to support adults with unmet literacy, numeracy and digital literacy needs to take part fully in society and to have access to learning opportunities that meet their needs. NALA does this by raising awareness of the importance of literacy, doing research and sharing good practice, providing online learning courses, providing a tutoring service and by lobbying for further investment to improve adult literacy, numeracy and digital literacy skills.

Adult Literacy is co-funded by the Government of Ireland and the European Union.