higher education & training

Department:
Higher Education and Training
REPUBLIC OF SOUTH AFRICA

DRAFT POLICY FRAMEWORK FOR THE PROVISION OF DISTANCE EDUCATION IN SOUTH AFRICAN UNIVERSITIES

May 2012

All interested persons and organizations are invited to comment on the Draft Policy Framework for the Provision of Distance Education in South African Universities. Comments should reach the Department not later than 2 July 2012.

Comments should be directed to the Dr E L Van Staden (email: vanstaden.e@dhet.gov.za).

The name, address, telephone number and fax number of the person, governing body or organization responsible for submitting comments must also be provided.

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List of acronyms

BOCODOL	Botswana College of Distance and Open Learning
CHE	Council on Higher Education
DHET	Department of Higher Education and Training
DBE	Department of Basic Education
FET	Further Education and Training
FTE	Full-Time Equivalent
HE	Higher Education
HEI	Higher Education Institution
HEMIS	Higher Education Management Information System
HEQC	Higher Education Quality Committee
HESA	Higher Education South Africa
ICT	Information and Communication Technology
IGNOU	Indira Gandhi National Open University
IEASA	International Education Association of South Africa
MHET	Ministry of Higher Education and Training
NADEOSA	National Association for Distance Education and Open Learning in South Africa
NAMCOL	Namibian College of Open Learning
NIOS	National Indian Open School
NOLNET	Namibian Open Learning Network Trust
NSFAS	National Student Financial Aid Scheme
ODL	Open and Distance Learning
OECD	Organisation for Economic Co-operation and Development
OER	Open Educational Resource/s
PQM	Programme and Qualification Mix
R&D	Research and Development
SADC	Southern African Development Community
Saide	South African Institute for Distance Education
SAUVCA	South African Universities' Vice-Chancellors' Association (superseded by HESA)
SETAs	Sector Education and Training Authorities
UNESCO	United Nations Education, Scientific and Cultural Organisation
Unisa	University of South Africa
US	Unit Standard
WQ	Whole Qualification
WTO	World Trade Organization

Glossary

Distance education is a set of teaching and learning strategies (or educational methods) that can be used to overcome spatial and/or temporal separation between educators and students. However, it is not a single mode of delivery. It is a collection of methods for the provision of structured learning. It avoids the need for students to discover the curriculum by attending classes frequently and for long periods. Rather, it aims to create a quality learning environment using an appropriate combination of different media, tutorial support, peer group discussion, and practical sessions. For funding purposes only, it may become necessary to develop a more quantifiable definition.

Blended learning refers to structured learning opportunities provided using a combination of contact, distance, and/or e-learning opportunities to suit different purposes, audiences, and contexts.

E-learning refers to structured learning opportunities mediated through the use of digital resources (usually combinations of text, audio and visual/video files) and software applications. E-learning may be offered on-line and synchronously (e.g. real-time conference), on-line and asynchronously (e.g. text-based discussion forum) or off-line (e.g. interactive CD/DVD/flash drive). E-learning can be employed in both contact and distance programmes.

M-learning or mobile-learning refers to e-learning opportunities formatted for access via mobile devices such as netbooks, tablets, smartphones, MP3/4 players etc.

Open Educational Resources (OER) are educational resources (including curriculum maps, course materials, textbooks, streaming videos, multimedia applications, podcasts, and any other materials that have been designed for use in teaching and learning) that are freely available for use by educators and learners, without an accompanying need to pay royalties or licence fees. OER is not synonymous with online learning or e-learning. Openly licensed content can be produced in any medium: text, video, audio, or computer-based multimedia.

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.

Provider means a registered institution which offers learning programmes that culminate in specified National Qualifications Framework standards and/or qualifications and manages the assessment thereof.

Post-schooling, in the South African context, refers to provision of educational opportunities to all people who have left school as well as for those who have never been to school. It includes education and training for out of school youth and includes institutions offering second chance learning, FET Colleges, education and training offered by the SETAs, Universities of Technology and Universities, as well as other training colleges and institutes.

Qualification means a planned combination of learning outcomes which has a defined purpose or purposes, and which is intended to provide qualifying learners with specified applied competence and a basis for further learning; it also means the formal recognition of the achievement of the required number and type of credits and such other requirements as may be determined by the South African Qualifications Authority.

Standard means registered statements of desired education and training outcomes and their associated assessment criteria.

1   Scope and purpose of this policy statement

Key policy provisions that flow from the discussion of the issues affecting distance higher education are highlighted in each section and are collated in a Summary Draft Policy Framework which is found in an accompanying document.

This is the Ministry of Higher Education and Training's (MHET) first policy document devoted entirely to the use of distance education in higher education programmes. Until now, distance education has featured in general higher education policies, plans, legislation, and executive decisions, but its importance and complexity warrants an additional separate policy statement.

The MHET sees distance provisioning as an *integral* part of the post-school system in general, and more specifically in higher education, therefore this policy should be read in conjunction with other policy documents affecting higher education generally. This policy statement is part of a broader focus on building the capacity of the education system but focuses primarily on higher education because of its unique features.

Through this policy framework, the MHET seeks to resolve many areas of uncertainty and provide strong support for the progressive development of South African distance higher education as an indispensable and integral component of our national higher education system.

From 1994, the former combined Ministry of Education encouraged the development of distance education and related approaches to teaching and learning at all levels, envisaging the role it could play at the heart of the transformation process. For decades, the provision of distance higher education programmes has afforded access to education to students in South Africa and the wider African region for whom full-time contact education has been either inappropriate, unaffordable, or inaccessible. It has therefore served the invaluable role of bringing higher education within the reach of students who would not otherwise have been able to study at this level. In the past, it has typically done so at a significantly reduced cost both to the state and to the student. In addition, niche programmes that serve a defined national need but have limited local appeal for contact students at any one institution have been offered effectively as distance programmes.

Distance education globally has also been an arena of innovation in higher education, an incubator for conceptual and technological advances that have been capable of strengthening teaching and learning in South African higher education across the board. For at least a decade, South African distance education practitioners have joined their international colleagues in pioneering education technologies for higher education as for other spheres of education and training. They are providing leadership in the research and development, design, and advocacy of curricula and materials that are especially tailored to the needs of independent students and sensitive to South African students' circumstances.

Although our country is an acknowledged pioneer in its initial deployment of correspondence education, much improvement is needed to ensure that all of our distance higher education programmes fully exploit the advantages of the mode and deliver learning opportunities with the required rigour, coherence, and effective student support. Moreover, considerable improvement is

required in success and throughput rates in distance programmes if the potential cost-benefits of distance education are to be realized. In common with higher education generally, distance higher education programmes also need to ensure that they equip students with the kinds of graduate competences needed for success after graduation. This requires attention to and investment in the quality of appropriate inputs and processes but also ongoing monitoring of outputs and impact. Distance education provision thus needs to rise to the double of challenge of providing greater access but doing so in ways that offer a reasonable expectation of turning access into success.

From 2004, a new University of South Africa became the sole dedicated distance higher education institution in democratic South Africa, combining the programmes, staff, and facilities of the former University of South Africa and Technikon Southern Africa and incorporating the Vista University Distance Education Campus in a single, merged, comprehensive open and distance learning university. With an audited active enrolment of just under 300,000 in 2010 and a new mission and vision that reflect its national and continental role, Unisa is recognised as one of the world's most important mega-universities. However, Unisa is not the sole public provider of distance higher education. In recent years many predominantly contact institutions have developed and launched distance education programmes, often in niche areas aimed at specific clienteles both locally and in the SADC region or beyond. This is another reason for making a policy statement at this time. There is need to ensure that growth in the system based on public funding is targeted towards the national good and aligned with the Medium Term Expenditure Framework.

The MHET acknowledges the Council on Higher Education (CHE)'s excellent research reports and policy advice on distance higher education which have strongly influenced this policy. Both Higher Education South Africa (HESA) and individual HEIs have made insightful statements on the subject, while the former South African University Vice Chancellors' Association (SAUVCA)'s earlier investigation of distance higher education sharpened focus on many of the important issues. As always, the MHET has tried to maximise the common ground between its own position and the advice it has received from the higher education sector, while forming its own judgement in the light of its own and the government's broader policy perspectives and resources.

2   The policy context

The need for a specific policy on distance education at this time is indicated by three contextual factors:

- The distance education component of higher education has grown considerably in absolute numbers
- The higher education system generally needs to grow further if we are to meet the targets set in policy
- Increasing ubiquity and flexibility of ICTs has opened up new opportunities for quality expansion of teaching and learning.

2.1 Growth of the system

South Africa's higher education system has transformed dramatically since 1994, providing considerably increased access to larger numbers of previously marginalised groupings. From 2000 to 2009, enrolments in public higher education rose from 578,134 to 837,779 students – an increase of 45%. By 2009, the proportion of black South African students in the overall higher education system had grown to 65% and the proportion of women had risen to 57%.[1]

Growth in student numbers has not been matched by growth in the number of academics, leading to a greater preponderance of large classes. However, Morrow[2] has argued that this does not mean that the quality of teaching necessarily needs to decline, provided that academics learn from the distance education experience and place greater emphasis on the development and use of well-designed learning resources and integrated, structured learning support.

Distance education proceeds from the belief that learning can be nurtured without necessarily requiring teachers and learners to be in the same place at the same time, and that the resource-based nature of distance education allows for the possibility to achieve economies of scale. However, the challenge to turn access into success requires substantial up-front investment in curriculum design and materials development, including attention to issues of structure, pacing and meaningful formative assessment, as well as considerable investment in decentralised student support.

Distance education has made a significant contribution to the overall growth in student enrolment – accounting for just below 40% of all headcount enrolments and 30% of full-time-equivalent enrolments (FTEs) over the last decade.

In South Africa, distance education programmes enrolled 316,349 students in 2009, which was 37,8% of all higher education students. Unisa's headcount enrolment in that year was 279,744 amounting to 88% of all distance education enrolments: 10 out of a total of 22 predominantly contact institutions enrolled the balance.

It is recognised that distance education students typically have competing demands for their time and progress more slowly through their studies because they do not usually carry full course loads.

Since most distance education students study part-time and do not carry a full course load, enrolment in distance programmes accounted for 28% of the total number of full-time-equivalent students (FTEs) in 2009, whereas headcount distance enrolments were 37% of the total. The new Unisa's contribution was 81% of the total distance education FTEs (compared to 88% of headcount enrolments mentioned above). The relative contributions of the predominantly contact institutions in 2009 varied considerably. In one contact institution distance, FTEs accounted for nearly half of all FTEs (North West University), in others the proportions were significant at 10-20% (Nelson Mandela Metropolitan University, University of KwaZulu-Natal, University of Pretoria) and in others less than one percent.

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[1] Unless otherwise stated, figures cited in this document are derived from the Higher Education Management Information System (HEMIS)

[2] Morrow, W. 2007. *Learning to teach in South Africa*. Cape Town: HSRC Press.

In 2009, the distribution of distance versus contact FTE enrolments by field of study was as follows:

- Science, engineering and technology 14%:86%
- Business/management 46%:54%
- Education 63%:37%
- Other humanities 39%:61%.

Overall enrolment in Science and Technology programmes was in line with the MHET's target ratio (30%) for higher education institutions but as noted skewed towards the contact institutions.

A high proportion of all Education FTE students were in contact institutions' distance programmes. These programmes tended to focus on a limited number of continuous professional development programmes rather than on initial professional education and training.

More than half of all distance students were women and three-quarters were black African – mostly South African but with significant numbers also from other African countries. Most distance students were mature adults (>24), though the number of younger distance students is growing. The age profile indicates the role distance education plays in providing second-chance/ alternative access to higher education and learning opportunities including professional upgrading for working adults. A noticeable trend in recent years has been an increase in the total number of younger students enrolling with Unisa (although the overall proportion of younger to older students appears fairly stable), with many first-time-entry school-leavers opting for distance higher education as an alternative to contact institutions. In 2009, according to Unisa's own internal analysis, 73,689 students (28% of enrolments, down from 31% in 2007) were below 24 years of age and 45,800 students (17% of enrolments, down from 23% in 2007) were entering HE for the first time[3]. These students bring with them expectations for facilities and support services similar to those offered by contact institutions, which is placing pressure on Unisa.

Distance programmes were offered primarily at undergraduate level and this is reflected in the nature of most distance education graduations. Students were more likely to pursue post-graduate courses through distance education at the initial level rather than at the advanced level with distance students contributing to 53% of headcount enrolments at the levels prior to Masters, 10,7% at Masters level and 7% at Doctoral level in 2009.

Undergraduate course/module success rates, as defined by the DHET, for distance higher education have improved from 57 % in 2007 to 63% in 2009 with Unisa's rate improving from 55% to 61%. This aggregate figure hides huge variation among the courses. In comparison, University of Pretoria, North West University and University of KwaZulu-Natal achieved success rates of 78%, 83% and 74% in courses in the limited range of programmes they offered in 2009.

Graduation rates, as defined by DHET, of distance education students at programme level were lower than those of contact institution students, particularly in Unisa's programmes. This is despite the fact that module/course pass rates often met or exceeded agreed targets indicating that stop-out and drop-out rates need particular attention.

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[3] Statistics prepared by Unisa's Department for Information and Strategic Analysis (DISA)

In the absence of any throughput data, the best we can do is to offer the following comparison. In 2009, 25% of higher education diplomates and graduates were distance students in comparison with a FTE enrolment ratio of 28%. Of these distance education diplomates/graduates 62% are from Unisa s in comparison with Unisa's enrolment share of 88% of distance headcount and 81% FTE students. In addition, at Unisa the graduate profile is somewhat skewed with Human Sciences accounting for 62%, and undergraduate certificates and diplomas 43%, of Unisa graduates in 2009.

It is noted that many Unisa students enrol for discrete courses which indicates the need for the ability to track enrolment and graduations separately for programme and modular/unit standards purposes at both institutional and HEMIS level. It is also noted that many distance students take a long time to complete, and many others drop out or fail and do not re-register. A study conducted in India revealed that distance BA students took an average of 5.86 years to complete their undergraduate programmes whilst MBA students took an average of 3.93 years. Completion time for BA students ranged from 3 to 9 years[4]. These findings are consistent with similar analyses undertaken at Unisa which have concluded that addressing drop-out rates is a more pressing concern than time to completion.

2.2   Need for further expansion

The 837,779 students enrolled in higher education in 2009 represented a 17% participation rate[5] compared to 15% in 2000. What this means is that increases in enrolment have only slightly exceeded the growth in the number of young people aged between 20 and 24. Consequently, the participation rate targeted in the National Plan of 2001 of 20%, typical for a middle income country, has not yet been achieved and, since most universities have reached their limit of on-campus students with their existing infrastructure, will remain difficult to do so without further growth of distance education opportunities. There is great pressure from school-leavers to register at Unisa, sometimes as a first choice due to cost and other factors but also because they have been refused admission at other institutions.

Given the growing demand for higher education, and international evidence that distance education can, under certain conditions, provide high quality educational opportunity more cost-efficiently and cost-effectively than traditional face-to-face provision, it seems logical to expand distance education provision in an orderly manner in which access and quality issues are at the forefront. In particular, the MHET sees the need for collaborative development of a national set of programmes targeted at South Africa's burgeoning unemployed/ not in education youth designed to enable them to become financially productive and socially invested members of society. This initiative would be most appropriately located at the FET/HET interface. In addition, there is need for the development of high quality formal professional qualifications for unemployed graduates to address national priorities such as the increased demand for teachers and social workers.

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[4] **(Source:** Graduates of Indira Gandhi National Open University:
How are they placed? **http://www.col.org/pcf2/papers/reddy_v.pdf** (Retrieved 24/03/2011)

[5] The number of higher education enrolments divided by the number of 20-24 year olds in the population, as estimated by StatsSA 2009 mid-year report.

2.3 Technological opportunities

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

The long-term impact of ICT on higher education is still largely a matter of conjecture (often driven by ideological determinism or commercial marketing), and will only really start to become fully clear over the next 15 to 20 years. Nevertheless, certain trends in ICT use that are relevant to higher education are emerging:

1. It is expanding the range of options available to education planners in terms of the teaching and learning strategies they choose to use, providing an often bewildering array of choices in terms of systems design options, teaching and learning combinations, and strategies for administering and managing education.
2. It is allowing for exponential increases in the transfer of data through increasingly globalized communication systems, and connecting growing numbers of people through those networks.
3. ICT networks have significantly expanded the potential for organizations to expand their sphere of operations and influence beyond their traditional geographical boundaries.
4. It is reducing barriers to entry of potential competitors to higher education institutions, by reducing the importance of geographical distance as a barrier, by reducing the overhead and logistical requirements of running education programmes and research agencies, and by expanding cheap access to information resources.
5. There has been an explosion in collective sharing and generation of knowledge as a consequence of growing numbers of connected people, and the proliferation of so-called Web 2.0 technologies. Consequently, collective intelligence and mass amateurization are pushing the boundaries of scholarship, while dynamic knowledge creation and social computing tools and processes are becoming more widespread and accepted.
6. Digitization of information in all media has introduced significant challenges regarding how to deal with issues of intellectual property and copyright. Copyright regimes, and their associated business models, that worked effectively prior to the development of ICT are increasingly under threat, and in some cases rapidly becoming redundant.
7. Systemically, it is tending to accentuate social disparities between rich and poor.
8. Collaborative engagement in the creation of high quality open educational resources (OER) provides an opportunity to address access, quality and cost issues simultaneously.

These developments offer extraordinary opportunities to universities, many of which were simply hardly even imaginable ten years ago. ICT has become central to knowledge production, dissemination, sharing, and application in ways that make it inconceivable to imagine planned future developments in higher education without identifying a central role for ICT. However, they also pose a significant challenge for South Africa, given the urgent requirement to ensure that investments in education reduce disparities between rich and poor. The key to achieving this within higher education is to ensure that the possibilities and power of ICT are extended to all of those enrolled in higher education, rather than just to those students whose economic circumstances enable them to acquire their own ICT infrastructure and connectivity.

E-learning continues to grow in importance in higher education. A tendency has, however, grown to use 'distance education' and 'e-learning' interchangeably. The use of distance education and e-learning as interchangeable or composite phrases introduces a blurring conflation of the terms,

which has sometimes led to poor quality strategic planning. It is true that introduction of ICT introduces a new range of educational strategies, but it remains a relatively simple matter to establish whether specific uses of ICT incorporate temporal and/or spatial separation. Thus, for example, learners working independently through a CD-ROM or online course materials are clearly engaged in a distance education practice, while use of satellite-conferencing, although it allows a degree of spatial separation, has more in common with face-to-face education because it requires learners to be in a specific place at a specific time. Many people harnessing ICT seem to think they are harnessing the benefits of good quality distance education, when, in most cases, they are simply finding technologically clever ways of replicating traditional, face-to-face education models.

The only complexity within this is that ICT has created one specific new form of contact, which is not easily classified as either face-to-face or distance. Online communication allows students and academics to remain separated by space and time (although some forms of communication assume people congregating at a common time), but to sustain an ongoing dialogue. Online asynchronous discussion forums, for example, reflect an instance where the spatial separation between educator and learners is removed by the 'virtual' space of the Internet, but where there remains temporal separation. However, as a discussion forum allows sustained, ongoing communication between academics and students, it is clearly a form of 'contact' not a form of independent study. Thus, there may be cause to introduce a new descriptor for educational methods of direct educator-student contact that are not face-to-face, but are mediated through new communications technologies.

An important lesson that has emerged from the past 10 years is to ensure that each education intervention using ICT is planned and implemented on its own merits. Technologies can be applied in a range of ways, to support an almost limitless combination of teaching and learning strategies, and it is essential to keep options as open as possible. However, ICT offers no quick-fix solutions to educational problems: integrating technology use into programmes based on poor pedagogical practice only magnifies the negative effects of that poor pedagogy. From a distance education perspective, it should also be noted that the typical approach currently of experimentally deploying new technologies on campuses often does not include processes to quickly scale them up to broad usage when they work and this often creates its own obstacles to full deployment. Thus, careful management and planning is an important requirement.

Given the diversity of access to ICTs, programmes need to be able to provide for multiple ways of accessing meaningful learning opportunities. Currently, learner management systems tend to be better geared towards facilitative registration, administration and assessment than for core content / learning provision.

An enabling ICT infrastructure is essential to the development of quality distance education provision in South Africa. Aside from more efficient administration services, it would provide for faster and cheaper communication, potential for far quicker delivery of learning material, as well as turnaround time for student assignment submission and return. Furthermore, it could enable meaningful interaction between students and faculty, and among students and their peers. Finally, an ICT infra-structure is essential for students to develop their skills to participate in the digital world of the twenty-first century. Creating such an enabling ICT infrastructure will require significant initial investment. Its maintenance costs could well be covered by savings from the current expensive and cumbersome distribution and communication systems (see 5.2 and 5.4).

2.4 Quality matters

As noted previously, student throughput rates at the programme level in distance higher education have tended to be lower than desired. In order to turn access into a reasonable chance of success, there is need for continued focus on the quality of provision.

While the MHET wishes distance education to take advantage of economies of scale to reduce the cost per student – thus increasing access with limited resources - , this must not be done at the expense of quality, particularly in programme design, materials development, student support and assessment.

The MHET is concerned about cost-intensive programmes being offered in distance mode where the institutions do not provide the appropriate environment such as the laboratories /equipment that are necessary for practicals and/or systems for the appropriate placement, mentoring and assessment of work integrated learning. It is noted that it is possible, if complex, to make adequate arrangements through collaboration, partnerships and shared use of multi-purpose community centres established and maintained by the state.

The MHET notes that collaborative development of high quality learning resources made available as Open Educational Resources (OER) provides the possibility both for increased access and quality and lower unit costs due to reduced duplication and greater usage.

3 The distinctiveness and purpose of distance higher education

The MHET views the role of distance education in the South African higher education system as:

1. **Providing access** to students for whom – either because of work commitments, personal social circumstances, geographical distance, or poor quality or inadequate prior learning experiences – traditional, full-time contact education opportunities are either inappropriate or inaccessible. Distance education can increase the flexibility of provision in structure, duration and timing. It is thus particularly important in providing opportunities for lifelong learning.
2. **Seeking** to **expand access** to educational provision to significantly larger numbers of learners, through shifting patterns of expenditure to achieve economies of scale by amortizing identified costs (particularly investments in course design and development and in effective administrative systems) over time and large student numbers.
3. Providing **low enrolment niche programmes** that are required by students across the country, for example training of Arts/Music teachers. Such courses will require **additional differentiated funding support** since they will not benefit from economies of scale. The rationale for offering such programmes, and the nature of the provision, will need to be carefully scrutinized and agreed to in enrolment planning and programme accreditation procedures as part of a national PQM planning strategy.
4. Producing and making available **high quality learning resources,** designed and developed collaboratively, to enhance and support the entire higher education system, including

specific foci on unemployed/non-student youth, rural development initiatives and professional training for unemployed graduates.

5. Offering outstanding modules for students at contact institutions who require one or two modules to complete the necessary requirements for proceeding to their next year of study, or to complete their qualifications.

In 1997, the former Department of Education's White Paper[6] stipulated that contact and distance education institutions would be encouraged to provide effective and flexible learning environments on a continuum of educational provision ranging from fully contact-based to fully distance-based, in which educators would be able to select from an increasing range of educational methods and technologies that were most appropriate to the context within which they operated. This is in line with the technological change outlined above, which has illustrated a few of the issues associated with understanding this continuum and where to place different teaching and learning methods within it.

While this is conceptually accurate, however, it remains essential to identify – from the range of possible applications of distance education those that are most relevant to the needs of South African society.

While distance education methods and use of e-learning can be applied to serve an almost limitless range of educational needs, it is critical to identify those that deserve the highest priority, given limited finances and institutional capacities in order to focus the effect of limited resources.

The MHET has identified the following as the highest priority requirements for distance education provision amongst the range available:

1) Support for the expansion of a small suite of high-volume distance education programmes that aims to provide affordable access to higher education studies to the large numbers of qualifying school leavers and unemployed youth, as well as unemployed graduates, who cannot afford to participate in face-to-face education higher education programmes or who have not been granted one of the limited places available within those programmes. The urgent imperative in this regard is to:

   a) Offer a limited range of programmes in order to ensure that the economies of scale of those programmes enable them to be delivered at significantly lower cost than face-to-face alternatives;

   b) Focus on programmes that will give successful graduates meaningful opportunities for employment after completion – in line with the New Growth Path;

   c) Ensure collaborative development and use of a common set of self-contained high quality learning resources published as OER to service these programmes;

   d) Ensure that the range of student support strategies deployed within those programmes take account of the challenges that many of these students will experience in coping with distance education studies and will offer meaningful chances of successful graduation to

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[6] Department of Education (DoE). 1997. *Education White Paper 3: A Programme for the Transformation of Higher Education*. Pretoria: DoE.

those who are diligent – this requires the ability for centres to recruit, manage and support appropriate tutors;

e) Avoid unnecessary duplication of public provision in some areas at the expense of a lack of provision in others.

2) In particular, encouragement to the new HEIs in the Northern Cape and Mpumalanga to collaborate with existing distance education providers, to offer, within the above-mentioned suite, highly supported, NQF level 5/6 distance programmes to students in their provinces as well as highly supported distance education post-schooling foundational programmes at NQF level 4. Such students would then be well-prepared to continue their studies across a range of modes of provision.

3) Financial encouragement for all face-to-face universities to develop online learning as a key strategy to offer niche programmes, especially at post-graduate level, to those who are unable to attend full-time programmes, either due to their employment status or their geographical distance from the campus. The purpose of this strategy will be to extend higher education opportunities to those who are currently denied this access due to their circumstances without placing significant burden on Unisa to be 'all things to all people'. This strategy will facilitate diversification of potentially low-enrolment, specialized programmes to occur where the expertise resides to deliver these programmes, rather than seeking to centralize it.

4) Growth of dedicated distance education centres outside Unisa, where this is justified and carefully planned. The Ministry acknowledges that there are a few traditionally face-to-face universities (notably University of the North West, University of Pretoria, Nelson Mandela Metropolitan University, and the University of KwaZulu-Natal) that have already made significant investments in developing dedicated distance education programmes. The intent of this policy is to facilitate this growth, while ensuring that it is aligned to the objectives outlined above and subject to ongoing quality assurance procedures, as is expected of all higher education.

5) It is specifically noted that accreditation of new distance education provision must be informed by an appropriate contextual analysis of need, among other things taking cognizance of existing public and private provision.

6) In light of this planned expansion, the role of Unisa as South Africa's dedicated distance education provider needs to be more clearly defined. (See 4.1)

7) Investment in improved student support to address unacceptably low levels of retention and throughput including the provision of multi-purpose centres, probably in collaboration with the government and with other providers.

4   Steering mechanisms

The MHET has underscored the importance of distance education programmes in higher education. However, mechanisms need to be found to steer the higher education system in a way that will enable distance education to fulfil its wide-ranging roles, while simultaneously stimulating transformation of distance education practice from a mode in which correspondence education predominates to one where students are properly engaged and supported in the learning process.

In the process of steering the system, and in particular of any intention to expand the system, cognizance must be taken of current poor teaching and learning practices in many high enrolment distance education courses (and in some high enrolment contact courses), as well as low throughput rates in higher education generally[7] and in distance higher education in particular.

Three linked mechanisms are needed to steer distance higher education in such a way that its vast potential is unlocked and the qualitative transformation that the Ministry envisages is accelerated. These are: institutional planning, funding arrangements and quality assurance. Three other policy enablers are learning resources and learning centres, creating and sustaining an enabling technology environment and cross-border policy.

The purpose of this policy statement, however, is not to identify funding mechanisms, as this will need to be undertaken as part of wider processes of ongoing review of those mechanisms. However, the strategic priorities identified in the previous section constitute a clear set of principles that should underpin the scale of relative investments in distance education, while sections below outline requirements for investment in distance education infrastructure that should be considered a public asset for use by all higher education (and potentially more widely). The renewed focus on distance education as a strategy for tackling youth and graduate unemployment also provides opportunities for growth of earmarked funding to be invested in creating high-volume, high quality programmes to deal with this urgent challenge.

4.1   Planning

National Plan for Higher Education. The *National Plan* (DoE 2001) guides the sector's framework development. Detailed institutional planning is the domain of the operational plan process. The primary steering mechanism is student enrolment planning. The MHET's approval process takes account of institutional missions, Ministerially approved PQMs, and student success and throughput rates.

While this policy framework confirms Unisa as the primary provider of distance education in South Africa, it provides that other institutions, both public and private, may offer distance programmes provided they motivate such programmes in terms of their mission and profile and in relation to the priorities set out in this policy, and provided the programmes meet the required quality standards in relation to delivery including academic development support for under-prepared students. For public HEIs, they would need to demonstrate that they meet the priority areas identified above.

Furthermore, institutions may enter into partnerships to facilitate the provision of support for distance education students. However, such partnerships must be with properly registered and accredited educational institutions, and programmes must meet the required quality standards. The obligations of the partners must be clearly spelled out in a partnership agreement and may not disadvantage students.

The above position is elaborated as follows:

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[7] Council on Higher Education (CHE). 2007. *Higher Education Monitor No. 6, A Case for Improving Teaching and Learning in South African Higher Education, October 2007*. Pretoria: CHE.

The University of South Africa. Given Unisa's unique national position, its role in Africa and its status internationally, it is important for the MHET and the institution's authorities to maintain a robust but essentially collaborative relationship in implementing Unisa's mission.

The MHET acknowledges Unisa's universal and African vision; its determination to become a leading force in ODL; its developmental research focus; its emphasis on affordable access for working people and school-leavers, programmes for lifelong learners, economies of scale in enrolment planning, appropriate curricula and student support, innovative ICT applications and quality assurance; and the university's determination to elevate throughput and graduation rates. These and other elements in the institution's *Strategic Plan* demonstrate a commitment to thorough and ongoing qualitative improvement, which must be among the very highest of Unisa's priorities.

Unisa is faced with a variety of simultaneous, competing policy demands and while it could be argued that all higher education institutions are faced with the same problems, Unisa finds itself in the difficult position of being the 'catch-all' for students who are not accepted at contact institutions or who cannot be accommodated in contact institutions. In addition many contact institutions, are raising university entrance requirements and thus excluding more students who then turn to Unisa as their only alternative. Furthermore there is a significant cohort of students (school leavers) who choose Unisa as their university of choice because of its affordability and flexibility. The system clearly needs to create more options for school leavers. This is discussed in Section 5.

Unisa's enrolment targets will be subject to the MHET's overall enrolment planning statement and bilateral consultations with the university. In approving Unisa's operational plan and PQM the MHET will pay close attention to the manner in which expansion targets are balanced against the requirements of improved quality in teaching and learning, especially better success rates. The MHET will wish to see evidence that Unisa's curriculum review process is sharply reducing uneconomical courses and boosting larger enrolment courses with improved student support in priority areas for development. The University's comprehensive status means that both academic and vocational programmes are offered. It does not mean that the University's choice of programme fields is unlimited.

The MHET acknowledges and supports Unisa and other distance providers' social mandate to provide access to students for whom full-time contact educational opportunities are inaccessible or inappropriate. However the higher education system has an obligation to ensure provision of an appropriate learning environment for those students who have been accepted into higher education programmes to guarantee they have a reasonable chance to complete their studies. Thus Unisa cannot be expected to absorb all potential higher education students who cannot be accommodated elsewhere in the system. Neither can Unisa be expected to offer all courses and programmes that cannot be offered cost-effectively elsewhere in the higher education system. There is need to:

a) Relate Unisa's overall enrolment to its 'carrying' capacity – in terms of appropriate numbers of academic staff as well as tutors with appropriate skills to ensure adequate academic leadership and support for different kinds of programmes, levels and CESM categories. Sufficient administrative staff need also to be in place.

b) Ensure that Unisa's PQM is comprehensive but sustainable in terms of staff numbers and expertise – the MHET notes that in 2009 after a rigorous PQM rationalization process, Unisa offered 737 different qualifications, comprised of 960 distinct semester courses and 2 491 distinct year courses.

c) Provide for greater diversification of opportunities for accessing higher education (see Section 5)

d) Provide space for innovation and proactive quality programme development to address emerging new areas of national need.

The MHET therefore supports Unisa's efforts to streamline its PQM in order to offer fewer courses and programmes of higher quality; its gradual move towards a focused PQM that offers academic and vocational learning programmes on a 60%/40% and its implementation of a managed open access system that takes simultaneous account of prospective student needs, the institution's carrying capacity in particular courses and programmes and the range of alternative study options that will increasingly be made available within the post-schooling/higher education system.

The MHET wishes to state clearly that it does not see new school leavers as a focus for Unisa and the University should not be marketing directly to such students; its counselling to prospective young students must include creating awareness of the alternative possibilities for study that the Ministry will increasingly make available (see Section 5).

In short, the MHET supports the notion that Unisa must be able to limit its intake only to those prospective students in those selected course and programme areas in which it can demonstrably offer a reasonable chance of turning access into success. It is therefore essential to clarify Unisa's preferred growth projection within the overall requirement that it concentrate on courses with sizeable enrolment.

In engaging with enrolment planning with the HEIs on distance education, the MHET will

a) be guided by the priority foci for distance education identified in Section 3.1 above

b) take into account the issues raised by the HEQC in both their audit and accreditation processes related to distance education provision

c) be guided by the existing level of saturation of the market noting that provincially based distance education provision might be more effective than national provision for programmes with a high practical/ work integrated learning component.

Predominantly contact institutions. Predominantly contact institutions may choose to offer distance programmes provided that effective quality measures are in place. Unisa should not require artificial protection from its peers but, on the contrary, should welcome other equally well-motivated and high quality professional players in the distance education field. However, there is a question of balance. Predominantly face-to-face institutions should remain just that. The onus is on each institution to justify a particular programme offering in terms of its mission and overall profile and the character of the programme concerned.

It should be noted that any module/course with an enrolment of fewer than 30 students and any programme with an enrolment of fewer than 300 students is unlikely to be able to benefit from any economies of scale.

In considering whether to approve a distance education programme the MHET will consider whether the programme fits the institution's mission; whether it meets national or regional needs; whether it meets the HEQC's quality criteria for distance programmes, including demonstrated readiness to offer such a programme; any past history of successful distance education provision and the overall balance of contact and distance enrolments in the institution.

The provision of distance education by registered private higher education institutions through their own programmes is growing but is still relatively small in scale by comparison with public provision. Developments in private distance education provision, especially innovative, cost-effective and high-quality programmes, will continue to interest the MHET and public providers. Many of the policy principles in this document have equal relevance for private providers. The MHET's registration requirements and the HEQC's quality assurance processes will ensure compliance by private institutions that seek to expand through distance education or move into distance mode for the first time. Public distance higher education providers will need to take this into account in their PQM planning exercises. However, expansion in private distance provision is likely to be in short duration programmes, often one year FTE, and in targeted areas rather than covering a comprehensive PQM.

This policy framework signals the MHET's firm intent to discontinue use of global 'graduation rates' as a proxy for proper analysis of the throughput of cohorts of students.

Related to the above, it is the MHET's belief that there should be a closer correlation between graduate output from contact and distance education provision and that the system as a whole should be seeking means to increase the proportion of students successfully completing the programmes for which they have enrolled. However, the MHET understands that, in general, distance education students proceed more slowly through their studies. It is therefore the MHET's belief that a course success of less than 65% at the level of modules/courses, and a cohort throughput rate of less than 35% within three times the minimum time for completion of a qualification[8], should be cause for concern and indicative of the need either for a major re-design or withdrawal of the module/programme from the PQM.

Provision for foreign students will be discussed in Section 6.

4.2   Funding arrangements
The Ministry's HE funding framework.

The annual total budgeted by Parliament for public higher education institutions is distributed to institutions in relation to their academic activity and output, especially teaching and research which contribute to the country's development. Institutions are required to plan and monitor their

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[8] Suggested as achievable in distance education by studies commissioned by the CHE in 2004 and submissions for Nadeosa Excellence Awards.

academic activities in relation to the available funds. Any change to current practice reflected in this distance education policy relates to a change in the distributive arrangements among institutions and not to the annual total of funds appropriated by Parliament for public higher education in line with the Medium Term Education Funding arrangements.

The provision of high quality distance education incurs costs in programme design, materials development and in the provision of student support. Given the relatively low success rates in distance education at programme level, improving quality in these areas is encouraged.

Funding in the teaching input grant category for distance higher education has in the past been at 50% of contact higher education. Increasing this level of funding would take funds away from contact institutions without guaranteeing improvements in distance education. So it is not advisable to substantially increase the teaching input grant funding to distance education in a blanket manner.

Distance education funding policy

The funding of distance higher education must be managed within the MHET's overall higher education funding policy, support the MHET's policy objectives, especially those relating to access, equity, quality and cost-effectiveness, and be simple to administer. It must be equitable and realistic and offer incentives for good practice in order to improve the quality and success rates.

The funding of higher education generally is the subject of a separate task team established for this purpose. This discussion provides some suggested principles and policy options to inform the task team's engagement. It identifies some critical areas for the funding review to support the drive towards improved quality of distance higher education provision. It also offers some possible funding issues for further consideration.

4.2.1 Critical areas for the funding review

a) It is recommended that the principle of parity of funding for teaching outputs from accredited courses and programmes at all levels regardless of mode of provision be retained as this validates the accreditation quality assurance process.

b) It is recommended that the principle of parity of funding for teaching inputs for all accredited qualifications at Masters and Doctoral level regardless of mode of provision be retained in recognition that at this level there is no significant difference in terms of resource inputs.

c) It is suggested that the current differentiation of distance education receiving a subsidy of 50% that of contact institutions is premised on a dated notion that equates distance education with print-based correspondence. Improving quality and achieving improved module/course and programme cohort throughputs requires significant investment in team-based programme design and learning resource development as well investment in the creation and maintenance of supportive, interactive decentralised student support systems, which will increasingly be web-based. It is suggested that the Funding Task Team initiate some comparative studies into the implications of investment in quality teaching and learning in both large scale contact-based provision, distance education provision as well as the blended forms of learning expected to be increasingly the norm. Such studies would need to take cognisance of comparative costs per student and cost per graduate with the caveat that for distance education provision the latter

would need to consider a longer period towards completion – two to three times the minimum study time is suggested.

d) It is recommended that the funding task team explore ways of recognizing and financially rewarding Unisa for contributions made to students' completion of qualifications awarded by other institutions

e) It is recommended that the infrastructure implications of planned enrolment growth, including the essential investment in ICT infrastructure and maintenance, needs to be factored into the subsidy funding for Unisa and other distance education providers.

f) It is recommended that in considering any future funding formula, attention should be given to any unintended outcomes. For example, in 2004 for the period to 2007, teaching input grants amounted to 56% of the subsidy available for higher education institutions and teaching outputs only 14%. This provides an incentive to increase access by enrolling large numbers of students but arguably not sufficient incentive to make the investment in quality teaching and support to ensure success. Shifting the balance more towards the teaching output subsidy might encourage greater attention being paid to pass rates and throughput (necessarily at both module/course and programme level on a graduated scale in which, for example, a 12-credit module, a 120 credit certificate and a 360 credit degree receive pro rata recognition and support) but the system will need to have robust structures and processes to ensure the quality of successful graduates. Either way, any input subsidies surely need to be justified by sufficient evidence of meaningful engagement. It seems important that submission of evidence that students are truly "active" requires that the timing of submission of census data should allow for students to have attempted a meaningful assessment and/or have engaged in a planned and monitored significant teaching/support initiative. Curriculum planning and funding for input subsidy purposes should take accommodate this need.

g) It is suggested that the principle of allowing a band of variation between planned and actual funded enrolment be retained in line with the negotiated enrolment plans for each institution.

h) It is recommended that if any provider is required to offer a *low* enrolment distance education niche programme to address a national need, cognisance should be taken that such an offering will not benefit from economies of scale. Thus the funding provided should not compromise the quality of such provision, by being too low.

4.2.2 Further issues that need to be considered
Three broad options currently exist within the limitations of the funding available:

a) Retaining the current trajectory of planned growth and differentiated funding (business as usual) – recognizing that this provides no mechanisms to improve curriculum relevance and quality of provision for distance higher education.

b) Limiting any substantive funded increase to expansion of offerings by designated providers to absorb the potential students who cannot be accommodated elsewhere in the system – however providers would then need to invest massively in improved design and support to substantially increase success rates and programme throughput particularly for the diverse but generally underprepared nature of candidates for the higher certificate. It is noted that traditional HEIs are not necessarily best placed to play this role (see 6.5).

c) Allowing enrolment to grow within the system as a whole in terms of the carrying capacities determined by institutions themselves – however the subsidy funding available is unlikely to

grow substantively so institutions would need to demonstrate how they would be able to sustain or improve quality in ways that are increasingly more cost-effective. This would entail allowing institutions to enrol in line with their carrying capacity including through re-conceptualised models of provision and demand.

Additional funding options that might be considered are:

d) Splitting the overall teaching subsidy budget into categories, ring-fencing funding for:
    - Large scale HEDE provision – noting that large-scale can mean relatively smaller numbers for institutions that offer programmes in a confined geographical space compared to Unisa which offers programmes nationally
    - Traditional contact-based provision
    - Technological infrastructure maintenance to benefit the whole system: realizing a commitment that all post-schooling/HE students have access to appropriate ICT resources and bandwidth. An initial national project to put in place the initial infrastructure could be the basis for a separate bid to Treasury.

e) However, it might be useful to consider enrolment numbers per course/programme rather than a classification of contact or DE for subsidy purposes for undergraduate programmes. This would be more verifiable and therefore easier to manage. Thus, for example, a module enrolling fewer than 150 students will not generate economies of scale whereas a module enrolling more than 1000 students should be able to; if the funding per student for an approved small-scale module with enrolment <150 is then 1 full unit; a module enrolling 151-999 might receive 0.85 units and a module enrolling 1000+ students a subsidy of 0.67. An empirical study would be needed to ascertain appropriate ratios and the impact on institutional finances of such an approach. Funding of distance provisioning through an additional block grant fund is also an option and then could be based on approved volumes-of-activity plus inflation. Unintended consequences must be borne in mind, however, for example, a contact-based institution may be able to demonstrate an ability to cope with larger enrolments by offering asynchronous tutorials e.g. 300 students who attend a lecture might be supported by 10 non-concurrent tutorials.

f) All modules/programmes offered by Unisa as well as Distance Education units at traditional contact-based institutions should probably be classified as distance education and be large scale. It would therefore be in the interests of these institutions to offer a limited PQM through DE.

g) Related to the above, the social mandate of South African HEIs generally, and that of Unisa in particular, with respect to the provision of educational opportunities for cross-border students needs to be clarified. The MHET believes that the core focus of higher education in South Africa should be meeting national needs; aggressive cross-border marketing of South African HE programmes should be curtailed. (See Section 5.6.)

h) The CESM funding categories need to be revisited to recognise the different input needs for different disciplines and types of programmes but to retain sufficient flexibility to ensure that institutions do not focus on large enrolments only in programmes that attract more funding resulting in an oversupply of certain types of graduates at the expense of others. Teacher education is a good example here: it remains in the lowest CESM funding category even though new accreditation requirements require investment in a robust teaching practice placement, mentoring and supervision system. While teaching practice has been funded as a full course at funding level 1, the issue now is to define it as an experiential learning component through the

funding review process and thus fund it accordingly. Similar concerns arise regarding any programmes of study that require substantive work-integrated-learning and/or practical components and/or substantial online engagement between teachers and students in synchronous and asynchronous fora. Such requirements militate against the potential of achieving economies of scale.

i) The funding framework might usefully also ring-fence funding to support the collaborative development of high quality curricula and OER which address identified national priority needs. Procurement policies which rely on tenders favour competition between providers, rather than collaboration, and are often judged primarily in terms of price. Working with OER is about building on the best available expertise and demands a different way of working. It is envisaged that the MHET would put out a request for proposals in terms of a specified national agenda (rather than restrictive terms of reference), and require proposals that require a demonstration not only of expertise, but also of collaboration and sharing – including OER.

j) Financial challenges are one of the highest causes of drop-out and stop-out ratios in higher education generally and there are often many 'hidden' costs for distance education students such as purchase of computers and bandwidth, textbooks not included in study packages, work-time lost to attend practicals, contact-sessions and/or work integrated learning sessions as well as the direct transport and accommodation costs that may be attendant on these. However, distance higher education students are often excluded from bursary schemes which are premised on full-time contact-based provision.

4.3 Quality assurance

While the quality of distance education has improved over the last decade, quality issues remain, with examples being found of poor didactic de-contextualised course materials, irrelevant and out-dated curricula, lack of sequencing or pacing, course materials not arriving on time, inadequate support for learning to maintain motivation and engage with student difficulties, inadequate formative assessment, lack of meaningful feedback, and inadequate practical work or exposure to work integrated learning especially in light of the changing student profile. Furthermore, many students have low expectations of distance education (for example they do not expect to get feedback on an assignment before they write the next one) and, given the dispersed nature of the student body, find it difficult to make their demands heard. With a stronger focus on cost-effective use of the limited funding available, quality assurance of provision to ensure that access translates into success is critical. Institutions need to develop their own internal quality assurance processes, but the recent institutional audit and programme re-accreditation processes of the CHE HEQC have illustrated the value of peer review processes as well. However, HEQC evaluators are sometimes unfamiliar with distance education and the use of technology.

Since the improvement of distance education quality is a prime concern of this policy, it follows that quality assurance is a vital requirement of the system. The responsibility for quality assurance rests first and foremost with the providers of distance education but they need to be able to emulate acknowledged standards of good practice as well as processes that contribute to continuing improvement. There is therefore need for credible, empirically based accreditation criteria.

Valuable work has been done on distance education quality criteria:

- NADEOSA, with the support and encouragement of the CHE HEQC, has published the authoritative volume *Designing and Delivering Distance Education: Quality Criteria and Case Studies from South Africa* [2005].
- The CHE HEQC's *Good Practice Guide for Distance Education* is in preparation.
- The CHE HEQC has engaged in national reviews of programmes with large distance education enrolments and is encouraged to continue such reviews where appropriate. The HEQC will publish guidelines for new providers of distance higher education to ensure readiness for distance education.

Distance education enrolments make up a significant proportion of the total system, and distance students are often from disadvantaged backgrounds and are relatively powerless. Therefore the MHET and the CHE HEQC have a particular duty to ensure that such students are assured of quality provision. The MHET appreciates the valuable work already done by the CHE HEQC and its collaborators. The MHET will need to ensure that the HEQC is sufficiently funded to undertake its essential work of providing effective external quality assurance to the growing distance education sector. Institutions involved in distance education provision will also need to strengthen their internal capacity for quality assurance.

The MHET will consult the CHE HEQC on how to engage with institutions to strengthen the quality of distance programmes.

This policy framework:

1. Commits the MHET to trying to ensure the adequate funding of the CHE HEQC in particular to enable it to sustain its commitment to continuous quality improvement, especially in distance education and large enrolment modules and programmes
2. Reaffirms the HEQC requirement that programmes moving to a new mode of delivery need to be re-accredited and approved for funding purposes. In particular, it is believed that a move from contact-based forms of provision requiring regular participation in scheduled on-campus activities (typically involving 40% or more of notional learning time) to 'flexible', 'part-time', 'off-campus, 'blended' and 'distance' forms of provision constitutes a new programme offering subject to CHE HEQC re-accreditation.
3. Reaffirms the minimum requirements for quality distance education provision (NADEOSA-CHE), including some minimum benchmarks for staff: student norms – for example – 1 academic per 75 FTE students/750 module headcount enrolments; 1 tutor per 40 learners for contact tutorials; 1 tutor per 50 learners for asynchronous online tutorial support.
4. Establishes the expectation of moving towards equivalence with contact education of pass rates at a module level and equivalence of throughput at a programme level within three times minimum time (recognizing that DE students generally progress more slowly) – this would need to be reflected in a refined graduation rate if the notion of cohort throughput is not used.
5. Requires that institutions establish systems that make provision for student tracking, the identification and support of at-risk learners and the monitoring of throughput cohort analyses differentiated by level, type and CESM category

6. Suggests that a process needs to be developed for reviewing large enrolment modules. There are many instances of very large module enrolments in South Africa (Economics 1 at Unisa has over 25 000 students). There needs to be a national engagement on strategies to ensure quality teaching and learning in such cases, particularly in distance education.
7. Requires the CHE HEQC to ensure it becomes fully equipped to evaluate new distance programmes, including online programmes for remote students, for the purposes of accreditation. This is particularly important given the priority applications of distance education.
8. Requires development of a sustained programme to ensure that students have appropriate expectations and are aware of their rights regarding distance education.

5   Creating an enabling environment for distance education

The formation of the MHET in 2009 facilitates a structured interface between Higher Education, the Further Education and Training (FET) colleges, the Sector Education and Training Authorities (Setas) and other training institutions, so that they may interact with one another in producing the knowledge and skills on which our society depends. The MHET Strategic Plan (2010/11-2014/5) seeks to break down functional silos thereby enabling individuals to traverse from learning to work and from work to learning throughout their lives. In fact, 'true blended learning'[9] has expanded to encompass both formal and informal learning within the learning and workplace performance architecture.

A key MHET priority is to expand and diversify education and training provision in the post schooling sub-sector. An important component of such an expansion and diversification would involve access to alternative programmes that are offered through more flexible forms of delivery, including distance education and e-learning. Thus any investment in establishing an enabling environment for the implementation of distance education programmes in higher education will be maximised by their use in strengthening post schooling delivery as well.

The emphasis in this section is on national infrastructure, approaches and system requirements that will support the expansion of quality distance education across the board – in higher education, in national post-schooling and foundational programmes and also for possible non-formal uses. In this respect, the MHET sees the following issues as being of strategic importance:

- Collaborative development of high quality learning resources
- Improved access to and use of appropriate technology
- Supporting a wider range of post-schooling study options
- Technological infrastructure for post schooling
- Shared learning and support centres.

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[9] Rosenberg, M 2006. *Beyond E-Learning.* John Wiley and Sons, Inc.

5.1 Collaborative development of high quality learning resources

The goal of high quality distance education will be supported by the development and sharing of well-designed high quality learning resources that build on the expertise and experience of top quality scholars and educators. Indeed, the concept of distance education is driven by an approach of communication of curriculum between learners and educators through use of resources (instructionally designed and otherwise) that harnesses different media as necessary. This concept is not limited to distance education: many courses and programmes in face-to-face universities now incorporate extensive use of instructionally designed resources, as academics have learned the limitations of lecture-based strategies for communicating information to students. Use of resource-based learning does not imply any intrinsic improvements in quality of learning experience. The extent to which shifting communication of curriculum to instructionally designed resources leads to improvement in the quality of education is entirely dependent on the quality of resources developed.

With this in mind, the MHET is keen to support efforts that focus on investing a larger proportion of total expenditure in the design and development of high quality learning resources, as a strategy for building and assuring the quality of distance education provision. To be effective, this approach should focus on investments in programmes with large student enrolments, in order to ensure that investments in developing high-quality learning resources can be spread over time and large student numbers, thereby creating sustainable distance education programmes.

However, the MHET is also interested in considering the extent to which investments in developing high-quality learning resources – applied as a national strategy – can make a contribution to improvement in the overall quality of higher education across all modes of teaching and learning. There is a growing international movement that advocates for the development of Open Educational Resources (OERs) which are freely available for use or adaptation.

OER has emerged as a concept with powerful transformative potential. Its educational potential lies in the idea of using resources as an integral method of communication of curriculum in educational courses, but it is the ease with which digitized content can be shared via the Internet that has capability to unleash the full potential of resource-based learning. Importantly, the only key differentiator between an OER and any other educational resource is its licence. Thus, an OER is simply an educational resource that incorporates a licence which facilitates re-use, and potentially adaptation, without first requesting permission from the copyright holder.

The Ministry is of the view that increased availability of high quality, relevant, need-targeted learning materials can contribute to more productive students and educators. Because OER removes restrictions around copying resources, it holds potential for reducing the cost of accessing educational materials, both for distance education programmes and for the system as a whole. In many higher education programmes, royalty payments for text books and other educational materials constitute a significant proportion of the overall cost, while processes of procuring permission to use copyrighted material can also be very time-consuming and expensive. Whilst international organizations such as UNESCO and the Commonwealth of Learning (COL) have made significant contributions to raising awareness about OER and whilst the global OER community of

contributors and users continues to grow rapidly, the concept of OER is not yet widely understood by higher education stakeholders in South Africa.

The MHET therefore understands that high quality learning resources are integral to high quality distance education and notes a growing reliance on resource-based learning among HEIs generally. Given this, the MHET will establish a Task Team that will:
1. Review existing national policies to assess the extent to which they make specific provision for supporting institutional investments in ongoing curriculum design, creation of effective teaching and learning environments within courses and programmes, and development of high quality teaching and learning materials.
2. Determine ways to provide support for the production and sharing of learning materials as OER at higher education institutions
3. Consider the adoption or adaptation, in accordance with national needs, of an appropriate Open Licensing Framework for use by all higher education stakeholders, within an overarching policy framework on intellectual property rights and copyright in higher education.
4. Play an awareness-raising and advocacy role around the use of OER, helping all higher education stakeholders to understand issues surrounding intellectual property rights and copyright, as well as how these are being challenged and re-shaped by the rapid digitization and online sharing of information and resources.

5.2   Improved access to and use of appropriate technology

As has been noted, ICT is now considered a critical infrastructure for effective higher education provision, while there is a parallel challenge to ensure that this infrastructure is extended equitably to all higher education students. Currently, access to learning technologies in South Africa is uneven, making it impossible for distance education and other providers to harness their potential to the full.

Recent developments in South Africa regarding the increased availability of bandwidth and the increasing affordability of digital devices require the MHET to put plans in process to ensure that, within the foreseeable future, meaningful access for all higher education students to appropriate learning technologies and broadband Internet access becomes a reality, to ensure that South African universities can be fully integrated into global knowledge and research networks in academia.

The MHET commits to ensuring that all higher education students have access to affordable connectivity and appropriate devices, initially at institutional sites and increasingly at their homes. Possible mechanisms will include:
1. Collaboration with other Ministries and other stakeholders to facilitate increased bandwidth and reduced costs for educational purposes.
2. Collaborative engagement with stakeholders to negotiate easier access to and reduced costs for internet enabled devices.
3. Appropriate MHET bids for funds to ensure that a comprehensive enabling ICT infrastructure is put in place for all post-schooling providers and particularly the distance higher education providers.
4. Facilitating the collaborative establishment and management of ICT-enabled, networked shared learning centres in areas where home-based provision is likely to be difficult in the short- to medium-term.

The Department of Communications leads all national level ICT initiatives in South Africa through the Electronic Communications and Transactions Act (2002) and has established a new team overseeing the development of the ICT sector in South Africa. The distance higher education sector will need to engage with this team. However, it is noted that in the higher education sector, the NGO TENET is also involved in a Rural Campus Connection Project utilising MHET funding through HESA and the Meraka Department of Science and Technology project involving fibre optic or wireless connection offering bandwidths of from 34Mb/s to 1GB/s. Appropriate utilisation of this increased capacity for effective distance higher education expansion requires careful and collaborative planning.

5.3   Supporting a wider range of post schooling study options

A key question here is whether at a national level the post-schooling/HE system offers programmes and produces graduates that meet national needs. There is need for greater collaboration between government ministries, HEIs and other role-players to pro-actively identify and address current and future needs and to encourage appropriate collaborative curriculum and learning resource development in areas which have a large and sustained need for new qualified participants. The most immediate needs are for high quality programmes focusing on life and physical sciences, animal and human health, teacher education, engineering and technology, but needs change and need to monitored and forecasted on a regular basis.. All such programmes will need to integrate a concerted effort to build foundational competence in appropriate literacy, numeracy and ICT skills that offer students a reasonable chance of success.

It may be that some kinds of needs are best addressed by institutions outside of the current formal HE arena, for example: an open school (possibly based on partnerships between the planned new institutions in the Northern Cape and Mpumalanga and FETIs) offering a range of programmes that bridge the schooling – higher education interface).

5.4   Technological infrastructure for post schooling

A key MHET priority is to expand and diversify education and training provision in the post schooling sector. A key component of such an expansion and diversification would involve access to alternative programmes that are offered through more flexible forms of delivery, including distance education and e-learning. Thus any investment in establishing an enabling technology environment for the implementation of distance education programmes in higher education will be maximised by their use in strengthening post schooling delivery as well.

5.5   Shared learning and support centres

The MHET has consistently advocated the importance of student support in distance higher education. Support for a network of well-designed and maintained learning centres for distance education students is one of the highest priorities of this policy.

Experience elsewhere shows that ODL institutions that engage in inter-institutional cooperation in establishing and running study centres have sound student support services. IGNOU, for example, has 3000 study centres across India and has a global presence in 66 countries. [10] In Namibia, the

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[10] http://www.buzzle.com/articles/ignou-is-largest-open-university-of-india.html

Namibian Open Learning Network Trust (NOLNET) facilitates sharing of resources and minimises duplication of services and resources by Open Learning Institutions in the country. There are 45 NOLNET centres across the country, over and above the more than one hundred study centres that are mostly located at existing formal schools. BOCODOL in Botswana runs 75 fully functional study centres throughout the country.

There are a substantial number of learning centres throughout South Africa that can serve as sites for the support and/or provision of open and distance learning programmes, provide administrative and logistical support and provide access for students to computers and online materials including libraries. These could range from the hire of the facilities of high schools and FET Colleges in the evenings and over weekends and school holidays for contact sessions through to stand-alone ICT-equipped and networked centres, possibly operating 24/7/365 and managed collaboratively.

1. The government remains committed to the development of Multi-Purpose Community Centres (MPCC) and in the past eight years has established some 35 such centres that can and should be used also as sites of learning support for higher education students. In addition, existing schools, colleges and university campuses are and should continue to be used as centres for the support of distance higher education students.
2. A comprehensive network of such centres has the potential to be a shared resource for the higher education sector and cooperation between institutions in establishing, staffing, equipping and running such centres is encouraged.
3. However, with increasing access to wireless connectivity and mobile technology, it seems likely that in the medium to long term the emphasis of student support will shift from centre- and contact-based approaches to on-line web-based approaches. The relative balance of investment in new centres and the upgrading of existing centres and investment in ensuring access of all higher education students to mobile, connected technology needs to be carefully weighed.
4. The MHET will therefore invite the CHE/HEQC and HESA, as well as the Ministry of Communications, to join it in co-sponsoring a workshop of concerned specialists to map the way forward. The membership of the task team should therefore be drawn from the higher education community and from specialist organisations working in the field of open and distance learning. The resulting recommendations should be directed primarily to the higher education community itself, though the MHET will expect to facilitate the work that will need to be done.

6   Cross-border distance higher education

6.1   The need for regulation
The MHET supports the international exchange of research, scholarship, academics and students, and academic partnerships between South African universities and universities across borders. In particular, distance education across Southern African borders is strongly endorsed in the government-ratified SADC Protocol on Education and Training and actively pursued by governments and providers within the region

For decades South Africans have been engaged in cross-border higher education both as receivers and providers, chiefly through the medium of correspondence education. It is a point of pride that Unisa has for many years enrolled and graduated students from outside the country, mainly from Africa but also further afield, and it rightly intends to continue to do so as an important part of its mission. Both Unisa and some predominantly contact institutions have mounted collaborative distance programmes with higher education institutions in the region.

The MHET is equally committed, however, to the principle that the international provision of education services should be subject to proper regulation by national authorities including supervision by competent quality assurance bodies in both providing and receiving countries. The MHET therefore strongly opposes the proposition that education services should be an unregulated commodity freely traded across borders, and will continue to oppose the inclusion of education in the WTO's General Agreement on Trade in Services. The MHET has taken the view that higher education is a public good whose provision in South Africa by foreign institutions or companies must be regulated in accordance with South African law to ensure that acceptable standards are maintained, students are protected and the democratic transformation of South African higher education is sustained. The internationalisation of higher education is best advanced by agreements and conventions outside of a trade policy regime.

Contact provision by foreign-owned institutions has been brought under the regulatory authority of the Higher Education Act, 1997 (No. 101 of 1997), but it is impossible to subject the operations of external distance higher education providers in South Africa to the same scrutiny and control if they have no physical presence in the country or local legal identity. This makes the regulation and accreditation of purely on-line courses particularly challenging.

Inter-governmental agreements designed to curb fraudulent or inferior distance higher education at source are the best available safeguard since they commit signatory states to ensure that providers of cross-border education meet acceptable criteria and are subjected to suitable quality assurance supervision in their home countries. The MHET has a strong interest in such international instruments and supports their effective application in South Africa. It is a matter of satisfaction and pride that the then CEO of South Africa's HEQC played a leading role in the formulation of the UNESCO/OECD *Guidelines for Quality Provision in Cross-Border Higher Education* (2005). The Ministry also has high regard for the International Association of Universities' (and associated bodies') statement on behalf of HEIs worldwide, *Sharing Quality Higher Education across Borders* (2005). Both documents give detailed guidance to HEIs and governments, as well as to quality assurance bodies and student bodies. They emphasise the mutual responsibility to ensure that cross-border higher education policy is in place and transparent, that the provision of cross-border higher education is embarked upon with a high sense of social responsibility and academic integrity, that full and correct information is available to students, that qualifications are transparent, that quality assurance processes are in place and effective, and that governments and HEIs maintain a collegial dialogue on the subject.

6.2 Code of conduct

It is imperative that South African participation in all forms of cross-border higher education in the African region, including distance higher education, should serve the development of its peoples.

Just as South Africans deserve protection from sub-standard or frankly exploitative offshore distance provision, so South African providers offering cross-border services should uphold standards at least as rigorous as they are required to observe at home. This includes making adequate provision for practicals and work integrated learning where appropriate.

The MHET appreciates the work done by the International Education Association of South Africa (IEASA) in developing a "Code of Ethical Practice in the Provision of Education to International Students by South African Higher Education Institutions", to which several South African HEIs are signatories. This instrument essentially supports ethical marketing of educational services. However, a more far-reaching code of conduct is needed for South African HEIs and associated service providers.

1. The MHET will engage the HEQC and HESA in discussion with a view to developing an agreed framework of principles and guidelines for action by all bodies and institutions in South Africa concerned with offering and receiving cross-border higher education.

2. As noted above, the MHET believes that the core focus of higher education in South Africa should be meeting national needs. While a level of internationalisation of both the student and staff body is considered a positive development, given its domestic concerns and challenges, South Africa cannot afford to aggressively market its higher education programmes across borders. South Africa remains committed to building and maintaining genuine international collaborations and partnerships in education. This is evident, for example, in the subsidy that it provides to SADC students (especially as 70% of our international students come from the SADC region. Currently South Africa exceeds the minimum 5% in terms of the Protocol (it is currently at ± 10%). In addition, all postgraduate students, regardless of their origin, are also fully subsidized.

3. In light of the above, the MHET recognises that where for strategic reasons, the South African government requests South African higher education institutions to support higher education development in other countries, that the nature of this support should be clearly articulated and funded accordingly.

7   Conclusion

Distance higher education is an appealing option particularly for mature and mid-career students, and not least for students with disabilities which make access to contact education difficult or impossible. The flexibility of distance learning is highly attractive. Students may study in their own time at home while continuing to work and earn, whether they live near or far from a university campus, earning initial or postgraduate qualifications, undertaking professional development, equipping themselves for a change of career, topping up incomplete programmes of study, taking courses that are unavailable elsewhere, or improving their general education. Government departments and corporate employers sponsor students for initial or continuing professional development in distance education and training programmes, enabling them to improve their knowledge and skills in their own time without withdrawing them from the workforce. And as the pressure on full-time undergraduate places increases, many first-time students choose distance

education because admission requirements are not always so strict, tuition fees are usually lower and they can avoid the costs of travel and living away from home.

Successive generations of information and communication technologies have vastly broadened the scope for innovation in programme design and delivery, both for distance and contact students. Radio, telephone, audio cassettes, satellite television, video, interactive computer software including open source learning environments, collaborative networks on the World Wide Web and the inexhaustible learning resources of the Internet have all been brought into use in South African distance education alongside the familiar medium of print.

For all these reasons distance higher education is an indispensable part of higher education provision and must aspire to and be judged by the highest standards.

South Africa's experience in the field is exceptional on the African continent and its leading practitioners are highly esteemed on the world stage. With these advantages we have an obligation to ensure that our distance higher education system delivers on its potential at home and makes an appropriate contribution to capacity building elsewhere, especially in our region.

The MHET has a clear interest in promoting good quality distance higher education, which is the goal of this policy. Its development has benefited from the combined expertise and advice of the higher education community. As the policy is implemented the MHET looks forward to continuing this challenging and productive collaboration.