



Our response to the Draft Policy Framework for the Provision of Distance Education in South African Universities



Here is the full response we sent to the Powers-That-Be in response to the call for comments on the Draft Policy Framework for Distance Education in South African Universities. We thought it especially important to respond given the positive move to openness in the document, which we heartily support.

This is not the official UCT response, but a response from a few of us in the OpenUCT Initiative and the Centre for Educational Technology (CET), especially myself, Cheryl Hodgkinson-Williams (special thanks) and Greg Doyle.

We are delighted overall by the direction of the policy, and hope that our contribution will make a difference.

1. Terminology

While we welcome the inclusion of Open Educational Resources in the Draft Policy (p.5), we *recommend that a broader term, Open Content, be utilised*. Materials that can be used in teaching and learning such as statistical data or research reports and/or scholarly articles, may not conventionally be thought of as teaching and learning materials or directly as “educational”. This is of particular importance at the postgraduate level where the “learning” materials are mostly primary sources and journal articles. This more encompassing term allows for other resources such as open data and open access journals to be considered as Open Content to which students and lecturers ideally will have access.

2. Disaggregation and assessment

The Draft Policy explains that a great deal of investment is required for curriculum design, materials development and decentralised student support (p9). Under materials development, specific mention is made of formative assessment, but not of summative assessment. *We recommend that summative assessment is included as it is a critical aspect of the educational offering* as this final ‘judgmental assessment’ leads to students gaining credits towards a qualification or not.

In a digitally-mediated higher education context, increasing disaggregation means the separation of the three key aspects of teaching and learning: content, interaction (pedagogy) and credentialing (through summative assessment). Previously this were inextricably linked, now they can be gained in different ways and places, and with the rise of Open Content globally it is likely to be the quality of the pedagogy or the reputation of the credentialing institution which provides the competitive advantage rather than the content, or the whole package.

Thus one emerging trend places emphasis on the final assessment and credentialing of the student, rather than on how or even where (campus-based or distance education) the student completed the curriculum. Many accrediting agencies such as the South African Institute of Chartered Accountants already operate in this fashion with their “board examinations”. In a situation of online choice globally, this becomes a possible model in higher education.

In the past when information was a scarce commodity, universities had a role to play in both disseminating information and ensuring that students developed their knowledge. Now that there is an abundance of information from a variety of credible sources, universities may have less of a role in disseminating information and a more critical role in determining whether a student has mastered the material (using a range of sources, at a formal higher education institution or informally using Open Content).

We therefore disagree with the view that content provides a competitive edge, which in our view lies in the support provided by formative feedback and the attainment of accreditation criteria by summative assessment which focus more on the learning outcomes, not merely on the learning inputs.

3. Alternative copyright mechanisms

The Draft Policy notes that the digitization of information has introduced challenges on how to deal with intellectual property rights and notes that these copyright regimes

might become redundant (p12), but fails to mention that alternative intellectual property rights mechanisms such as Creative Commons[1] exist to address these challenges.

We recommend that the policy supports the use of alternative intellectual property rights mechanisms such as Creative Commons and GNU General Public Licenses[2] that provide a range of licenses between the traditional copyright and the public domain. It is the development of these licensing mechanisms with full attribution to the author that has made Open Educational Resources possible

4. Adaptation of Open Educational Resources

While it is heartening to note the mention of collaborative creation of Open Educational Resources in the Draft Policy (p12), creation of materials is only one step in this process. The fullest benefits of OER arise when materials are not only reused, but also revised, remixed and redistributed. Wiley defines these processes as follows:

- Revise: adapt and improve the OER so it better meets your needs
- Reuse: use the original or your new version of the OER in a wide range of contexts
- Remix: combine or “mashup” the OER with other OER to produce new materials
- Redistribute: make copies and share the original OER or your new version with others (Wiley, Green & Soares 2012:2).

We recommend that the terms reused, revised, remixed and redistributed are included after the creation of OER in the Policy document.

Furthermore we suggest that in order for all the Higher Education institutions as well as formal or informal training organisations in South Africa to benefit from the OER cycle (i.e. creation, reuse, revision, remixing, redistribution) that the Ministry of Higher Education and Training considers ways in which to reduce the duplication of effort in the OER cycle by creating a government supported mechanism (such as the Tertiary Education Network (TENET), that can act as a ‘referatory’ to all OER created, revised and remixed by South African academics and workplace trainers to optimise the redistribution of OER and break down silos between the formal and informal learning in institutions and in the workplace..

Notwithstanding existing institutional repositories and learning management systems, we need a mechanism to optimise the sharing and finding of OER across South Africa. This could, for example, be referred to as the South African Open Commons or OpenContent South Africa.

5. Collaborative creation of OER

Although the Draft Policy document mentions the collaborative development of OER as a way to develop high quality learning resources (p14), we caution that this will need some support from institutions particularly at campus-based universities where the development of teaching materials has been under-valued in favour of research publications.

However, there are possible ways of optimising synergies between institutions if collaborative materials development is acknowledged as a valued academic activity and recognised in performance appraisal and promotion processes. Moreover the value of adapting OER should not be overlooked as there is a wealth of Open Content freely available online for use and adapt. The team-based approach to curriculum design and resource development is mentioned again on page 21, but the same caveat noted.

We welcome the suggestion that the funding framework might usefully ring-fence funding to support the collaborative development of high quality curricula and OER (p24), but strongly recommend that the funding be directed to revising, remixing and redistributing as well. This funding could be used for academics to apply for grants for collaborative OER creation, revising and/or remixing which could include the payment for necessary hardware, software, technological support, graphic design and copyright clearance services.

6. Centralised support for distributed activities

We therefore suggest that other coordinating and enabling mechanisms be investigated to play a supporting role for the institutional repositories which already exist in almost all South African universities.

This would involve articulating protocols around norms and conventions for a community of repositories for sharing their content. The central activity would be to support this existing and nascent community, and possibly the development of an aggregator to enable maximum exposure. It would also enable optimum sharing of materials – especially revised and remixed OER – and at the same time allow for HEI’s to retain their original materials in their institutional repository thereby retaining their institutional branding and identity (p6) in a competitive environment

At the moment OER is still in its infancy in South Africa, with the University of Cape Town’s UCT OpenContent[3] directory of a selection of materials from UCT academics, a few courses available from the University of the Western Cape[4] and the OER Africa portal run by SAIDE for Sub-Saharan Africa[5].

If there were a central referatory for Open Content in South Africa as mentioned above, this could enable easier comparison of materials as well as afford peer reviewers and/or quality assurers the opportunity to evaluate these, as is done in the Connexions OER platform at Rice University[6].

5. Distinctiveness and purpose of distance education higher education

We welcome the inclusion of the idea expressed in the Draft Policy that self-contained high quality learning materials be published as OER to service high-volume distance education programmes (p15), but once again note the need for attention to be paid to the reuse, remixing and redistribution of these materials so that they are kept current and relevant thereby avoiding the consequence of irrelevant and outdated curricula mentioned on page 24.

6. Creating and enabling environment

6.1 Collaborative development

We strongly endorse the need for attention to be paid to the collaborative development of high quality learning resources (p.27). We recommend that as these high quality teaching and learning materials are mostly developed by academics or others receiving some form of government funding, and are therefore paid for by the public purse, they should be openly available to all. Wiley et al 2012 make the following request:

“Finally, all governments—national, state, county, and local—along with educational institutions must adopt a simple public policy: “Publicly funded resources are openly licensed resources.” This means that if public investment helps create an educational resource, then that content is published under an open license” (Wiley et al 2012:5).

We strongly support the recommendations that a review of national policies is undertaken, that ways of providing support for OER creation, revising, remixing and redistribution be sought, that alternative licensing mechanisms be investigated and that advocacy for OER be increased. To this end we recommend that the Department of Higher Education and Training support the UNESCO Paris OER Declaration[7] encouraging support for OER and to make educational materials developed with public funds freely available to everyone, launched at the OER Congress in Paris 20-21 June 2012.

6.2 Infrastructure

We support 4.2.2 d) in the Draft policy framework which states the need for “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.”

We also recommend liaison between DHET and those activities being undertaken by the Department of Science and Technology building an infrastructure to support research activities

[1] <http://creativecommons.org/licenses/>

[2] <http://www.gnu.org/copyleft/gpl.html>

[3] <http://opencontent.uct.ac.za/>

[4] <http://freecourseware.uwc.ac.za/>

[5] <http://www.oerafrica.org/>

[6] <http://cnx.org/>

[7] <http://www.unesco.org/new/fileadmin/MULTIMEDIA/HQ/CI/CI/pdf/2012%20Paris...>



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