



Co-funded by
the European Union



Drafting a Regulatory Framework for Online Higher Education Programs - Workshop

21st – 22nd July, 2026

Venue: Deans' Board, University of Juba

Dr. Lilly Abau Yosia

Assistant Professor of Communications and Information Systems

School of Computer Science and Information Technology

University of Juba

Content

- ❑ Online Programs and Experiences in South Sudan
- ❑ Online Programs and Experiences in South Sudan: Challenges
- ❑ Data Protection and Student Privacy
- ❑ Consumer Protection and Transparency
- ❑ Accessibility and Inclusion Requirements
- ❑ Licensing and Accreditation Requirements

Online Programs and Experiences in South Sudan



Introduction

- ❑ Emerging vital component of higher education
- ❑ Provides flexible learning opportunities,
- ❑ Expands access to education, and
- ❑ Supports lifelong learning
- ❑ So available data about existing online education

Methodology

- ❑ Phones calls to some key university staffs
- ❑ A few universities have begun implementing

Challenges

- ❑ Institutional, technological, and pedagogical

University of Juba - COVID-19

- ❑ Online learning management system to enable lecturers to upload lecture notes, PowerPoint slides, assignments, and recorded video lectures
- ❑ Currently establishing the country's first comprehensive online degree program, yet to become fully operational.

Africa Zeal University (AZU)

- ❑ Operating an online education program for approximately four years.
- ❑ Student enrolment remains relatively low.
- ❑ Expensive to operate while generating limited returns from tuition fees.
- ❑ Requires substantial institutional support and policy development.

Online Programs and Experiences in South Sudan: Challenges

Institutional Challenges

- ❑ Limited awareness among administrators/staff regarding digital learning value/requirements
- ❑ Institutional leaders view an optional addition rather than a strategic component.
- ❑ Resistance to organizational change
- ❑ Traditional administrative structures and established teaching practices.



Technological Challenges



- ❑ The COVID-19 challenges: Poor Internet Connectivity, Limited Digital Skills, Electricity and Infrastructure Constraints: Frequent power outages and inadequate ICT infrastructure
- ❑ Lectures conduct: Developing and maintaining an online learning platform requires significant financial and technical resources. official website and existing administrative systems.
- ❑ Google Meet lacks many of the essential features of a learning management system. e.g active engagement, scheduled classes taught consistently; teaching hours, attendance records, learning activities, and assessment reports. Central management of course materials, assignments, grading, and student progress.

Online Programs and Experiences in South Sudan: Challenges

Pedagogical Challenges

- ❑ Social science programs, sufficient for theoretical subjects, student engagement and interaction remain limited.
- ❑ Natural sciences, engineering, medicine, and other laboratory-based disciplines. Difficult to determine whether students fully understand.

Financial Challenge

- ❑ Limited Access to Digital Devices
- ❑ High Cost of Internet Data



Financial Sustainability

- ❑ Requires substantial investment in infrastructure, internet connectivity, servers, software licenses, cybersecurity, digital libraries, technical support, and staff training.
- ❑ Without increased enrolment or external funding, maintaining high-quality online education remains difficult.

Data Protection and Student Privacy

Why Data Protection Matters?

Routine collection of a wide range of personal and academic information, including:

- ❑ Student identification and contact details.
- ❑ Admission and enrolment records.
- ❑ Academic transcripts and examination results.
- ❑ Financial and payment information.
- ❑ Attendance and learning activity records.
- ❑ Communication between students and lecturers.
- ❑ Learning analytics and performance data.
- ❑ Biometric information where remote assessment technologies are used.

Principles for a National Data Protection Framework

- ❑ **Lawfulness and Transparency:** What information is collected., Why it is collected., How it will be used., Who may access it., How long it will be retained
- ❑ **Data Minimisation:** reduce privacy risks and improve data management.
- ❑ **Accuracy and Integrity:** maintain accurate and up-to-date records and provide mechanisms for students to review and correct inaccurate information where appropriate.
- ❑ **Secure Storage and Retention:** using appropriate technical and administrative safeguards. Define retention periods, and securely destroy unwanted information in accordance with institutional policies and national regulations.

Data Protection and Student Privacy

Cybersecurity Requirements

- ❑ Secure user authentication and password management.
- ❑ Multi-factor authentication for critical systems.
- ❑ Encryption of sensitive information during storage and transmission.
- ❑ Role-based access controls to limit access to authorised personnel.
- ❑ Regular cybersecurity risk assessments and security audits.
- ❑ Secure backup and disaster recovery systems.
- ❑ Continuous monitoring of institutional networks.
- ❑ Incident response procedures for cybersecurity breaches.

Student Privacy Rights

The regulatory framework should guarantee that students have the right to:

- ❑ Be informed about how their personal information is collected and used.
- ❑ Access their educational records.
- ❑ Request correction of inaccurate personal information.
- ❑ Expect confidentiality of academic records.
- ❑ Receive protection against unauthorised disclosure of personal information.
- ❑ Be notified where significant data breaches affect their personal information.

Data Protection and Student Privacy

Responsible Use of Learning Analytics and Artificial Intelligence

The regulatory framework should require institutions to:

- ❑ Use student data solely for legitimate educational purposes.
- ❑ Ensure transparency in the use of automated systems.
- ❑ Prevent discrimination or unfair treatment resulting from automated decision-making.
- ❑ Protect the confidentiality of learning analytics.
- ❑ Establish oversight mechanisms for the ethical use of artificial intelligence in education.

Institutional Responsibilities



- ❑ Develop comprehensive data protection and privacy policies.
- ❑ Establish institutional data governance structures.
- ❑ Designate officers responsible for data protection and cybersecurity.
- ❑ Train academic and administrative staff on privacy and information security.
- ❑ Conduct regular risk assessments and system audits.
- ❑ Ensure that third-party technology providers comply with national data protection requirements.
- ❑ Develop comprehensive data breach response and recovery plans.

Consumer Protection and Transparency

Consumer Protection

- ❑ Safeguard students against misleading practices, poor-quality educational services, financial exploitation, and unfair treatment.
- ❑ Rights and responsibilities of both higher education institutions and students be defined.
- ❑ Institutions be required to respect students' rights to fairness, privacy, academic integrity, and equal access to learning opportunities.

Transparency and Information Disclosure

Higher education institutions should publicly disclose:

- ❑ Institutional licensing and legal registration.
- ❑ Accreditation status of the institution and individual online programmes.
- ❑ Programme objectives, curriculum structure, learning outcomes, and qualification awarded.
- ❑ Admission requirements and selection criteria.
- ❑ Tuition fees, technology fees, examination charges, and any additional costs.
- ❑ Programme duration, mode of delivery, and graduation requirements.
- ❑ Methods of teaching, learning, and assessment.
- ❑ Technology and internet requirements for participation.
- ❑ Student support services, including academic advising, technical assistance, and library services.

Consumer Protection and Transparency

Fair Marketing and Recruitment Practices

Prohibited from making inaccurate claims regarding:

- ❑ Accreditation or recognition status.
- ❑ Employment or graduate outcomes.
- ❑ International partnerships or affiliations.
- ❑ Programme rankings or awards.
- ❑ Availability of scholarships or financial assistance.

Student Rights and Consumer Protection

Students should be guaranteed the right to:

- ❑ Receive quality education consistent with national standards.
- ❑ Access complete and accurate programme information.
- ❑ Be informed of all financial obligations before enrolment.
- ❑ Receive timely academic and technical support.
- ❑ Be assessed fairly using transparent assessment procedures.
- ❑ Access institutional policies and regulations.
- ❑ Submit complaints and appeals through clearly defined procedures.
- ❑ Receive protection against discrimination, unfair practices, and misleading information.

Consumer Protection and Transparency

Complaint and Dispute Resolution

- ❑ Be simple, fair, and accessible.
- ❑ Protect the confidentiality of students.
- ❑ Include clear timelines for resolving complaints.
- ❑ Allow appeals against academic and administrative decisions.
- ❑ Provide an opportunity for unresolved cases to be referred to the Ministry or the National Council for Higher Education.

Financial Transparency

- ❑ Tuition and registration fees.
- ❑ Payment schedules.
- ❑ Additional technology or administrative charges.
- ❑ Refund and withdrawal policies.
- ❑ Conditions under which fees may change.
- ❑ Financial obligations if programmes are suspended or discontinued.

Institutional Accountability

- ❑ Maintain internal quality assurance systems.
- ❑ Regularly review programme quality and student satisfaction.
- ❑ Publish accurate information on programme performance where appropriate.
- ❑ Cooperate with external quality assurance and accreditation reviews.

Accessibility and Inclusion Requirements

Accessibility and Inclusion

- ❑ Ensuring that all learners, regardless of disability, geographic location, gender, age, language, or socioeconomic status, can fully participate in online education.
- ❑ Ensuring that learning environments, teaching methods, technologies, and support services respond to the diverse needs of all students.

Key Regulatory Requirements

1. Universal Access to Digital Learning

- ❑ Provide learning management systems that function effectively on computers, tablets, and mobile phones.
- ❑ Optimize learning platforms for low-bandwidth environments.
- ❑ Allow offline access to learning materials where possible.
- ❑ Provide flexible learning schedules for working adults and students in remote or conflict-affected areas.

2. Inclusion of Students with Disabilities

- ❑ Compatibility with screen readers and other assistive technologies.
- ❑ Keyboard navigation for students who cannot use a mouse.
- ❑ Captions and transcripts for recorded lectures and multimedia resources.
- ❑ Accessible digital documents and electronic textbooks.
- ❑ Alternative formats for visual, audio, and interactive learning materials.
- ❑ Reasonable accommodations during online assessments.

Accessibility and Inclusion Requirements

3. Promoting Equity in Access

- ❑ Women and girls.
- ❑ Students living in rural and remote communities.
- ❑ Internally displaced persons and refugees.
- ❑ Working adults.
- ❑ Students from economically disadvantaged households.
- ❑ Learners with disabilities.

4. Digital Infrastructure and Connectivity

- ❑ Affordable internet connectivity.
- ❑ Reliable electricity supply.
- ❑ Campus ICT infrastructure.
- ❑ Learning management systems.
- ❑ Digital libraries.
- ❑ Cloud-based educational services.

5. Digital Literacy and Student Support

- Orientation programmes for new online students.
- Digital literacy training.
- Academic advising.
- Technical support services.
- Online library services.
- Mental health and psychosocial support where appropriate.

6. Inclusive Learning Design

- Flexible assessment methods.
- Multiple formats for learning resources.
- Interactive and collaborative learning opportunities.
- Plain language communication.
- Culturally relevant learning materials.
- Universal Design for Learning (UDL) principles where appropriate.

Licensing and Accreditation Requirements

Purpose of Licensing and Accreditation

- ❑ Ensure that online qualifications awarded by South Sudanese institutions are credible, nationally recognized, and internationally comparable.
- ❑ Safeguard students from low-quality or fraudulent providers while promoting continuous improvement across the higher education sector.

Principles for a National Licensing Framework

Institutions to demonstrate that they possess:

- A valid institutional charter or legal authority to operate.
- Appropriate governance and management structures.
- Qualified academic and administrative staff.
- Adequate financial sustainability.
- Reliable Information and Communication Technology (ICT) infrastructure.
- Secure Learning Management Systems (LMS).
- Policies on academic integrity, student support, data protection, and cybersecurity.
- Internal quality assurance mechanisms.

Licensing and Accreditation Requirements

Accreditation Standards

Academic Quality

Institutions should demonstrate that online programmes:

- Align with the National Qualifications Framework and approved academic standards.
- Have clearly defined learning outcomes.
- Maintain equivalent academic standards to face-to-face programmes.
- Use appropriate online teaching and assessment methods.
- Regularly review and update curricula.

Institutional Governance

- Institutional policies for online learning.
- Risk management and compliance systems.
- Ethical use of educational technologies.
- Continuous monitoring and evaluation.

Academic Staff

Regular professional development in:

- Online pedagogy.
- Digital assessment methods.
- Learning management systems.
- Artificial intelligence in education.
- Student engagement strategies.
- Inclusive online teaching practices.

ICT Infrastructure

- Reliable Learning Management Systems.
- Secure digital platforms.
- Data backup and disaster recovery systems.
- Technical support services.
- Stable internet connectivity.
- Cybersecurity safeguards.

Licensing and Accreditation Requirements

Student Support Services

- ❑ Student orientation for online learning.
- ❑ Academic advising.
- ❑ Technical support.
- ❑ Digital library services.
- ❑ Online counselling where appropriate.
- ❑ Accessible communication channels between students and instructors.

Assessment and Academic Integrity

- ❑ Verify student identity.
- ❑ Prevent academic misconduct.
- ❑ Protect examination integrity.
- ❑ Maintain transparent grading procedures.
- ❑ Provide fair appeal mechanisms.

References

1. Consumer Awareness: Curating Information About Higher Education
2. Personal Data and Privacy Protection in Online Learning: Guidance for Students, Teachers and Parents
3. Legal Framework for Consumer Protection in Digital Transactions
4. The E-learning readiness of higher education institutions during times of crises
5. The current status of e-Learning in Sudan
6. The future of online learning: innovations, accessibility, and the digital divide
7. Personal data and security technical guide for online education platforms
8. Shaping Digital Education Enabling factors for quality, equity and efficiency
9. Online education accreditation scheme Guidance on meeting the online education standards
10. Legal Challenges of Protecting Students' Privacy in Online Learning: A European Data Protection Law Analysis
11. Republic of South Sudan Ministry of General Education and Instruction: General Education Sector Plan 2023-2027

THANK YOU

Recommendations

- Increase awareness among university leaders, academic staff, and students about the benefits and requirements of online education.
- Invest in robust learning management systems that integrate teaching, student attendance, assessments, grading, and academic reporting.
- Provide continuous professional development for lecturers in online pedagogy and digital instructional design.
- Improve internet connectivity and digital infrastructure across universities. Strengthening ICT infrastructure,
- Expand affordable internet access
- Improve electricity supply,
- Develop national policies and quality assurance frameworks specifically for online higher education.
- Encourage blended learning approaches that combine online theoretical instruction with face-to-face practical sessions for science and engineering programs.
- Seek partnerships with government agencies, development partners, and international universities to support infrastructure development and capacity building.

Recommendations

- ☐ Develop national regulations governing the collection, processing, storage, sharing, and retention of student data.
 - ☐ Establish minimum cybersecurity standards for all institutions offering online education.
 - ☐ Require every higher education institution to adopt comprehensive data protection and privacy policies.
 - ☐ Introduce mandatory reporting and response procedures for significant data breaches.
 - ☐ Regulate the ethical use of artificial intelligence, learning analytics, and cloud-based educational technologies.
 - ☐ Build institutional capacity through continuous training in data governance, cybersecurity, and digital risk management.
 - ☐ Integrate compliance with data protection and privacy standards into institutional licensing, accreditation, and quality assurance processes.
-
- ☐ Establish national consumer protection standards applicable to all online higher education providers.
 - ☐ Require institutions to disclose accurate information on licensing, accreditation, programme quality, fees, learning outcomes, and student support services.
 - ☐ Prohibit misleading advertising, false claims, and unfair recruitment practices.
 - ☐ Mandate transparent financial policies, including published tuition fees, additional charges, and refund procedures.
 - ☐ Require institutions to establish accessible complaint and appeals mechanisms with external oversight where necessary.
 - ☐ Strengthen institutional accountability through regular quality assurance reviews and compliance monitoring.
 - ☐ Promote student awareness of their rights and responsibilities through orientation programmes and publicly available institutional policies.

Recommendations

- ❑ Make accessibility and inclusion mandatory requirements for licensing and accreditation of all online higher education programmes.
 - ❑ Adopt national digital accessibility standards consistent with internationally recognized best practices.
 - ❑ Require institutions to demonstrate compliance with accessibility requirements before approval of online programmes.
 - ❑ Promote investment in affordable digital infrastructure, internet connectivity, and educational technologies.
 - ❑ Support capacity building for academic staff in inclusive online teaching and accessible content development.
 - ❑ Establish monitoring and evaluation mechanisms to assess institutional compliance with accessibility and inclusion standards.
 - ❑ Encourage collaboration with telecommunications providers and development partners to reduce the digital divide and improve equitable access to online education.
1. Develop a National Licensing Framework for institutions offering online programmes.
 2. Establish national accreditation standards specific to online higher education.
 3. Require institutional licensing before any online programme is introduced.
 4. Mandate programme accreditation based on academic quality, governance, ICT capacity, learner support, accessibility, and assessment integrity.
 5. Strengthen the national quality assurance agency to conduct regular institutional audits and accreditation reviews.
 6. Introduce periodic renewal of accreditation based on demonstrated compliance and continuous quality improvement.
 7. Promote alignment with regional and international quality assurance frameworks to facilitate recognition of South