

Towards a Unified e-Learning Strategy

Consultation Response Form

The closing date for this consultation is: 30 January 2004

Your comments must reach us by that date.

Note when completing electronically Use:

- **tab** key, **only** to access input boxes;
- **scroll** bar to navigate the form;
- **mouse** to access hyperlink.

The information you send to us may need to be passed to colleagues within the Department for Education and Skills and/or published in a summary of responses received in response to this consultation. We will assume that you are content for us to do this, and that if you are replying by e-mail, your consent overrides any confidentiality disclaimer that is generated by your organisation's IT system, unless you specifically include a request to the contrary in the main text of your submission to us.

The Department may, in accordance with the Code of Practice on Access to Government Information, make available on public request, individual consultation responses. This will extend to your comments unless you inform us that you wish them to remain confidential.

Please insert 'X' if you want us to keep your response confidential

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If your enquiry is related to the policy content of the consultation you can contact the e-Learning Strategy Unit:

Telephone: **020 7273 5451**
Email: e.learning@dfes.gsi.gov.uk

If you have a query relating to the consultation process you can contact:

Telephone: **01928 794888**
Fax: **01928 794 311**
Email: consultation.unit@dfes.gsi.gov.uk

Please insert 'X' in **one** of the following boxes that best describes you as a respondent.

<input type="checkbox"/> Head Teacher	<input type="checkbox"/> Principal/Vice Chancellor
<input type="checkbox"/> Employer	<input type="checkbox"/> Union
<input type="checkbox"/> Teacher/Lecturer/Trainer	<input type="checkbox"/> ICT/ILT co-ordinator
<input type="checkbox"/> Learner	
<input checked="" type="checkbox"/> Other (please specify) ▶	Learning Technology Organisation

Question 1

What are your views on our description of e-learning and its benefits? (Ch 1)

Comments:

We are comfortable with the broad definition used in Paragraph 1 "someone is using e-learning if they are learning in a way that uses information and communications technologies". But the definition suffers from the weakness that it is so broad as to divert attention from particular variants of e-learning, and from the specific strategies which are required to succeed at any particular variant.

The benefits are clearly summarised, with the exception of the benefits which e-learning can bring to learners with disabilities, especially through the use of assistive technology. (This is an aspect of e-learning on which the consultative document is relatively poorly developed.)

The Chapter also rather lacks a sense of caution, firstly presenting e-learning almost as a panacea for many of the weaknesses in education, when there are plenty of examples of poor quality e-learning which bring few if any of the described benefits, and secondly giving insufficient weight to the fact that implementing e-learning well in many contexts is a difficult and complex challenge.

Question 2

Do you think we have identified the main weaknesses and barriers to the use of e-learning? (Ch 2)

Yes

No

Not Sure

Comments:

We think that there are some additional weaknesses and barriers.

1. The quality and extent of the ICT infrastructure is very variable between and within different sectors of public education, within individual institutions, and between different parts of England, with too high a proportion of households and businesses unable to get economical broadband access to the internet. [This barrier ought to be more prominently visible in the document, rather than it being rather lost in Chapter 4: Leading Sustainable e-Learning Implementation.]

2. Although substantial amounts of public funding have been earmarked for the improvement of ICT infrastructure, especially in Schools and FE, the proportion of institutional budgets which is devoted to ICT spending is frequently still too low to bring about the sorts of "across the board" improvements which are needed if e-learning is to take root. This fact is often masked by crude counting of PCs, without regard for what specification these are, or, for example, by colleges reporting that a high percentage of their teaching staff have access to a PC, when a high proportion of delivery is done by agency staff for whom no or limited provision is made.

3. The emphasis in some centrally funded e-learning content development initiatives has been on the production of media-rich content which is not suitable for use on the relatively low specification infrastructure which is still prevalent, even if it is suitable from the point of view of its design.

4. The scope to have effective and efficient provision of online learning with LSC funding has for several years been severely compromised by the audit rules (and/or by providers' overly cautious

interpretation thereof). These rules derive from a funding methodology based originally on "guided learning hours" (i.e. synchronous, same-place contact between learners and teachers) whereas online learning often involves asynchronous, different-place contact between learners and teachers. Despite this fundamental, obvious, and frequently highlighted difference, FEFC and subsequently LSC clung to the use of a funding methodology (and audit rules) for online learning which were unfit for purpose. The result of this has been:

- * insitutional caution in developing online learning programmes;
- * waste of public money on the purchase of ICT tools and systems to assist in the creation of audit evidence;
- * significant waste of effort by teachers in recording audit evidence at the expense of time spent on teaching.

5. ALT understands learning technology as the systematic application of a body of knowledge to the design, implementation and evaluation of learning resources. The body of knowledge – the fruit of research and practice – is based on principles of good learning theory, instructional design and change management but is grounded in a good understanding of the underlying technologies and their capabilities. We think that an underlying barrier to the effective uptake and development of e-learning is the under-developedness of learning technology as a specific research discipline, something which ALT is seeking to address.

6. An area which Chapter 2 does not tackle is the attitude of teaching staff: they enjoy f2f teaching, there is an absence of appropriate reward structures to encourage them to change, and, whether justified or not, there is a lack of trust about job security, as well as a fear of loss of control over their own teaching. In combination these act as a major barrier to the adoption of e-learning.

7. Another barrier at a strategic institutional level is risk. E-learning, like all good learning, is expensive, and investment in it on an institutional scale represents a big risk, made worse by the underdevelopedness of learning technology as a discipline, and learning technologist as a profession (one main way to mimimise risk in this area is for the body of knowledge referred to above in 5 to be applied in decision-making). Furthermore, a process is needed to give institutions some indemnity from risk arising from innovation: for example during the introduction of genuinely novel approaches an insitution's league table ratings may decline, attracting economic or other penalties.

Question 3

Is a unified strategy appropriate? (Ch 2)

Yes

No

Not Sure

Comments:

The document's ambitious emphasis on a unified strategy is one of its major strengths, in particular because there are so many strategic overlaps, for example:

- * content and tool suppliers serving the workplace-learning, school, FE, and HE markets;
- * network infrastructure needing to be procured and utilised cross-sectorally;
- * some aspects of staff training and development (for example the accreditation of learning technologists, in which ALT has a particular interest) being best handled cross-sectorally;
- * technical and other standards needing to be developed for use cross-sectorally;
- * knowhow and experience in the learning technology domain needing to be applied cross-sectorally, in such a way that lessons already learnt in, say, HE are applied in FE, rather than lost.

Question 4

Do you agree with our vision for e-learning? (Ch 3)

Agree

Disagree

Not Sure

Comments:

We agree broadly with the vision, notwithstanding the additional weaknesses and barriers we have identified in response to Question 2 above. In particular we think that two more "strategic action areas" should be considered:

- * Developing the e-learning infrastructure;
- * Providing a supportive and fit-for-purpose financial and managerial climate.

(If the current document's "Leadership and Management" became "Leadership, Management, and the Business Environment, then "providing a supportive managerial climate" could be subsumed within it.)

Under the "Transforming Teaching and Learning" action area we think that a new strand - "Learning Technology Research" - should be introduced.

The vision does not mention the benefits of e-learning for teachers and trainers across the whole of education and training. Since these are a primary implementation group for the strategy, this is a serious omission.

Question 5

Will the proposed action areas enable the vision to be realised? (Ch 3)

Yes

No

Not Sure

Comments:

Firstly the strategy needs to be developed so as to address the barriers and weaknesses summarised in our response to Question 2.

Secondly the action areas need to be broadened as suggested in our response to Question 4.

Question 6

Are the proposed actions for leading sustainable development feasible and appropriate? (Ch 4)

Yes

No

Not Sure

Comments:

1. Actions 8, 9, and 10 should sit, with others, such as 54, under a new Infrastructure Strategic Action Area.

2. Action 7 may be risky, with its feasibility determined in part by user reaction to BS 8426 - A code of practice for e-support in e-learning systems, and to BS 7988 - A code of practice for the use of information technology (IT) in the delivery of assessments.

3. Proposed Action 5 "Develop an understanding of how to adapt institutional funding models to take account of e-learning delivery etc" only partly, and rather weakly, addresses the audit issue identified above in response to Question 2.

Question 7

Are the proposed action areas for supporting innovation in teaching and learning feasible and appropriate? (Ch 5)

Yes

No

Not Sure

Comments:

The YES box above appears to be un-tickable!

1. The emphasis on engaging professional associations, in Action 12, is very welcome.

2. Action 13 should include supporting centres with a subject focus through a technology assessment and guidance service, to advise non technologists on:

* what technologies can do;

* how technologies can be deployed effectively in learning and teaching.

ALT could assist in getting such a service established, if it was funded so to do.

3. Action 14 should have a greater emphasis on funding the development and dissemination of "exemplar" good practice implementations, a remit only partly currently met in FE and HE by FERL and LTSN, respectively. The US Sloan Consortium's "Effective Practices" web site is an example of the sort of service which would be of value here. Certainly, ALT could assist in getting such a service established, if it was funded so to do.

4. ALT's current work to establish a Learning Technology Research Labs "Special Interest Group" fits well with Actions 22 to 24.

5. ALT welcomes having been explicitly identified as a partner for the actions in this Chapter.

Question 8

Are the proposed action areas for developing the education workforce feasible and appropriate? (Ch 6)

Yes

No

Not Sure

Comments:

This area is close to ALT's heart, and we strongly support the reference in Paragraph 74 to the accreditation of learning technologists. Currently we have consultants working with us on developing a simple, economical, voluntary, peer-based UK-wide structure to accredit individuals as Learning Technologists, in collaboration with HE, FE, and industry bodies. [Project web site: <http://www.ucl.ac.uk/epd/alt-accreditation/>; January 2004 Document "Accrediting learning technologists: a review of the literature, schemes and programmes" http://www.ucl.ac.uk/epd/alt-accreditation/Initial_review.doc].

One critical requirement which must be met if teachers are to embrace e-learning is for teachers in all sectors to have ready access to ICT resources, and in particular, to a networked computer. Currently, this is not the case for a large proportion of them, especially in schools, FE, and Adult and Community Learning, and without it a lot of training and development effort could be wasted. One way to address this issue is for institutions to view the provision of appropriate technology to teachers as a recurrent cost, with, say, 1% of payroll costs earmarked to keep teachers appropriately equipped.

Question 9

Are the proposed action areas for unifying learners' support feasible and appropriate? (Ch 7)

Yes

No

Not Sure

Comments:

ALT welcomes the suggestions for qualifications and rewards for teaching staff. However the document at present appears to assume that teachers will behave rationally when evidence so far suggests these are very emotive issues. More needs therefore to be done to address the feelings of teaching staff concerned about loss of autonomy, job security and job satisfaction.

Question 10

Are the proposed action areas for aligning assessment feasible and appropriate? (Ch 8)

Yes

No

Not Sure

Comments:

The proposed actions are reasonable but DfES must avoid the trap of appearing to want to reengineer everything to fit e-learning.

E-assessment, for example, may still be relevant for non e-learning. Nor is it clear that credit systems need much change because of e-learning per se.

The list of partners is probably a little large but could include ALT.

The big wins are those involving formal assessment such as 16-19 and degree assessment. Some good case studies here are overdue, especially in A levels.

Question 11

Are the proposed action areas for building a better e-learning market feasible and appropriate? (Ch 9)

Yes

No

Not Sure

Comments:

1. There is a vast array of educational content freely available on the internet, some of it of very high quality, and there is a growing tendency for educational and cultural institutions (for example MIT or the BBC) to make their content freely available for reuse. The establishment of the "Creative Commons" license, under which MIT is making materials available within its ground-breaking OpenCourseWare initiative - <http://ocw.mit.edu/index.html> - is particularly significant.
2. Open Source Software is playing an increasingly important role in e-learning, just as it is in the economy more generally. For example one of the largest FE colleges in England now relies on an Open Source VLE.
3. DfES rightly calls for a greater emphasis to be placed in the creation of tools to enable teachers to develop and deploy content, without acknowledging the contradiction that the development of good tools to create content will tend to undermine the development of a market for content.
4. For these reasons it may not be realistic to expect a thriving market to develop across the full spectrum of e-learning.
5. Concerning the large amount of e-learning content already developed with public funding (for example by Ufi/learndirect or by NLN), efforts should be made to maximise the use to which this is put, by, for example, making NLN content available to schools, and Ufi/learndirect content available to FE and schools.
6. One specific concern is that the Chapter places rather too much emphasis here on content, and not enough on tools to support pedagogical interaction. The vision is to enable teachers and learners to access, use, create, and share high-quality learning materials by ensuring that the conditions for a thriving market and for innovation are in place. This seems to confuse learning content with learning activity. It would be more appropriate to seek to ensure that teachers and learners can access, use, create, and share high-quality _tools_ for supporting learning. Such tools necessarily include content or materials in the sense of learning resources and teaching packages, but should extend beyond this to incorporate effective tools for learner/learner and learner/tutor interactions. Learning materials tend to suffer from the 'not invented here' syndrome (as was the case, for example within much of the TLTP programme in HE) and unless very carefully designed tend to block off creativity by offering the user a closed ended experience, whereas tools open up creative opportunities, allowing users to generate their own meaningful activities and exchanges. Desk top applications and systems providing access to email, bulletin boards and IP based videoconferencing are the current generation of such tools. Mobile phones/PDAs equipped with intelligent software agents, MUDS/MOOs, avatars, holographic environments may be examples of the next generation.

Question 12

Are the proposed action areas for assuring technical and quality standards feasible and appropriate? (Ch 10)

Yes

No

Not Sure

Comments:

The proposed Actions in Chapter 10 are ambitious, and we believe that there is a role for ALT in this area. The Chapter's general silence on W3C specifications (on accessibility, the semantic web, XML etc) is a disappointment, as is its overly national (as against international) focus.

As stated previously, Action 54 (central procurement) relates to obtaining value for money as well as to assuring technical quality and standards, and should thus perhaps be assigned to a different Strategic Action Area.

BSI's work on e-learning standards, through its IST43 Committee, should be strengthened, and greater take-up of these standards would be encouraged if BSI could be supported in making the standards freely available.

Question 13

Have we identified the correct partners for the actions?

Yes

No

Not Sure

Comments:

We welcome ALT's inclusion as a Partner in Chapter 5, and 6, and consider that we also have a role to play in Chapters 4, 8, and 10.

ALT stands almost alone amongst the identified partner organisation as one which does not receive core funding directly from Government (for example Becta) or directly from a Government or sector agency (for example QAA, or CETIS).

As a professional and scholarly association we naturally must retain our independence, but, that said, our capacity to play the partnership role envisaged would be greatly strengthened if we were placed on a more secure footing by the provision of a modest amount of grant-in-aid.

Question 14

What actions do you see as the priorities?

Comments:

Take things slowly.

Look for lessons elsewhere in the world.

Aggregate demand to procure economically.

Take a determined line on standards, for example through eGIF.

Ensure teachers have the time, support, facilities, and incentives to enable them to get to grips with e-learning.

Concentrate on "pretty good pedagogy" rather than on media-rich content.

Strive for the strategy to work cross-sectorally.

Question 15

In your experience what are the most significant achievements of e-learning? (We would welcome your case studies.)

Comments:

1. It has caused many teachers to reconsider what and how they teach. Where there has been genuine reconsideration (as opposed to doing things to keep up with the Jones's), this great focus on teaching has been almost universally effective.

2. It has made lifelong learning a serious possibility by providing online learning opportunities that are flexible and competitive.

3. It has brought interactivity to distance education, thereby increasing its acceptability and relevance.

4. E-learning has become the focus of most leading edge research and development in teaching, rekindling interest in interactive learning, collaborative learning, peer assessment, and spawning new possibilities in the form of just-in-time learning and most recently, learning.

5. Specific exemplars of effective practice include:

* Many different parts of the Open University's activities;

* BBC Byte Size;

* Workplace learning initiatives such as the TUC's or the Polymer Project;

* Telford Technology College's ICT GNVQ;

- * CISCO's worldwide CCNA curriculum;
- * The Sheffield College's Weblinks resource (over 5000 categorized, practitioner-identified curriculum-related web-sites), GCSE English Online course, and pre-GCSE English Online course;
- * Tameside College's Passport to Learning programme;
- * NLN's "Paving the way to excellence in e-learning";
- * the LTSN Generic Centre's recently published e-learning guides.

Question 16

What do you think should be the respective roles of education leaders, Government and its agencies and the ICT industry in taking the strategy forward?

Comments:

Leaders in education should lead! To do that they need to understand. There is usually a lag as leaders do have lots of good experience but it is usually out of date. They therefore cannot yet put themselves in the mindset of the consultation document. This is a serious problem which has few short cuts other than provision of "e-learning adoption incentives" at various levels within the education system. The role of Government is to provide the incentives for acquiring understanding (and sticks if necessary a little later on!).

Another role of Government is to lay down standards but to do so in a fashion that permits some options to change if decisions are shown to have been inappropriate. In this way transfer will be facilitated. eGif must continue to evolve in a sure but swift footed fashion with good input from the e-learning community and from organisations representing people with disabilities (not enough is made in the consultation document of the access-widening capabilities of e-learning and e-assessment).

Another standard setting role for Government is in the quality assurance (QA) arena, with e-learning providing potentially better frameworks for QA, not least because of the scope within e-learning for automated recording of QA-related data. Standards that make it hard to do things without ICT are a very good way forward.

A final role for Government is to fund research programmes, and to facilitate transfer and related activities.

The role of the ICT industry is to be just that - its hardest task at the moment is to survive, with sections of the e-learning part of the ICT industry having a hard time at present. The key thing that we want from the industry is standards conforming products that work reasonably. If Government sets markets right then the ICT industry will repond, but Government should only do this within a world framework, which means that the standards embraced by eGIF should, where possible, be international ones.

General comments

Please make any General comments here.

Comments:

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you tick the box below.

Please acknowledge this reply

Here at the Department for Education and Skills we carry out our research on many different topics and consultations. As your views are valuable to us, would it be alright if we were to contact you again from time to time either for research or to send through consultation documents?

Yes

No

Code of Practice on written consultation

The following seven standards from the Cabinet Office Code of Practice on written consultation should be reproduced in all consultation documents. This is binding on Departments. Ministers' reasons for any departures should be explained.

All UK national public consultations are required to conform to the following standards:

1. Timing of consultation should be built into the planning process for a policy (including legislation) or service from the start, so that it has the best prospect of improving the proposals concerned, and so that sufficient time is left at each stage.
2. It should be clear who is being consulted, about what questions, in what timescale and for what purpose.
3. A consultation document should be as simple and concise as possible. It should include a summary, in two pages at most, of the main questions it seeks views on. It should make it as easy as possible for readers to respond, make contact or complain.
4. Documents should be made widely available, with the fullest use of electronic means (though not to the exclusion of others), and effectively drawn to the attention of all interested groups and individuals.
5. Sufficient time should be allowed for considered responses from all groups with an interest. Twelve weeks should be the standard minimum period for a consultation.
6. Responses should be carefully and open-mindedly analysed, and the results made widely available, with an account of the views expressed, and the reasons for decisions finally taken.
7. Departments should monitor and evaluate consultations, designating a consultation co-ordinator who will ensure the lessons are disseminated.

Thank you for taking the time to respond to this consultation.

Completed questionnaires and other responses, should be sent to the address shown below by

Send by post to: **Consultation Unit, Department for Education and Skills, Level 1B, Castle View House, Runcorn, WA7 2GJ.**

Responses and comments can be sent via e-mail to: e.learning@dfes.gsi.gov.uk