RESPONSE TO THE DRAFT POLICY FRAMEWORK FOR THE PROVISION OF DISTANCE EDUCATION IN SOUTH AFRICAN UNIVERSITIES – MAY 2012

1. INTRODUCTION

HESA welcomes the opportunity to respond to the draft policy framework for the provision of distance education in South African universities.

This response draws on work undertaken by the predecessors of HESA (SAUVCA and CTP), and later by HESA itself. The first report, entitled *Learning Delivery Models in Higher Education in South Africa* (SAUVCA/CTP, 2003) was the result of an occasional paper commissioned by the Board to interrogate policy and implementation issues relating to Distance and Open Learning at the time, with a view to providing inputs to future policy development. The Board set up a 16 member Reference Group consisting of representatives from the sector under the chairmanship of Dr Theuns Eloff, and appointed two main researchers, namely Prof W Morrow (of the then University of Port Elizabeth) and Ms E Nonyongo (UNISA).

The second document, *HESA's position on Enhancing the Contribution of Distance Higher Education in South Africa* (HESA, 2005) was the higher education sector's response to two reports produced by the Council on Higher Education (CHE), and it encompassed comments and responses to both *Enhancing the Contribution of Distance Higher Education in South Africa* published by the CHE in September 2004, as well as the CHE's Policy Advice Report, namely *Advice to the Minister of Education on Aspects of Distance Education Provision in South African Higher Education,* published by the CHE in March 2004.

This response will reiterate some of the findings and positions emerging from our previous work, but will also address new issues emerging from the draft policy framework. In addition, with the publication of the MHET's draft policy framework, the HESA office requested universities to submit their own responses to enhance this response. Eight universities submitted their responses to the office, namely University of Pretoria, Central University of Technology, Cape Peninsula University of Technology, North-West University, University of the Free State, Stellenbosch University, University of Cape Town and University of Johannesburg. Other universities, most notably the University of South Africa, submitted their responses directly to the Ministry of Higher Education and Training.

Furthermore, while many of the points raised in the institutional responses are incorporated into this response, the eight institutional responses included quite detailed inputs and these are thus forwarded together with the sector response as stand-alone inputs to the draft policy framework.

In broad terms, the sector supports the policy framework and hopes that the time is now ripe to finalise a policy direction informed by developments in the years since the first documents were produced.

2. LEARNING DELIVERY MODELS IN HIGHER EDUCATION IN SOUTH AFRICA (SAUVCA/CTP, 2003)[1]

The SAUVCA/CTP (2003) report noted first and foremost that the distinction between 'contact' and 'distance' modes of delivery is rapidly breaking down, both in South Africa and elsewhere in the world. There is now *de facto* a continuum of modes of delivery which depend on various proportions of face-to-face contact and other types of learner support, including print material, tutorials, Information Communication Technologies (ICTs) and other communication technologies. There is an increasing convergence between 'contact' and 'distance' modes of delivery, to the benefit of both.

What emerges from these developments is a new concept of teaching which transcends the categories of 'contact' and 'distance' and focuses our attention on the design of learning systems in terms of a variety of learning resources of which face-to-face contact is only one amongst others, and not necessarily the most important or effective. This increasingly guides the practices of teaching in all Higher Education Institutions (HEIs), and renders the distinction between institutions in terms of modes of delivery no longer viable.

The rapid increase in the use of ICTs in Higher Education occurs within the context of broader economic and social developments affecting institutions both regionally and internationally. Against this background, ICT is seen as a vehicle for delivering educational and other knowledge-related benefits. These benefits include creating more learning opportunities and a variety of learning resources, promoting better and more flexible learning and ultimately, enhancing the quality of Higher Education.

Open/distance learning (ODL) has become the common 'mode of delivery' in HEIs across the world, and has had a major impact on higher education particularly in poorer and developing countries. Importantly, distance learning begins with a *method* - it is a way of teaching which does not require the presence of the teacher and the learners at the same place at the same time. Open learning begins with a p*urpose* - to develop strategies of educational delivery which, at an affordable cost,

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[1] The full report is available on request

can overcome barriers of access to education. The coherent integration of a variety of learning resources into a flexible pattern that enables effective learning is the hallmark of best practice ODL, and it is the foundation for the new concept of teaching.

The public higher education sector accepts and supports the decision that there should be a single dedicated 'distance' HEI for South Africa, but it understands that this does not imply the restriction or curtailment of ODL practices of other HEIs in the system. Such a restriction or curtailment would be detrimental for the future of Higher Education in South Africa. Not only would it fail to acknowledge developments in modes of delivery in contemporary higher education, it would also close down the spaces for innovations that can reduce costs, increase access and enhance the quality of higher education.

The practice of classifying institutions according to 'modes of delivery' should be abandoned. A new funding framework should move towards a funding formula for programmes which not only acknowledges, but promotes, the convergence of modes of delivery. This implies that 'traditional' residential institutions should be allowed to introduce or continue with ODL, within certain parameters.

In addition, Quality Assurance benchmarks, which focus sharply on best practice ODL, should become the norm for the whole system. Furthermore, geographically dispersed shared Higher Education Learning Centres should be established, and substantial cooperation across the sector in respect to the creation of ODL learning materials for the major qualification pathways is needed, as well as a national facility for the hosting of ODL learning materials, and the e-learning potential of ODL models should be used to the fullest.

2.1   A summary of key recommendations emerging from the 2003 SAUVCA/CTP study

- One of the principal challenges to the higher education systems is to provide high quality access to a wide diversity of our population. The needs of a globalised economy, and redress from past inequitable access, require the provision of higher education learning opportunities to a range of mature learners, many of whom have other responsibilities;
- All modes of delivering higher education, distance education in particular, will use ICT increasingly. ICTs are likely to make tutoring specialised subjects possible in rural areas, where currently there are insufficient qualified persons available to conduct tutorials. However, the majority of our population do not, at this time, have ready access to sophisticated ICTs;

- If we do not enable public HEIs to compete effectively with other providers from outside of the national public higher education sector, we will be failing to serve the higher education needs of our society and our population; and
- Current and future financial constraints necessitate pragmatic and affordable solutions, which will allow us to exploit the resources, especially human resources, of the current higher education system in South Africa, to the benefit of the whole society.

Despite the time lapse between developing the views above and the call for comments on the same topic in 2012, HESA is of the opinion that these views are still valid.

3. HESA's POSITION ON *ENHANCING THE CONTRIBUTION OF DISTANCE HIGHER EDUCATION IN SOUTH AFRICA* (July 2005)[2]

The second paper was the position paper developed in response to the two documents published by the CHE. These views also still stand. The 2005 HESA position paper largely agreed with the recommendations made in the CHE document and reiterated its earlier analysis (SAUVCA/CTP, 2003). These agreements include the following:

- HESA agrees that there is a need to conceive of modes of delivery in higher education as on a continuum from pure 'distance education' to pure 'face-to-face' education, and avoid approaching it as a dichotomy.
- Although HESA agrees that, for practical considerations, the distinction between 'distance' and 'face-to-face' higher education should be maintained in the interim, this should be seen as a transitional measure. This is the case because HESA still believes that the distinction is blurring in everyday practice of a number of HEIs.

In terms of **funding**:
- HESA furthermore agrees that the teaching output subsidy should be the same for all programmes (regardless of mode of delivery).
- Also, that the teaching input subsidy should be the same for all upper post-graduate (M and D) programmes (regardless of mode of delivery).
- Moreover, a funding mechanism should be developed that provides some form of subsidy to institutions 'for successful completion of single courses by students who do not ever intend to

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[2] Full position paper available on request

complete an entire programme of study or who are completing their qualification at another institution'.

Referring to **quality assurance**:

- HESA agrees with the quality assurance recommendations without qualification. However, it would like to point out that quality assurance criteria developed by the HEQC should be applicable to all programmes, with no distinction between 'distance' and 'face-to-face' delivery. It is thus important for distance education quality concerns to be integrated into the HEQC criteria.

In reference to **learning centres**, HESA noted that:

It is widely accepted that the quality of student support in distance education programmes is strongly dependent on the availability and quality of learning centres located within easy reach of where the students live and work. In its concluding comments the CHE Report talks of the 'crucial contribution of distance education' to the system of higher education to which the White Paper of 1997 commits us, and it adds that 'this contribution could be greatly enhanced should a network of learning centres for the higher education system be developed' (p.189). The SAUVCA/CTP report noted that at that time (July 2003) there were some 200 'learning centres' managed by a range of HEIs. It was also noted that many institutions found it difficult to maintain such centres, to equip them adequately, and to ensure that they were well managed in the interests of students.

The CHE Report recommends that UNISA should: 'play a key role in building a national infrastructure, in collaboration with face-to-face institutions' by establishing shared national higher education learning centres, and developing and coordinating a national technology network primarily for teaching purposes (p.185).

HESA supports this view: a network of national higher education learning centres has the potential of saving overall costs, and, if well designed and managed, could on their own make a major difference to the quality of higher education available to those in remote areas. It is clear that the expertise and experience of UNISA will be invaluable to the whole system if it does undertake to play a key role in this regard. HESA would like to emphasise that the success of such projects will depend on genuine collaborative partnerships between UNISA and the other HEIs, and careful attention to cost-benefit relationships. Furthermore, provided that the special needs of higher education students were kept clearly in mind, it might be possible that some of these higher education learning centres could be linked to municipal libraries or community learning centres already in existence.

However, the establishment of national higher education learning centres needs to be aligned with the national ICT policy.

Quality **learning resources** is a particular focus of the CHE Report and some compelling reasons for collaboration in this regard between HEIs were provided. HESA agrees with these reasons and supports the proposal that we need to redouble our efforts to establish mechanisms of making the best possible use of the dispersed academic capacities of the public HEIs. However, it recognises that there are formidable barriers that would need to be overcome – in relation to institutional boundaries, branding and identity in a competitive environment, funding regimes, intellectual property rights, etc.

This concludes the brief summary of HESA's and its predecessors' (SAUVCA/CTP) informed views on the direction needed for distance education in South Africa. The sector is relieved that the Ministry of Higher Education and Training (MHET) has once again taken up the challenge to 'resolve many areas of uncertainty and provide strong support for the progressive development of South African distance higher education as an indispensable and integral component of our national higher education system' (MHET, 2012: p. 7). In the light of the new increased targets proposed in both the National Development Plan and the Green Paper for Post-School Education and Training in terms of participation in post-school and higher education, the introduction of a policy that could greatly enhance access, is timely indeed. Following below is HESA's additional response to the draft policy.

4. **RESPONSE TO THE DRAFT POLICY FOR THE PROVISION OF DISTANCE EDUCATION IN SOUTH AFRICAN UNIVERSITIES – MAY 2012**

This part of the response deals specifically with the draft policy framework (2012) in terms of the following main areas:

*   Definitional issues
*   ICT
*   OER
*   Funding
*   Quality assurance
*   Target groups

4.1 Definitional issues

Technological and conceptual developments in higher education have advanced distance education into a complex but integral part of post-school education. It is noted that this method of delivery was developed to overcome spatial separation between educators and students and provide learning opportunities for many not able to access traditional education. As noted in the draft policy framework, distance education can, however, not be seen as a single mode of delivery as it involves a collection of means and methods that provide learning opportunities for students who cannot engage in contact education. This means that 'distance education' may have multiple meanings, depending on context and educational need, and therefore underscores the need for a clear definition. While this has been recognised in the draft policy framework, it is our view that the definitions provided remain inter-related and lack the clarity required for careful policy formulation and to inform planning and funding.

The glossary on page 5 of the draft policy framework describes 'distance education' as the offering of learning opportunities via a combination of different media, tutorial support, group discussions and practical sessions. In addition, the glossary also defines 'blended learning', 'open learning', 'e-learning' and several others. Despite this, it seems as if distance education serves as an umbrella term that encapsulates all the various modes and the term 'distance education' seems to be used somewhat interchangeably throughout the document. These definitional challenges are further complicated by the fact that the definitions of distance education have important funding implications and are applied by the DHET and the CHE/HEQC in somewhat different ways.

The DHET currently funds two modes of delivery, referring to contact and distance; where distance includes all other means that cannot be classified as contact. Accordingly, HEMIS defines distance education as teaching and learning for students who are taught outside normal university hours and students who normally do not receive tuition at university campuses, and consequently do not have access to the university facilities to the extent that contact students do. Attendance at the university is incidental, irregular, special. The interaction with institutional teachers or institutional supervisors is undertaken through "distance education" techniques, e.g. correspondence, telematics, or the internet.

In contrast to the two aforementioned modes that are acknowledged and funded by DHET, the Higher Education Quality Committee (HEQC) seems to distinguish the modes of delivery from a different perspective. When new programmes are accredited, institutions are required to indicate whether programmes are contact, distance, contact and distance or mixed-mode. The recent HEQF-submissions that involved all the higher education providers in the country distinguished between contact, distance, mixed/blended mode and e-learning. When applying for programme

accreditation, institutions may select one of the aforementioned modes of delivery, but the DHET fund the selected mode of delivery either as contact or distance. It is therefore necessary to clarify the significance of 'blended or mixed-mode' and 'e-learning' when accrediting programmes as this impacts on the funding thereof.   The HEQC classifies a programme as:

- 'contact' if 30% or more of the notional learning hours are dedicated to lectures and other contact between the lecturers and students;
- 'Distance' is seen as a programme that does not provide for any contact between the lecturer and the students; and
- Mixed mode/blended learning may be regarded as a blend of the aforementioned modes – it may therefore include contact between lecturers and students up to 30% of the notional learning time.

The difference between the HEQC's and DHET's meanings of the different modes emphasizes the need for a clarification of definitions and meanings. Institutions might view a programme as blended, as it is not a distance programme, but also does not include more that 30% contact time. Such a programme includes contact between lecturers and students, as well as provides access to university facilities such as the library, laboratories and classes, but it is funded as a distance programme - the DHET regards any mode other than contact as distance.

The MHET and the HEQC need to clarify the various meanings that may be ascribed to the different modes of delivery, as these may be misinterpreted by institutions. Some institutions do offer courses in 'block contact sessions' meaning that students attend lectures/workshops at the campus from time to time, but spend the majority of their learning time off-campus. In such a case, the programme is a combination of contact and distance, but still requires significant teaching input from the institution in terms of human and physical resources - DHET however regards this as distance education.

As a start, HESA suggests that the terms *open learning* and *distance learning* are combined to describe a situation in which the following boundary conditions are accounted for:
- Reference to minimum and maximum study periods;
- Mention of degrees of spatial and temporal separation between lecturers and students;
- Pointing to the fact that academic years would not be bound to traditional academic semesters but that an open environment would allow student-centredness in terms of flexibility of learning provision as regards access, assessment and articulation.

Importantly, the impression is created in the policy framework that modes of delivery, methods of delivery and methods of presentation all refer to the same things, which is not the case.

We therefore urge the DHET to move away from the dated absolute distinction between face-to-face and distance education and rather, as the draft policy framework suggests, *"introduce a new descriptor for educational methods of direct educator-student contact that are not face-to-face, but are mediated through new communications technologies"* (p13). It makes sense to create such a new descriptor with the condition that clear and concise definitions are provided to help higher education institutions make the necessary distinctions (minimum percentage contact time; definition of what *contact time* implies, etc.) in terms of the different modes of delivery for statutory reporting purposes especially in the light of possible different subsidy levels for the different modes. With regard to this descriptor it might be useful to rather focus on a continuum of learning opportunities ranging from face-to-face to fully technology-mediated or alternatively making a distinction between synchronous (with or without technology) and asynchronous (with or without technology) learning opportunities.

Furthermore, new and evolving innovations should not be stifled by the policy: an issue that is not addressed in the draft policy framework is how possible hybrid courses could be developed that could be offered simultaneously with on- and off-campus students in a synchronous manner. The possibility that the two modes of delivery could even merge and stabilize in one hybrid solution in the future through the potential advantages of the utilization of synchronous ICT should not be excluded.

4.2 Information and Communication Technologies (ICT)

While the sector supports the arguments in the draft policy framework with respect to the developments of ICT and the increasing ubiquity of technology, a few cautionary notes are needed. In work with students it is evident that despite widespread access to and use of smart phones, sizeable numbers of students continue to enter university without having used computers. Such students are likely to find distance education offered via technological platforms difficult to successfully engage with. In addition, the importance of focusing first on principles of sound teaching and learning and then on the role that technology might play in supporting this, requires emphasis.

In the framework document, paragraphs 2.3 and 5.2 make specific mention of expanding access to computers and the internet for poor students who may not have access to such resources. However, no clarity is provided regarding how this might be achieved and there does not appear to be sufficient consideration of the enormous financial implications of such a move. Although the term mobile learning is defined in the glossary, there is little reference to the possibilities afforded by

mobile learning. Arguably, mobile learning which makes use of current devices available to students to support the learning process, might be a more practical approach to consider, at least in the shorter term.

Given the importance of ICT to success of the proposals presented in the draft policy framework, more specific attention to the logistics of how ICT access can and will be ensured is needed. Additional exploration of the effective use of existing devices (such as mobile phones) to support distance education provision is also recommended.

However, it is also strongly suggested that an implementation plan clearly accounts for the vast digital divide, instances of technophobia and lack of computer literacy that still persist in South Africa. We are convinced that the bridging of this gap in a comprehensive way that focuses on more than only technology is a prerequisite for the successful implementation of the policy on open-distance learning.

Furthermore, the cost to the student of significant internet-based interaction must be factored into the efficacy of new initiatives regarding distance education. If students cannot afford to have stable, fast and convenient access, most of the more useful types of new media with interactive features are worthless or recreate the digital divide.

The draft policy framework appears to limit its consideration of appropriate ICT to end-user devices and high-bandwidth networks i.e. to connectivity and accessibility. However, effective distance education, as with other modes of delivery, also requires information systems, applications and technologies in both the realms of teaching and learning processes, and management and academic administration.

The impact of information and communication technology (ICT) on education in general and on distance education in particular over the past 15 years is indisputable and will continue. It is the responsibility of universities to optimise the possibilities of ICT in teaching and learning. However, in a developing context like South Africa, where internet penetration is only significant in urban areas, the use of *appropriate technologies* becomes imperative. In developing contexts, one should be careful to link the use of ICT in distance education to quality. It is possible to deliver distance learning programmes of a high quality with little or no use of technology or to use ICT extensively and still have a poor quality distance education programme. The statement on ICT and quality distance programmes on page 12 should therefore be questioned.

Finally, caution should be exercised in assuming that the maintenance costs of an extensive ICT system would be recovered by savings on current systems. All higher education institutions are

experiencing ever-increasing costs associated with providing the necessary infrastructure and support for e-technologies and m-learning (mobile-learning).

4.3 <u>Open Education Resources</u>

The focus on quality Open Education Resources (OER) that are designed collaboratively is sensible and could possibly improve the quality of the resources as a result of the peer review, but the question remains how ready institutions and individual "experts" ("top quality scholars and educators" p27) are to engage in this kind of work.

Although the suggestion that learning material should be made more widely accessible is laudable, more clarity is needed with regard to the incentives that would be offered and how the author will still be referenced if the material is used.

Also, the redesign of learning material to make it available as OER will require additional expertise and time. Although the use of ICT is welcomed, the higher personnel costs will have to be factored into the equation.

ICT that could potentially support the collaborative development of learning resources include Open Education Resource (OER) repositories, content management systems, digital rights management (DRM) systems, amongst others. The availability of ICT systems in support of collaborative development of learning resources is therefore not the problem. The necessary ICT components exist and are sophisticated. The challenge lies in convincing the academic staff members of the desirability of collaborative content development and implementing alternative incentives that will drive changes in behaviour.

With the above caveat in mind, the sector nevertheless welcomes a consortium approach for the provision of open and distance learning (p 20). These initiatives would not only lead to greater co-operation between public and accredited private providers of higher education, but would also lead to improved pooling of resources to meet the demands of an enhanced distance education system.

Furthermore, we suggest that coordinating and enabling mechanisms be investigated to play a supporting role for the institutional repositories which already exist in almost all South African universities. This would involve articulating protocols around norms and conventions for a community of repositories for sharing their content. The central activity would be to support this existing and nascent community, and possibly the development of an aggregator to enable maximum exposure. It would also enable optimum sharing of materials - especially revised and remixed OER - and at the same time allow for HEIs to retain their original materials in their

institutional repository thereby retaining their institutional branding and identity (p6) in a competitive environment.

Examples from elsewhere have shown that making institutional content freely available online has raised the profile of the institution (at MIT, Abelson 2007) and allowed students to explore higher education courses informally that a number have taken up formally as fee-paying students (at the Open University, Lane 2008). In addition, sharing quality teaching materials opens up opportunities for excellent teachers to be acknowledged by their peers and internationally in a way that would not be possible if the materials were held behind university walls.

And finally, we consider teaching resources developed with public funds to be on a par with research funded by the state purse, and believe that all scholarly content developed with public money should be made freely available online for the public at large to benefit from. Given the ease with which this is now possible in an online world, we argue that resources, expertise and enabling policy should be put in place to make this happen.

4.4 <u>Funding</u>

The draft policy framework states that distance education has typically resulted in significant cost saving for the State and the student (2012, p. 7).

While this is true historically, the growth and expansion of distance education needs to be considered in the context of the current higher education milieu. Funding of distance education is critical. An expansion of the system will require additional resources, which, as stated (p21) cannot come at the expense of additional burdens on contact institutions, which are facing increasing demands on their limited resources.

There is a danger that cost saving will be at the expense of the distance students, both in terms of actual cost and progress in learning. The cost of providing the cohesive curriculum design, learning materials, assessment, decentralised support and e-Learning platform should not be underestimated.

To avoid complicated funding issues there will need to be a clear differentiation and understanding of the HEMIS reporting in terms of the distance enrolment versus contact enrolment figures. This is acknowledged in the draft policy document. The draft policy document deals with the need for classifying additional delivery modalities but there is no discussion on classifying additional student

categories and on how the HEMIS reporting of throughput etc. will be dealt with. As distance education is currently funded at 50% of the contact modality and it is postulated that distance throughput targets should be three times the minimal time, dealing with this flexibility and/or permeability of students will need to be clearly articulated in terms of funding.

Furthermore, the current funding formula for universities founded in the classification of institutions on the basis of modes of delivery does not provide for a situation in which a convergence of modes of delivery is accepted. We recommend that the current funding principles need to be revisited to provide for the development of a single coordinated higher education system in which a variety of learning methods is used to serve the purpose of an affordable, accessible and flexible learning environment.

Developing high quality courses and materials for distance education is extremely costly as is borne out by the experience of the Open University in the UK as acknowledged in the CHE report: 'In distance education the quality of the source (subject matter and pedagogy) is related to the level of investment in its design'(p. 105).

Furthermore, designing materials for distance education does not only involve disciplinary and curriculum expertise, but also the contribution of ICT practitioners with the technical expertise to translate ideas into the features of software programmes.

There is ambiguity around funding arrangements with on the one hand a clear statement that the current HE budget probably would not grow significantly (i.e. do more with less), and on the other hand, references to extra funding for certain niche distance education programmes, learning centres and student support at these centres. A stronger focus on distance education initiatives will initially require substantial investments in staff, resources, centres and technology, especially in the preparation of lecturers to teach in these new virtual learning spaces. Since the subsidy formula is currently under review, the proposed funding arrangements for the provision of distance education may be considered as part of the more comprehensive review process.

The review process should also investigate the assumption that economies of scale can be reached in terms of programmes that rely heavily on laboratories, specialised equipment, etc. The relevant CESM funding categories will also need to be reviewed to relate more closely to actual cost.

Although research indicates that distance education can provide high quality access to university education more cost-effectively and cost-efficiently (under certain conditions) than traditional face-to-face provision, it is therefore understood that substantial up-front investment is required in inter

alia curriculum design, materials development, academic staff development as well as in decentralised student support. One of the possible reasons for the low retention and throughput of distance education students at traditional-face-to-face universities can be attributed to the inability of academic staff at these institutions to deliver on the design of quality materials and support suitable for distance delivery. Attempts to deliver distance education are often not supported by adequate investment in the development of academics in the methodologies of open and distance education. The resultant attempts of academics to duplicate face-to-face teaching methods at a distance escalate the challenges of distance education, where the materials and methods stay the same, only offered off-campus. Often, in the latter approach, contact time is greatly reduced or lectures offered in block sessions without adequately considering sound pedagogical principles and the requirements for quality distance education. In our experience, one of the reasons that this happens is because universities cannot afford substantial investment in the development of academics and the provision of structures to provide quality distance models of delivery.

Thus, if distance education is to be successful in addressing the stated vision, a new approach, based on open learning principles is to be introduced. Several references are made in the draft policy framework to the need for investment in distance education, and without this, distance education is unlikely to achieve the goals specified. However, universities are not currently in a position to self-fund the initial expenditure to be incurred for the development of new, high quality, distance education programmes that will deliver on the potential of open learning in this country. Without earmarked funding, we will not be able to develop distance education offerings (current and new) to their full potential.

The sector supports the MHET statement in the Draft Policy Framework for the Provision for Distance Education in South African Universities (cf. Glossary & pp. 21 – Critical areas for funding review), stating that it might be necessary to develop a more quantifiable definition for distance education – specifically for the purposes of funding and is hopeful that the Funding Task Team will take the MHET recommendations in this regard into consideration.

Finally, the sector fully supports the proposals to base the funding differentiation on actual costs. The affordability of distance education is an important consideration for institutions. The subsidy formula should be such that it would be affordable for institutions to admit a significant number of distance education students who are subsidised on the basis of actual costs, which may be less than the cost of face-to-face education.

Regarding paragraph (f) on p21 we therefore concur with the proposed change of the balance more towards the teaching output subsidy (as opposed to teaching input subsidy) in an attempt to pay

greater attention to success and throughput rates with the proviso that robust quality assurance arrangements are put in place at institutional and national levels to ensure the quality of all programmes, including the distance education programmes.

4.5 <u>Quality assurance</u>

We wish to assert that while we do not believe that there is a need for re-accreditation of programmes for funding purposes, there is a need for re-accreditation for quality purposes in the move to a different mode of delivery. The quality concerns in relation to curricular and pedagogical requirements of a contact programme are not the same as those for a programme that is delivered at a distance. Curricular design, including sequencing and pacing, are important in both modes of delivery, but contact programmes have an inherent flexibility that is not to be found in distance, on-line programmes. Flexibility to accommodate different student learning needs has to be built in deliberately and therefore the quality of design is critical in these programmes.

However, whilst we believe that it is important for institutions wishing to offer programmes exclusively via distance mode to submit proposals to the HEQC from a quality assurance perspective, we do not think it is necessary to ask the DHET for approval as this would perpetuate the current outmoded dichotomy of distance and face to face delivery modes. Further, the proposal to get so-called contact institutions to motivate requests to offer programmes via distance mode in relation to the list of priorities provided in the draft policy document is very worrying as this list is over-determined by needs of the labour market and does not take account of the role of distance education in extending access to formative degrees.

Since the quality of distance education provisioning is a key concern, we suggest that the draft policy framework should consider to include specific policy requirements and examples of best practices on how the quality assurance of distance education will be regulated and managed (e.g. selection criteria for prospective distance education students, national readiness/admissions tests for prospective students similar to the National Benchmarking Tests, specific and appropriate minimum criteria for the delivery of distance education programmes and student support for distance education students, specific provision for the unique dimensions of distance education provision in the institutional and national quality assurance systems, etc.).

The primary driver of distance education expansion should be quality. The sector therefore supports the focus of the draft policy framework on quality and quality assurance. The challenge in South

Africa, however, is not a lack of quality criteria or quality directives, but rather the application of these criteria in practice and the continuous monitoring of quality. The sector is therefore encouraged by the acknowledgements that quality programmes are costly and will need to be funded properly.

Quality administrative services in the delivery of distance education programmes are just as important as the quality of the learning material. It is impossible to deliver quality distance education programmes without quality administrative structures, systems and processes, or sufficient human resources. There should not only be very specific criteria and requirements for distance education administration, but the funding from government and the institutions themselves should make provision for that.

The policy framework acknowledges that the Higher Education Quality Committee (HEQC) evaluators are sometimes unfamiliar with distance education. The draft policy framework should be clear that seasoned distance education practitioners should be included in the HEQC evaluation teams for distance education programmes. The HEQC evaluation teams should also include at least one distance education administrator. Only evaluating the academic content of distance education programmes and not the administrative component of such programmes will not ensure quality distance education.

4.6 Target groups

The draft policy framework seems to be addressing provision of distance education to a much wider range of target groups than university students. Either the title of the policy should make that clear, or provision for these other target groups should be dealt with in separate documents.

Provision of alternative opportunities for post-school youth and adults should therefore be made. Furthermore, we recommend the development of a set of 'open access' courses that could be used either to gain access to formal programmes in colleges or universities of for entry into the workplace.

Distance education should not be seen as a simple solution to the problem of access to higher education opportunities for young people who are 'not in education, employment or training' (NEET) as no matter how innovative and carefully designed, distance education makes greater demands on

formal academic literacy skills, and – in the more junior stages at least – requires a supportive environment to foster adjustment and effective study approaches. It is probably safe to assume that the majority of students who are not accommodated in higher education at present are less well prepared for formal study at an advanced level than those who are.

The current high failure and low completion rates within higher education (even when disaggregating UNISA performance statistics) provide a clear indication of the extent of the challenge that will be faced by the sector if the needs of even more poorly prepared students are to be met. That this can be achieved through distance education is not plausible.

This is particularly important in the context of the argument that distance education will provide a means of expanding enrolment in higher education towards the 20% participation rate specified in the National Plan of 2001; and that distance education should be used as a vehicle for providing educational opportunity at the FET/HE interface. Provision of education at this level, as well as broadening access, has implications for the type of student enrolling in distance education programmes. Given the many quality challenges in the current public schooling system, it seems unrealistic to assume that students would enter distance education programmes well equipped for self-directed learning.

5. CONCLUSION

Following is a brief summary of the main points made in the submission, as well as including a few other issues not discussed in section 4.

5.1 In general, HESA supports the broad thrust of the draft policy framework. HESA agrees that, notwithstanding throughput challenges in the sector, distance education 'has made a significant contribution to the overall growth in student enrolment' and commends any proposals to further expand access in a cost-effective and cost-efficient manner.

5.2 However, HESA notes with concern that the draft policy maintains the **dichotomy of 'distance' and 'face-to-face'** modes of delivery despite recognising that:

> The past ten years has seen rapid development in Information and Communication Technology (ICT), and an accompanying explosion of ICT-related activity in the higher education sector, as universities grapple with the challenge of how best to deploy the potential of ICT to the benefit of students, academics, and the institutions themselves (MHET, 2012: p. 12)

5.3 While HESA agrees that ICT does not offer 'quick-fix' solutions to educational problems, the policy seems to ignore the fact that **all HEIs are increasingly relying on ICT** to deliver programmes, not only dedicated distance education institutions. HESA's earlier comments and responses (2003 and 2005) emphasised that in higher education, locally as well as elsewhere in the world, 'there is an increasing convergence between 'contact' and 'distance' modes of delivery, to the benefit of both' (SAUVCA/CTP, 2003). Furthermore**, 'an enabling ICT infrastructure'** is essential for *all* quality higher education, not only quality distance education, particularly as seen against the call for greater access throughout the post-school system. Nevertheless, HESA strongly supports improved **access to and use of appropriate technology** in terms of affordable broadband connectivity to all higher education students.

5.4 In terms of **access and success**, HESA agrees that the current MHET definition of graduation rates is perhaps inappropriate when applied to distance education when the slower progress of distance education students is taken into consideration. Further, the fact that many students often enrol for less than a full programme should also be factored in, in calculating graduation rates.

5.5 HESA would like to question the assumption in the draft policy that distance education could be a solution for the problem of the **'burgeoning unemployed/not in education, [employment or training (NEET)] youth'**, especially in the light of the statement that 'the MHET wishes to state clearly that it does not see new school leavers as UNISA's primary audience' (MHET, 2012: p. 11). Linked to the above is the assumption that students with **'poor quality or inadequate prior learning experiences'** would cope with the different demands of asynchronous, independent learning. The reasons for lower graduation rates of distance education students are certainly linked to 'work commitments, personal social circumstances [and] geographical distance', but may also be linked to greater under-preparedness of students, a challenge that the sector as a whole is grappling with. The NEET youth, especially those with poor quality or inadequate prior learning may find distance education especially challenging. This is borne out by Kilfoil (UNISA, 2008: p. 1) who aptly puts it as follows:

> The UNISA student profile has shifted over the past two decades from the traditional, working adult towards more students choosing UNISA straight from school for reasons of access. About twenty percent of the students registered fall into this younger group. This is a group that demands more contact and has less access to technology than the working adult.

5.6 Furthermore, the statement that distance education could be more accessible to students with poor quality education seems to suggest that distance education programmes have (or should have?) **lower entry requirements relative to entry requirements for the system as a whole**. If this assumption is incorrect, then the draft policy should say so. In our view, a student who does not meet the specific admission requirements may not enrol for the chosen programme, irrespective of the mode of delivery. A different mode of delivery implies alternate teaching methodologies and flexibility, but it should not impact on the quality, content or admissions requirements into a specific course. The Ministry might need to revisit the statement on page 14 of the draft policy framework based on a better understanding of distance education's approaches to provide the scaffolding required by school leavers who do not meet the higher education entry requirements. As it currently stands this might be interpreted as a lowering of standards and quality – students with inadequate prior learning do not meet the requirements for contact programmes, but will be granted access into distance education programmes. HESA is of the opinion that **alternative opportunities** should be provided for such students, with well thought through articulation pathways to link with university study at a later stage. Such alternative opportunities may well be made available through distance education. For this reason, HESA is surprised that the draft policy limits itself to **'specifically university education'**, especially in the light of 5.3 'supporting a wider range of **post schooling study options**' where the draft policy framework states that 'some kinds of need [may be] best addressed by institutions outside of the current formal HE arena, for example: an **open school**'. The rationale for limiting this draft policy framework to university education is not clear. However, HESA strongly supports the sentiment in 5.4, namely 'access to alternative programmes that are offered through more flexible forms of delivery, including distance education and e-learning' (MHET, 2012: p. 23).

5.7 Although HESA supports the priority areas for distance education identified in the draft policy, the rationale for limiting the two newly proposed HEIs in the Northern Cape and Mpumalanga to **NQF level 5/6 distance programmes** is not clearly articulated in the draft policy. Further, **NQF 4 foundational programmes**, which are not 'university education', seem to link with our previous point, namely that other opportunities need to be made available before students proceed to higher education.

5.8 HESA strongly supports **a funding review** and agrees that much of the subsidies to dedicated distance education institutions and/or contact institutions offering distance learning are based on dated notions of distance education. Furthermore, in addition to our earlier comments (2003 and 2005), the CHE Report is still relevant in this regard:

- o It is a dangerous piece of conventional wisdom that distance education is less expensive than traditional contact education (p. 105);
- o The accumulated research literature suggest two fundamental conclusions: Distance education institutions are usually more cost-efficient than conventional institutions, and *can* be more cost-effective (p. 105);
- o In distance education the quality of the course (subject matter and pedagogy) is related to the level of investment in its design (p. 105);
- o The costs of teachers in traditional institutions are so great as to make all other aspects of variable costs relatively trivial (p. 107);
- o There is ample evidence that the methods of distance education can be used to increase the productivity of education systems (p. 111).

5.9 Linked to the dated notions of distance education, HESA is surprised that despite including definitions of open learning in the glossary of the draft policy framework, **Open Distance Learning (ODL)** does not seem to feature strongly in the document.

5.10 HESA broadly agrees with the draft policy framework's proposals regarding **quality assurance**. Although we support the process for approval and accreditation of distance education programmes, there is a concern that the approval process takes very long and that it has a detrimental impact on the development and introduction of distance education programmes. Developing high quality programmes is not only expensive, but it also takes at least 18 months to finalise. If the approval process takes a year, new programmes can only be introduced in three to four years' time, thereby defeating the object of enhancing access.

5.11 HESA is also supportive of a review of existing policies to develop an appropriate **'Open Licensing Framework** ... within an overarching policy framework on intellectual property rights and copyrights in higher education'. Furthermore, in terms of **Open Education Resources** it is essential that providers in South Africa acknowledge the value of collaboration and joint responsibility for delivery and standards – the collaborative development of high quality distance education (and OER) resources takes an important place in the draft policy framework,

and by implication underlines the importance of the philosophy of open learning, against the mere competition amongst institutions for student numbers. The policy framework reminds us of the essential starting-point of the expansion of the HE system and 'invites' joint efforts to deliver on quality. While the sector supports calls towards greater cooperation and collaboration among universities, we are also mindful of the many challenges and obstacles to such collaboration. As such, a clearly formulated policy framework within which such cooperation and collaboration could be realised is needed. Nevertheless, there is collegial recognition of the importance of sharing scarce high level skills and a commitment to development of a mechanism for both rewarding individual contributions while enabling a pooling of resources in the formation of expert groups. The concept of the sharing of well-designed high-quality learning resources and open education resources, as well as issues of intellectual property, is still a new development with many potential pitfalls. These and other forms of collaboration between institutions and other organisations will be challenging, but it also presents interesting opportunities to consider the big picture for the South African system on multi-university and system levels. The sector supports the establishment of a task team that will address matters related to OER. The sector can contribute to the work of this task team.

5.12   HESA also strongly supports, as noted in its 2003 and 2005 comments, the notion of '**shared learning and support centres'** and will support a workshop with specialists to map a way forward in relation to the balance between a network of learning centres and the availability of **mobile technology**. The MHET accords highest priority to support for a network of well-designed and maintained **learning centres for distance education students**. Several possibilities for building this network are provided, such as using local schools, contact university campuses, FET College campuses, as well as linking with the Multi-Purpose Community Centres (MPCC) that have been, and continue to be, developed by government. While the sector agrees that such a network of support structures is critical to the success of distance education initiatives, we are also mindful of some experiences in working in partnership with FET Colleges and other sites, to offer university education. Despite the importance of these partnerships in broadening access, a host of political, managerial and logistical challenges have been experienced which have the potential to impact on the quality of support provided. Related is the challenge of identifying suitably qualified personnel to work at these centres and provide the front line support to students. While much of the focus in the draft policy framework is on academic support of students, it is important to also consider how non-academic support such as counselling could be provided.

5.13   The draft policy framework is silent on work integrated learning (WIL) and experiential learning which are integral to vocational and professional qualifications. The MHET is requested to provide clearer statements as to how it will see the administration and funding of work integrated learning for professional degrees offered through distance education. Guidelines and additional support in terms of professional training via the distance mode of delivery are needed. The need for experiential training and the assessment and quality assurance pose specific challenges – these need to be investigated and clarified. Furthermore, the different curriculum models used by the QCTO, SETAs, and HEQC will determine WIL modalities for different qualification types. The implementation of these will need to be carefully thought out to ensure that students are not only able to qualify, but that quality assurance systems ensure suitable learning occurs at the appropriate depth and level.

5.14   In terms of guidance and clarity, the sector is of the view that policy guidelines will be needed in respect of the following:

- The educational (and ethical) use of social media, emerging technologies as well as internet-based resources (e.g. YouTube; Khan Academy; Open Educational Resources, etc). As the use of mobile technology and social networking sites are expanding exponentially, there will need to be clear policy guidance, impact tracking and implementation strategies emanating from the Ministry. Researching the quality of didactic support, initiating change and deploying suitable funding and implementation across three different sectors of higher education (QCTO, SETAs, CHE) will require a well-planned, cohesive framework.

- The use of existing open source resources (particularly when these are from countries such as the US and the UK). The many freely available open educational resources from world-class institutions should be considered, as well as the need for specifically South African distance/e-learning content.

- A commitment to the creation of South African-specific open source higher education resources (or to extend existing provision e.g. Open Sources Africa).

- Guidelines on the appropriate e-pedagogy and distance education training of university lecturers, coupled with supportive and regular evaluation of existing programmes by e-pedagogy and distance education specialist (the South African Institute for Distance Education (SAIDE) may be a good resource in this regard).

- Guidelines for curriculum design where the medium of instruction is significantly different from face-to-face delivery.

5.15　Our overall sense is that the document is timely, but we remain uncertain as to the expansion of the sector in terms of the audience anticipated for that expansion (in the Green Paper for example, the massive expansion of the FET sector is specified), but here (in the draft policy) it seems more generalised.

5.16　The support for distance learning at dedicated distance education institutions and residential institutions where distance education takes place is important and the cost structures should be researched to arrive at realistic calculations of actual cost. The significant additional cost of managing distributed student learning is a factor that has to be added to the noted concerns about the cost of teaching material and interactive media development.

5.17　HESA agrees that an engagement is needed to address '**cross-border provision'**. HESA supports measures such as intergovernmental collaboration and legislation to protect students against abuse by low quality cross-border distance education providers. At the same time, however, the use of ICT enables "borderless education" and it should be recognized that this makes regulation more difficult. Nevertheless, the *Southern African Development Community* (*SADC) Protocol on Education and Training* and the United Nations Educational, Scientific and Cultural Organization (UNESCO)/Organisation for Economic Cooperation and Development (OECD) *Guidelines for Quality Provision in Cross-border Higher Education* could be helpful in conceptualising our response to cross-border provision.

6.　REFERENCES

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