Designing and Delivering Distance Education: Quality Criteria and Case Studies from South Africa

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WITH
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An Overview of Quality Assurance in Distance Education in South Africa

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Introduction

Across the world, the quality of distance education varies enormously. On the one hand, we have an example of a distance education institution which in a particular country ranks amongst the leaders in all higher education for the quality of its teaching and learning. On the other hand, we have scurrilous distance education providers who take students’ money, provide a miserable set of plagiarized notes, give no assignments, provide no learner support and, having wasted students’ precious time, invite them to what is essentially a challenge examination. That there is such a wide range of practices in distance education is partly because distance education students find it so difficult to mobilize and complain, partly because the temptation to make money out of distance education programmes is great, and partly because the large numbers of students on many distance education programmes make it difficult to ensure that each student receives quality attention.

South Africa’s recent history has shown both the potential and the difficulties of distance education. Robben Island became South Africa’s first and arguably most successful learning centre during the long years in which many of South Africa’s foremost leaders were
imprisoned there. But the success of that learning centre was not a result of a conscious institutional decision to provide support for its learners. The learners themselves took the initiative, supported not by tutors from the provider institution, but by volunteers who acted as messengers between institution, families and prisoners, to ensure that they progressed from course to course. As students during the eighties were wont to say: ‘Under odds we will study, under odds, we will pass!’

In the ten years since our freedom, various efforts have been made to improve the quality of distance education – not in order to undermine the initiative of students, but to ensure that students do not have to spend so much time overcoming the extrinsic barriers to success (like not receiving their materials or assignment tasks in time) and can concentrate on the intrinsic challenges of learning (such as mastering the complexities of calculus, or understanding constructivist approaches to learning).

As will be seen, the National Association of Distance Education Organizations of South Africa (NADEOSA) has played, and continues to play, an important role both in the development of awareness of quality in the South African distance education community. It also engages with quality assurance bodies specifically appointed for the quality assurance of distance education, particularly higher education.

This overview will look at the following key questions for quality assurance of distance education that we have grappled with in the last ten years:

- What do we understand by quality in distance education?
- Should quality assurance be externally controlled or internally driven?
- Should quality assurance processes for distance education be integrated into quality assurance processes for all education?
- Can policy makers actively prevent bad practice while stimulating innovation and excellence?

### The importance of policy

Crucial to quality in distance education is a formal commitment to distance education by government. In South Africa we have been fortunate in this regard, especially as we moved into post apartheid South Africa.

The government-in-waiting’s commitment to increasing access to education through the use of distance education methods was evident in the 1994 Policy Framework for Education and Training (ANC Education Department, Johannesburg):

> The development of a well-designed and quality distance education system based on the principles of open learning is the only feasible approach to meeting the needs of the vast numbers of our people who were systematically deprived of educational opportunity in the past, while at the same time providing opportunities for the youth coming up through the educational system at present. It will allow people access to education and training and the ability to determine where, when, what and how they want to learn (ANC, 1994:78).
Even at this early stage, however, there was concern that in order to do this successfully, distance education provision had to meet certain criteria, such as:

well-designed courses, learner support, efficient administrative processes and appropriate organizational structures and evaluation procedures (ANC, 1994:77).

It was also clear that in order to ensure quality, which in turn would enable distance education methods to be used successfully for access, there had to be research into the state of distance education in the country. The ANC Education Department requested SAIDE to organize an International Commission to conduct a review and assessment of distance education in South Africa. In conducting its work, the International Commission, chaired by Prof. Gajaraj Dhanarajan, developed a set of criteria for what it termed ‘well-functioning distance education’. It then reviewed South African distance education against these criteria, as well as against the priorities for education and training, which were evolving for a liberated post 1994 South Africa. Thus a new impetus was given to a process for clarifying and refining what is meant by quality distance education in the South African context.

The new South Africa’s first White Paper on Education and Training of 1995 contributed to this refinement with an important distinction between open learning and distance education. Open learning, it was stated, was a set of principles that should apply to any educational programme:

Open learning is an approach which combines the principles of learner-centredness, lifelong learning, flexibility of learning provision, the removal of barriers to access learning, the recognition for credit of prior learning experience, the provision of learner support, the construction of learning programmes in the expectation that learners can succeed, and the maintenance of rigorous quality assurance over the design of learning materials and support systems. South Africa is able to gain from world-wide experience over several decades in the development of innovative methods of education, including the use of guided self-study, and the appropriate use of a variety of media, which give practical expression to open learning principles (Department of Education, 1995).

As is reflected in this statement from the 1995 White Paper, the use of distance education methods can give ‘practical expression to open learning principles’. Thus a set of underlying principles for distance education was established.

The new government also commissioned an investigation of higher education, which intensified the emphasis on quality as success. In order to be successful, institutions not only had to increase access; they also needed to ensure that completion and throughput rates on programmes were high enough to merit the cost of mounting the programme. A distinction began to be drawn between ‘true’ distance education, which provided sufficient learner support for learners to succeed in their studies, and ‘correspondence education’ in which there was no face-to-face element in the course design at all. The policy research of the National Commission on Higher Education culminated in the policy statements in the White Paper on the transformation of higher education.

This White Paper, while noting its concern about ‘the efficiency, appropriateness and effectiveness of much current distance education provision’ (Department of Education,
In 1997, the Department of Education, through its Directorate of Distance Education, Media, and Technological Services took the initiative in this ongoing work of improving the quality of distance education. The Department contracted a research team to assist with the development of a discussion document entitled *A Distance Education Quality Standards Framework for South Africa*.

The framework and approach to quality assurance contained in this document were based not only on an understanding of distance education provision in South Africa at the time but also on international experience. The mood of the progressive international literature at the time was best captured by the title of the quality assurance document of the Norwegian Association for Distance Education (NADE): *From External Control to Internal Quality Assurance* (Ljosa and Rekkedal, 1993). There were cautions about the role of standards – it was felt that they should encourage a process of continuous quality improvement, rather than merely prescribe a minimum. This could best be achieved through stimulating internal quality assurance processes in which institutions would evaluate themselves and set their own quality improvement agenda. Bureaucratic control according to set minimum standards, it was felt, would undermine the real goal, the internal drive to quality. In the South African document, this understanding was expressed as follows:

> Standards for education should not (as legislation tends to do) merely prescribe a minimum, but give scope for continuous quality improvement (Department of Education, 1996:51).

The second point that was highlighted was the importance of stakeholder consultation – not only to ensure that the standards developed are accurate and sufficiently comprehensive, but also that those who are going to use the standards have ownership of them and, in the process of contributing to them, develop a shared understanding of how they should be
interpreted. As the relevant recommendation in the 1996 document states:

Guidelines/standards should be developed through a consultative process, so that they are both understood and accepted as valid by the people who will use them (Department of Education, 1996:51).

Taking the last point into consideration, a consultation process was arranged with members of the newly formed National Association of Distance Education Organizations of South Africa (NADEOSA). This consultation process culminated in a revised set of standards in a draft policy statement entitled *Criteria for Quality Distance Education in South Africa: Draft Policy* (1998).

The framework for the 1996 and 1998 documents was drawn from a range of international sources. The format for the standards/criteria was adapted from that used by the Scottish Vocational Educational Council (SCOTVEC). There are thirteen standards/criteria representing the main institutional elements for distance education provision:

- Policy and planning;
- Learners;
- Programme development;
- Course design;
- Course materials;
- Assessment;
- Learner support;
- Human resource strategy;
- Management and administration;
- Collaboration;
- Quality assurance;
- Marketing;
- Results.

Under each of the headings there is an overall standard/criterion, followed by numbered elements which tease out the implications of adherence to the broad standard. The thirteen standards/criteria provide an overview of what is meant by quality distance education, and, if further detail is required, the reader can engage with the specific elements.

The intention was originally to publish the 1998 *Quality Criteria* as a separate policy document for distance education. But many people at the time thought when they read the document that the criteria actually applied to all educational provision, rather than merely to distance education, and that the standards of excellence in distance education should inform standards required for all educational provision. So the policy document was not published.
The impact of the 1996 Quality Standards Framework

However, both the 1996 Quality Standards Framework and the 1998 Quality Criteria policy document have had an impact. They have been used both inside South Africa and internationally. Namibia, for example, is developing its approach to quality assurance for distance education based on the 1998 Criteria. In 2001, the Asian Association of Open Universities in association with the Commonwealth of Learning brought out a document entitled, A Framework for Creating a Quality Assurance Culture in a Dedicated Distance Education Institution, in which it acknowledged extensive use of the South African Quality Standards Framework document. Within South Africa, a variety of institutions have taken up the challenge of internal self-evaluation using the 1998 Quality Criteria.

However, even though there has been a growth in understanding and practice of quality distance education by a number of providers, at the same time much that is of poor quality persists. What is more alarming is that it is usually in programmes with large numbers, or in institutions whose distance education provision is growing steadily, that this poor quality persists. The financial gains from large scale provision, and the complexity of providing adequate support to large numbers of students together conspire to make providers resist change.

Some examples of this bad practice in South Africa include:

- In 2003, in an undergraduate course at first year level with an enrolment of over 10 000 learners, the only formative assessment was an optional multiple choice assignment. Student support in the form of contact sessions reached less than 10% of the students. It is estimated that the course cost R181 per student. On a conservative estimate the course made profits of R10 million a year but this money was not used to improve the assessment and learner support of the students on the course.

- In 2003, in a teacher upgrading course with 705 enrolments where the provider was receiving bursaries of R5000 per teacher, less than three hours of learner support was provided per module (about 3% of the notional learning hours of the module), and often this support consisted merely of showing a video of a lecture to the students.

The existence of the Quality Standards Framework which sets out very explicit requirements for both learner support and assessment has obviously had no effect on these courses/programmes.

There are also, despite such forums as NADEOSA, widely differing understandings of what constitutes quality distance teaching and learning. Some providers have improved assessment and learner support, but when the course materials are evaluated, the teaching and learning method is clearly authoritarian transmission mode without any attempt to develop concepts step-by-step based on learners’ experience.

There is a need for some measure of external regulation, and a stepped-up effort to achieve an understanding of what constitutes quality distance education that goes beyond acceptance of a common set of criteria. Under the South African Qualifications Authority and the
Council on Higher Education, external bodies have been created and are beginning to exert the required pressure for change. The remainder of this introduction explores the current thinking about how the quality of distance education can be controlled and improved. Although current thinking about strategies for quality assurance of distance education relates primarily to higher education, the criteria and minimum targets contained in this publication relate equally to general and further education.

Current thinking on quality assurance of distance education in higher education in South Africa

Should there be separate quality criteria for distance education?

An important question to ask about the quality assurance of distance education is whether or not it should be considered separately from the quality assurance of all education.

Current thinking on the question about whether or not to integrate quality assurance processes for distance education into those for all education is that, as far as possible, distance education concerns should be infused into criteria for the audit of all institutions and accreditation of all programmes. There is considerable overlap between criteria for quality distance education, and generic criteria for all educational programmes, and there is little point in proliferating criteria unnecessarily.

As a result, the Higher Education Quality Committee has consulted the distance education community and infused distance education concerns into both its Criteria for Institutional Audit (HEQC, 2004), and Criteria for Programme Accreditation (HEQC, 2004c).

For example, Criterion Eight of the Criteria for Institutional Audit (Higher Education Quality Committee, 2004:11) reads:

> Clear and efficient systems and procedures are in place for the design and approval of new programmes, courses and modules. The requirements are consistently applied and regularly monitored.

Distance education additions are as follows (Higher Education Quality Committee, 2004: 12):

(ix) In the case of distance learning programmes, tested systems, technologies and support arrangements for materials development and delivery for distance learning.

In the case of the programme accreditation criteria, sometimes a minimum standard clearly appropriate particularly to distance education has been included in an obvious way. See Criterion 4 (vii) (Higher Education Quality Committee, 2004c:11):

> For distance learning programmes, sufficient administrative and technical staff is employed to handle the specialized tasks of registry, dispatch, management of assignments, record-keeping, and other issues in relation to student needs.
In other cases, the infusion of distance education concerns is less obvious. For example, the following was added to one of the minimum standards in Criterion 3 (Higher Education Quality Committee, 2004c:10):

(ii) The majority of full-time academic staff has two or more years of teaching experience in a recognised higher education institution, and in areas pertinent to the programme. In the case of professional programmes, a sufficient number of academic staff members also have relevant professional experience. Qualified and experienced academic staff design the learning programme, although junior or part-time tutors may act as facilitators of learning. [our emphasis]

The last sentence of this minimum standard is important in the case of distance education programmes in which typically academics at the central institution design curriculum and materials, but employ part-time tutors to assist students in local learning centres close to where they live or work. Although critical for distance education, the standard is also relevant to tutoring arrangements at face-to-face institutions.

However, infusion of distance education concerns into criteria for the accreditation of all programmes does not imply that there is no distinction between distance and face-to-face education.

In the late 90s, the thinking was that it was counter-productive to deal with distance education separately from the rest of education. There was at the time a feeling that the distinction between face-to-face and distance education was blurring, and that there would, in due course, be a convergence. This opinion was strengthened by the fact that nearly all the criteria for distance provision could equally be applied to face-to-face provision. In addition, distance providers were concerned that for distance education to be dealt with separately would mean being regarded as inferior, and distance programmes should compete equally with all educational programmes.

However, it is clear from recent research (Council on Higher Education, 2004) that in South Africa at least, while the distinction may be blurring, distance and face-to-face education are not converging. There is still a distinct role for distance education and the requirements for successful delivery need to be spelt out so that distance education can fulfil this role properly. The NADEOSA Quality Criteria in Section Two of this book are an attempt to do this. For example, high quality learning materials are critical for successful distance delivery, because, in distance education it is the materials that are the main teacher – rather than the lecturer standing in front of a class or managing a tutorial. Hence the NADEOSA Quality Criteria contain 18 elements that describe what quality materials are. These 18 elements cover both print-based and web-based materials, and deal with issues as wide-ranging as accessibility, coherence and approach to teaching and learning (See Quality Criterion no 5, elements 5.5.1 to 5.5.11 and 5.6.1 to 5.6.7).

However, criteria only have life and power inasmuch as they are used and interpreted. In addition, quality is not fixed and static but develops with changes in educational thinking and practices as well as with advances in technology. The rapid expansion of electronic learning has been the most noticeable change in the last decade.
For these reasons, the development of criteria has to be an ongoing consultative process, in which those most affected engage and contribute. A consultative process was followed in the revision of the 1998 Criteria for Quality Distance Education in South Africa: the criteria already established for distance education were revised, as well as expanded to include criteria for the use of electronic learning, leading to the NADEOSA Quality Criteria for Distance Education in Section Two of this book. They are a description of what constitutes quality as understood by the distance education community in South Africa at this point in our history.

Although only the HEQC’s criteria carry legal force, there is a role for ‘additional benchmarks’ that are used in institutional processes of self-evaluation. The HEQC position with regard to use of additional criteria is that1:

The HEQC will require providers of distance education programmes to conduct periodic self-evaluation exercises to evaluate their effectiveness against the HEQC’s criteria as well as additional benchmarks that they wish to employ. This will constitute part of the evidence when institutions apply for self-accreditation [our emphasis].

Provider readiness to offer programmes using distance education methods

In the last ten years there has been a large increase in the number of distance education programmes offered by predominantly face-to-face providers. This is for a variety of reasons. Sometimes the shift to distance is not deliberate. When providers use e-learning in contact programmes, they realize that students do not actually have to be with a lecturer to be learning, and gradually they extend their programme to more and more students who seldom if ever are on campus. In other cases, the decision to offer programmes using distance education is deliberate – providers realize that they can increase access to a more diverse group of students in cost-effective ways, and they shift to distance. Whether deliberate or not, often the provider either does not know or is not willing to develop the systems necessary to deliver distance education effectively. For example, in large scale distance programmes, management of assignments is a major task. It is not a question of lecturers taking in assignments when they see the students one week, and returning the assignments the next week when they see the students again. Simply opening assignments received by post is a time-consuming logistical operation, let alone arranging for them to be marked by a range of tutors, moderated, and returned to students before the next assignment is due.

Face-to-face providers often require assistance with delivering programmes using distance methods. There are therefore plans to prepare a guide on provider readiness to offer programmes using distance education methods and use this in workshops for traditionally face-to-face institutions that wish to offer programmes using distance education methods.

In addition, however, institutional auditors as well as programme evaluators need to be aware of what to look for when traditionally face-to-face institutions offer programmes

1 A quotation from the comment on the first proofs of this book from the HEQC, 1 February 2005
using distance education methods. Distance education concerns are infused into the HEQC’s 
Criteria for Programme Accreditation, which all higher education programmes, whether 
face-to-face or distance, are required to meet. But because they are infused, the particular 
needs of distance education are not immediately apparent. A summary of separate distance 
education issues may therefore be helpful in judging provider readiness to offer programmes 
using distance education methods. We suggest the following summary as a starting point.

Table 1: Issues to consider in judging provider readiness to offer distance 
education programmes

<table>
<thead>
<tr>
<th>Planning development and review</th>
</tr>
</thead>
<tbody>
<tr>
<td>The particular characteristics and needs of distance education are taken into account in the planning, development and review of such programmes.</td>
</tr>
<tr>
<td>• Programme planning and budgeting are aligned, with potential income clearly identified, and appropriate levels of resources are set aside for course design and development, for administrative systems and for supporting learners.</td>
</tr>
<tr>
<td>• The design of the programme ensures explicit and reasoned coherence between, on the one hand, the aims and intended learning outcomes, and, on the other, the strategies for teaching at a distance, the scope of the learning materials and the modes and criteria of assessment.</td>
</tr>
<tr>
<td>• The design of the programme provides a learning opportunity which gives to students a fair and reasonable chance of achieving the exit level outcomes required for successful completion.</td>
</tr>
<tr>
<td>• Existing programmes are monitored, reviewed and subject to re-approval regularly, in particular to ensure that the content of all learning materials remains current and relevant and that learning materials, teaching strategies and forms of assessment are enhanced in the light of findings from feedback.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Staffing</th>
</tr>
</thead>
<tbody>
<tr>
<td>The particular demands of distance education are taken into account in the staffing arrangements of programmes.</td>
</tr>
<tr>
<td>• Course/module designers and developers are suitably qualified (at least 2 levels above the course/module level) and trained or guided in materials development.</td>
</tr>
<tr>
<td>• Determination of staff workload makes provision for all aspects of course/module development and delivery, especially for materials development and assessment.</td>
</tr>
<tr>
<td>• Arrangements are in place for proper recruitment, training and monitoring of the necessary part-time and contract staff.</td>
</tr>
<tr>
<td>• Arrangements are in place for academic and support staff to be trained to use any administrative systems and/or technologies used in the programme.</td>
</tr>
</tbody>
</table>

continued page 15
Programme implementation

The institution has the necessary systems and guidelines in place to implement programmes at a distance.

- Institutional standards for ethical marketing are in place and monitored.
- Processes exist for communicating full and clear information about the nature and expectations of the programme of study so that informed decisions can be made by students.
- Tested systems for administering and teaching students at a distance are in place, covering general communication, materials development and delivery, learner support and feedback on assessment.
- Systems are in place to identify inactive students and support them timeously.
- Technologies used are tested and reliable, and staff and students are versed in their application.
- Systems are in place to monitor, review and provide the feedback referred to in Criterion 1 above.

Assessment

Policies and procedures for assessment take into account the particular contexts of distance education students.

- The policy requires that formative assessment with individual timeous student feedback is an integral part of the programme and that appropriate systems and procedures are in place to make this viable.
- Where tutors are used to provide formative assessment, proper quality assurance is conducted by the provider.
- A provider is able to demonstrate publicly that summative assessment procedures used for programmes studied at a distance are appropriate for the mode of study, for the circumstances in which the programmes are studied and for the nature of the assessment being undertaken.

National reviews of existing programmes

Provider readiness to offer distance education programmes is about new programmes – or existing face-to-face programmes that institutions want to offer using distance education methods. But there also needs to be a strategy for the quality assurance of existing programmes. However, it is not possible from a financial and human resources point of view to examine all existing distance programmes even within the next ten years. The Higher Education Quality Committee has therefore decided to undertake national reviews leading to re-accreditation in selected programme and qualification areas. The first such review was the MBA review in 2003/4 and the second is the National Review of Professional and Academic Programmes in Education planned for 2005 to 2007.
In the selection of such programme areas, the extent of large scale distance provision in that programme area needs to be taken into account for two reasons: the numbers of students affected, and the fact that in large scale distance education the temptation to maximize economies of scale at the expense of quality is great. The HEQC (Higher Education Quality Committee, 2004a: 4) notes that:

if it reviewed only 24 courses with enrolments of over 3000 in 2001, it could reach nearly one third of all UNISA’s course enrolments. Similarly, by reviewing 14 distance education teacher education programmes at predominantly face-to-face institutions, the HEQC could reach nearly 71% of distance education full-time equivalent students at such institutions.

The national reviews will use the HEQC’s programme accreditation criteria as the basis for developing subject-specific criteria for the particular field and programme to be reviewed. In the National Review of Professional and Academic Programmes in Education, there is also a task team led by UNISA which is developing a set of criteria particular to distance teacher education to be used together with the generic HEQC criteria.

Conclusion

It is critically important to support all quality initiatives, both by advocacy and by capacity development for quality improvement. The intention is that, in partnership with the distance education community through such organizations as NADEOSA, the Higher Education Quality Committee will provide institutional capacity development through workshops on its criteria, guides for good practice and other relevant issues.

This publication is an element of this co-operative effort.

Select references


Asian Association of Open Universities. (2001). *A Framework for Creating a Quality Assurance Culture in a Dedicated Distance Education Institution*.

Centre for Educational Technology and Distance Education. (1998). *Criteria for Quality Distance Education in South Africa: Draft Policy Statement*. Pretoria: Department of Education.


Introduction

The quality criteria in this section have their origin in documents produced in 1996 and 1998, as was pointed out in Section One. Although the initial research was done for the Department of Education, the criteria have been revised twice since then by NADEOSA in a stakeholder process involving the distance education community. It is for this reason that they are now being published as *The NADEOSA Quality Criteria for Distance Education in South Africa*. The thirteen criteria have been retained from the original (1.Policy and Planning; 2.Learners; 3.Programme Development; 4.Course Design; 5.Course Materials; 6.Assessment; 7.Learner Support; 8.Human Resource Strategy; 9.Management and Administration; 10.Collaborative Relationships; 11.Quality Assurance; 12.Information Dissemination; and 13.Results). The majority of the individual elements of the criteria have also been retained, but the phrasing and ordering of these elements has been revised, and there are a number of additional elements.

There are a number of difficulties with criteria. One difficulty is that they can never be comprehensive enough. Even if a decision is reached to go with a fixed set of criteria, the elements of each of the criteria can be elaborated as new perspectives on practice emerge through research, evaluation, or changes in technology. In the current set of NADEOSA Quality Criteria, there are thirteen criteria with 212 individual elements. Doubtless, if more minds were applied to the process, a further 100 or so could be added. A second difficulty is that stating the criteria in detail does not mean that there is a shared understanding of how they are to guide practice. Strategies need to be found to interrogate and interpret the criteria.
This publication proposes two such strategies. Firstly, in an Addendum to the NADEOSA Quality Criteria in this section, criteria have been selected that reflect current concerns in distance education practice in South Africa. This is an attempt to prioritize, and to give evaluators a set of elements to start with. In addition, in each case, a description of the concern provides the reason for the selection. At the same time, it is hoped that the description of the concern will help evaluators interpret the selected elements of the criteria and understand why they have been included. The areas of concern are drawn from evaluation and research in distance education conducted by SAIDE over the last ten years, and discussed at two successive NADEOSA conferences.

The second strategy is provided in the case studies in Section Three of this publication. Sets of criteria fragment practice, often distorting it in the process. Furthermore, however well-intentioned, criteria can be reductionist and stifle good practice, rather than encouraging it. In Section Three, the practice speaks for itself through the case studies. The case studies illustrate aspects of the criteria, and in some instances, go beyond them.

A note on terminology

The distinction between programme development, course design and course materials, has been adopted from one of the source documents for these criteria, the Department of Education’s draft policy document, *Criteria for Quality Distance Education in South Africa* (1998:6):

*Programme development* concerns itself with the curriculum in macro planning of groups of courses, how they combine to realise a general educational goal or set of outcomes (such as a degree, diploma, or certificate), as well as the procedures governing access and articulation with other programmes ...

*Course design* concerns itself with planning the content, pedagogy and assessment in individual courses. ...

*Course materials* are the concrete products that are results of programme development and course design activities. They are learning materials in any medium or combination of media.
1. Policy and Planning

The educational provider has a clear sense of purpose and direction, which is informed by national priorities as well as by the quality demands of cost-effective educational provision. There is both a rationale and relevant systems for the use of distance education methods to achieve the purpose of the programme for the target learners.

Elements of the Criterion

1.1 The mission statement of the educational provider sets out clearly and unambiguously goals and principles which are fit for its local, national and international context and which adequately provide for transformational issues.

1.2 Policy statements, strategic plans, slogans or mottoes are aligned with the mission, goals and principles of the educational provider.

1.3 There are policy statements and evidence of implementation of policies on:
- programme development;
- course design;
- course materials development;
- services to and responsibilities of learners;
- learner support, including tutors and mentors;
- assessment;
- recognition of prior learning and current competence;
- where appropriate, integration of workplace learning into the theoretical curriculum (co-operative education);
- language of teaching and learning, as well as of internal and public communication;
- human resource strategy;
- management and administration;
- finances, fees and payment regulations;
- quality assurance and review;
- evaluation and research;
- admissions and an enrolment management strategy to facilitate access for success;
- marketing;
- accreditation;
- collaboration;
- export of programmes; and
- the use of information and communication technology (ICT).

1.4 The provider or programme management team can provide a rationale for the use of distance education or electronic learning methods for the delivery of the programme/course to the intended target learners.
1.5 Prior to offering programmes of study by distance education, the provider has explicitly designed systems for administering and teaching learners at a distance and has planned for contingencies in order to meet its stated aims in terms of academic quality and standards.

1.6 There is a recognition that the use of electronic learning methods is likely to require greater levels of collaboration, both nationally and internationally, and therefore the provider has considered:
   - selection of an appropriate technical platform for design and delivery;
   - installation of technical infrastructure that is compatible with present or possible future partners;
   - a process for the development and/or implementation of shared standards for online content across partners.

1.7 There is a published statement of the educational provider’s commitment to learners and how this commitment will be measured.

1.8 Implementation plans are realistic, both in terms of learning and teaching goals and in terms of financial sustainability, and designed to enable targets to be met.

1.9 Policy statements and methods of implementing them are recorded, readily available, and fully understood by members of staff.

1.10 There are mechanisms to support and monitor staff in the implementation of these policies.

1.11 There are monitoring procedures to ensure that all policies are implemented, evaluated, and amended as and when necessary.

1.12 Equal opportunities are ensured for all learners, staff and other clients.
2. Learners

There is up-to-date detailed information about past, present and potential learners. This is used to inform policy and planning of programme development, course design and materials development, learner support, and other relevant aspects of educational provision.

Elements of the Criterion

2.1 The provider has developed a learner profile that identifies the characteristics and situation of distance education learners. This profile should include:

- demographic factors - for example, age, gender, geographic location, and occupation/employment;
- language profiles - including language ability in the main language of teaching and learning, language background, and multilingual language ability;
- motivation for learning - for example, for career purposes or personal interest;
- educational background/learning experience - for example, prior learning and experience, prior qualifications, experience of distance learning, learning skills and styles, and language background;
- special needs - for example, barriers to learning, physical disabilities or learning difficulties;
- resource factors - for example, financial resources, place of learning, times available for learning, access to electricity, access to media and technologies;
- experience and knowledge of technology; and
- success rates of past and present learners.

2.2 The management of information system provides for the tracking of learner performance (for example, in assignments, examinations, or even attendance at contact sessions) and can be used to identify at risk learners and those learners who, though registered, are inactive. It can also be used to determine completion and throughput rates.

2.3 Research into learners and their needs is a high priority and is used to inform all aspects of policy.

2.4 Learner information is used to design programmes, courses, materials, learner support, and counselling services that are flexible and learner-centred.

2.5 Mechanisms are in place for promoting access to learners from marginalized groups, inter alia, through the provision of academic development programmes.

2.6 Tutors have access to information about their learners and contribute to the collection of such information.

2.7 Systems exist to maintain the confidentiality of information about learners.

2.8 Special needs (for example, physical disability) are considered in the design of course materials, assessment arrangements, and communication with tutors.

2.9 The educational provider is aware of and caters for learners with learning difficulties.
3. Programme Development

Programmes are flexible and designed with national needs as well as the needs of prospective learners and employers in mind; their form and structure encourage access and are responsive to changing environments; learning and assessment methods are appropriate to the purpose and outcomes of the programmes.

Elements of the Criterion

Programme planning

3.1 The programme is developed in terms of a needs analysis based on an audit of existing courses and programmes, market research, liaison (where appropriate) with industry and professions, national and regional priorities, and the needs of the learners.

3.2 The programme is part of the provider’s mission and plans.

3.3 For each programme, there is a publicly accessible description of:
- the qualification to which the programme leads;
- the admission requirements;
- purpose and outcomes;
- target learners;
- teaching and learning strategies (including, where appropriate, workplace learning);
- features of the learning environment and resources;
- assessment strategy;
- courses or modules in the programme; and
- where appropriate, accreditation arrangements and articulation with other programmes offered by the educational provider, in the workplace or other educational providers.

3.4 There is a careful analysis of the most appropriate technologies to support:
- the provision of course materials to learners;
- other teaching and learning processes; and
- management and administration of the programme.

3.5 The selection of technologies is based on the needs, resources and capabilities of the learners and the provider, and the purposes of the programmes on offer.

3.6 Wherever possible, courses are used in more than one programme.

3.7 Human resource planning is an integral part of programme development.

3.8 Programme planning and budgeting are aligned, with potential income clearly identified, and appropriate levels of resource set aside for course design and development, for administrative systems and for supporting learners.
Programme approval
3.9 Procedures for the approval of programmes meet the requirements of the relevant bodies, but are not cumbersome and allow for and encourage innovation and flexibility.

3.10 Where programmes are exported, procedures are established for reviewing legal programme approval requirements and also requirements under local law in respect of relevant matters including consumer protection, copyright, employment, packaging and postal despatch.

Programme curriculum
3.11 The outcomes, content, teaching and learning strategies and assessment methods in the programme are aligned and appropriate for the level and purpose of the programme.

3.12 In the case of professional and vocational programmes, work-based learning forms an integral part of the curriculum, and, where appropriate, placement in a work-based environment is an essential component of the programme.

3.13 The various courses of the programme are integrated.

3.14 To facilitate conceptual pathways through the programme, due attention is paid to the appropriate sequencing of modules/courses in a programme, and to the management of options.

Admissions and learner support
3.15 To facilitate access, entry requirements for the programme are as open as possible, and include recognition of prior learning and experience.

3.16 Where entry is open, care is taken to provide sufficient academic support to learners who may be under-prepared. This may be by the provision of access or bridging courses, additional units within existing courses, or increased face-to-face support.

3.17 Numbers of learners enrolled in a programme do not exceed the capacity of the staff and the administrative infrastructure to provide for learner support and assessment needs in terms of the criteria in this document.

3.18 Care is taken that learners admitted to programmes which require the use of technology have sufficient access to that technology to make it possible for them to succeed in the programme.

Accreditation, articulation and flexibility
3.19 Wherever possible, programmes allow for flexible exit points.

3.20 Learners are made aware of credit requirements of the programme and the possibilities for transfer to other programmes offered by the same or other educational providers.
3.21 Where appropriate, assessment is linked to accreditation and fulfils the requirements of external quality assurance bodies.

Quality assurance

3.22 Clear and effective procedures are in place (including internal and external peer review) to monitor and evaluate programmes on a regular basis.

3.23 Review findings are disseminated appropriately and used for staff development, curriculum improvement and increasing learner access.

3.24 Should a decision be taken to discontinue the programme, due attention is given to meeting the provider’s commitments to the learners registered on the programme.
4. Course Design

The course curriculum is well-researched, with aims and learning outcomes appropriate to the level of study; content, teaching and learning and assessment methods facilitate the achievement of the aims and learning outcomes; there is an identified process of development and evaluation of courses.

Elements of the Criterion

Course planning

4.1 The course is designed with national needs as well as the needs of prospective learners and employers in mind.

4.2 The elements of the course (see 4.3 and 4.4 below) and the relationships between them are consciously planned.

4.3 For each course, there is a publicly accessible and learner-friendly description of the aims and learning outcomes; entry-level skills, knowledge and experience; credit rating and/or notional hours of learning; target learners; teaching and learning strategies; content outline; items in the learning package (including elements such as study guides, textbooks, tutorial letters, audiotapes and videotapes); assessment strategy; and a year plan containing key dates for learners.

4.4 Choice of media and technology is justified in the light of the aims of the course, required learning outcomes, learner needs, capacity to access and use the technologies, the physical features of the teaching sites and available facilities and services.

4.5 There is a stated language policy for the course which is based on the national language policy, language profiles of learners, career context and curriculum. The policy is implemented in course materials, assessment and learner support.

4.6 The list of courses offered by an educational provider is limited to a number that allows for quality investment in course design and development in the context of budgetary limitations. (Quality is defined by the criteria in this document).

Course curriculum

4.7 The amount and complexity of work required to complete the course merits the credits which it has been allocated. This also applies to the assessment for recognition of prior learning and experience.

4.8 Where a course is imported or exported, account is taken of the needs of local contexts, and, where necessary, the course is adapted accordingly (for example, by the inclusion of local case studies or a glossary of terms).

4.9 Content, teaching and learning strategies and assessment are carefully structured to facilitate the achievement of the learning outcomes.
4.10 Various forms of learner support are built into the design of the course.

4.11 Teaching, learning and assessment activities encourage critical thinking and independent learning.

4.12 The teaching and learning strategies of the course acknowledge learners’ existing knowledge and experience, and provide opportunities for guided integration of new knowledge.

4.13 Where appropriate, experiential learning opportunities are designed into the course. There are suitable methods of recording and assessing this (such as portfolios, logbooks, project reports, learner interviews, or reports from the mentor).

Quality assurance

4.14 The educational provider requires relevant competence of authors, consultants, and others that are brought into the course design and development process.

4.15 The educational provider gives authors, consultants, and others involved in the course design and development process necessary guidance and training regarding aspects of distance education in order to assure quality in their work.

4.16 An appropriate infrastructure exists within the educational provider to administer the range of elements of the course efficiently.

4.17 There is a timetable for the regular revision and updating of courses.
5. Course Materials

The content, assessment, and teaching and learning approaches in the course materials support the aims and learning outcomes; the materials are accessibly presented; they teach in a coherent way that engages the learners; there is an identified process of development and evaluation of course materials.

Elements of the Criterion

Materials development planning

5.1 The development of course material is based on a project plan which describes, for example, finances and other resources, the delegation of responsibility among those involved, and an adequate time schedule for the work.

5.2 If existing course material is used for a particular course, its suitability is evaluated in terms of required learning outcomes, the appropriateness of the teaching and learning approach, and its relevance for the target learners.

5.3 If existing course material is used for a particular course, there is proper acknowledgement of the source of all quotations and no breach of local or international copyright laws.

5.4 While the provider holds copyright for course materials developed by employed or contracted staff, the individual author’s intellectual property rights are also respected.

Quality course materials

5.5 Materials are developed and reviewed in terms of the following criteria:

5.5.1 There are clearly laid out aims and learning outcomes, and an explicit indication of study time (notional study hours per section of the material) which allow learners to adopt sensible study plans.

5.5.2 The content and teaching approach support learners in achieving the learning outcomes.

5.5.3 Learner-friendly introductions, linking and summarizing passages motivate the learners and provide coherence to the materials.

5.5.4 The content of the course is accurate, up-to-date, relevant to aims and outcomes, free of discrimination, and reflects awareness of the multilingual and multicultural reality of South African society.

5.5.5 The language level of the materials is appropriate for the target learners and the materials assist learners with the particular difficulties that learning-through-reading and learning at a distance require.

5.5.6 Care is taken to understand the contexts in which learners live and work, as well as their prior knowledge and experience. This knowledge is used in the design of the materials.
5.5.7 Active learning and teaching approaches are used to engage learners intellectually and practically, and cater for individual needs.

5.5.8 Content is presented in the form of an unfolding argument, rather than discrete bits of information that have no obvious connection.

5.5.9 The various elements of the course materials and different media are integrated, and the integration is clearly sign-posted.

5.5.10 The course materials are designed in an accessible way. Access devices (such as contents pages, headings), graphic presentation of information, and layout facilitate use by the target learners.

5.5.11 The overall technical quality of the materials facilitates learner use.

5.6 In web-based/online courses, the following additional criteria apply:

5.6.1 The service is speedy and reliable: it is easy to connect to the site, and the site loads quickly with a minimum number of crashed sessions.

5.6.2 Pages and text are designed for consistency, readability and attractiveness.

5.6.3 The site is easily navigable, has a sitemap with clearly marked links, and the different elements integrate seamlessly with each other.

5.6.4 The site is up-to-date, with minimum technical faults, and continuously under development.

5.6.5 The site clearly displays its institutional links and acknowledges sources of material used.

5.6.6 Support in the use of various functions on the site is provided both in the site itself and from external technical assistance.

5.6.7 The site encourages interactions with other learners as well as with the tutor/mentor.

Quality assurance

5.7 The materials development plan includes provision for evaluation during the developmental process in the form of critical commenting, developmental testing, or piloting.

5.8 The materials are periodically reviewed in the light of ongoing feedback from learners and tutors and advances in knowledge and research.
6. Assessment

Assessment is an essential feature of the teaching and learning process, is properly managed, and meets the requirements of accreditation bodies and employers.

Elements of the Criterion

Assessment design

6.1 Assessment is recognized as a key motivator of learning and an integral part of the teaching and learning process. It is used to inform teaching practice and improve the curriculum.

6.2 Assessment information (including learning outcomes, assessment criteria as well as assessment procedures and dates) is provided in all courses, modules or topics.

6.3 The level of challenge of the assessment in a programme is appropriate for the level of the qualification to which it leads.

6.4 There is a range of formative and summative assessment tasks and methods which ensure that all learning outcomes are validly assessed.

6.5 Assessment, especially of experiential or workplace learning, is designed in terms of predetermined outcomes and criteria.

6.6 A range of parties is involved in assessment of learners: for example, there might be self-assessment, peer assessment, tutor assessment and/or assessment by workplace mentors.

6.7 For each programme, there is at least one integrated assessment procedure which is a valid test of the key purposes of the programme.

6.8 There are effective procedures for recognizing prior learning and for assessing current competence.

6.9 In distance education delivery between countries, care is taken that the assessment activities are designed and administered in ways that do not disadvantage learners in a range of contexts.

Quality assurance of assessment

6.10 Staff involved in assessment are assessment-literate and competent to assess learning at the level required by the programme.

6.11 Where part-time tutors are involved in assessment, they are trained for the task, and academic staff monitor and moderate both formative and summative assessment to promote reliability and fairness.
6.12 The assessment strategy includes systems for internal and external moderation that meet the requirements of the accreditation body.

**Assessment management**

6.13 Marking procedures for both formative and summative assessment promote consistency and accuracy of marking, grading, and provision of feedback to learners.

6.14 There are clear procedures to receive, record, process, and turn around assignments within a timeframe that allows learners to benefit from formative feedback prior to the submission of further assessment tasks.

6.15 An appeal system is in place for when learners have a complaint about the fairness of the assessment.

**Security**

6.16 Arrangements for locally-administered summative assessments are secure.

6.17 Particularly when electronic methods are used, there are adequate systems to ensure security of personal information and security of identity during assessment processes. However, the security solutions are flexible enough to accommodate different programmes and styles of teaching and learning.

6.18 Documented procedures assure that security of personal information is protected in the conduct of assessments and evaluations and in the dissemination of results.

6.19 Assessment results are recorded securely and reliably and are available to all stakeholders including learners (as is appropriate).

6.20 Clear and efficient arrangements are in place to ensure that the integrity of certification processes is not compromised.
7. Learner Support

Learners are provided with a range of opportunities for real two-way communication through the use of various forms of technology for tutoring at a distance, contact tutoring, assignment tutoring, mentoring where appropriate, counselling (both remote and face-to-face), and the stimulation of peer support structures. The need of learners for physical facilities and study resources and participation in decision-making is also taken into account.

Elements of the Criterion

Academic support

7.1 Learners are encouraged to create and participate in ‘communities of learning’ in which the individual learner thinks and solves problems with others engaged in similar tasks. This is facilitated through a range of learner support mechanisms – peer support sessions, tutorials/contact sessions, teaching on assignments, support in the workplace (mentoring), email and Internet communications, for example.

7.2 Academic support is built into the design of the course materials.

7.3 Learners are carefully oriented to the teaching and learning methods on the programme, particularly if electronic learning methods are used.

7.4 Where appropriate, the development of competence in the use of information and communication technologies is built into the learning outcomes of the programme.

7.5 In selection of venues and times for contact sessions, travel time and expense for learners are considered. Care is taken to place suitable sites of learning close to where learners live/work.

7.6 Tutors are selected and trained for their crucial role in encouraging active engagement of each learner in the course/programme through:
- establishing and maintaining a supportive relationship with each learner in their group;
- mediating learning from the course materials;
- teaching on assignments by giving constructive feedback.

7.7 Tutor training places particular emphasis on equipping tutors to analyze and assist learners with language and learning difficulties.

7.8 The tutor/learner ratio is sufficiently small to enable tutors to know their learners as individuals, be able to support them in their studies and monitor their progress.

7.9 There are sufficient contact sessions to ensure that the learners are able to achieve the outcomes of the course.
7.10 Contact sessions are integrated into the course design, rather than being an add-on extra.

7.11 The teaching and learning activities at contact sessions acknowledge learners’ existing knowledge and experience, and provide opportunities for guided integration of the new knowledge and skills as contained in the course materials.

7.12 There are opportunities for individual academic support for learners either by telephone, by appointment, or online.

Counselling support
7.13 Learners have access to counselling for personal difficulties/advice related to their study before and during their course or programme, as well as after its completion.

Administrative support
7.14 Administrative staff are trained to be helpful, clear and consultative in the way they relate to and make arrangements for learners.

7.15 The obligations and responsibilities of learners and the educational provider are made clear at registration. It is clear what resources and equipment the provider will supply, and what the learner will have to supply personally.

7.16 Where possible, arrangements are made to meet learners’ needs for physical facilities for study, tutorial, and resource space.

7.17 Learners have access to facilities (for example, libraries) and equipment that are necessary for their successful learning.

7.18 Learners are provided with technical support for educational technology hardware, software, and delivery system required in a programme.

Learning centres as part of learner support
7.19 Both academic and administrative functions of learning centres are taken care of in the way that learning centres are managed.

7.20 Learning centres, to the extent that they become fixed structures, and particularly fixed structures with technological equipment, are accessible to the broader community, rather than merely to a provider offering a formal programme.

Monitoring/quality assurance
7.21 Before each critical phase of a course/programme (for example, before the first assignment, contact session, examination), each learner is contacted and encouraged to participate.

7.22 Learner performance is monitored and learners at risk identified. Timeous educational intervention is provided for such learners.
7.23 Performance of tutors and attendance of both tutors and learners at contact sessions is monitored regularly. The work of mentors in supporting and assessing learners in the workplace is also monitored by the provider. Monitoring data is analysed and acted upon.

7.24 Feedback is sought from tutors/mentors as well as from learners for the review of courses and programmes.

7.25 Learner structures, such as learner/student representative councils and faculty associations, are established, recognized and empowered to represent learners on structures of institutional governance.
8. Human Resource Strategy

The staff structure as well as the experience, qualifications, responsibilities and job descriptions of staff are appropriate for the education and training services provided; staff development programmes equip staff to perform their roles and tasks effectively.

Elements of the Criterion

Staff complement

8.1 Distance education teaching tasks are distributed among separate functional responsibilities; for example, course design, instructional design/course materials development, electronic media use, editing, tutorial support for learners, monitoring of tutors, counselling, assessment, and management of the distance education learning system.

8.2 The main responsibility for programme development, course design and monitoring of programme delivery is that of qualified academic staff.

8.3 Course design/development staff are suitably qualified (at least two levels above the level of the course).

8.4 The number of full-time academic staff in the educational provider is as small as possible, but the number of tutors (mostly employed on a part-time basis) is sufficient to provide for individual needs of learners.

8.5 The educational provider employs sufficient administrative and technical staff to handle specialized tasks of registry, despatch, management of assignments, administrative support, as well as technical IT support to learners and staff.

Staff development

8.6 Staff are trained, monitored, and supported for the specialized roles and tasks they perform, including design, management and delivery of electronically-offered programmes.

8.7 Staff engaged in online tutoring and moderation of online discussions are qualified and trained for the intensive engagement and direction which is required.

8.8 Staff development is regarded as the responsibility not only of the individual, but also of the particular department and educational provider in which the individual works.

8.9 There are systems for the dissemination of newly acquired skills and information.
Workload

8.10 Academic workload is measured in terms of the following:
- course design;
- preparation of course materials;
- piloting of courses;
- devising and participating in assessment strategies;
- tutoring, particularly online tutoring;
- supervision of tutors/markers/other staff;
- management of courses;
- monitoring the success of the course;
- research and evaluation;
- contact hours with learners.

8.11 In planning workloads, it is recognized that more time is needed for research and development of electronically-offered programmes because of the complexity and expense of virtual education.

8.12 The workload of staff involved in online support for learners is carefully monitored.

HR systems

8.13 Arrangements are in place for the proper recruitment, training, monitoring and payment of necessary part-time and contract staff.

8.14 Staff selection and promotion criteria give priority to quality of performance in course development, teaching, and management of learning.

8.15 There is an effective performance management and appraisal system for all staff.
9. Management and Administration

There is effective and accountable management of communication and information as well as human and material resources; democratic governance structures are in place; efficient administrative systems support the activities of the educational provider; the educational provider is financially sound and can make reliable educational provision.

Elements of the Criterion

Accountability and governance

9.1 There are clear lines of accountability within the educational provider, between the educational provider and its governing structures, and between governing structures and the community.

9.2 Proper accountability structures and mandates for responsible officers are in place.

9.3 Staff and learners and external stakeholders are represented on governance structures.

9.4 Mechanisms are in place to prevent staff from using their position of power within the institution to generate extra revenue for personal benefit or double payment for the same work.

Management of communication

9.5 There are effective systems for communication with current and potential learners, with key outside bodies, with governance structures, and with all staff and tutors involved in courses.

9.6 Enquiries, applications and complaints are dealt with quickly and clearly within a structured administration system.

9.7 Learners’ questions are answered quickly, clearly, and supportively.

Management of the curriculum

9.8 Appropriate schedules are developed for all activities forming part of the distance education system, with due attention given to lead times needed to meet deadlines.

9.9 Enrolment practices include provision of accurate, helpful information to prospective learners, as well as efficient handling of money and registration information.

9.10 Production and delivery of course materials is fast, accurate, and reliable. Where existing systems prove inefficient, creative alternatives are found.

9.11 There are systems to organize decentralized support for remote learners – grouping of learners, allocation of tutors, location of suitable sites of learning.

9.12 There are clear procedures to receive, record, process, and turn around assignments.
9.13 The turnaround time on assignments is kept to a minimum.

9.14 The examination system, where it is necessary, is reliable and valid.

**Management of information**

9.15 Learner records (for example, contact details, assessment results) are detailed, up-to-date, and accessible to tutors, academic and administrative staff.

9.16 Tutor records (for example, qualifications and experience of tutors) are detailed for each tutor and available to tutor-monitors.

9.17 Records of course results and other management information can be analyzed to:
- give completion rates for each group of learners;
- identify at risk learners;
- identify inactive learners.

9.18 Pass, throughput and retention rates are monitored.

**Management of facilities and equipment**

9.19 Facilities and equipment support the learner and are appropriate for the education and training services provided.

9.20 In the case of electronically-offered programmes, the provider ensures the reliability and predictability of a ‘fit-for-purpose’ teaching and learning delivery platform, and there is a budget for regular upgrading.

9.21 Equipment and facilities are well-managed and maintained and secure against damage or theft.

9.22 There are emergency methods of communication for use in the event of a failure of the primary channel of communication, and these are fail-safe.

9.23 Staff and learners are trained in the use of the equipment, facilities, and communication and information systems.

**Management of finances**

9.24 Proper budgetary processes are in place to ensure that allocation of resources reflects the goals, values and principles of the educational provider.

9.25 Financial procedures (for example, handling of fees, orders, accounts, receipt of external funds, and part-time and full-time salaries) are known and adhered to.

9.26 Budgeting procedures are in place to deal with allocation of resources and monitoring of expenditure. Budgeting procedures are flexible enough to promote and enable constructive experimentation in design and delivery methods.

9.27 Proper evaluation systems are in place to compare estimated goals and budgets with actual achievements.
9.28 Clear decision-making structures exist for seeking and receiving funds and allocation and control of resources.

9.29 Financial aid and information about criteria for its allocation are provided for learners, external funding and donations permitting. Information about financial aid is clear to all learners.
10. Collaborative Relationships

In the interests of cost-effective provision of education and training, collaborative relationships are formed and collaborative projects are undertaken wherever possible.

Elements of the Criterion

10.1 Wherever possible, collaborative relationships (involving public and private institutions, governmental and non-governmental educational providers, stakeholders and/or community structures as well as agencies or providers outside of the country) are formed for:

- sharing developed courses;
- jointly developing new courses;
- sharing facilities such as libraries and learning centres;
- sharing regional centres for learner registration, distribution of study material, and examinations;
- jointly delivering programmes;
- collaborating in research.

10.2 Membership of relevant associations and forums is encouraged.

10.3 The programme plan includes criteria for selecting partners and contractors and the means to monitor and evaluate their work.

10.4 To facilitate workplace learning, partnerships are built with employers that enable productive experiential learning opportunities for learners.

10.5 In the organization of consortia for programme development or delivery, structured contractual relationships are formed to protect the interests of all parties including learners. Performance expectations are defined in contracts and agreements.

10.6 In cases in which providers offer programmes developed externally (either by an e-university or other external sponsoring agencies), there are clear procedures for programme approval in which quality assurance requirements of both provider and the external body are dovetailed.

10.7 In programmes delivered collaboratively, responsibility for performance remains with the provider that certifies learners.

10.8 In the case of public-private partnerships, the public partner takes full academic and quality management responsibility, and ensures that learner rights are protected.
11. Quality Assurance

There is an integrated framework at a policy and practice level that informs a clear cycle of planning, implementing, monitoring, reflection and action to ensure that learners’ and staff needs as well as the needs of other clients are met.

Elements of the Criterion

11.1 The provider ensures that day-to-day activities are aligned with its mission, goals, principles and policies in relation to national and/or regional priorities.

11.2 Internal quality assurance processes are articulated with external processes as laid down by the relevant quality assurance bodies.

11.3 There is a clear cycle of planning, development, documentation, reporting, action, and review of policy and procedures.

11.4 In the case of electronically-offered programmes, mechanisms for monitoring learner participation and performance are designed into the technical platforms used in electronically-delivered programmes. For example, systems may be designed to track:

- the time spent by different learners on components of the materials;
- the sequence of choices made by learners in accessing web-based files; or
- learner participation in online discussions.

11.5 The provider engages in benchmarking and uses appropriate monitoring and evaluation techniques to gather and analyze data to use as a basis for setting priorities and planning for quality improvement.

11.6 There are demonstrable processes and ongoing efforts to improve the quality of teaching and learning according to priorities identified through monitoring and evaluation processes.

11.7 Staff development is a fundamental strategy to promote quality service provision.

11.8 Staff, learners, and other clients are involved in the process of quality assurance and quality review.

11.9 There are clear routines and systems for quality assurance, and staff are familiar with those that relate to their work.

11.10 Quality management mechanisms are in place to ensure that exported programmes are of equivalent quality to those offered in South Africa, and that there is compliance with the national quality criteria and other requirements of the importing country.
12. Information Dissemination

Education and training services of the educational provider are effectively and accurately promoted in a variety of ways.

Elements of the criterion

12.1 The publicity provided for each programme is accurate and sufficiently detailed to enable applicants to make an informed choice. (The following is a suggested list of such information: target learners, entry requirements, aims and learning outcomes, content, learning material, teaching and learning activities, scope of programme, learner support services, assessment and accreditation procedures, price, payment conditions, right to return course materials, recommended time limits for completion).

12.2 In the case of programmes using electronic methods, the learner is informed regarding access to technologies used in the programme, technical competence required, and the nature and potential challenges of learning in the programme’s technology-based environment.

12.3 Employers and others who enter into collective agreements regarding education or training have received sufficient and correct information about the content and outcomes, entry requirements, implementation and aims of the programme.

12.4 The provider’s advertisements are truthful, objective and informative and meet the clients’ needs.

12.5 In the case of public private partnerships, public partners monitor the advertisements of private partners to ensure alignment.

12.6 Information about programmes reaches as many as possible of those who can be expected to have a need or use for these programmes, given limitations imposed by resources and available information channels.

12.7 The institution uses effective learner recruitment, selection, support and development procedures to ensure that sufficient numbers of adequately-prepared learners enter and succeed in the programmes.

12.8 These strategies form part of the institution’s management of information system and are subjected to institutional cyclical reviews.
13. Results

The educational provider fulfils its mission and individual programmes achieve valid teaching and learning goals in cost-effective ways that have a positive impact on society and meet the needs of clients and national priorities.

Elements of the Criterion

13.1 The educational provider is fulfilling its mission and attaining its transformation goals.

13.2 Learners are attaining the intended outcomes specified by the provider in the design of the programme.

13.3 Expert peers/professional bodies are satisfied with the relevance and quality of learning achieved by learners on the programme.

13.4 Learners and recent graduates are generally satisfied with the programme (in particular its learner support and assessment practices) and its staff.

13.5 Employers/ the professions/ the community (as appropriate) are satisfied with the quality of the graduates from the programme.

13.6 The programme team is satisfied with the leadership and management of the programme, as well as the resources and facilities allocated to them to run the programme.

13.7 Staff are all involved in a co-ordinated way in continuous improvement of the programmes, courses, course materials, administration, and support services.

13.8 Sufficient numbers of learners complete individual programmes and courses successfully to justify the cost in time and person-power of designing programmes, courses, and the learner support system. Pass, throughput and retention rates are monitored.

13.9 The provider has financial results that afford the learners a reasonable prospect of completing their studies, and sufficient surpluses to ensure future development of products and services.

13.10 Programmes are achieving equity in access, retention and success rates for graduates in terms of requirements of relevant authorities.

13.11 Feedback and results of the programme review/evaluation are used to effect improvements in the programme’s design and delivery and to develop further educational expertise of academic staff.
A selection of criteria that address current concerns in South African distance education

For ease of reference, the current concerns in distance education have been organized into the following categories:

- Staffing;
- Programme development;
- Course design and course materials development;
- Assessment;
- Course delivery and learner support;
- Programme monitoring and evaluation;
- Finances/planning.

Under each of these categories, the relevant quality criterion has been quoted and the current concern explained.
Staffing

1. Workload of course co-ordinators

Relevant quality criterion

3.17 Numbers of learners enrolled on a programme do not exceed the capacity of the staff and the administrative infrastructure to provide for learner support and assessment needs in terms of the criteria in this document.

Reason for concern

There is an underestimation of the amount of work that is involved for academic/course co-ordinators in supervising materials development, assessment design, tutor training, monitoring and support, quality management of assessment, response to learner queries, and processes for monitoring and review. At some distance education institutions, academic staff are responsible for the coordination of between five and ten courses. This means that their time is spent almost entirely on writing tutorial letters, and they have no time to engage tutors, train and support them, and ensure that their work is up to standard. This effectively means that, although learning centres may be in place, and facilities exist to employ tutors, time constraints make academic/course co-ordinators fall back primarily on correspondence methods.

There is also too little recognition of how the workload increases for the numbers of learners registered on the programme. If there is to be a tutor: learner ratio of 1:30, a course of 1000 learners will need about 30 tutors. To train, monitor, and moderate the assessment of these 30 tutors, supervise monitoring and review, and sign off payment requires considerable management. Moderation alone would involve looking at about 500 assignments/examinations over a year, which involves 125 hours or 16 days of work. Tutor training would involve five days (including preparation), supervision of marking procedures another five days, monitoring and review about 15 days, development of tutorial and assessment material about 15 days, administration for tutors about 10 days, and response to learner queries, about 30 days (15 minutes per learner per annum). This is a total of 101 days. If, in addition, course co-ordinators are required to tutor learners on the programme themselves, then a further 40 days could be added. Presumably the academic staff member needs some time for his or her own research, participation in faculty affairs, and participation in the wider educational community. If about 30 days are allocated for this, then coordination of one course is a full-time job of about 170 days per annum.

These realities need to be taken into consideration in planning. There need to be strategies for scaling up and down the number of course co-ordinators when numbers of learners increase or decrease.
2. Systems for appointment/payment of part-time tutors

**Relevant quality criterion**

8.13 Arrangements are in place for the proper recruitment, training, monitoring and payment of the necessary part-time and contract staff.

**Reason for concern**

In many predominantly face-to-face institutions, systems are lacking to appoint and pay short-term, part-time staff. This creates problems for programmes that require the hiring and payment of tutors for weekend contact sessions and/or marking of scripts. A decentralized learner support system is impossible without the ability to appoint such tutors in flexible ways, and if tutors are not paid promptly, the provider will not be able to retain them. This usually means that programme staff, rather than the human resources department of the institution, need to manage contracts and payments.

3. Administrative support

**Relevant quality criterion**

8.5 The educational provider employs sufficient administrative and technical staff to handle specialized tasks of registry, despatch, management of assignments, administrative support, as well as technical IT support to learners and staff.

**Reason for concern**

Distance education programmes typically require more administrative support than face-to-face systems. Staff are needed, for example, for decentralized registration of learners; materials production and despatch; maintenance of information management systems; administration of decentralized contact sessions; and assignment management (receiving, opening, sorting, distributing for marking, entering marks, returning). The international norm for dedicated distance education institutions is one administrative staff member for each full-time academic staff member. In South Africa, this may be over-ambitious. But there is a need for increased administrative support. This could be in the form of full-time appointments, but part-time or sub-contracted support can be brought in to scale-up capacity at critical times – for example, when assignments need to be sorted or materials despatched.
Programme development

4. Information on target audience

Relevant quality criteria

2.1 The provider has developed a learner profile that identifies the characteristics and situation of distance education learners. This profile should include:

- demographic factors – for example, age, gender, geographic location, and occupation/employment;
- language profiles – including language ability in main language of teaching and learning, language background, and multilingual language ability;
- motivation for learning – for example, for career purposes or personal interest;
- educational background/learning experience – for example, prior learning and experience, prior qualifications, experience of distance learning, learning skills and styles, and language background;
- special needs – for example, barriers to learning, physical disabilities or learning difficulties;
- resource factors – for example, financial resources, place of learning, times available for learning, access to electricity, access to media and technologies;
- experience and knowledge of technology; and
- success rates of past and present learners.

4.1 The course is designed with national needs as well as the needs of prospective learners and employers in mind.

Reason for concern

Analysis of the needs of the target audience and collection, maintenance and use of learner information is critical in distance education. Because learners are not very often met face-to-face, an extra effort needs to be made to understand the varying contexts and needs of learners. If learner profiles are not known, the course cannot be designed with needs, knowledge and experience of the learners in mind, which may result in unnecessary drop-out.

5. Credit rating of programmes

Relevant quality criterion

4.7 The amount and complexity of work required to complete the course merits the credits which it has been allocated. This also applies to assessment for recognition of prior learning and experience.
Reason for concern

For qualifications registered on the South African National Qualifications Framework (NQF), learning is measured in notional learning hours, rather than chronological duration. It has been agreed that 10 notional learning hours is equivalent to one credit. This means that what was formerly documented as a one year qualification, is now registered as a 120 credit qualification – because it is assumed that one year of full-time study requires 1 200 notional learning hours.

Because of the fact that it is credits rather than the duration of the programme that determines whether or not a qualification can be awarded, some providers have been claiming that part-time learners can be awarded qualifications in periods that are exactly the same as if the learners were studying full-time; for example, a 360 credit first degree in three years part-time\(^1\). The NQF rule of thumb that each credit is equivalent to 10 notional learning hours is often ignored – more learners will generally be attracted to programmes that appear to offer more for less time and money. In addition, if the provider offers a programme in less time, delivery costs will be reduced considerably.

There are norms for the number of credits that can, under normal circumstances, be earned in a single year of part-time distance education study. International norms state that a part-time distance education learner can be expected to study 12 to 15 hours a week on a distance education programme for approximately 40 weeks per year – a total of 600 notional learning hours. This includes time for independent study from course materials, time spent participating in contact sessions or practicals, and time spent on assessment. If learners are expected to do more than this in a single year, then either the course is overloaded, or the amount of work required is insufficient to merit the credits awarded. A possible exception to this is in programmes in which there is work-integrated learning; for example, in-service teacher development, in which lesson preparation may be part of the daily work of an employed teacher as well as a requirement of the in-service programme.

6. Academic level of programme

Relevant quality criterion

| 6.3 The level of challenge of the assessment in a programme is appropriate for the level of the qualification to which it leads. |

Reason for concern

In a number of programmes, good pass rates are achieved not because the teaching and support is good, but because the learning and assessment demands are low; for example, an Honours level programme requiring mainly rote learning or the mastery of a single textbook. If courses in a programme have good pass rates because learning and assessment

\(^1\) There are increasing numbers of full-time distance education learners at dedicated distance education institutions such as UNISA, and so of course this issue will not apply to them.
demands are below the acceptable level for the qualification to which the programme leads, there is clearly a problem. Currently, the only evidence that is regularly available to judge level is external moderator reports. There should also be reports from benchmarking processes. Levels need to be assessed by peer experts in the relevant discipline/field.

Course design and course materials development

7. Course information for learners

Relevant quality criterion

4.3 For each course, there is a publicly accessible and learner-friendly description of aims and learning outcomes; entry level skills, knowledge and experience; credit rating and/or notional hours of learning; target learners; teaching and learning strategies; content outline; items in the learning package (including elements such as study guides, textbooks, tutorial letters, audiotapes and videotapes); assessment strategy; and a year plan containing key dates for learners.

Reason for concern

In many courses, there is little attempt to explain different elements of the course and provide learners with a guide to different components of the course material. Learners are not advised even about the sequence in which they should study courses in the programme. Sometimes learners receive incomplete sets of course materials, receive them in the incorrect order, or too late to make use of them for assessment purposes.

8. Lead time for course materials development

Relevant quality criterion

5.1 The development of course material is based on a project plan which describes, for example, finances and other resources, delegation of responsibility among those involved, and an adequate time schedule for the work.

Reason for concern

Since materials need to be ready at the beginning of a course/programme, lead time and upfront financing are needed not only for developing and evaluating course materials, but also for producing and distributing them. Internationally, norms for materials development are between 10 and 100 hours for every hour of learner learning. In South Africa, most course writers (often without any staff development) are expected to produce materials at a rate of below one hour for every hour of learner learning. International experience illustrates
unequivocally that it is impossible to produce materials of a reasonable educational quality with such a small investment of time. It is not only the materials writing person hours that should be considered in course materials development. Planning, writing, critical reading, developmental testing, layout, editing, proofing and production need to be taken into consideration – these processes cannot be done simultaneously.

9. Materials review

Relevant quality criterion

| 5.8 | The materials are periodically reviewed in the light of ongoing feedback from learners and tutors and advances in knowledge and research. |

Reason for concern

Because of the difficulties of revision of printed/published course materials, often distance education courses are used for too long and are not updated. They often have reference lists where the most recent references are 15 to 20 years out of date. Aside from changes in the discipline/field, the courses often do not even reflect changes in the world (for example, there are Geography textbooks that still refer to East and West Berlin). There need to be standardized procedures or timelines for curriculum and course review.

Assessment

10. Formative assessment

Relevant quality criteria

| 6.1 | Assessment is recognized as a key motivator of learning and an integral part of the teaching and learning process. It is used to inform teaching practice and improve the curriculum. |

| 6.4 | There is a range of formative and summative assessment tasks and methods which ensure that all learning outcomes are validly assessed. |

| 6.14 | There are clear procedures to receive, record, process, and turn around assignments within a timeframe that allows learners to benefit from formative feedback prior to submission of further assessment tasks. |
Reason for concern

Although it is key to any educational programme, formative assessment is crucial in distance education. This is because learners with limited time engage with materials primarily in relation to tasks set for assessment. However, many distance education courses do not provide opportunities for formative assessment. Absence of formative assessment denies learners what is often the only opportunity to receive individualized feedback on their work. Furthermore, if formative assessment does not contribute to the final mark, then the motivation for learners to do the tasks diminishes – it must be remembered that distance education learners are usually fitting their study into already full lives, and if an activity is not compulsory, there is the tendency to overlook it. The following indicates some of the varieties of less than satisfactory assessment practice in South African programmes at the moment:

- There are assignments, but they are not compulsory and do not count for the year mark. Only the examination mark counts.
- There are assignments, which though compulsory, are not marked individually. Learners mark their own assignment against generic tutorial letters/answer sheets. However, it is only if learners submit the assignment that they are given entry to the examination.
- There is one assignment, and it is marked and feedback provided to the learner, but the assignment does not count towards the final mark. Only the examination counts.

11. Quality assurance of tutor marking

Relevant quality criteria

<table>
<thead>
<tr>
<th>6.11</th>
<th>Where part-time tutors are involved in assessment, they are trained for the task, and academic staff monitor and moderate both formative and summative assessment to promote reliability and fairness.</th>
</tr>
</thead>
<tbody>
<tr>
<td>6.13</td>
<td>Marking procedures for both formative and summative assessment promote consistency and accuracy of marking, grading, and provision of feedback to learners.</td>
</tr>
</tbody>
</table>

Reason for concern

Because of the large numbers of learners in some distance education programmes, academic staff often delegate marking of assignments to tutors, and do not maintain sufficient control of standards. Even with experienced staff, there is great variability in the approach to marking, but with large numbers of learners, and part-time staff, there is an even greater chance of variability. Best practice in standardization of tutor marking characteristically involves organizing marking sessions for each assignment in which course co-ordinators assist groups of tutors to work collectively through a number of assignments in order to work out a common approach to grading and to ways of responding to common problems. These marking sessions also provide an opportunity for internal moderation, usually by course co-ordinators. Marking sessions also tend to improve turnaround time as much of the marking is done in the sessions, and it is easier to control how long the rest of the marking takes.
Course delivery and learner support

12. Materials delivery systems

Relevant quality criteria

9.10 Production and delivery of course materials is fast, accurate, and reliable. Where existing systems prove inefficient, creative alternatives are found.

9.22 There are emergency methods of communication for use in the event of a failure of the primary channel of communication, and these are fail-safe.

Reason for concern

In a distance education programme in which the main means of communication of the curriculum is the course materials, it is only when learners receive the materials that they can start learning. Failure to produce and despatch materials on time is non-delivery of the programme.

If programmes use sophisticated technology (such as satellite broadcasts, video-conferencing, or the Internet for online discussions) the teaching and learning is dependent on ensuring connectivity. This means that the technical infrastructure (for example, ISDN lines, electricity, Internet service provider connections) that facilitates the delivery is functional. If there are technical problems, the teaching and learning does not happen - it is just the same as if no course materials had been delivered.

13. Integration of contact sessions into course design

Relevant quality criteria

7.9 There are sufficient contact sessions to ensure that learners are able to achieve the outcomes of the course.

7.10 Contact sessions are integrated into the course design, rather than being an add-on extra.

Reason for concern

There appears to be a lack of understanding of the particular character of learner support in distance education programmes. In distance education, learner support is not simply individual counselling or administrative support or support for particular learners who may be struggling. It is support for every learner, it directly affects the success of the learner on the course, and is part of teaching and learning on the course. It is more like the official lecture programme at face-to-face institutions – a recognized element of the curriculum. However, in many distance education programmes in the country, this kind of learner support is not built into the design of a course. Instead learner support is an optional extra, very often for an additional fee. What should happen
is that whatever is needed to help learners achieve the outcomes of the course is included in the course fee and integrated into the course design. Contact sessions/tutorials can, of course, be conducted using various forms of technology, rather than requiring tutors to meet learners face-to-face. They can be individual tutorials or group tutorials. Academic learner support should be initiated by the provider, rather than by the learner and it should be integrated into course design.

14. Size of contact sessions or tutorials

Relevant quality criteria

| 7.1 | Learners are encouraged to create and participate in ‘communities of learning’ in which the individual learner thinks and solves problems with others engaged in similar tasks. This is facilitated through a range of learner support mechanisms – peer support sessions, tutorials/contact sessions, teaching on assignments, support in the workplace (mentoring), email and Internet communications, for example. |
| 7.9 | The tutor/learner ratio is sufficiently small to enable tutors to know their learners as individuals, be able to support them in their study and monitor their progress. |

Reason for concern

In a number of distance education programmes in the country, contact sessions take the form of lectures to large numbers of learners at a central venue. Typically in this approach, lecturers from the central campus go on a tour of main learning centres around the country and have one or two hours at each centre with 50 to 100 learners. The two hours are usually focused on ‘examination preparation’. In these kinds of sessions, although learners can ask questions, there is very little opportunity for real interaction. In such a large group learners do not get to know each other or the lecturer, and learners are faceless and nameless to the lecturer. Clearly in such a situation, the main aim of learner support – the development of communities of learning in which the individual learner thinks and solves problems with others engaged in similar tasks – cannot be achieved.

15. Telephone support

Relevant quality criterion

| 7.13 | There are opportunities for individual academic support for learners either by telephone, by appointment, or online. |

Reason for concern

Individual academic support, even if not extensive, should be available if particular learners need more guidance than is provided in contact sessions, tutorials, or tutorial letters. Although providers may claim that they offer such support, the mechanisms for offering it should be interrogated. For example, often, although providers claim that they offer telephone support
for learners, it is clear on further investigation that the times at which it is offered make it almost impossible for the target learners to access it. For example, in many in-service teacher education programmes, telephone consultation times are 8h00 to 15h00 on weekdays. This is exactly the time that teachers are occupied at school and cannot take advantage of the service. This is particularly problematic if the telephone support is the only way in which learners can contact the provider.

Programme monitoring and evaluation

16. Means to determine inactive or at risk learners

Relevant quality criterion

9.17 Records of course results and other management information can be analyzed to:
- give completion rates for each group of learners
- identify at risk learners
- identify inactive learners.

Reason for concern

It is relatively easy to present inflated learner numbers for distance education programmes, if it is only registration information that is used. Learners can be registered but dormant in every other way and not costing the provider any money to service. There need to be ways to determine whether or not learners are active: for example, by submission of assignments or participation in contact sessions. Otherwise, accepting a subsidy for these learners, or using the numbers to advertise the popularity of the programme, is dishonest.

17. Acting on monitoring information

Relevant quality criteria

11.5 The provider engages in benchmarking and uses appropriate monitoring and evaluation techniques to gather and analyse data to use as a basis for setting priorities and planning for quality improvement.

11.6 There are demonstrable processes and ongoing efforts to improve quality of teaching and learning according to priorities identified through monitoring and evaluation processes.
Reason for concern
There is far too little investment of either time or resources in monitoring of programmes. This is an issue for all programmes, whether face-to-face or distance. But it is more critical in distance education: increased complexity of systems and remoteness of learners from the centre mean that it is difficult to pick up informally when things are not happening. Formal monitoring systems have to be developed to provide information to management at the centre, so that action can be taken before it is too late. There are customarily three problems with monitoring systems:

- plans for monitoring are over-ambitious – too much information is collected, and the nature of the information is difficult to analyze;
- data is collected but never analysed and reported on;
- no action is taken on the basis of the reports.

18. Throughput rates

Relevant quality criterion

13.8 Sufficient numbers of learners complete individual programmes and courses successfully to justify the cost in time and person-power of designing programmes, courses, and the learner support system. Pass, throughput and retention rates are monitored.

Reason for concern
Although pass rates on individual courses are generally relatively unproblematic, throughput (number of originally-enrolled learners that complete the whole programme successfully) in distance education programmes is generally low. Low throughput rates in distance education are predominantly, but not exclusively, in longer programmes (360 credit degrees or diplomas), and in ‘difficult’ programmes, such as a Bachelor of Science. There is an argument for being lenient on distance education programmes with regard to throughput rate – opportunities for flexibility, taking individual courses rather than the whole programme, for ‘interest’, and the strains of part-time study could account for higher drop-out rates than are customary in full-time study.

However, a number of other factors could also be responsible for low throughput, including:

- inadequate learner support;
- admissions policies that are too open, allowing access to programmes to learners without the necessary background to succeed in them;
- course materials that do not teach properly;
- insufficient formative assessment and/or little feedback on assessment.
It is the responsibility of programme staff to ensure that appropriate learners are admitted to programmes, and that teaching, learning, assessment and support systems are good enough to provide those learners with a reasonable chance of success.

This is important, not only from the point of view of the learners, but also from the point of view of cost-effectiveness of the programme. To take a hypothetical example: if the purpose of the programme is to add to the pool of Science graduates in the country, and R2 million is budgeted for the delivery of a programme to achieve this purpose for 200 potential graduates, then R10 000 is being spent on each graduate. If only 5% of the initial intake of learners graduate, then the cost per successful learner rises to R100 000, which is clearly unaffordable.

**Finances/planning**

**19. Programme planning, budgeting and financial reporting**

**Relevant quality criteria**

- **3.8** Programme planning and budgeting are aligned, with potential income clearly identified, and appropriate levels of resource set aside for course design and development, for administrative systems and for supporting learners.

- **9.27** Proper evaluation systems are in place to compare estimated goals and budgets with actual achievements.

**Reason for concern**

Research into the costing of large-scale distance education programmes indicates that when learner numbers are 500 or above, it begins to be possible to run such programmes on learner fees alone, combined with reduced subsidies from government, even where there is substantial learner support provided. This makes it possible for these programmes to cross-subsidize other programmes. Although some cross-subsidization across programmes may be necessary in order to achieve the provider’s mission, often the provider makes no investment at all in the improvement of quality of large scale programmes. This is problematic because learners paying the fees do not get the benefit of their investment. There is a need for programme-based budgeting with regular financial reporting so that resources can be tracked and a reasonable proportion used for quality improvement for learners whose fees are paying for the programme.