



# **Assessment of the Impact of Selected Aspects of the South African National Qualifications Framework**

**2017 NQF Impact Study Report**

**March 2019**

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This report was compiled by Dr Heidi Bolton and Ms Renay Pillay, based on research conducted by Dr Heidi Bolton, Ms Renay Pillay, Dr Letitia Adaken, and Ms Yuraisha Chetty (all from SAQA); Mr Marco Macfarlane (Umalusi: Council for Quality Assurance in General and Further Education and Training); Dr Amani Saidi (Council on Higher Education [CHE]); Mr Vijayen Naidoo (CEO of the Quality Council for Trades and Occupations [QCTO]), Ms Busi Langa (QCTO), and Dr Mario Landman and Ms Nadia Landman (QCTO-commissioned researchers); Ms Tola Akindolani, with inputs from Ms Yvonne Shapiro, Mr Nkhangweleni Luvhengo, Mr Lefa Lenka, Mr Livhuwani Bethuel Ramphabana, and Ms Charmaine Lebooa (all from SAQA), Ms Reneilwe Maake (CHE), Mr Joe Samuels and Dr Julie Reddy (Chief Executive Officer [CEO] and Deputy CEO of SAQA), Professor Talvin Schultz (Chairperson of SAQA's Research Committee); and Mr Zweli Baleni, Ms Michelle Buchler, Professor Sarah Howie, Dr Percy Mahlathi, Dr Vuyisile Nkonki, Professor Shirley Pendlebury, and Professor Shirley Walters (SAQA Research Committee members).

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**Contact details**

Postnet Suite 248  
Private Bag X06  
Waterkloof  
0145

Helpdesk: 086 010 3188

Facsimile: 012 431 5039

Websites: [www.nqf.co.za](http://www.nqf.co.za) and [www.saqa.org.za](http://www.saqa.org.za)

E-mail: [help@nqf.co.za](mailto:help@nqf.co.za) and [saqainfo@saqa.org.za](mailto:sqaqainfo@saqa.org.za)

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# List of Acronyms

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AAC	Associated Assessment Criteria
ABET	Adult Basic Education and Training
ACS	Advocacy and Communication Services
AET	Adult Education and Training
ANA	Annual National Assessment
AQP	Assessment Quality Partner
ASD	Accredited Skills Development Provider
BATSETA	Council of Retirement Funds of South Africa
BBC	Black Business Council
B Eng	Bachelor of Engineering
BUSA	Business Unity South Africa
CAERT	Credit Accumulation, Exemption, Recognition, and Transfer
CAPS	Curriculum and Assessment Policy Statement
CASS	Continuous Assessment
CAT	Credit Accumulation and Transfer
CEDEFOP	Centre Européen pour le Développement de la Formation Professionnelle (European Centre for the Development of Vocational Training)
CEO	Chief Executive Officer
CET	Community Education and Training
CETC	Community Education and Training College
CHAT	Cultural Historical Activity Theory
CHE	Council on Higher Education
COTT	Central Organisation for Trade Testing
CPD	Continuing Professional Development
DAFF	Department of Agriculture, Fisheries and Forestry
DBE	Department of Basic Education
DFQEAS	Directorate for Foreign Qualifications Evaluation and Advisory Services
DHET	Department of Higher Education and Training
DoE	Department of Education
DoL	Department of Labour
DPME	Department of Planning Monitoring and Evaluation
DPSA	Department of Public Service and Administration
DQP	Development Quality Partner
DRR	Directorate for Registration and Recognition
DSSD	Directorate for Standard Setting and Development
ECE	Elementary Certificate of Education
EIA	External Integrated Assessment
EISA	External Integrated Summative Assessment
ELO	Exit Level Outcome
ETQA	Education and Training Quality Assurance
FET	Further Education and Training
FLC	Foundational Learning Certificate
GCE	General Certificate of Education

GENFET	General and Further Education and Training
GENFETQA	General and Further Education and Training Quality Assurance
GETC	General Education and Training Certificate
GETCA	General Education and Training Certificate for Adults
GFET	General and Further Education and Training
GFETQSF	General and Further Education and Training Qualifications Sub-Framework
GIZ	Gesellschaft für Internationale Zusammenarbeit
HEI	Higher Education Institution
HELTASA	Higher Education Learning and Teaching Association of Southern Africa
HEMIS	Higher Education Management Information System
HEQC	Higher Education Quality Committee
HEQCIS	Higher Education Quality Committee Information System
HEQF	Higher Education Qualifications Framework
HEQSF	Higher Education Qualifications Sub-Framework
HESA	Higher Education South Africa
HET	Higher Education and Training
HOD	Head of Department
HRDS	Human Resource Development Strategy
HRDS-SA	Human Resource Development Strategy for South Africa
ICASS	Internal Continuous Assessment
ICE	Intermediate Certificate of Education
ICT	Information and Communications Technology
IEB	Independent Examinations Board
INDLELA	Indlela Development Skills (Artisan Training Centre)
INSETA	Insurance Sector Education and Training Authority
ISAT	Integrated Summative Assessment Task
IT	Information Technology
KPI	Key Performance Indicator
LARF	Level, Activities, Roles, Focus
LLB	Bachelor of Laws
LOLT	Language of Learning and Teaching
LPG	Learning Programme Guideline
LQDF	Learner Qualification Development Facilitator
M&E	Monitoring and Evaluation
MBA	Master of Business Administration
MHET	Minister of Higher Education and Training
MIE	Managed Integrity Evaluation
MIS	Management Information System
MoA	Memoranda of Agreement
MoE	Minister of Education
MSP	Master System Plan
MTA	Manpower Training Act
MTT	Ministerial Task Team
NAMB	National Artisan Moderation Body
NASCA	National Senior Certificate for Adults
NATED	National Accredited Technical Education

NCM	National Coordinating Mechanism
NCS	National Curriculum Statement
NCV	National Certificate: Vocational
NDP	National Development Plan
NGP	National Growth Path
NLRD	National Learners' Records Database
NPHE	National Plan for Higher Education
NPPSET	National Plan for Post-School Education and Training
NQAI	National Qualifications Authority Ireland
NQF	National Qualifications Framework
NSB	National Standards Body
NSC	National Senior Certificate
NSDS	National Skills Development Strategy
NSF	National Skills Fund
OBE	Outcomes-Based Education
OECD	Organisation for Economic Cooperation and Development
OFO	Organising Framework for Occupations
OQMSD	Occupational Qualifications Management Strategic Document
OQSF	Occupational Qualifications Sub-Framework
PALC	Public Adult Learning Centre
PAT	Practical Assessment Task
PCO	Programme Coordinator
PED	Provincial Education Department
PHEI	Private Higher Education Institution
PoE	Portfolio of Evidence
PSET	Post-School Education and Training
Q&S	Qualifications and Standards Committee
QA	Quality Assurance
QAS	Qualification Assessment Specifications
QAP	Quality Assurance Partner
QC	Quality Council
QCTO	Quality Council for Trades and Occupations
QDF	Qualification Development Facilitator
QDP	Quality Development Partner
QEP	Quality Enhancement Project
QPCD	Quality Promotion and Capacity Development
ROI	Return on Investment
RoL	Record of Learning
RPL	Recognition of Prior Learning
RSA	Republic of South Africa
SAA	South African Airways
SACAI	South African Comprehensive Assessment Institute
SADC	Southern African Development Community
SAFCERT	South African Certification Council
SAG	Subject Assessment Guideline
SAIT	South African Institute of Tax Practitioners

SAQA	South African Qualifications Authority
SARS	South African Revenue Service
SA-SAMS	South African School and Administration Management System
SBA	School-Based Assessment
SC	Senior Certificate
SC(A)	Senior Certificate (Amended)
SDG	Sustainable Development Goal
SDIPE	Skills Development Institute for Physical Education
SDP	Skills Development Provider
SETA	Sector Education and Training Authority
SGB	Standards Generating Body
SLA	Service Level Agreement
SMS	Short Messaging Service
StatsSA	Statistics South Africa
TO	Trades and Occupations
TVET	Technical and Vocational Education and Training
UNESCO	United Nations Educational, Scientific and Cultural Organisation
UWC	University of the Western Cape
WBL	Work Based Learning
WIL	Work Integrated Learning
WPL	Workplace Learning
Umalusi	Council for Quality Assurance in General and Further Education and Training
UoT	University of Technology
USAf	Universities South Africa



# Foreword

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The South African Qualifications Authority (SAQA) is mandated through the National Qualifications Framework (NQF) Act (Republic of South Africa [RSA] 2008) firstly to conduct or commission investigations on issues of importance for the development and implementation of the NQF in South Africa, including periodic studies of the impact of the NQF on South African education and training (RSA 2008, Clause (k)[i]). SAQA is also required to publish the findings of these investigations (Ibid. (k)[ii]).

Why an NQF Impact Study? The effectiveness of the set of policies, which regulates education and training in the country, needs to be known. Information needs to be publicly available. Democratic South Africa inherited an unfair system that was lacking in transparency. The South African NQF was designed to integrate this system, make it universally accessible, and enable redress, quality learning, and transparency.

Under the NQF Act, SAQA is responsible for advancing the objectives of the NQF, overseeing its implementation and further development, and coordinating the three NQF Sub-Frameworks. Each of these Sub-Frameworks is overseen by a Quality Council. The work of SAQA and the Quality Councils is governed by the NQF 'System of Collaboration' – a system which binds the key NQF partners in a respectful, collaborative, coordinated approach, in which they consult with and support each other, and uphold agreements between them. Strong working relationships are of central importance in this work; 'relational agency' (Edwards, 2010; 2014) is a key skill.

Relational agency involves engaging with and seeking to understand the motives of others, and then proceeding on the basis of the common knowledge built between the collaborating entities. In this spirit, SAQA and the Quality Councils conducted the 2017 NQF Impact Study together, each organisation assessing the impact of particular aspects on which it has been focusing and seeking to make an impact. A realist approach to impact evaluations was adopted, in which the various inputs, activities, outputs and outcomes, and impacts linked to the selected aspects, were explored. This approach was located within an understanding shaped by Cultural Historical Activity Theory (CHAT), and an attempt to use the study to develop relational agency in the system.

I trust that key NQF stakeholders and the public in general will find in this report useful; in terms of the areas focussed upon in the research, the analyses and findings presented, and the recommendations made. reflections on the trends revealed in relation to the foci of the study, and a base on which to build a more equitable education and training system of quality for all.

**Joe Samuels**  
**Chief Executive Officer, SAQA**

# Executive Summary

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## INTRODUCTION AND BACKGROUND

The South African Qualifications Authority (SAQA) is mandated by the National Qualifications Framework (NQF) Act (Act 67 of 2008) to "[c]onduct or commission investigations on issues of importance for the development and implementation of the NQF, including periodic studies of the impact of the NQF on South African education, training and employment" and "publish findings of the investigations" (RSA, 2008: Section 13[k(i)-(ii)]). SAQA fulfils this part of its mandate by conducting an NQF Impact Study every three to four years; these studies are named after the year in which the data are collected.

Potentially, the general question addressed in the 2017 NQF Impact Study, was 'What is the emerging impact of NQF implementation, on the systemic integration and articulation, access and redress, and quality and transparency in education, training, development and work?' Given the time frame of the study, and the historical stage of development of the system (Engeström, 1987), however, it was not possible to address each of these aspects fully. It would have been premature for SAQA and the Quality Councils to conduct a *full* NQF impact study in 2017, as the Quality Councils were still in the process of finalising and advocating their Sub-Framework policies for Recognition of Prior Learning (RPL), Credit Accumulation and Transfer (CAT), assessment and articulation in line with SAQA's related overarching policies, the Ministerial Policy for the Coordination and Funding of RPL (DHET, 2016) and Articulation Policy (DHET, 2017). SAQA and the Quality Councils thus selected particular questions, in relation to the foci of their work in the eight years since the promulgation of the NQF Act.

## CONCEPTUAL FRAMEWORK

The conceptual framework of the 2017 NQF Impact Study comprised understanding the NQF as a 'relational system' (Bolton and Keevy, 2011), and SAQA-Quality Council work as being characterised as Engeström's (1987; 2001) 'interacting systems' within a Cultural Historical Activity Theory (CHAT) perspective. A realist approach to impact evaluation (Pawson and Tilley, 2004) was used. CHAT informed the understanding of the NQF, and shaped the research questions, methods, and samples for the study. The concept of 'relational agency' (Edwards, 2010; 2014) was encouraged – both in planning and conducting the research by SAQA and the Quality Councils, and in the extensive engagements with stakeholders through the surveys and interviews throughout the study.

## RESEARCH QUESTIONS

The 2017 NQF Impact Study sought to ascertain the effects and emerging impact of NQF implementation on the systemic integration and articulation, access and redress, and quality and transparency, in education, training, development and work. The stage of NQF policy development at the start of the study meant that the research focus needed to be on key aspects, rather than on the whole system. Efforts were made to build relational agency through the study. Stakeholder experiences were captured; triangulation was done. The research team sought to conduct the study in line with the foci in Sustainable

Development Goal 4, which are ‘inclusive and equitable quality education’ and promoting lifelong learning, which equip learners to acquire the knowledge and skills needed to promote sustainable development, sustainable lifestyles, human rights, gender equality, the promotion of a culture of peace and non-violence, and global citizenship (UNESCO, 2015). The articulation agenda in South Africa was also central in the research. While SAQA and the Quality Councils worked collaboratively on all the research questions addressed, each of these entities originally developed research questions relevant for their contexts.

There were six focal areas in the study, each with one or two main research questions, and several sub-questions. The main questions, the methods, samples, findings and types of analysis used, are summarised in Table A below. Essentially the over-arching research design of the study comprised six sub-projects. The first two sub-projects used mixed methods, comprising documentary analyses, followed by in-depth interviews with purposively selected respondents; Sub-Project 2 also included some surveys. Sub-Project 3 had a survey design. Sub-Project 4 had a qualitative design, comprising extensive in-depth interviews with a purposively selected and snowballed sample. Sub-Projects 5 and 6 had mixed method designs; Sub-Project 5 comprised a documentary analysis, and a quantitative trends analysis. Sub-Project 6 commenced with a documentary analysis, followed by a survey and then in-depth interviews.

**Table A: Summary of the research design of the 2017 NQF Impact Study**

Research Question	Method	Analysis	Sample summary
<b>SUB-PROJECT 1:</b> <b><i>Alignment of NQF policies for RPL, CAT, and assessment</i></b> <b>(Section 5 of the report)</b>			
SAQA 1A) To what extent are the RPL, CAT and Assessment policies in the NQF Sub-Framework contexts aligned to the over-arching policies of the Department of Higher Education and Training (DHET)/ Department of Basic Education (DBE)/SAQA?	<b>Survey (1C) supplemented with interviews (1B) preceded by document analysis (1A)</b>	<b>Thematic analysis CHAT informed/ Thematic analysis within CHAT categories</b>	<b>CHAT informed</b> <u>Document analysis:</u> DHET (2016; 2017); SAQA (2014a; 2014b; 2016); DBE (2012); Umalusi (2015); CHE (2016c); QCTO (2016b,d; 2017a) – Policies for RPL, CAT, Assessment, Articulation.  <u>Interviews:</u> 7 senior Quality Council policy developers
SAQA 1B) How did the publication of the SAQA policies for RPL, CAT, and Assessment impact on the related work of the Quality Councils?			<b>CHAT informed</b> <u>Survey</u> 99 Private Universities 54 Private Colleges 29 Accredited Skills Development Providers (SDPs) 17 SDPs for Old Trades Qualifications 14 SDPs for New Trades Qualifications 11 SDPs for other New Occupational Qualifications 14 Assessment Quality Partners (AQPs) 11 Development Quality Partners (DQPs) 4 Qualification Development Facilitators (QDFs) 61 Employers
SAQA 1C) What impact have SAQA’s policies for RPL, CAT, and Assessment			

had on selected Quality Council stakeholders?			
<b>SUB-PROJECT 2:</b> <b><i>Evidence of the impact of national RPL, CAT, and assessment policies</i></b> <b>(Section 6 of the report)</b>			
SAQA 1D) Evidence of impact of RPL and CAT policies on public Higher Education Institutions (HEIs) in: (a) HEI websites, (b) HEI Statutes, and (c) Handbooks/Yearbooks  <u>Umalusi (1A)</u> How has NQF Act informed Umalusi's policy development and the development of the General and Further Education and Training Qualifications Sub-Framework (GFETQSF)?  <u>Umalusi (1B)</u> What impact has the implementation of Umalusi's policies under the NQF Act, had on its stakeholders in the GFETQSF context?	<b>Survey (1D)</b>  <b>Interviews preceded by document analysis</b>	<b>Thematic analysis CHAT informed/ Thematic analysis within CHAT categories</b>  <b>Thematic/ analysis Qualitative Content analysis</b>	<b>CHAT informed</b> <u>Website/Document analysis</u> 26 Public HEIs 1 Yearbook  <u>Umalusi (1A)</u> NQF Act; SAQA's policies for RPL, CAT, Assessment; and Umalusi's RPL, CAT, and Assessment Policies  <u>Umalusi (1B)</u> Key policy-makers within Umalusi, and five Umalusi staff members who had recently left Umalusi, but who had worked extensively on the policies concerned; Representatives of the four major assessment bodies that implement the policies of interest (DBE, DHET, Independent Examinations Board [IEB], South African Comprehensive Assessment Institute [SACAI]).
<b>SUB-PROJECT 3:</b> <b><i>Impact of selected aspects of the transparency apparatus of the NQF</i></b> <b>(Section 7 of the report)</b>			
SAQA 2A) Where do stakeholders obtain information on qualifications, part-qualifications, Professional Bodies, Professional Designations, providers, learner achievements, and the verification of qualifications in South Africa?  SAQA 2B) What do stakeholders know about SAQA's searchable databases?	<b>Surveys (2A-2E)</b>	<b>Thematic analysis within CHAT categories</b>	<b>CHAT informed</b> <u>(Searchable databases and trends project)</u> 9 National Government Departments 57 Provincial Government Departments All 26 Public Universities All 50 Public Technical and Vocational Education and Training (TVET) Colleges 99 Private Universities 54 Private Colleges All 3 Quality Councils 5 Statutory Bodies All 96 recognised Professional Bodies All 21 Sector Education and Training Authorities (SETAs) 29 Accredited SDPs 17 SDPs for Old Trade Qualifications 14 SDPs for New Trade Qualifications

<p>SAQA 2C) If SAQA's searchable databases are used, how are they used, and how useful were they found to be?</p> <p>SAQA 2D) Are stakeholders aware of the National Learners' Records Database (NLRD) Trends Reports? If so, how were these reports used, and what impact did they have?</p> <p>SAQA 2E) How useful is SAQA's Record of Learning Service? What impact has this service had, on stakeholders' lives and work?</p>			<p>11 SDPs for other New Occupational Qualifications 14 AQPs 11 DQPs 4 Qualification Development Facilitators (QDFs) 61 Employers</p> <p><u>(RoL project)</u> Random selection of 1 000 clients (3%) (of total of 35 807 clients) who had used SAQA's RoL. Due to technological factors, 520 two-question questionnaires were emailed to clients (learners).</p>
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**SUB-PROJECT 4:**  
***Stakeholder experiences and impact of the NQF Level Descriptors***  
**(Section 8 of the report)**

<p>SAQA 3A) How are the NQF Level Descriptors understood and used – and where did stakeholders learn of and about them? How do stakeholders use the Level Descriptors; what have the Level Descriptors enabled; and what challenges have been experienced? Do stakeholders have suggestions for improving the Level Descriptors?</p> <p>SAQA 3B) How have the NQF Level Descriptors aided or blocked learning pathways, and what could be done to strengthen the Level Descriptors in this regard?</p>	<p><b>Surveys (3A, 3B) Triangulated with interviews (3B)</b></p>	<p><b>Thematic analysis within CHAT categories</b></p>	<p><b><u>CHAT informed</u></b> <u>Interviews</u> were held with the following purposely selected respondents<sup>1</sup>:</p> <ul style="list-style-type: none"> <li>• 33 (of 36 selected) SAQA staff members</li> <li>• 11 (original sample 6) Senior Quality Council managers</li> <li>• 7 (original sample 15) Senior DHET and DBE staff members</li> <li>• 18 (snowballed) Qualification Developers, consultants and SETAs – recommended by the Quality Council interviewees</li> <li>• 5 Private HEIs (which had registered several qualifications under the NQF Act)</li> </ul> <p><u>Surveys</u> were sent to:</p> <ul style="list-style-type: none"> <li>• 25 AQPs and DQPs</li> <li>• All 26 Public HEI</li> <li>• All 50 Public TVET Colleges</li> <li>• All 21 SETAs</li> <li>• 153 Private HEIs/Colleges</li> <li>• 71 Skills Development Providers</li> <li>• 61 Employers</li> <li>• All 96 recognised Professional Bodies</li> </ul>
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<sup>1</sup> A detailed explanation of the sample selected and response rates for this project, is provided in Section 8 of this Report.

**SUB-PROJECT 5:**

***Impact of Council on Higher Education (CHE) initiatives to integrate public and private Higher Education***

**(Section 9 of the report)**

<p><b>CHE (1A)</b> What are the mechanisms that the CHE has developed and implemented since 2008, under the NQF Act, to promote integration and articulation between public and private Higher Education – and what impact have these initiatives had on integration/articulation?</p>	<p><b>Interviews preceded by document analysis (CHE 1)</b></p> <p><b>Learner movement trends analysis (CHE 2)</b></p>	<p><b>Content analysis CHAT informed (CHE 1)</b></p> <p><b>Comparative analysis of learner movement using NLRD data (CHE 2)</b></p>	<p><b>CHAT informed</b> <u>Documents (CHE 1A):</u> CHE’s NQF or Higher Education Qualifications Sub-Framework (HEQSF)-related policy documents, frameworks, good practice guide documents, (CHE, 2001; 2004a,b; CHE, 2005; CHE, 2008; CHE, 2010a; CHE, 2011b,c,d; CHE, 2012b; CHE, 2013a,b; CHE, 2014b,c,d; CHE, 2015b,c; CHE, 2016b,c,d; 2017a,b) and annual reports (CHE, 2009; CHE, 2010b; CHE, 2011a; CHE, 2012a; CHE, 2013c; CHE, 2014a; CHE, 2015a, CHE, 2016a; CHE, 2017a).</p>
<p><b>CHE (1B)</b> How much student movement has occurred between public and private Higher Education since 2008, and how does this differ from student movements before 2008 (student movement patterns before 2008 will provide the baseline)?</p>			<p><b>CHAT informed</b> <u>Interviews (CHE 1A):</u> Four directors from CHE’s core function directorates, including (1) Programme Accreditation, (2) National Standards and Reviews, (3) Institutional Audits, and (4) Quality Assurance and Promotion Coordination.</p> <p><b>(CHE 1B)</b> The students achieving Bachelor’s Degrees in the periods 2003 to 2008 (295 856) and 2010 to 2015 (461 357). Students achieving a Bachelor’s Degree as a first qualification in the selected fields in the HEQSF context: (a) Business, Commerce, and Management Science (52 034), and (b) Information Technology (IT) (885).</p>

**SUB-PROJECT 6:**

***Experiences and impact of new Quality Council for Trades and Occupations (QCTO) model for occupational qualifications***

**(Section 10 of the report)**

<p><b>QCTO (1A)</b> What are the significant differences between the QCTO model for qualifications under the NQF Act, and the Unit Standards-based model under the SAQA Act, with respect to (a) qualification design, (b) the provisioning of occupational training, and</p>	<p><b>Interviews preceded by document analysis and survey</b></p>	<p><b>Thematic analysis within CHAT categories</b></p>	<p><b>CHAT informed</b> QCTO qualification design and provisioning documentation pre and post-2010, for the following set of selected qualifications: <u>Large uptake</u> Healthcare Promotion Officer NQF3 Tax Professional NQF8 <u>Small uptake</u> Compliance Officer NQF6 Electrical Line Mechanic NQF4 Financial Markets Practitioner NQF7 Professional Principal Executive Officer NQF5</p>
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<p>(c) the administration processes of both?</p> <p><u>QCTO (1B)</u> What is the stage of progress regarding implementing the new model for the selected set of qualifications, and has it served to simplify the Occupational Qualifications Sub-Framework (OQSF)?</p> <p><u>QCTO (1C)</u> How have the differences between the pre- and post-2010 models impacted on stakeholders linked to the selected qualifications? What do the stakeholders say about the efficiency and effectiveness of the new system in this regard? And what do the stakeholders say about the simplicity of the system, and the extent to which there is articulation between the selected occupational qualifications, qualifications in the other two NQF Sub-Frameworks, and workplaces?</p>			<p>Tax Practitioner NQF6 Toolmaker NQF5</p> <p>Analysis of the minutes of SAQA's Qualifications and Standards Committee (Q&amp;S) meetings 2012-2017 inclusive (analysis of the issues raised over time).</p> <p><b><u>CHAT informed</u></b> <u>Group interviews/digital surveys:</u> DHET (1) SAQA (3) SETAs which used pre- and post-2010 models (4) DQPs/QDFs (3) AQPs (9) Public and private institutions of learning/SDPs (21 complete + 19 partial surveys) Learners (24) Employers (0)<sup>2</sup></p>
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## GENERAL NOTE REGARDING THE RECOMMENDATIONS

The recommendations from the 2017 NQF Impact Study need to be seen in light of the implementation of the NQF Act, and the achievement of the NQF objectives to date. The recommendations may be adjusted in relation to the decision made in Parliament, on the NQF Amendment Bill.

On the basis of the NQF aspects investigated, the overarching findings are that:

- RPL, CAT, NQF transparency tools, NQF Level Descriptors, integrating public and private Higher Education, and the new QCTO qualifications model, are deeply

<sup>2</sup> It was only possible to contact the employers of the learners once the 24 learners had responded and made the employer details available. However, in some instances, learners had moved employers; in other instances, the employers were large companies and could not remember the learners. Timing in the current study did not allow for further investigation in this regard.

embedded within the work of the NQF partners and stakeholders;

- extensive relational work for, and the implementation of, these aspects have taken place; and
- further alignment and deepened implementation is needed and could be achieved through addressing (i) stakeholder-reported barriers, (ii) inconsistencies and gaps in the system, and (iii) ensuring regular communication with stakeholders.

Recommendations were initially developed by the researchers on the basis of sub-project findings. Inputs from SAQA’s Research Committee and Board, and SAQA-Quality Council engagements have been incorporated. Table B outlines the recommendations and their sources. The table is followed by brief summaries of the specific purpose, method, findings and recommendations of each of the six sub-projects.

**Table B: Outline of recommendations, their sources, and actions needed**

<b>Recommendation</b>	<b>Source (Sub-Project/Entity)</b>	<b>Entities to act (Lead)</b>
#1 Align RPL, CAT, and assessment policies	#1 (SAQA + Umalusi)	SAQA, QCs, DHET, DBE
#2 Develop implementation plan for RPL and CAT	#1 + #2 (SAQA)	SAQA, DHET, DBE, QCs+
#3 Address GFETQSF stakeholder difficulties	#2 (Umalusi)	Umalusi, SAQA
#4 Review Umalusi quality assurance of public provision	#2 (Umalusi)	Umalusi, SAQA, DHET, DBE+
#5 Increase awareness of NQF transparency tools	#3 (SAQA)	SAQA
#6 Simplify, clarify, workshop, NQF Level Descriptors	#4 (SAQA)	SAQA, Quality Councils
#7 Deepen integration of public and private HE	#5 (CHE + SAQA)	CHE, SAQA
#8 Strengthen consistency, information in OQSF	#6 (QCTO + SAQA)	QCTO, SAQA

## **SUB-PROJECT 1:**

### ***Alignment of NQF policies for RPL, CAT, and assessment***

#### **Purpose and methods**

This sub-project investigated the extent to which the RPL, CAT and assessment policies in the NQF Sub-Framework contexts are aligned to the over-arching DHET and SAQA policies. Independent documentary analyses were conducted by the SAQA and Umalusi researchers. Findings were then integrated.



## Findings

The analyses showed that although the three Quality Councils' policies for RPL, CAT and assessment were *generally* aligned to those of SAQA and the DHET, there are anomalies which need to be addressed, including:

- (i) variations in the conceptualisation of RPL within individual policy documents,
- (ii) restrictions for RPL cohorts/the proportions of qualification for which RPL can be utilised, and
- (iii) silence or lack of elaboration on (a) objectives; (b) implementing RPL; (c) RPL capacity development; (d) addressing barriers to RPL; (e) the development and use of RPL toolkits; (f) avoiding distinctions between RPL and traditional learner achievements; (g) managing RPL data; (h) RPL research; (i) dealing with RPL complaints; (j) the elaboration of RPL roles and responsibilities; (k) advocacy and information sharing regarding RPL, and (l) reporting on RPL.

The CAT policies of the Quality Councils are broadly aligned to SAQA and DHET articulation policies, but provide insufficient guidance for (a) CAT concepts and processes; (b) entity roles and responsibilities in the Sub-Framework contexts; (c) CAT for articulation *across* the NQF Sub-Frameworks; and (d) reporting on articulation.

Umalusi has revised its assessment policy since the 2017 analyses for the study; the DBE is currently in the process of revising its assessment policy. At the time of the analysis, the assessment policies of the three Quality Councils and the DBE, did not elaborate on: (a) the different types of assessment and feedback needed in the respective contexts; (b) relationships between assessment and articulation/ RPL/ CAT; (c) the development and maintenance of data systems compatible with the NLRD; (d) accessible language in assessments; and (e) stakeholder roles and responsibilities, amongst others.

SAQA's 2014 policies for implementing RPL and CAT were found to be fairly strongly aligned to the DHET policies for RPL and articulation, with small differences.

## Recommendations

### **Recommendation 1: Align RPL, CAT, and assessment policies**

To address the non-aligned aspects of SAQA, DBE, and Quality Council policies, it is recommended that:

- the DBE, SAQA, and the Quality Councils consider revisions of the affected policies; and
- SAQA sets up dialogue mechanisms to address any contested aspects and develop criteria for exceptions.

## Recommendation 2: Develop an 'Implementation Plan for RPL and CAT'

To ensure the aligned, system-wide implementation of RPL and CAT, it is recommended that:

- SAQA facilitates information-sharing events with NQF stakeholders to deepen understandings and agree on an 'Implementation Programme for RPL, CAT, and Articulation', and
- the NQF Implementation Framework and System of Collaboration be updated to include (a) RPL, CAT and assessment policy alignment, (b) implementation of the aligned policies, and (c) RPL and articulation data and reporting.

### SUB-PROJECT 2:

#### *Evidence of the impact of national RPL, CAT, and assessment policies*

##### Purpose and methods

This sub-project focused on how the SAQA policies for RPL, CAT, and assessment were observed/ reported to have impacted on the related work of the Quality Councils. The extent of policy alignment was taken as an indication of the impact of SAQA's policies. Umalusi researchers conducted a separate impact analysis, interviewing seven key GFETQSF assessment body stakeholders. SAQA researchers analysed the extent of alignment in the Statutes and other documents of the 26 public Higher Education Institutions (HEI), and surveyed a 10% random sample of the 576 private HEI/Colleges, 100 Skills Development Providers (SDPs), and the 61 employers linked to Business Unity South Africa (BUSA) and the Black Business Council (BBC).

##### Findings

Umalusi found that its assessment policy had impacted on the work of the sampled assessment bodies, in that the policy was reported to be shaping and controlling their work. Interviewed stakeholders were found to understand the policy, view it as being comprehensive, and utilise it fully. However, they seldom referred to CAT and RPL.

SAQA's analysis of the public HEI documents revealed that while RPL and articulation are being implemented across HEI, this implementation is uneven (see Tables C and D). Of the hundreds of Handbooks/ Yearbooks/ Rulebooks found, careful reading of three randomly selected Handbooks showed that even in a single department, the RPL and articulation requirements for the different qualifications offered, could differ widely. While a University Statute may promote RPL and articulation, documents closer to the 'user interface' could work against these.

**Table C: Items that could promote articulation in public HEI (n=26)**

Item	No. of HEIs with this item
Statutes published on HEIs website	16
General rules on HEIs website	21
Handbooks, Yearbooks, Rulebooks,	Handbooks (6), Yearbooks (3), Rulebooks (1),

Prospectus, Calendars	Handbooks + Yearbooks (3), Prospectus (12), Calendars (7), Prospectus + Calendar (6)
Policies for RPL/ CAT/ articulation on HEI website	16 had none of these 10 had policies, or guidelines, or both 20 had <i>information</i> on RPL/ alternative access (with/without policy)
HEI website items which could support articulation	22 (eg funding, contacts for career advice, student support items)
HEI Ombud Office	4

**Table D: Private College/HEI respondent awareness and impact of SAQA policies for RPL, CAT, assessment (Respondents n=37 of a possible 57)**

Item	No. of responding private HEIs/Colleges (with comments)
Aware of SAQA policies for RPL, CAT, assessment	37
Aware of CHE policies for RPL, CAT, assessment	31
Reporting 'assessment has <i>not</i> changed' under NQF Act	17
Reporting 'assessment <i>has</i> changed' under NQF Act	16 (example comments: 'NQF levels are key tools in CAT assessments' 'NQF levels guide assessment' 'assessment ... is more rigorous')

Private HEIs reported that (a) it was burdensome to implement RPL and CAT, and (b) there were no guidelines to translate achieved learning into credits. The CAT challenges raised included differences in the knowledge and skills taught across different institutions, and that similarly named modules often have different learning outcomes.

All five of the responding Skills Development Providers (SDPs) were aware of the QCTO policies. They raised concerns regarding financial restrictions, the moratorium on organisational structures, and the appointment of personnel. They noted that the Quality Councils do not embrace RPL equally, and generally do not recognise occupational qualifications for exemption purposes.

Half of the 16 employers who responded were aware of SAQA's policies. They noted that RPL is under-utilised due to resource constraints, and the lack of incentives to do so.

### Recommendations

Some recommendations from this sub-project are addressed in Recommendations 1 and 2 above.

#### Recommendation 3: Address GFETQSF stakeholder difficulties

To address GFETQSF stakeholder difficulties, it is recommended that Umalusi (in collaboration with SAQA):

- adds criteria and guidelines for implementation to its assessment and CAT policies;
- clarifies the terms 'Credit Exemption', 'Credit Recognition', and the operationalisation of these terms;
- conducts information-sharing sessions with GFETQSF stakeholders, to enhance awareness and implementation of RPL and CAT; and
- addresses articulation pathways for adults – eg through implementing the National Senior Certificate for Adults (NASCA), or offering the National Senior Certificate (NSC) in different ways (part-time/ extended time/ etc.). SAQA should arrange a dialogue with the relevant stakeholders, to this end.

#### **Recommendation 4: Review Umalusi quality assurance of public provision**

Review and revise how Umalusi quality assures public provision so as to improve its effectiveness.

### **SUB-PROJECT 3:**

#### ***Impact of selected aspects of the transparency apparatus of the NQF***

##### **Purpose and methods**

This sub-project sought to ascertain (1) where stakeholders obtain information on qualifications and related aspects, (2) what stakeholders know about SAQA's searchable databases; (3) the extent to which stakeholder use these databases and find them useful; (4) stakeholder awareness of the National Learners' Records Database (NLRD) Trends Reports, how these are used, and their impact, and (5) stakeholder experiences of SAQA's Record of Learning Service, and its impact.

A survey instrument focusing on these aspects was developed on 'esurv' and the link emailed to all public HEI and Colleges; a 10% randomly selected sample of private HEI/Colleges; SDPs; national, provincial and local government departments; the Quality Councils; the parastatal Statutory Bodies, the 106 recognised Professional Bodies, the Sector Education and Training Authorities (SETAs), and employers registered with BUSA and BBC – a total of 589 organisations; 199 responses were received (34% response rate). To assess the impact of SAQA's Record of Learning (RoL) Service, a sample of 1 000 individuals was randomly selected from the 35 807 clients who had used the service between 2015-2017 (inclusive), and surveyed via Short Messaging Service (SMS).

##### **Findings**

The majority of stakeholders who responded to the survey were aware of, and use, SAQA's searchable databases. The majority were not aware of the NLRD Trends Reports. Tables E and F provide more detail.

**Table E: Reasons for using SAQA’s searchable databases, and benefits**

<b>Use of NLRD databases</b>	<b>No. of responding organisations (n=199)</b>
For obtaining information on <b>qualifications</b> that are registered on the NQF, from “SAQA and/or the NLRD”	130
For getting information on <b>part-qualifications</b> that are registered on the NQF, from “SAQA”	120
For getting information on <b>Professional Bodies</b> that are listed on the NQF, from “SAQA and/ or the NLRD”	114
For obtaining information on <b>Professional Designations</b> that are listed on the NQF, from “SAQA and/or the NLRD”	104
For obtaining information on the <b>verification of qualifications</b> in South Africa, from “SAQA and NLRD and Verifications”	117
‘NLRD is part of the information sources used’	28
‘For qualification development’	90
<b>Benefits of NLRD databases</b>	<b>No. of responding organisations (n=182)</b>
The NLRD databases ‘have positive benefits’	130
‘Useful for verifying information’	32
‘Accessibility of information’	31
‘Confirmation of qualifications’	24

**Table F: Awareness and impact of NLRD Trends Reports (n=193)**

<b>Awareness of NLRD Trends Reports</b>	<b>No. of responding organisations (n=193)</b>
Had not seen any NLRD Trends Reports	127
Had seen some of the NLRD Trends Reports	66
Had seen Trends Report 4 (2017)	55
Had seen Trends Report 3 (2013)	45
Had seen Trends Report 2 (2006)	34
Had seen Trends Report 1 (2004)	22
<b>Impact of NLRD Trends Reports</b>	<b>No. of responding organisations</b>
‘had <b>not</b> impacted’	89 (n=193)
‘ <b>had</b> impacted’	54 (n=193)
NLRD Trends Report impact question ‘not applicable’	45 (n=193)
‘had influenced strategic discussions/ planning/ decision-making’	28 (of 54 reporting impact)

The total number of individuals receiving the RoL survey was 520; 82 (16%) responded, 45 reported finding the service ‘very useful’; 18, ‘useful’; 34 rated it as having had ‘a strong impact’ on their lives, and 19 as it having had ‘some impact’.

## **Recommendation 5: Enhance information-sharing regarding NQF transparency tools**

It is recommended that SAQA continues and enhances information-sharing to advocate use of the searchable databases of the NLRD, and RoL and Verification Services. Clarify what is meant by 'prospective employee'.

### **SUB-PROJECT 4:**

#### ***Experiences and impact of the NQF Level Descriptors***

##### **Purpose and methods**

This sub-project investigated how the NQF Level Descriptors are understood and used, what they have enabled for stakeholders, challenges experienced, and suggestions for improvement. The questions were addressed through questionnaires emailed to 503 entities: all public HEIs and Colleges; Development and Assessment Quality Partners (DQPs, AQPs), SDPs; organised employers; recognised professional bodies, and a 10% random sample of private HEIs/Colleges. Further, 74 in-depth interviews were conducted with SAQA staff (33); senior Quality Council officials (11); senior DHET and DBE officials (seven); and snowballed DQPs, Quality Development Facilitators (QDFs), SETAs (18), and private HEIs (five).

##### **Findings**

Interviewed stakeholders understood the definitions of the Level Descriptor categories in SAQA's policy document. The main reported uses of the Descriptors were to:

- (a) pitch the types and levels of learner competences in qualification development and evaluation;
- (b) cater for access, progression and articulation; and
- (c) describe the levels of competences required for professional designations.

Level Descriptors were found to be used by those who design, accredit, evaluate, compare and critique local and foreign qualifications, either for the purposes of registration on the NQF or for the recognition of foreign credentials. To a lesser extent, respondents mentioned using the Descriptors in training; conceptualising jobs; articulation, and professional designations. Reasons given for the usefulness of the Descriptors included their roles in developing uniformity, enhancing articulation, enabling comparison, defining competency levels, and supporting the registration of professional bodies. The most-mentioned benefit was the role of the Descriptors in the qualification development process. Of the 65 responding professional bodies, 58 reported finding the Descriptors 'useful/very useful/essential'; seven reported 'limited use'. The SAQA and Quality Council interviewees reported relying on the Descriptors for their work.

The main challenges reported regarding the Descriptors were (1) their academic and wordy nature; (2) their 'broad and overlapping' character, which makes them difficult to distinguish, (3) lack of guidance for their use, (4) lack of elaboration of the competences in the Descriptors, for occupational/workplace contexts, and for professional designations,

and (5) lack of public awareness. Some respondents found the ‘old Level Descriptors’ (under the SAQA Act) more user-friendly than the present Descriptors; the process of qualification development was however reported to be more consistent under the NQF Act.

### **Recommendation 6: Simplify, clarify, and workshop the NQF Level Descriptors**

It is recommended that SAQA refines the NQF Level Descriptors, taking into account the stakeholder uses and challenges reported, and hosts public consultation workshops as part of this process and to share information on the finalised Descriptors.

## **SUB-PROJECT 5:**

### ***Impact of CHE initiatives to integrate public and private Higher Education***

#### **Purpose and methods**

Sub-Project 5 sought to describe the CHE mechanisms implemented since 2008, to promote integration and articulation between public and private Higher Education sectors, and the impact of these initiatives. The project included NLRD data analyses of student movements between the sectors – before and after 2008 – as a proxy for the relative integration and articulation of the sectors.

#### **Findings**

The numbers of students achieving Bachelor’s degrees in both public and private Higher Education, were found to have increased under the NQF Act, relative to the numbers of achievements under the SAQA Act. A marked increase was also found, in the contribution of private HEIs to the total number of students achieving Bachelor’s degrees annually. There was some growth in the numbers of students who, having achieved a Bachelor’s degree, went on to achieve a second or third HEQSF qualification. The numbers of students achieving second or third qualifications in public HEIs after obtaining first degrees from private HEIs, and *vice versa*, showed a small increase across the two periods. The data suggest that after obtaining a first Higher Education qualification, students appeared to be increasingly flexible in terms of selecting whether to pursue subsequent qualifications in public or private HEIs. The trend found was in the direction desired, but for enhanced access and progression, needs to be deepened.

### **Recommendation 7: Deepen articulation between public and private Higher Education**

To enhance access to, and progression in and beyond, Higher Education, it is recommended that the CHE (a) continues to develop and implement its policies, frameworks and good practice guides across public and private Higher Education, while increasing its quality promotion and capacity development activities; and (b) reports articulation successes widely.

To make possible the recognition of a wider range of qualifications from private HEI via (a) private HEI offering a wider range of Higher Education qualifications, and (b) professional body registration of individuals with qualifications from both types of institutions, SAQA could work with the South African Private Higher Education (SAPHE) body, DHET, and others, towards (1) the review and repealing of the restrictive legislation [that also that contradicts Section 29 of the Constitution, and Section 53(1) of Higher Education Act], and (2) expediting the DHET process of developing criteria for private HEIs to become fully-fledged universities as envisaged in the 2016 amendment of the Higher Education Act.

## **SUB-PROJECT 6:**

### ***Impact of the new QCTO model for occupational qualifications***

#### **Purpose and methods**

Sub-Project 6 sought (a) to describe the pre- and post NQF Act models for occupational qualifications; (b) assess progress in implementing the new model for a selected set of qualifications; and (c) understand its impact. Occupational qualification documentation pre and post-2010, was analysed. Individuals linked to two qualifications with large uptake, and six with small uptake, were surveyed and interviewed by the QCTO researchers. Interviews were conducted with representatives from the DHET and SAQA (four); SETAs (four); DQPs, QDFs and AQPs (12); public and private SDPs (40) and 24 learners – linked to the selected qualifications. The SAQA researchers analysed the minutes of SAQA's Qualifications and Standards (Q&S) Committee meetings of 2012-2017, to identify issues raised in relation to qualifications submitted by the QCTO.

#### **Findings**

Stakeholders implementing the post-2010 QCTO model for occupational qualifications reported general acceptance of the model. Capacity building emerged as a focus: performance enhancements and additional human resources were noted by respondents to be improving the effectiveness and efficiency of the QCTO. Several challenges were reported. Firstly, the standards of the new occupational qualifications were said to be high, so that 'it is difficult for learners to articulate into' them. Secondly, the lack of standardisation in the way credits and notional hours; RPL; and learnerships are managed in the OQSF context, were said to impact on articulation. Thirdly, there were calls for flexibility in aspects such as 'the windows for approval' in qualification development processes, and in alternative opportunities for authentic work experience. Fourth, many stakeholders commented on a lack of communication and clarity from the QCTO, and a need for regular updates. Fifth, difficulties were noted regarding the QCTO's multi-partner quality assurance system, which was said to cause time lags, confusion, and additional expenses.



## **Recommendation 8: Strengthen consistency, articulation, information sharing in the OQSF context**

It is recommended that the QCTO:

- makes efforts to ensure (a) articulation into occupational qualifications, (b) learner support to navigate barriers when studying occupational qualifications, and (c) the compatibility of credits to ensure articulation into continued learning and work pathways once the qualifications have been achieved;
- continues its capacity-building and performance-enhancing work, to increase its ability to coordinate the components of the OQSF system;
- grows standardised RPL and learnership practices within sub-sectors, as a single approach does not necessarily work across contexts and a measure of standardisation is needed;
- explores expanded opportunities for authentic work experience; and
- runs regular information-sharing and training sessions for stakeholders, and uses its communication initiatives to advocate and expand the OQSF as widely as possible.

## **ON BUILDING RELATIONAL AGENCY**

A deliberate attempt was made when conducting the 2017 NQF Impact Study, to use the research as an opportunity to develop the 'relational agency' (Edwards, 2010; 2014), and 'solidarity' (Von Kotze and Walters, 2017) needed within and between NQF stakeholder organisations for implementing the NQF. Deliberate attempts were made to avoid what Soudien (2012) describes as 'othering'.

In practice, this approach meant that while SAQA provided the leadership for the study, its conceptualisation; the determination of the research questions, design and instruments; the research itself, and the analyses and reporting, were done collaboratively. This collaboration meant setting up meetings and other opportunities to allow for discussion and collaboration towards building mutual understanding and allowing for deep engagement with the motives, issues, needs, and traditions of all four organisations. These efforts also helped to build the shared (common) knowledge on which the study is based. SAQA and the Quality Councils collaborated towards sharpening the research questions and instruments, providing information for valid research samples, gathering extensive data, clarifying analyses, and meeting reporting requirements.

In the 2017 NQF Impact Study, allowing for the different foci, and the variations in the research methods used in the four contexts of SAQA and the Quality Councils, may have lessened the standardisation of aspects in the study. However, it arguably enriched the study, the findings of which can be used in the implementation and further development of the NQF. It also arguably enhanced the relationships between the research teams located in the four organisations, and there are signs that the collaborative spirit has spread beyond this research project.

## LIMITATIONS OF THE STUDY

Efforts were made in SAQA's 2017 NQF Impact Study, to address the limitations in SAQA's 2014 NQF Impact Study, in addition to the new foci addressed. The main criticism of the 2014 study, was the lack of triangulation and lack of reporting on stakeholder experiences. The 2017 study addressed these issues through a combination of documentary reviews, and extensive surveys and interviews of the range of NQF stakeholders. In addition, different researchers from the larger SAQA-Quality Council research team worked together on the six sub-projects in different ways, at different times, and critiqued each other's work. These steps were taken in an attempt to eliminate bias. The efforts towards triangulation are clearly visible in all six sub-projects. In a small number of instances, the limited response rates for some of the surveys may be a limitation.

The variation in the research questions across the sub-projects may seem to some, a second limitation. While the over-arching research question sought to ascertain the impact of the implementation of the NQF policy suite, SAQA and each Quality Council chose foci for the specific research questions, which had been central efforts for their organisations in the eight years since the promulgation of the NQF. The researcher collaboration points towards the possibility of a more streamlined research question for SAQA's 2021 NQF Impact Study.

A third limitation, always, is the impossibility of determining direct cause and effect in a complex system made up of interacting sub-systems – each of those with further interacting sub-systems (Engeström, 1987; 2001). It is argued however, that the way that activities, outputs, outcomes and emerging impact have been linked in the 2017 NQF Impact Study report, go some way towards showing the links in the data and trends.

## USEFULNESS OF THE CONCEPTUAL FRAMEWORK

The conceptual framework selected, proved enabling, extending the categories of items that would otherwise have been considered. Using the realist approach (Pawson and Tilley, 2004) led to attempting to establish *post-hoc*, the links between initiatives, and the patterns found. It also encouraged the researchers to look for the heterogeneity of responses within and between respondent groups, and different responses across time periods. The use of CHAT (Engeström, 1987; 2001) helped to visualise the NQF system, and to select appropriate methods to investigate it. The CHAT categories were used to guide the sampling categories of respondents, in that the researchers sought to include respondents from all of the Communities of Practice in the NQF system; respondents at different levels of the authority hierarchies in these Communities of Practice; and respondents 'close to the centres' of these communities, as well as those on the peripheries. CHAT led the researchers to look deliberately for a variety of 'NQF tools and rules' such as those of and in, initiatives, policies, advocacy, and so on. The building of relational agency has been described. It is suggested that this conceptual frame be used again in future NQF impact studies.

## **CLOSING COMMENTS**

The 2017 NQF Impact Study identified a conceptual framework that proved useful, and could be used again. The ways of using it could be refined. The study addressed six sets of research questions, which possibly lent it complexity, but proved useful for the organisations involved. SAQA-Quality Council collaboration helped to strengthen the research. The interviews conducted, and the project as a whole, used, and arguably built, relational agency in the system. In some instances, the responses to the surveys were at very high rates; in other instances, these rates were too low. The researchers think however, that overall, a balanced picture has emerged. The foci of the study were in line with the foci in Sustainable Development Goal 4, of 'inclusive and equitable quality education' and promoting lifelong learning which equip learners to acquire the knowledge and skills needed to promote sustainable development, sustainable lifestyles, human rights, gender equality, promotion of a culture of peace and non-violence, and global citizenship (UNESCO, 2015). The research also supports the articulation agenda in South Africa. The researchers urge NQF policy-makers and implementers to address the recommendations for the benefit of all NQF beneficiaries in the country.

# 1. Introduction

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The National Qualifications Framework (NQF) in South Africa was established in the post-1994 post-*apartheid* rebuilding of the country, in line with the South African Constitution, as the means to integrate a racially divided, unequal, unfair education and training system. The South African Qualifications Authority (SAQA) is mandated to conduct or commission periodic studies of the impact of the NQF on South African education, training and employment (NQF Act 67 of 2008: Clause 13(k)[i]).

## 1.1 WHY SHOULD SAQA EVALUATE THE IMPACT OF THE NQF?

It is important ethically, and for effectiveness and efficiency purposes, to evaluate the impact of government Acts. The Department of Planning, Monitoring, and Evaluation (DPME) in the Presidency carries out this role in South Africa, and between 2015 and 2017 conducted an NQF Act Implementation Evaluation (DPME, 2018). The Evaluation sought to ascertain how the NQF Act is being implemented, to identify the successes achieved and challenges experienced, and make recommendations regarding improvements to the implementation of Act in the future. The Department of Higher Education and Training (DHET), together with SAQA and the Quality Councils, must implement the agreed-upon recommendations.

SAQA is, however, mandated to conduct periodic studies of the NQF, and has done so following the promulgation of the NQF Act, in 2010, 2014, and 2017<sup>3</sup>, with the studies being named after the year in which the data are collected. SAQA uses these studies to develop deep understandings of the embeddedness and impact of particular aspects of the NQF on different stakeholder groups across the NQF context. The studies are planned to be developmental, to strengthen the aspects being investigated. The research is designed collaboratively between SAQA and the Quality Councils, with inputs from the DHET and the DBE, and as it leads this work, SAQA deliberately seeks to build ‘relational agency’ (Edwards, 2010; 2014) and relationships between the key NQF partners. In this in-depth, action learning and research, with its collaborative and developmental character, SAQA’s impact studies have differed from that conducted by the DPME.

## 1.2 THE 2017 NQF IMPACT STUDY: APPROACH AND FOCI

While the study sought to focus on the impact of the NQF policy suite, and NQF stakeholder experiences of this set of policies, it was not possible for the scope of the study, to focus on *all* the NQF policies. The decision was taken to focus on the Recognition of Prior Learning (RPL), Credit Accumulation and Transfer (CAT) and assessment policies of SAQA and the Quality Councils<sup>4</sup>, because these organisations have these policies in

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<sup>3</sup> The 2010 study was exploratory, and the 2010 report was not circulated beyond SAQA. The 2014 study was reported and disseminated in 2015, 2016, and 2017.

<sup>4</sup> The NQF in South Africa comprises three articulated NQF Sub-Frameworks, namely, the General and Further Education and Training Qualifications Sub-Framework (GFETQSF); the Higher Education Sub-Framework (HEQSF) and the Occupational Qualifications Sub-Framework (OQSF) – each overseen by a

common; the Quality Councils must develop and implement RPL, CAT and assessment policies in line with SAQA's policy. The remaining NQF suite policies are developed by SAQA, and implemented by all NQF stakeholders. The NQF suite consists of policy for (1) the NQF Level Descriptors, (2) registering qualifications and part-qualifications on the NQF, (3) recognising Professional Bodies and registering Professional Designations, (4) RPL, (5) CAT, (6) assessment, (7) evaluating foreign qualifications, and (8) the misrepresentation of qualifications.

The research for the 2014 study was conducted mainly by a SAQA research team, with substantial inputs from the Quality Councils. Its conceptual underpinnings were workshopped with the Quality Councils, and the Quality Councils provided substantial inputs in the form of analyses of their histories, and how the NQF Act had impacted on their NQF Sub-Framework contexts. The 2017 study, in contrast, is deeply collaborative, conducted by a team of researchers based across SAQA and the Quality Councils, led by SAQA. High-level conceptual guidance was provided by SAQA's Research Committee, a Sub-Committee of the SAQA Board which was joined by high-level representatives from each Quality Council, the DHET and the DBE to form the Reference Group for the study.

The concept for the study, and the specific research questions and research proposals for the SAQA and Quality Council sub-projects were developed collaboratively by SAQA and the Quality Councils. SAQA provided the over-arching idea and themes, based on the NQF policy context and imperatives; these were then workshopped and fine-tuned for relevance in the particular organisational contexts. The research was also conducted collaboratively, each entity focusing on the components most relevant for their contexts, and collaborating where joint work was needed to enhance the research samples, access to key respondents, the interview and survey tools, relevant documentation and/or data, analyses, and other aspects. The intention was that the 2017 NQF Impact Study would not involve 'extra' work, but rather, assess the impact of, and reflect on and seek to enhance, initiatives already underway.

### ***The 2017 NQF Impact Study and critiques of the 2014 Study***

SAQA's 2014 NQF Impact Study (SAQA, 2017a) received some positive critique; it was said that it 'has value in its own right' and 'is very useful, and well-timed for the [DPME's] NQF Act policy implementation evaluation' (Hercules, 2016) and was generally said to be 'very comprehensive'. It was, however, thought by some to fall short in terms of 'accepted large-system impact evaluation design' (*Ibid.*), which included a 'log-frame' with clearly defined inputs, activities, outputs, outcomes, and impact.

While SAQA's 2014 NQF Impact Study did not use a 'theory of change' approach, SAQA's 2017 NQF Impact Study explicitly used the 'realist evaluation' method which tracks systematically, what has been attempted, how this was done, the range of inputs required, the range of experiences of the diverse groups of stakeholders involved, and the various aspects of impact perceived. SAQA's 2014 study was based on Engeström's (1987) 'cycle

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Quality Council, namely, Umalusi: Council for Quality Assurance in General and Further Education and Training; CHE, and the Quality Council for Trades and Occupations (QCTO).

of expansive system learning', which, although explaining system change effectively, is not widely recognised in the evaluation community. SAQA's 2017 approach is more in line with current evaluation conventions.

In acknowledgement that the NQF is a complex object in that it comprises several interacting sub-systems, SAQA's 2014 study, utilised Engeström's (1987; 2001) Cultural Historical Activity Theory (CHAT) with its 'expansive learning spiral' as the theory of change. This conceptual framework enabled the researchers to show different changes over time, simultaneously, in the different NQF contexts, between 1995 and 2014. The main criticisms (Hercules, 2016) were that this approach did not link sufficiently, the system's developmental outcomes – or those aspects presented in the study as outcomes – with the NQF legislation. These links were further weakened by the fact that the time-frames and scope of the study did not allow for thorough triangulation, in the form of stakeholder views.

The 2017 NQF Impact Study seeks to address these criticisms and weaknesses while again utilising CHAT. It uses a 'realist approach' (White, 2009; Catley *et al* 2008a; 2008b; Pawson and Tilley, 2004) in the attempt to forge strong arguments for the links between activities carried out, mechanisms that bring about change, the indirect and direct results of the activities, and the changes observed, as 'outcome patterns' (White, 2009) rather than single outcomes. In other words, it seeks to 'map the chain of developments' (*Ibid.*) to link NQF initiatives to observed patterns on the ground.

This approach involved attempting to understand the various stakeholder contexts researched, and deliberately seeking heterogeneity (White, 2009). Using CHAT was useful for understanding the heterogeneity within and between the SAQA and NQF Sub-Framework contexts, and for locating contestations. Using CHAT enabled locating and seeking to understand, the different tools and rules used, and the different stakeholder groups in the four research contexts.

The 2017 study essentially used a survey design, supplemented with interviews and documentary analysis where deeper understanding was sought. The concept of NQF stakeholders being 'policy-makers' (M), 'policy implementers' (I), or 'policy beneficiaries' (B), was used to categorise the samples selected.

### ***Broad research questions***

The 2017 NQF Impact Study addressed three broad research questions; SAQA and the Quality Councils designed sub-projects within the areas covered by the broad questions.

1. **(Towards a single integrated and articulated national system for learning achievements)**
  - a) To what extent are the NQF policies of the DHET, DBE, SAQA, and the Quality Councils aligned?
  - b) To what extent have the NQF policies been advocated and to what extent are they known?

- c) What are the emerging effects of these policies – to what extent, and how have they shaped practices?
2. **(Towards enhanced quality and transparency)**
    - a) What quality and transparency-related initiatives have been implemented in the NQF context?
    - b) What are the emerging effects of these initiatives – to what extent, and how, have they shaped practices?
  3. **(Towards redress, and enhanced access, mobility and progression in education, training, and employment opportunities)**
    - a) To what extent can redress and enhanced access, mobility and progression be seen in the NQF system? To what extent are people able to enter and progress through the system?

### 1.3 STRUCTURE OF THE REPORT

Section 1 of this report presented the rationale for the 2017 NQF Impact Study, explaining its approach and foci. Section 2 contextualises the study, describing how the NQF is understood in South Africa, its historical transition, and its policy and research contexts.

Section 3 details the conceptual framework utilised. This framework includes CHAT (Engeström, 1987; 2001); a ‘realist approach’ to impact evaluations (Pawson and Tilley, 2004); and the idea of ‘relational agency’ (Edwards, 2010; 2014).

Section 4 presents the research questions, research design, methods and sampling used. The research questions originated in areas in which SAQA and the Quality Councils sought to assess emerging impact. Six sets of questions were addressed, and are reported as six sub-projects.

Section 5 of the report covers Sub-Project 1, on the alignment of the Quality Council policies for RPL, CAT, and assessment, with SAQA’s related policies – as determined through documentary analyses.

Section 6 of the report presents Sub-Project 2, which focused on the impact of national policies for RPL, CAT, and assessment. SAQA investigated the impact of its policies on the related policies of the Quality Councils, and on some of the work of selected NQF stakeholders, namely, public universities. Umalusi analysed how its policy development for RPL, CAT and assessment was impacted upon by SAQA’s related policies. Section 6 also reports on Umalusi’s research into the impact of its policies for RPL, CAT, and Assessment on key stakeholders in the General and Further Education and Training Qualifications Sub-Framework (GFETQSF) context, namely, the Assessment Bodies.

Section 7 covers Sub-Project 3, which addressed a range of sub-questions around the awareness, understanding, and reported impact of selected aspects of the transparency tools of the NQF – including the searchable databases of the National Learners’ Records

Database (NLRD), the NLRD Trends Reports, and SAQA's Record of Learning (RoL) Service.

Section 8 of the report presents Sub-Project 4, which focused on stakeholder awareness, understandings, uses, and reported impact, of the NQF Level Descriptors.

Section 9 of the report covers Sub-Project 5, the CHE's analysis of its initiatives towards integrating public and private Higher Education, and student movements between public and private Higher Education Institutions (HEIs) as a proxy for the impact of these initiatives.

Section 10 covers Sub-Project 6, the QCTO's research into stakeholder awareness and uses of the new QCTO model for occupational qualifications, to suggest the emerging impact of this model.

Section 11 closes the report with reflections, concluding comments, and recommendations by SAQA and the three Quality Councils. Section 11 is followed by the full list of references used in the 2017 NQF Impact Study as a whole.



## 2. Context of the study

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Section 2 of this report sketches understandings of the National Qualifications Framework (NQF), and summarises briefly, changes in the NQF over time, and the broader socio-economic, policy and research contexts of the 2017 NQF Impact Study.

### 2.1 WHAT IS THE SOUTH AFRICAN NQF?

Following the NQF Act 67 of 2008 (RSA, 2008), the South African NQF is a single integrated education and training system, made up of three differentiated and coordinated NQF Sub-Frameworks. Its objectives are to:

- a) create a single integrated national framework for learning achievements;
- b) facilitate access to, and mobility and progression within, education, training and career paths;
- c) enhance the quality of education and training; and
- d) accelerate the redress of past unfair discrimination in education, training and employment opportunities.

The objectives of the NQF are designed to contribute to the full personal development of each learner and the social and economic development of the nation at large (*Op.Cit.*). As well as addressing past discrimination, the NQF is associated with avoiding unfair discrimination on an on-going basis.

The South African Qualifications Authority (SAQA) and the Quality Councils must seek to achieve the objectives of the NQF by:

- (1) developing, fostering and maintaining an integrated and transparent national framework for the recognition of learning achievements;
- (2) ensuring that South African qualifications meet appropriate criteria, determined by the Minister as contemplated in Section 8 of the NQF Act, and are internationally comparable; and
- (3) ensuring that South African qualifications are of an acceptable quality.

SAQA and the Quality Councils must work towards systemic integration and transparency, quality and international comparability, as well as redress and learner access, success and progression in the education and training system. All these entities are *obliged to work together and integrate their work into the whole* integrated system desired. The South African NQF is unusual in its comprehensiveness, in that it includes education and training, Professional Bodies and Professional Designations, the evaluation of foreign qualifications, Verification; Record of Learning (RoL); and NQF Advice services, and the National Learners' Records Database (NLRD).

### ***NQF structures***

The South African NQF comprises three coordinated NQF Sub-Frameworks, each overseen by a Quality Council as follows.

- The GFETQS) overseen by Umalusi: Council for Quality Assurance in General and Further Education and Training (DHET, 2013a).
- The Higher Education Qualifications Sub-Framework (HEQSF) overseen by the Council on Higher Education (CHE) (DHET, 2012a).
- The Occupational Qualifications Sub-Framework (OQSF) overseen by the Quality Council for Trades and Occupations (QCTO) (DHET, 2014).

Each Sub-Framework is made up of a grid of qualifications as shown in Table 1.

**Table 1: The South African NQF**

NQF Sub-Framework/Quality Council	NQF Level	NQF Sub-Framework and qualification type		NQF Sub-Framework/Quality Council
Higher Education Qualifications Sub-Framework (HEQSF)/ Council on Higher Education (CHE)	10	Doctoral Degree Doctoral Degree (Professional)	-	Occupational Qualifications Sub-Framework (OQSF) Quality Council for Trades and Occupations (QCTO)
	9	Master's Degree Master's Degree (Professional)	-	
	8	Bachelor Honours Degree Postgraduate Diploma Bachelor's Degree	Occupational Certificate Level 8	
	7	Bachelor's Degree Advanced Diploma	Occupational Certificate Level 7	
	6	Diploma Advanced Certificate	Occupational Certificate Level 6	
	5	Higher Certificate	Occupational Certificate Level 5 <sup>5</sup>	
General and Further Education and Training Qualifications Sub-Framework (GFETQSF)/ Umalusi	4	National Certificate <sup>6</sup>	Occupational Certificate Level 4	
	3	Intermediate Certificate <sup>7</sup>	Occupational Certificate Level 3	
	2	Elementary Certificate <sup>8</sup>	Occupational Certificate Level 2	
	1	General Certificate <sup>9</sup>	Occupational Certificate Level 1	

<sup>5</sup> The N4-N6 qualifications located at NQF Level 5 are currently under revision

- No qualifications have been determined at these levels on the OQSF as yet

<sup>6</sup> Umalusi issues National Certificates for the Senior Certificate (SC), SC (Colleges), National Senior Certificate (NSC), National Certificate: Vocational (NCV), National Senior Certificate for Adults (NASCA), and National Technical Education [NATED], which is currently under revision

<sup>7</sup> Umalusi issues Intermediate Certificates for the NSC (Grade 11), NCV Level 3 and Intermediate Certificate of Education (ICE) (and N2, which is currently under revision)

<sup>8</sup> Umalusi issues Elementary Certificates for the NSC (Grade 10), NCV Level 2, and Elementary Certificate of Education (ECE) (and N1, which is currently under revision)

<sup>9</sup> Umalusi issues General Certificates for the General Certificate of Education (GCE), General Education and Training Certificate: ABET (GETC: ABET), and General Education and Training Certificate for Adults (GETCA)

SAQA is the legally mandated custodian of the NQF (RSA, 1995; 2008). SAQA's leadership and oversight role involves advancing the objectives of the NQF in line with the South African Constitution, overseeing NQF development, and coordinating the three NQF Sub-Frameworks. The South African NQF is however more than these structures: it embraces a variety of tools, processes, Communities of Practice and integrating structures.

## ***NQF policies***

SAQA is mandated to develop the NQF Level Descriptors and 'NQF policy suite' outlined here for ease of reference, as the studies reported in Sections 5-10 consider the impact of many of these<sup>10</sup>.

## **NQF Level Descriptors**

The ten NQF Levels in the South Africa each have a Level Descriptor, a description of learning achievements or outcomes appropriate for qualifications at that level (SAQA, 2012a). The purposes of the NQF Level Descriptors are to ensure coherence in learning, and to enable allocation of qualifications to particular levels in order to assess their comparability (*Ibid.*). Each Level Descriptor speaks to ten competences, which are differentiated as they progress from one level to the next (*Op.Cit.*). The intention is that practitioners working in the three NQF Sub-Framework contexts will use these Level Descriptors in their work: the project reported in Section 8 focused on stakeholder awareness, understandings, uses and views on the impact of the NQF Level Descriptors.

## **Policy and Criteria for Registering NQF-aligned qualifications on the NQF**

SAQA must develop and implement after consultation with the Quality Councils, policy and criteria for the development, registration, and publication of qualifications and part-qualifications (RSA, 2008, Clause 13[1][h(i)]). Of relevance for the present study, is that qualifications and part-qualifications must include mechanisms for *alternative access* via Recognition of Prior Learning (RPL)<sup>11</sup>, and that *learner progression* must be made possible through linking part to whole qualifications, and full qualifications to learning-and-work pathways (see Sections 5, 6, 8, 9, 10 of this report).

## **Policy and Criteria for Implementing the RPL, Credit Accumulation and Transfer (CAT), and Assessment**

SAQA is also mandated to develop, after consultation with the Quality Councils, policy and criteria<sup>12</sup> for RPL, CAT and Assessment (RSA, 2008, Clause 13[1][h(iii)]). The Quality Councils must develop related policies for their Sub-Framework contexts; the 2017 NQF Impact Study foci included investigation of the extent to which, and the nature of, how

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<sup>10</sup> For more detail see SAQA, 2017a and 2017b.

<sup>11</sup> RPL involves the recognition, mediation and assessment of learning obtained non-formally and informally.

<sup>12</sup> The status of these policies is that of legal documents; their implementation is mandatory.

these policies are aligned, and impact on NQF stakeholders (See Sections 5 and 6 of this Report).

### **Policy and Criteria for Recognising a Professional Body and Registering a Professional Designation in the context of the South African NQF**

The main aims of this Policy and Criteria for *Recognising a Professional Body and Registering a Professional Designation for the Purposes of the National Qualifications Framework Act* (SAQA, 2012b), are to align professional body practices with values in the South African constitution. This Policy includes items to promote public understanding of, and trust in, professions and Professional Designations in the NQF context. Professional Bodies are an essential part of the system for education, training, development and work; their experiences and views have been included in all the relevant sub-projects in the 2017 NQF Impact Study.

### **System of Collaboration**

The *System of Collaboration* was developed collaboratively by the NQF partners to guide mutual relations between SAQA and the three Quality Councils in a way that promotes constructive cooperation in line with the NQF Act (RSA, 2008) and *Resolving a Dispute in terms of the NQF Act* (Government Gazette 33483, August 2010). The *System of Collaboration* is one of the tools for relationship-building and the development of the 'relational agency' needed within the NQF context<sup>13</sup>.

### **NQF services**

SAQA offers a number of services in line with the NQF Act, namely, the NLRD, the Verification Service and RoL Service, the Foreign Qualification Evaluation and Advisory Services, and the Advocacy and Communications Service (ACS). The current study included assessing the impact of aspects of the NLRD, and the RoL service (See Section 7 in this Report).

### **National Learners' Records Database (NLRD)<sup>14</sup>**

The NLRD is the electronic Management Information System (MIS) of the NQF, which houses information on the following:

- all qualifications and part-qualifications registered on the NQF;
- all recognised Professional Bodies and their registered designations;
- information on Quality Assurance bodies accredited to quality assure particular qualifications, and on qualifications registered but still needing quality assurers;
- education and training providers accredited to offer registered qualifications and part-qualifications; and

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<sup>13</sup> The *System of Collaboration* was developed in 2011 after consultation with the Quality Councils, and updated in 2013 and 2017, again after consultation with the Quality Councils.

<sup>14</sup> The NLRD is described in more detail in SAQA, 2017a.

- data on learner achievements for studies relating to qualifications and part-qualifications, as well as Learnerships, in South Africa.

### **SAQA's Verification Service and Record of Learning (RoL) Service**

SAQA's Verification Service involves verification of the authenticity of learning achievements in South Africa. Learner records held in the NLRD and in other formats can be queried by institutions of learning and employers to verify whether individuals possess the qualifications that they claim to possess. The Verification Service also offers a 'Record of Learning' (RoL) service: learners who have achieved qualifications in South Africa can request a RoL – a statement of all the qualifications they have achieved. The current study sought to understand the impact of this service (See Section 7 of this Report).

### **Foreign Qualification Evaluation and Advisory Services**

SAQA's Directorate for Foreign Qualifications Evaluation and Advisory Services (DFQEAS) evaluates foreign qualifications in order to ascertain their authenticity and determine their equivalence on the South African NQF. SAQA works with both national and international counterparts and partners to fulfil this function<sup>15</sup>.

### **NQF Advocacy and Communication Services**

SAQA's Advocacy and Communication Services have been operating since 2008; they include a help line as well as multi-channel communications, events and publications. The impact of these services was not considered in the present study<sup>16</sup>.

## **2.2 HISTORICAL TRANSITION: SAQA ACT TO NQF ACT**

The transition from the SAQA Act (RSA, 1995) to the NQF Act (RSA, 2008) is covered elsewhere (SAQA, 2017a). Following implementation of the NQF Act in 2009, SAQA developed the NQF policy suite (see Section 2.1), and the three NQF Sub-Frameworks were established/aligned their operations to the NQF Act and SAQA's policies. The current study assesses the impact of some of this work.

### ***Establishing standard-setting and Quality Assurance mechanisms in each of the Sub-Framework contexts under the NQF Act***

Following the promulgation of the NQF Act, the Quality Councils had to set up or align their standard-setting and Quality Assurance mechanisms as required.

### **Establishing standard-setting and Quality Assurance mechanisms in the General and Further Education and Training Sub-Framework (GFETQSF) context**

Umalusi was established in 2001 by the General and Further Education and Training

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<sup>15</sup> These services are described in more detail in SAQA, 2017a.

<sup>16</sup> NQF Advocacy is described in more detail in SAQA, 2017a.

Quality Assurance (GENFETQA) Act, which was amended in 2008 to bring the organisation's mandate in line with the NQF Act. Umalusi, as the Council for Quality Assurance in General and Further Education and Training (GENFET), took over operations from the South African Certification Council (SAFCERT) and was established as a band education and training quality assessor. Since the work of SAFCERT was heavily focused on national examinations, the standardisation of results and ultimately the certification of learner achievements, Umalusi began by taking on the existing mandate while conducting research better to understand its role in the system.

With the promulgation of the NQF Act in 2008, and the concomitant amendment of the GENFETQA Act, Umalusi moved from the position of a band education and training quality assessor to that of a Quality Council. This provided Umalusi with greater certainty about its role in the system, and the organisation set about organising and populating the GENFETQA. Alongside this task, and in line with the stipulations in the NQF Act, Umalusi also engaged in large-scale policy development both to satisfy the requirements of the Act, and also to provide the GENFET sector with greater certainty in terms of operational matters. Using research as a base, Umalusi has since 2008 engaged in rapid policy-development for the sector, and such policy creation has been a primary lever for influencing operations in the GENFET space. For this reason, Umalusi sought to assess the impact of particular areas of its policy work in the present study.

Given that the immediate effects of the NQF Act were to trigger large scale policy development within the Quality Councils, it thus follows that the research questions investigated by Umalusi in this study hinge on the creation of policy and its implementation in the context of the NQF Act.

### **Establishing standard-setting and Quality Assurance mechanisms in the HEQSF Context**

Following the promulgation of the NQF Act and related Acts, the Quality Councils had to set up or align their standard-setting and Quality Assurance mechanisms as the legislation required. The CHE was assigned the responsibility for developing and managing the HEQSF. Related functions for this key responsibility are those of developing and implementing policy and criteria for the development, registration and publication of qualifications; and for assessment, RPL, and CAT, as well as for developing qualifications or the qualification standards necessary for the Higher Education sector. With respect to Quality Assurance, the NQF Act mandates the CHE to develop and implement policy for Quality Assurance; ensure the integrity and credibility of Quality Assurance; and ensure that Quality Assurance is indeed undertaken for the Sub-Framework (RSA, 2008).

In 2009, the Higher Education Quality Council (HEQC) of the CHE initiated an assessment and review of its Quality Assurance mechanisms in order to give effect to its role as a Quality Council. Key frameworks that were revised to align with the NQF Act include those for Programme Accreditation and National Reviews (CHE, 2015c).

The standard-setting function within the context of the NQF Act, was anticipated to

commence in 2009 but was delayed by the lack of funding and capacity (CHE, 2009). In 2011, the CHE developed a framework necessary to guide the implementation of its newly added role of developing standards for qualifications within the HEQSF. The framework was published in 2012.

Historically the Higher Education sector has been characterised by dichotomies in terms of the quality of provision, methods of teaching and learning and the overall status of institutions (Kruss, 2004). Since the onset of democracy in 1994, various government programmes have been implemented to address the dichotomies between historically black and historically white institutions, and also between traditional Universities and Universities of Technology (van Staden, 2017). However, there have not been similar direct government interventions to integrate public and private Higher Education.

One of the objectives of the NQF is to create a single integrated national system of education and training. The integration within and between the NQF Sub-Frameworks for GENFET, Higher Education and Training (HET), and training for Trades and Occupations (TO), is a prerequisite for achieving the objective of creating a single integrated national system for education and training. It is with this understanding that the CHE as the Quality Council for Higher Education has been developing and implementing following the NQF Act, mechanisms for ensuring that there is integration and articulation between the public and private components of the Higher Education sector; these efforts have aimed to work towards one integrated and articulated Higher Education system that contributes to a single integrated national education and training system.

The CHE therefore took SAQA's 2017 NQF Impact Study as an opportunity to assess the extent to which integration and articulation between the public and private Higher Education components are progressing following the interventions it has implemented since 2008. The research questions were developed to assist in identifying and describing all the mechanisms that the CHE has developed and implemented since 2008 to promote integration and articulation between public and private Higher Education. The research questions also sought to determine the extent to which articulation between the two components of Higher Education is taking place, using the patterns of student movements across the public and private Higher Education sector as the key indicator.

### **Establishing standard-setting and Quality Assurance mechanisms in the OQSF context**

The QCTO was launched in February 2010 and became operational on 1 April 2010. Historically, the Manpower Training Act (MTA) (RSA, 1981)<sup>17</sup> provided for the promotion and regulation of the training of artisans and for the establishment of the National Training Board (NTB). Any employer or employee individual or group, could, with a view to accreditation, establish a training board in a particular industry or area by signing a constitution that was in line with the Act. The training boards could approve the training of apprentices by or on behalf of any employer (RSA, 1981: Clause 13); the Minister of Manpower was mandated to designate trades and prescribe qualifications and the related

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<sup>17</sup> The MTA No. 56 of 1981 was amended in 1982, 1983, 1990, and 1993.

conditions of study and work. The Manpower Act (Ibid.) also provided for Regional Training Centres, Private Training Centres, and Industry Training Centres. There were 'grants-in-aid' for any trade union, employers' organisations or federations that provided training to their office-bearers, employees, or members – and for unemployed people. Trade Testing was centralised at the Central Organisation for Trade Testing (COTT). COTT was responsible for the co-ordination, Quality Assurance and recommendation of certification to the Registrar of Manpower Training at the Department of Labour (COTT was later replaced by INDLELA).

This system generated a number of serious challenges for South Africa, the biggest of which was the legislated unevenness of opportunities for people in different population groups. Added to this racial discrimination and equally seriously problematic, was the inherited class-based structure in which the training system was located. There was virtually no articulation between the training system and its education system counterpart, which apart from being highly unjust, also served to block skills development and modernisation in the country. The quality of training was also a major challenge as it varied across training centres and was not always up to standard. There was a lack of policy for the accreditation of Regional Training Centres and Private Training Centres. There was no standardisation across curricula, and training fees were uneven across contexts.

#### *Quality Assurance of qualifications for TO after 1994*

The SAQA Act (RSA, 1995) established SAQA and led to the development of the NQF and a range of standard setting and Quality Assurance arrangements which enabled South African qualifications to be registered on a single NQF framework. SAQA initially developed and implemented this integrated system by establishing two directorates: the Directorate for Standards Setting and Development (DSSD) (responsible for the development of qualifications and Unit Standards), and the Directorate for Quality Assurance (responsible for NQF implementation through Education and Training Quality Assurance Bodies [ETQAs] for the various sectors). SAQA fulfilled its operational responsibilities for the Quality Assurance of NQF-registered qualifications in the TO sector, through National Standards Bodies (NSBs), Standards Generating Bodies (SGBs), and the ETQA divisions of the Sector Education and Training Authorities (SETAs).

This operating model proved to be cumbersome: each SGB and each NSB comprised around 30 stakeholders; these groups flew around the country to meet for qualifications-development work. The NSBs met every second month, which could lengthen processes if revisions were needed, especially when there were political contestations. The SGBs were later replaced by Task Teams of Experts. The qualifications developed by these Task Teams were quality assured by Consultative Panels, and the final screening of the qualifications to ensure that they met the national quality requirements, took place at the executive level of SAQA, and the SAQA Board. Trades were not registered as occupational or sector-based qualifications and were listed on the NQF, which resulted in each sector using its own terminology, and multiple listed trades for the same Trade.



The changes effected in the TO sector under the SAQA Act (RSA, 1995) while failing to integrate the education and training sectors, did lead to a single integrated national system for TO. SAQA populated the NQF with qualifications and Unit Standards, which addressed the needs identified by the various industries in the country. The implementation of the NQF Act empowered education and training stakeholders in the sector: the rules for operation were clear, and were shaped by stakeholder participation, although stakeholder involvement was sometimes uneven. The ETQAs employed a developmental approach in the accreditation of providers, resulting in differing levels of accreditation status. Some industries preferred their employees to register for individual Unit Standards or skills programmes rather than for full qualifications. The uptake on some full occupational qualifications was very slow; some qualifications were unattractive to learners as the qualifications were not portable or accepted for articulation into Higher Education, although this had been the main intention. There were inconsistencies in approaches to learning and assessment in the sector. Offering sector-based qualifications involved Memoranda of Agreements (MoA) between ETQAs, which were often not well managed. Refinement of the qualifications model for Trades and Occupations was needed.

### *Transition to the NQF Act*

The NQF Act ushered in broad changes in the TO sector, the main change involving a shift from a top-down centralised approach to standard setting and Quality Assurance, to a differentiated approach where the three Quality Councils developed and quality assured qualifications with differing models. After the promulgation of the NQF Act, the Skills Development Act was revised (RSA, 1998; 2008b), and the QCTO was created. Operational responsibility for the development and Quality Assurance of occupational qualifications moved from SAQA to the QCTO. The NQF Act provided for a managed transition between 2009 and 2012. By October 2012 the QCTO had assumed full responsibility for qualifications development and Quality Assurance in the TO sector.

Another key structural development from the point of view of the TO sector was the publication of Presidential Proclamation 44 of 2009, which enabled the split of the then-national Department of Education (DoE) into the Department of Higher Education and Training (DHET) and the Department of Basic Education (DBE). The entire skills development function of the Department of Labour (DoL) was incorporated into the DHET – including the SETAs and the QCTO.

### **QCTO focus in the 2017 NQF Impact Study**

The QCTO aimed, through the current study, to identify how the post-2010 QCTO model for occupational qualifications has impacted on the development of occupational qualifications and the provision of occupational training. The research team also sought to understand the stage of progress regarding implementing the new model – for selected qualifications – and to understand its role in the simplification of the OQSF.

## **2.3 BROADER POLICY CONTEXT OF THE SOUTH AFRICAN NQF**

Education and training in South Africa are governed by a comprehensive set of policies, at the centre of which is the NQF Act (RSA, 2008) and related legislation for the GFETQSF (DHET, 2013a), HEQSF (DHET, 2012a), and the OQSF (DHET, 2014). These policies are nested within other national policies and developmental plans including the National Development Plan (NDP) (RSA, 2011a), the National Growth Path (NGP) (RSA, 2011b), and the Human Resources Development Strategy for South Africa (HRDS-SA) (RSA, 2009; 2018). The White Paper for Post-School Education and Training (DHET, 2013c) and its implementation-oriented Draft National Plan for Post School Education and Training (NPPSET) (DHET, 2018), are also key documents for the NQF partners and stakeholders.

In addition, the recent NQF Act Implementation Evaluation (Department of Planning, Monitoring and Evaluation [DPME]) is an important contextual feature for the present study. Being a completely separate study, conducted by a research team that worked completely independently of the research team which conducted the present study, parts of the DPME study could serve as triangulation or at least, patterns against which the findings of the present study could be illuminated.

This policy basket was deliberately used to shape the research questions and sub-questions in the 2017 NQF Impact Study.

### ***NDP, 2011; NGP, 2012 and Human Resource Development Strategy for South Africa (HRDS-SA), 2010-2030***

The implications of the NDP (RSA, 2011a), the New Growth Path (RSA, 2011b), and the 2010-2030 Human Resource Development Strategy (HRDS-SA) (RSA, 2009) for the implementation of the NQF Act have been highlighted elsewhere (SAQA, 2017a). Improving the quality of education, skills development, and innovation in the country, and the broadest access to these systems, are imperative for achieving the goals outlined in all these framing documents

### ***White Paper for Post-School Education and Training (PSET), 2013c***

The PSET system – or all education and training provision for those who complete school, those who do not complete schooling, and those who never attended school – is addressed in this White Paper. Objectives in the White Paper are aligned with NQF objectives. The achievement of a single coordinated PSET system, expanded access, improved quality of education and training provision, and strengthened relationships between institutions of learning, and between these institutions, and the workplace, are emphasised. There are stipulations for the range of NQF leaders and stakeholders. Highlights regarding these objectives are noted as they shaped the context and research questions of the present study.

The White Paper sets out strategies to improve capacity in the institutions over which the DHET has oversight, including the 26 public Higher Education Institutions (HEIs); 50 public

Technical and Vocational Education and Training (TVET) Colleges; Community Education and Training Colleges (CETCs)<sup>18</sup>; SETAs; the National Skills Fund (NSF); and the regulatory bodies responsible for the development, registration, and Quality Assurance of qualifications – the Quality Councils and SAQA.

### **The NQF, SAQA and the Quality Councils**

The White Paper makes clear that the NQF in its present form, and the existing structures and remits of the main NQF partners will remain. SAQA must play a leadership role in guiding the further development of systemic articulation. The Quality Councils have greater flexibility regarding the qualifications previously in their ambits.

### **Developing new programmes; consolidating existing programmes**

In the strengthened PSET system, existing programmes – such as the NCV, NATED programmes, GETC and Senior Certificate (SC – are to be consolidated or reviewed and strengthened. New qualifications – such as the National Senior Certificate for Adults (NASCA and occupational programmes funded by SETAs or the NSF – were proposed and have since been developed.

### **Articulation**

The importance of articulation between qualifications offered at HEIs and those offered in other PSET institutions is emphasised, and is key for the present study.

### **The White Paper for PSET, and the NQF**

Particularly noteworthy for the present study, is that all PSET entities must comply with SAQA and Quality Council requirements (DHET, 2013b). The White Paper underscores the importance of the roles of SAQA and the Quality Councils in achieving its objectives.

### ***Draft National Implementation Plan for the White Paper for Post-School Education and Training (PSET), 2018***

A draft NPPSET has been developed that provides for the implementation of the policy goals contained in the White Paper PSET (DHET, 2013c)<sup>19</sup>; it seeks to guide implementation over a 12-year period (from 2018 to 2030).

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<sup>18</sup> Previously referred to as Public Adult Learning Centres (PALCS).

<sup>19</sup> Where the White Paper provides a broad vision and policy goals and proposals without specifying a policy implementation trajectory, the NPPSET converts policy vision into implementation frameworks and strategies.

## ***DPME NQF Act Implementation Evaluation: Findings and Implications, 2018***

In 2015/16, the DPME in partnership with the DHET commissioned an implementation evaluation of the NQF Act (No. 67 of 2008). The purpose was to identify successes and challenges in implementation of the NQF Act and to provide recommendations for improvement in implementation of the NQF Act.

### **Recommendations from the DPME's NQF Act Implementation Evaluation**

The evaluation report provides recommendations for DHET, DBE, SAQA and the Quality Councils. An Improvement Plan has been developed on how the recommendations would be addressed. SAQA's is responsible for addressing nine broad recommendations under three improvement objectives. SAQA's activities include:

- 1) the development of theories of change and/or log frames to clarify the aims and objectives of the NQF;
- 2) strengthening the System of Collaboration;
- 3) the establishment of an NQF-wide workflow system that tracks and monitors applications from the time they are submitted to Quality Councils to the time they are registered;
- 4) advice to the Minister (Higher Education and Training [HET]) on (a) conceptions/definitions of the different categories of qualifications - Occupational, Vocational, General, Academic, and Technical; (b) areas of actual and perceived duplication in the accreditation and registration processes and (c) the transfer of the Quality Assurance of N1-N3 qualifications to the QCTO;
- 5) the development of a process to discuss and resolve any actual or perceived duplication in legislation between NQF bodies and statutory/non-statutory Professional Bodies – during the qualification design and Quality Assurance processes;
- 6) the development of guidelines clarifying what a part-qualification is in the context of the Sub-Frameworks; and
- 7) usage of data from the NLRD to track and monitor policy changes and developments across the NQF.

The Quality Councils are responsible for addressing two recommendations in the Improvement Plan:

- 1) They must respond to the concerns around the looming deadlines on last dates for new enrolments for qualifications that have not been aligned to the HEQSF and OQSF.

- 2) They should determine whether more cost-effective risk-based approaches to Quality Assurance can be adopted, particularly in cases where the cost of compliance and enforcement can be high.

## **2.4 RESEARCH CONTEXT: 2017 NQF IMPACT STUDY**

The 2017 NQF Impact Study is located in the context of the previous NQF impact studies in South Africa and the world.

### ***Lessons from existing South African NQF Impact Studies***

SAQA has conducted four NQF Impact Studies to date – two in 2002 and 2004 (SAQA, 2003; 2005), under the SAQA Act – two under the NQF Act. The main lessons from the first two studies (2002-2004) were the need to ensure credible sampling and triangulation. The 2010 study showed the importance of focusing the research questions on aspects that had been the focus of the work done in the period under evaluation. The 2014 study (SAQA, 2017a) on the other hand, was lacking in and pointed to, the critical importance of building the chain of reasoning, from the *intention* of the work for which impact was being evaluated, to the related activities, outputs, and emerging impact. These lessons have shaped directly, the research design, method and sampling, of the present study<sup>20</sup>.

### ***Lessons from NQF impact studies conducted internationally***

Few NQF impact studies have been conducted internationally. A literature search and conversations with members of the international NQF community revealed three studies to date (Scottish Executive, 2005; National Qualifications Authority Ireland [NQAI], 2009; Australian Qualifications Framework Council [AQFC], 2009), and a current Centre for the Development of Vocational Training (CEDEFOP) initiative (Bjornavold, 2016). These studies underscored the importance of obtaining a wide range of stakeholder views, and given the many communities under an NQF, the triangulation of the data obtained. The CEDEFOP process – like the recent South African DPME's evaluation of the implementation of the NQF Act (DPME, 2018) – illustrated the complexity of the task of trying to define the aspects to be evaluated. In both cases, multiple stakeholders needed to workshop the conceptualising of the aspects to be evaluated.

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<sup>20</sup> The lessons from the early South African NQF impact studies are covered in more detail in the full report of the 2014 NQF Impact Study (SAQA, 2017a).

## 3. Conceptual framework

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This section presents the conceptual framework underpinning the 2017 NQF Impact Study. It starts by sketching how the South African NQF is conceived by the main NQF partners. It goes on to explain how Engeström's (1987; 2001) Cultural Historical Activity Theory (CHAT) informed this understanding of the NQF, and how CHAT shaped the research questions, methods, and samples for the study. It then describes the 'realist evaluation approach' (Pawson and Tilley, 2004) used in the study, including the changes SAQA and the Quality Councils sought to effect between 2009 and 2017. It closes by elaborating the concept of 'relational agency' (Edwards, 2010; 2014), and how the deepening of relational agency was sought in the study, through SAQA-Quality Council collaboration.

### 3.1 HOW THE SOUTH AFRICAN NQF IS CONCEPTUALISED

Over 150 of the world's 257 countries have qualifications frameworks (SAQA, 2016); these frameworks take different forms. The South African NQF is commonly seen as a 'register of qualifications' or a 'grid of qualifications'. It can also be seen as a mechanism or device to relate the different parts of the system – a 'relational device' (Bolton and Keevy, 2011). Engeström's (1987) 'activity triangle' (CHAT) is a useful tool to describe the network of relationships in the NQF – between an individual organisation and its goals, and the mediating tools, rules, Communities of Practice, and divisions of labour in its implementing contexts (Olvitt, 2010). It also addresses the intersection of all of these aspects of an organisation, with the corresponding aspects of other organisations in the system. These ideas are elaborated in more detail in SAQA Bulletin 12(2), and in the report on SAQA's 2014 NQF Impact Study (SAQA, 2017a).

### 3.2 CHAT IN THE 2017 NQF IMPACT STUDY

SAQA's 2014 NQF Impact Study (SAQA, 2017a) was based on CHAT in that it informed the approach of SAQA and the Quality Councils working together, with respective foci on the over-arching NQF context and the three NQF Sub-Framework contexts. It informed the focus in that study, on the analysis of the different tools, rules, and Communities of Practice within the main NQF partner organisations – and it attempted to capture the different 'voices' of these organisations, and through co-analysis and co-reporting for the study. It influenced the research design, which involved analysis of comparative system aspects over time. Its 'expansive learning cycle' concept was used to show system change over time, including the changes over time, of the different parts of the system. These aspects were maintained and enhanced in the 2017 study – by acknowledging the organisational intersection and inter-organisational collaboration when designing the research, by seeking to understand the experiences of stakeholders occupying different positions in the intersecting NQF systems, by considering impact at particular points in time, and by exploring contested areas, and looking for expanded learning and development.

#### *Interacting sub-systems of the NQF*

The 2017 NQF Impact Study sought to embrace the interacting systems of SAQA and the

Quality Councils, and those of the stakeholders of these organisations. It was acknowledged from the start, that implementing the NQF policy is achieved simultaneously in different but inter-connected sub-systems, on the basis of multiple policies that should be, but in some cases are not, aligned.

### ***‘Tools’ and ‘Rules’***

Tools comprise anything used in the transformation process through which a subject achieves its object, including both material and conceptual tools. A tool mediates the relationship between the subject and the object. It can refer to a plan, a policy, an idea, and other tools (Engeström, 1987; Kuutti, 1996). Rules are explicit and implicit norms, conventions, and social relations within a community. Rules are imposed by ‘actors’ (individuals) in social groups, including larger organisational and professional communities (*Ibid.*).

### ***‘Communities of Practice’ and ‘Divisions of Labour’***

Communities of Practice are groups of ‘actors’ (collectives) that share the same purposes and/or values, and are bound by spoken/documented or unspoken/ undocumented rules or criteria. ‘Communities of Practice’ mediate activities. ‘Subjects’ could be members of multiple communities. Subjects can be positioned differently within Communities of Practice: leaders and the main members of a Community of Practice will subscribe most closely to the shared criteria; others will participate more peripherally but this participation is still seen as being legitimate (Engeström, 1987; Kuutti, 1996). ‘Division of labour’ refers to the allocation of responsibilities within or between collectives. The division of labour shows the organisation of a community in relation to the transformation process of the object into the outcome (*Ibid.*).

### ***Contested aspects and ‘Expansive Learning’***

Contradictions are integral to activity systems (Engeström, 2001). Contradictions are seen as being sources of learning, change and development; contradictions present the system with opportunities for creative innovation, for new ways of thinking and doing (*Ibid.*). Addressing contradictions leads to expansive learning and transformation in activity systems: as the contradictions in a system are aggravated, some individual participants or groups begin to question and deviate from established norms, sometimes moving into ‘collaborative envisioning’ and deliberate efforts towards collective change (*Ibid.*). ‘Expansive transformation’ is accomplished when the objects and motives of an activity are re-conceptualized to embrace a wider range of possibilities than was previously the case (*Ibid.*).

## **3.3 REALIST APPROACH TO IMPACT EVALUATION**

SAQA’s 2014 NQF Impact Study (SAQA, 2017a) was found to fall short of the ‘accepted large-system impact evaluation design’ used by the national Department of Monitoring and Evaluation (DPME), which includes a ‘log-frame’ with clearly defined inputs, activities,

outputs, outcomes, and impact (Hercules, 2016). In the 2017 NQF impact study an effort was made to address this critique by making stronger links between the goals sought by the organisations; the related actions, inputs and intentions underlying initiatives, and stakeholder experiences of these initiatives – in order to argue impact in a more robust way. The 2017 study commenced with a review of different approaches to conducting impact evaluations in social contexts.

### ***Realist approach in the 2017 NQF Impact Study***

The approach adopted for the 2017 NQF Impact Study followed the theory-based '*realist evaluation*' approach (Pawson and Tilley, 2004). White's (2009) criteria were adopted to build common elements across the different institutional inputs, and in order to attempt to explain *why* certain aspects are working or not. *Participatory impact assessment* (Catley *et al* 2008a; 2008b) was encouraged. The approach enabled the nuanced foci, questions, methods, and samples of the participating organisations within the over-arching approach advocated, and the continued use of CHAT.

The following broad methodological aspects were considered.

- **Mapping out the chain of developments** – including (1) the changes expected, (2) change-drivers (variety of inputs, including activities), (3) the mechanisms designed to bring about the change, (4) the direct and indirect results of the activities, (5) the changes observed in terms of outcome patterns, and (6) the effects of the changes – and multiple aspects were sought at each of these stages. It was emphasized that NQF implementation initiatives were embedded in contexts (Pawson and Tilley, 2004).
- **Understanding context** – attempts were made to understand the NQF implementation contexts, and how the contexts were inter-woven with the chains of developments found. Context was not seen as being separate from the actions taking place; context was understood as being integral to, and embedded in, the initiatives in relation to which impact was assessed (Fenwick, 2010; 2014).
- **Anticipating heterogeneity** – as heterogeneity was expected in experiences and impacts, categories of groups were generated to explain differential impact (White, 2009:11). CHAT (Engeström, 1987; 2001) was useful for defining the analytical categories of 'Community of Practice', with mediating tools, rules, and authority hierarchies.
- **Using a mixture of methods and triangulation** where possible.

### **3.4 RELATIONAL AGENCY**

As a 'relational (relationship-building) mechanism' in the education and training system (Bolton and Keevy, 2011), the NQF needs relationship-building agents, or actors with 'relational agency' (Edwards, 2010; 2014). SAQA has engaged in relationship-building



since its inception, advocating an approach based on ‘communication, collaboration, and coordination’. In 2014, to kick-start a deepened conscientisation of the need and skills for the practices of communication, collaboration and coordination, SAQA invited Professor Anne Edwards (Oxford University) to run workshops on *relational agency* and *relational expertise* for staff from key NQF organisations. The aims of the workshops were to make front-of-mind, relational work that needs to be done, and to identify and explore ways in which key organisations could support each other. SAQA has since continued to lead extensive relationship-building work with NQF policy-makers, implementers, and beneficiaries.

### **Concept of Relational Agency**

Four ideas are central in the concept of relational agency (Edwards 2010; 2014). First, the idea that relational expertise involves *additional* (specialised) knowledge and skills over and above specialised core (technical) expertise.

Secondly, relational expertise involves *understanding and engaging with the motives of others*. It allows the expertise (resources) offered by others to be surfaced and used.

Third, *relational expertise is useful* vertically (in authority hierarchies), but it is also relevant for horizontal collaboration across practices at similar levels in authority hierarchies. It is useful within and across organisations.

Lastly, relational expertise respects history, but is *focussed on the common knowledge created through shared understanding of the different motives of those collaborating, and going forward together*.

Soudien (2012), in his lecture ‘*Whither Progressive Education and Training in South Africa*’ pointed to the need to recognise the full range of alternative points of view in the South African context, including both dominant and marginalised views. Soudien (*Ibid.*:20) pointed to the need for a ‘project of expansion’ where people are “constituted on a basis that is not premised on ‘othering’”. NQF leaders and stakeholders need to ask, “How do I enter into a relationship with [the system] other [who may have a view] which is absolutely opposite to my [own] preconceptions”, and engage that person on his/her own terms (*Ibid.*: 25)? This kind of engagement is about accepting that learning can take place anywhere, under any circumstances, and being open to learning, which could transcend boundaries in unexpected ways (*Ibid.*). This is an expansive inclusivity which does not ‘otherise’ voices, ideas, and ways of doing that are different. Bensusan (2012:29-30) speaks of the ability to “enter into and take conversations forward” with charity, which in this instance involves “proceeding from a position of generosity toward the other, inclining to accept the thrust of the other’s argument even though it may not have been formulated in the best way”.

### **3.5 APPLICATION OF THE CONCEPTUAL FRAMEWORK IN THE STUDY**

This sub-section of the report explains how the concepts of CHAT, the realist approach to impact evaluations, and relational agency, informed the 2017 NQF Impact Study.

## ***Informed by CHAT***

CHAT (Engeström, 1987; 2001) enabled SAQA and the Quality Councils to understand the NQF as a complex system made up of interacting sub-systems (such as the sub-systems of SAQA and the Quality Councils), each with actors working towards objectives, where these efforts are mediated by the tools used, the system and sub-system rules, the Communities of Practice involved, and the divisions of labour – in the Communities of Practice as well as in the system as a whole. In addition, the systems of SAQA and each Quality Council could be viewed as ‘macro-systems’ made up of the sub-systems of the stakeholders involved in each. And in turn, each of these stakeholder sub-systems – such as an HEI, TVET College, professional body, school, Community College, or other entity – could be viewed as the macro-system, with its sub-systems (campuses, departments, and so on). At each of these levels, there are interacting Communities of Practice – each with tools, and rules, and divisions of labour.

It was thus understood that the tools used – such as policies and processes and initiatives – and the rules involved in each of these Communities of Practice would be influenced, not only by their organisational culture, traditions, role-players, and hierarchies, but also by the cultures, and traditions; role-players and hierarchies in the part of the system or sub-system, and the larger system, in which they were operating.

These understandings informed the samples selected for the surveys and interviews, the documents analysed, and the research instruments developed for the 2017 NQF Impact Study. The samples and research instruments had to demonstrate understanding of the embeddedness of individual responses, and the responses of groups of respondents.

## ***Using the realist approach in the sub-projects***

Following the realist approach (Pawson and Tilley, 2004), in each of the sub-projects in this study, the interventions which were the objects of the research, were defined, and the long-term objectives of the interventions were identified – before the research commenced. Efforts were made to articulate the assumptions underlying the interventions. Also before the research started, the desired changes were described, in terms of the changes expected; the change-drivers; and the inputs made and activities carried out. In each instance, attempts were made to hypothesise around a range of possible outcomes, and a range of the effects of these outcomes, based on the range of NQF stakeholders involved. This exercise helped to shape the research samples and instruments.

## ***Building Relational Agency through the 2017 NQF Impact Study***

A deliberate attempt was made when conducting the 2017 NQF Impact Study, to use the research as an opportunity to develop the ‘relational agency’ (Edwards, 2010; 2014), and ‘solidarity’ (Von Kotze and Walters, 2017) needed within and between NQF stakeholder organisations for implementing the NQF. Deliberate attempts were made to avoid what Soudien (2012) describes as ‘othering’.

In practice, this approach meant that while SAQA provided the leadership for the study, its conceptualisation; the determination of the research questions, design and instruments; the research itself, and the analyses and reporting, were done collaboratively. This collaboration meant setting up meetings and other opportunities to allow for discussion and collaboration towards building mutual understanding and allowing for deep engagement with the motives, issues, needs, and traditions of all four organisations. These efforts also helped to build the shared (common) knowledge on which the study is based. SAQA and the Quality Councils collaborated towards sharpening the research questions and instruments, providing information for valid research samples, gathering rich data, clarifying analyses, and meeting reporting requirements.

In the 2017 NQF Impact Study, allowing for the different foci, and the variations in the research methods used in the four contexts of SAQA and the Quality Councils, may have lessened the standardisation of aspects in the study. However, it arguably enriched the study, the findings of which are useful for the further development of the NQF. It also arguably enhanced the relationships between the research teams located in the four organisations, and there are signs that the collaborative spirit has spread beyond just the research teams, a development which bodes well for future articulation initiatives in the NQF context.

## 4. Research questions, instruments, procedures, samples

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Potentially, the general question addressed in the 2017 National Qualifications Framework (NQF) Impact Study, was ‘What is the emerging impact of NQF implementation, on the systemic integration and articulation, access and redress, and quality and transparency in education, training, development and work?’ Given the time frame of the study, and the historical stage of development of the system (Engeström, 1987) however, it was not possible to address each of these aspects fully. It would have been premature for South African Qualifications Authority (SAQA) and the Quality Councils to conduct a *full* NQF impact study in 2017, as the Quality Councils were still in the process of finalising and advocating their Sub-Framework policies for Recognition of Prior Learning (RPL), Credit Accumulation and Transfer (CAT), assessment and articulation in line with SAQA’s related overarching policies, the Ministerial Policy for the Coordination and Funding of RPL (DHET, 2016) and Articulation Policy (DHET, 2017). SAQA and the Quality Councils thus selected particular questions, in relation to the foci of their work in the eight years since the promulgation of the NQF Act. This section of the report presents the specific research questions addressed by SAQA and each Quality Council, and the overall research design, methodology, and sampling used.

### 4.1 DIMENSIONS CONSIDERED IN ADDRESSING THE RESEARCH QUESTIONS

In keeping with the realist approach to impact evaluations (after Hearn and Buffardi, 2016), each of the participating organisations bore the following in mind. These aspects helped to shape the selection of the samples, and the contents of the research instruments.

- What types of effects would be evaluated?
- At what level would changes be investigated? (group, institution, or policy level?)
- Degrees of separation – how closely linked are the steps (inputs, activities, outputs, outcomes, impact) in the causal chain? What contextual/other factors could intervene between the steps?
- What are the short-, medium- and long-term changes?
- Heterogeneity of benefits – how are different groups affected differently, by the intervention?

Based on the experience of conducting and reporting on SAQA’s 2014 NQF Impact Study and its main shortcoming, in the 2017 study, the research team acknowledged the centrality of capturing stakeholder experiences of the impact of NQF policies on their organisations and work. Attempts were made to capture the experiences of the *range* of NQF stakeholders involved in each aspect investigated.

The research team sought to conduct the study in line with the foci in Sustainable Development Goal 4, which are ‘inclusive and equitable quality education’ and promoting

lifelong learning, which equip learners to acquire the knowledge and skills needed to promote sustainable development, sustainable lifestyles, human rights, gender equality, the promotion of a culture of peace and non-violence, and global citizenship (UNESCO, 2015). The articulation agenda in South Africa was also central in the research. Sub-Projects 1 and 4 focus on alternative access and redress (the alignment of national RPL policies, and the impact of these policies in the system). Sub-Project 2 investigates NQF stakeholder experiences of the searchable databases of the NQF; these publicly available databases are part of the transparency tools of the NQF. Sub-Project 3 considers stakeholder experiences of the NQF Level Descriptors, and how these Descriptors have enabled or blocked learning pathways; Sub-Project 5 investigates student movements between public and private Higher Education – both these projects are essentially focussing on systemic integration, and articulation. Sub-Project 6 researches stakeholder experiences of the new QCTO model for occupational qualifications; this comprises a focus on quality and efficiency.

One of the findings of SAQA's 2014 NQF Impact Study was that there was a need to consider ways in which the Department of Higher Education and Training (DHET), Department of Basic Education (DBE), SAQA, and the Quality Councils could be supported in their work. The 2017 NQF Impact Study could be described as a collaborative initiative of mutual support, where the spotlight was cast on initiatives of importance to SAQA and the Quality Councils, and the researchers investigated some of the effects and emerging impact of these, together. The 'relational work' done in this regard, is described in Section 3.

## **4.2 RESEARCH QUESTIONS**

While SAQA and the Quality Councils worked collaboratively on all the research questions addressed in the 2017 NQF Impact Study, each of these entities originally developed research questions relevant for their contexts. The original questions are presented below.

### ***Research questions addressed by SAQA***

#### **SAQA Research Question 1**

SAQA Question 1, on the impact of SAQA policies for RPL, CAT and assessment, had two parts. After the promulgation of the NQF Act, SAQA developed policies for the RPL, CAT and assessment as part of the NQF policy suite. The Quality Councils had to develop corresponding policies for their Sub-Framework contexts, that were in line with SAQA's policies. Later, the DHET developed RPL coordination policy, and national articulation policy. The SAQA and Quality Council policies had to be aligned with the DHET's policies. Alignment in this instance suggests the impact of the DHET policy on the other policies, and the impact of SAQA policy, on that of the Quality Councils.

### **SAQA Question 1**

- **1A) To what extent are the RPL, CAT and Assessment policies in the NQF Sub-Framework contexts aligned to the over-arching policies of the DHET/DBE/SAQA?**
- **1B) How did the publication of the SAQA policies for RPL, CAT, and Assessment impact on the related work of the Quality Councils?**

### **SAQA Research Question 2**

SAQA Question 2, on experiences and impact of selected NQF transparency tools also had two parts. The searchable databases of the NQF contain detailed information on qualifications, part-qualifications, articulation possibilities, providers offering the qualifications, RPL providers, recognised Professional Bodies, and registered Professional Designations. Individuals can access the records of their own learning. The National Learners' Records Database (NLRD) Trends Reports show trends in NLRD data over time; each report covers a theme. The Record of Learning (RoL) Service provides learners with officially verified records of their own learning. SAQA needed to know how stakeholders had experienced these 'transparency' services, and how the services had impacted on their lives.

### **SAQA Question 2**

- **2A) To what extent do policy-makers, implementers and beneficiaries know about and use the searchable databases of the NQF, and the National Learners' Records Database (NLRD) Trends Reports?**
- **2B) What have been stakeholder experiences of SAQA's Record of Learning (RoL) Service?**

### **SAQA Research Question 3**

SAQA Question 3, in two parts, focused on the NQF Level Descriptors. The Level Descriptors are key tools for articulation and progression in the NQF. SAQA needed to know how stakeholders had experienced the Level Descriptors, and perceptions around how the Level Descriptors had impacted on learning pathways.

### **SAQA Question 3**

- **3A) How have the NQF Level Descriptors been used, and what impact have they had?**

- **3B) How have the NQF Level Descriptors aided or blocked learning pathways, and what could be done to strengthen the Level Descriptors in this regard?**

### ***Research questions addressed by Umalusi***

Umalusi addressed two related questions. Umalusi sought to understand how SAQA's policies had impacted on its policies, and how its policies had impacted on key stakeholders in its context.

#### **Umalusi Question 1**

**How did the NQF Act inform Umalusi's policy development in the areas of RPL, CAT and assessment? (What impact have NQF Act-related policies had, on related Umalusi policy development in this regard?)**

#### **Umalusi Question 2**

**What impact has the implementation of Umalusi's policies for RPL, CAT and assessment under the NQF Act had, on selected stakeholders in the General and Further Education and Training Qualifications Sub-Framework (GFETQSF)?**

### ***Research questions addressed by the CHE***

The CHE addressed two related questions. Under the NQF Act, the CHE has focused on addressing barriers to student movements between public and private Higher Education Institutions (HEIs). The CHE sought to take stock of its related initiatives to date, and to assess the effects of this set of initiatives through the proxy of student movement data.

#### **CHE Question 1**

**What mechanisms have the Council on Higher Education (CHE) developed and implemented since 2008 under the NQF Act, to promote integration and articulation between public and private Higher Education – and what impact have these initiatives had, on integration/articulation?**

#### **CHE Question 2**

**How much student movement has occurred between public and private Higher Education Institutions (HEIs) since 2008, and how does this differ from student movements before 2008?**

## **Research questions addressed by the Quality Council for Trades and Occupations (QCTO)**

After the promulgation of the NQF Act, the QCTO came into being, and designed a new model for occupational qualifications that sought to address unevenness in the pre-NQF Act model. The QCTO sought to understand how its new model had been experienced, and how it is perceived. The QCTO addressed one complex question.

### **QCTO research question**

**How has the QCTO model for occupational qualifications in the integrated education and training system under the NQF Act impacted on the development of occupational qualifications and the provision of occupational training?**

### **4.3 RESEARCH DESIGN: 2017 NQF IMPACT STUDY**

There were six focal areas in the study, each with one or two main research questions, and several sub-questions. The main questions, the methods, samples, findings and types of analysis used, are summarised in Table 2 below. Essentially the over-arching research design of the study comprised six sub-projects. The first two sub-projects used mixed methods, comprising documentary analyses, followed by in-depth interviews with purposively selected respondents; Sub-Project 2 also included some surveys. Sub-Project 3 had a survey design. Sub-Project 4 had a qualitative design, comprising extensive in-depth interviews with a purposively selected and snowballed sample. Sub-Projects 5 and 6 had mixed method designs; Sub-Project 5 comprised a documentary analysis, and a quantitative trends analysis. Sub-Project 6 commenced with a documentary analysis, followed by a survey and then in-depth interviews.

**Table 2: Summary of the research design of the 2017 NQF Impact Study**

<b>Research Question</b>	<b>Method</b>	<b>Analysis</b>	<b>Sample summary</b>
<b>SUB-PROJECT 1:</b>			
<b><i>Alignment of NQF policies for RPL, CAT, and assessment</i></b> <b>(Section 5 of the report)</b>			
SAQA 1A) To what extent are the RPL, CAT and Assessment policies in the NQF Sub-Framework contexts aligned to the over-arching policies of the Department of Higher Education and Training (DHET)/ Department of Basic Education(DBE)/SAQA?	<b>Survey (1C) supplemented with interviews (1B) preceded by document analysis (1A)</b>	<b>Thematic analysis CHAT informed/ Thematic analysis within CHAT categories</b>	<b>CHAT informed</b> <u>Document analysis:</u> DHET (2016; 2017); SAQA (2014a; 2014b; 2016); DBE (2012); Umalusi (2015); CHE (2016c); QCTO (2016b,d; 2017a) – Policies for RPL, CAT, Assessment, Articulation.  <u>Interviews:</u> 7 senior Quality Council policy developers  <b>CHAT informed</b> <u>Survey</u> 99 Private Universities



<p>SAQA 1B) How did the publication of the SAQA policies for RPL, CAT, and Assessment impact on the related work of the Quality Councils?</p> <p>SAQA 1C) What impact have SAQA's policies for RPL, CAT, and Assessment had on selected Quality Council stakeholders?</p>			<p>54 Private Colleges  29 Accredited Skills Development Providers (SDPs)  17 SDPs for Old Trades Qualifications  14 SDPs for New Trades Qualifications  11 SDPs for other New Occupational Qualifications  14 Assessment Quality Partners (AQPs)  11 Development Quality Partners (DQPs)  4 Qualification Development Facilitators (QDFs)  61 Employers</p>
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**SUB-PROJECT 2:**  
***Evidence of the impact of national RPL, CAT, and assessment policies***  
**(Section 6 of the report)**

<p>SAQA 1D) Evidence of impact of RPL and CAT policies on public Higher Education Institutions (HEIs) in:</p> <p>(a) HEI websites,  (b) HEI Statutes, and  (c) Handbooks/Yearbooks</p> <p><u>Umalusi (1A)</u>  How has NQF Act informed Umalusi's policy development and the development of the General and Further Education and Training Qualifications Sub-Framework (GFETQSF)?</p> <p><u>Umalusi (1B)</u>  What impact has the implementation of Umalusi's policies under the NQF Act, had on its stakeholders in the GFETQSF context?</p>	<p><b>Survey (1D)</b></p> <p><b>Interviews preceded by document analysis</b></p>	<p><b>Thematic analysis</b>  <b>CHAT informed/Thematic analysis within CHAT categories</b></p> <p><b>Thematic/analysis Qualitative Content analysis</b></p>	<p><b>CHAT informed</b>  <u>Website/Document analysis</u>  26 Public HEIs  1 Yearbook</p> <p><u>Umalusi (1A)</u>  NQF Act; SAQA's policies for RPL, CAT, Assessment; and Umalusi's RPL, CAT, and Assessment Policies</p> <p><u>Umalusi (1B)</u>  Key policy-makers within Umalusi, and five Umalusi staff members who had recently left Umalusi, but who had worked extensively on the policies concerned;  Representatives of the four major assessment bodies that implement the policies of interest (DBE, DHET, Independent Examinations Board [IEB], South African Comprehensive Assessment Institute [SACAI]).</p>
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**SUB-PROJECT 3:**  
***Impact of selected aspects of the transparency apparatus of the NQF***  
**(Section 7 of the report)**

<p>SAQA 2A) Where do stakeholders obtain information on qualifications, part-qualifications, Professional Bodies, Professional Designations, providers,</p>	<p><b>Surveys (2A-2E)</b></p>	<p><b>Thematic analysis within CHAT categories</b></p>	<p><b>CHAT informed</b>  <u>(Searchable databases and trends project)</u>  9 National Government Departments  57 Provincial Government Departments  All 26 Public Universities  All 50 Public Technical and Vocational Education and Training (TVET) Colleges</p>
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<p>learner achievements, and the verification of qualifications in South Africa?</p> <p>SAQA 2B) What do stakeholders know about SAQA's searchable databases?</p> <p>SAQA 2C) If SAQA's searchable databases are used, how are they used, and how useful were they found to be?</p> <p>SAQA 2D) Are stakeholders aware of the National Learners' Records Database (NLRD) Trends Reports? If so, how were these reports used, and what impact did they have?</p> <p>SAQA 2E) How useful is SAQA's Record of Learning Service? What impact has this service had, on stakeholders' lives and work?</p>			<p>99 Private Universities  54 Private Colleges  All 3 Quality Councils  5 Statutory Bodies  All 96 recognised Professional Bodies  All 21 Sector Education and Training Authorities (SETAs)  29 Accredited SDPs  17 SDPs for Old Trade Qualifications  14 SDPs for New Trade Qualifications  11 SDPs for other New Occupational Qualifications  14 AQPs  11 DQPs  4 Qualification Development Facilitators (QDFs)  61 Employers</p> <p><u>(RoL project)</u>  Random selection of 1 000 clients (3%) (of total of 35 807 clients) who had used SAQA's RoL.  Due to technological factors, 520 two-question questionnaires were emailed to clients (learners).</p>
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**SUB-PROJECT 4:**  
***Stakeholder experiences and impact of the NQF Level Descriptors***  
**(Section 8 of the report)**

<p>SAQA 3A) How are the NQF Level Descriptors understood and used – and where did stakeholders learn of and about them? How do stakeholders use the Level Descriptors; what have the Level Descriptors enabled; and what challenges have been experienced? Do stakeholders have suggestions for improving the Level Descriptors?</p>	<p><b>Surveys (3A, 3B) Triangulated with interviews (3B)</b></p>	<p><b>Thematic analysis within CHAT categories</b></p>	<p><b><u>CHAT informed</u></b>  <u>Interviews</u> were held with the following purposely selected respondents<sup>21</sup>:</p> <ul style="list-style-type: none"> <li>• 33 (of 36 selected) SAQA staff members</li> <li>• 11 (original sample 6) Senior Quality Council managers</li> <li>• 7 (original sample 15) Senior DHET and DBE staff members</li> <li>• 18 (snowballed) Qualification Developers, consultants and SETAs – recommended by the Quality Council interviewees</li> <li>• 5 Private HEIs (which had registered several qualifications under the NQF Act)</li> </ul>
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<sup>21</sup> A detailed explanation of the sample selected and response rates for this project, is provided in Section 8 of this Report.

SAQA 3B) How have the NQF Level Descriptors aided or blocked learning pathways, and what could be done to strengthen the Level Descriptors in this regard?			<p><u>Surveys</u> were sent to:</p> <ul style="list-style-type: none"> <li>• 25 AQPs and DQPs</li> <li>• All 26 Public HEI</li> <li>• All 50 Public TVET Colleges</li> <li>• All 21 SETAs</li> <li>• 153 Private HEIs/Colleges</li> <li>• 71 Skills Development Providers</li> <li>• 61 Employers</li> <li>• All 96 recognised Professional Bodies</li> </ul>
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**SUB-PROJECT 5:**  
***Impact of Council on Higher Education (CHE) initiatives to integrate public and private Higher Education***  
**(Section 9 of the report)**

<p><u>CHE (1A)</u> What are the mechanisms that the CHE has developed and implemented since 2008, under the NQF Act, to promote integration and articulation between public and private Higher Education – and what impact have these initiatives had on integration/articulation?</p> <p><u>CHE (1B)</u> How much student movement has occurred between public and private Higher Education since 2008, and how does this differ from student movements before 2008 (student movement patterns before 2008 will provide the baseline)?</p>	<p><b>Interviews preceded by document analysis (CHE 1)</b></p> <p><b>Learner movement trends analysis (CHE 2)</b></p>	<p><b>Content analysis CHAT informed (CHE 1)</b></p> <p><b>Comparative analysis of learner movement using NLRD data (CHE 2)</b></p>	<p><b>CHAT informed Documents (CHE 1A):</b> CHE’s NQF or Higher Education Qualifications Sub-Framework (HEQSF)-related policy documents, frameworks, good practice guide documents, (CHE, 2001; 2004a,b; CHE, 2005; CHE, 2008; CHE, 2010a; CHE, 2011b,c,d; CHE, 2012b; CHE, 2013a,b; CHE, 2014b,c,d; CHE, 2015b,c; CHE, 2016b,c,d; 2017a,b) and annual reports (CHE, 2009; CHE, 2010b; CHE, 2011a; CHE, 2012a; CHE, 2013c; CHE, 2014a; CHE, 2015a, CHE, 2016a; CHE, 2017a).</p> <p><b>CHAT informed Interviews (CHE 1A):</b> Four directors from CHE’s core function directorates, including (1) Programme Accreditation, (2) National Standards and Reviews, (3) Institutional Audits, and (4) Quality Assurance and Promotion Coordination.</p> <p><b>(CHE 1B)</b> The students achieving Bachelor’s Degrees in the periods 2003 to 2008 (295 856) and 2010 to 2015 (461 357). Students achieving a Bachelor’s Degree as a first qualification in the selected fields in the HEQSF context: (a) Business, Commerce, and Management Sciences (52 034), and (b) Information Technology (IT) (885).</p>
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**SUB-PROJECT 6:**  
***Experiences and impact of new Quality Council for Trades and Occupations (QCTO) model for occupational qualifications***  
**(Section 10 of the report)**

<p><u>QCTO (1A)</u> What are the significant differences between the</p>	<p><b>Interviews preceded by</b></p>	<p><b>Thematic analysis within</b></p>	<p><b>CHAT informed</b></p>
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<p>QCTO model for qualifications under the NQF Act, and the Unit Standards-based model under the SAQA Act, with respect to (a) qualification design, (b) the provisioning of occupational training, and (c) the administration processes of both?</p> <p><u>QCTO (1B)</u> What is the stage of progress regarding implementing the new model for the selected set of qualifications, and has it served to simplify the Occupational Qualifications Sub-Framework (OQSF)?</p> <p><u>QCTO (1C)</u> How have the differences between the pre- and post-2010 models impacted on stakeholders linked to the selected qualifications? What do the stakeholders say about the efficiency and effectiveness of the new system in this regard? And what do the stakeholders say about the simplicity of the system, and the extent to which there is articulation between the selected occupational qualifications, qualifications in the other two NQF Sub-Frameworks, and workplaces?</p>	<p><b>document analysis and survey</b></p>	<p><b>CHAT categories</b></p>	<p>QCTO qualification design and provisioning documentation pre and post-2010, for the following set of selected qualifications:</p> <p><u>Large uptake</u> Healthcare Promotion Officer NQF3 Tax Professional NQF8</p> <p><u>Small uptake</u> Compliance Officer NQF6 Electrical Line Mechanic NQF4 Financial Markets Practitioner NQF7 Professional Principal Executive Officer NQF5 Tax Practitioner NQF6 Toolmaker NQF5</p> <p>Analysis of the minutes of SAQA's Qualifications and Standards Committee (Q&amp;S) meetings 2012-2017 inclusive (analysis of the issues raised over time).</p> <p><b><u>CHAT informed</u></b> <u>Group interviews/digital surveys:</u> DHET (1) SAQA (3) SETAs which used pre- and post-2010 models (4) DQPs/QDFs (3) AQPs (9) Public and private institutions of learning/SDPs (21 complete + 19 partial surveys) Learners (24) Employers (0)<sup>22</sup></p>
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<sup>22</sup> It was only possible to contact the employers of the learners once the 24 learners had responded and made the employer details available. However, in some instances, learners had moved employers; in other instances, the employers were large companies and could not remember the learners. Timing in the current study did not allow for further investigation in this regard.

## **4.4 VALIDITY, RELIABILITY, ETHICS**

Efforts were made to strengthen the validity and reliability of the research, and a highly ethical approach was maintained throughout.

### ***Validity***

Validity was obtained/enhanced by surveying and interviewing respondents directly involved in the aspects being investigated, and by surveying and interviewing as many of these respondents as possible, in order to capture the range of views that might exist. In some instances, different researchers worked together on the same interviews; in other instances, the same key respondents were interviewed by different researchers. The research instruments were developed collaboratively. Most of the analyses were cross checked by a second researcher, or even more than one researcher.

### ***Reliability***

Reliability was sought through using the same research instruments and approach for all data gathering of a particular type. For extensive numbers of interviews, for example, the researchers initially worked in small groups so that a common approach was developed. Thereafter, the researchers worked alone with the interviews, taking care to record information in exactly the same ways – as enabled by the tools used. The surveys were administered via ‘esurv’, in exactly the same way for each respondent within a category. Where mails were distributed with the surveys, care was taken to ensure that all the researchers involved, used exactly the same message. Basic thematic analysis was used in all the documentary analyses.

### ***Ethics***

Conditions of strict confidentiality and anonymity were maintained throughout the study. Each interview was coded so that nowhere in the interview notes or lists were respondent names revealed. Any interview content or notes that may have revealed the identity of a key respondent, was removed from the notes and anonymised or generalised in the analyses. All the survey instruments distributed stated clearly, that all responses would be treated as strictly confidential and anonymous. When these surveys were distributed via ‘esurv’, this anonymity was automatically maintained. When the surveys were distributed via email, the responses and not the return emails were stored. Where permissions were required, these were obtained from the heads of the organisations concerned.

# 5. Sub-Project 1: Alignment of National Policies for Recognition of Prior Learning (RPL), Credit Accumulation and Transfer (CAT), Assessment

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The research in this sub-project was conducted by the South African Qualifications Authority (SAQA). SAQA sought to understand the extent to which the Quality Council policies for Recognition of Prior Learning (RPL), Credit Accumulation and Transfer (CAT), and assessment were aligned to its policies in these areas – and to the later Ministerial policies for the Coordination and Funding of RPL (Department of Higher Education and Training [DHET], 2016), and articulation (DHET, 2017). The research question was as follows.

- **SAQA Question (1A):** To what extent are the RPL, CAT and assessment policies in the NQF Sub-Framework contexts aligned to the overarching policies of the DHET, Department of Basic Education (DBE), and SAQA?

## 5.1 METHOD AND SAMPLING FOR SUB-PROJECT 1: PROJECT TO ASSESS THE ALIGNMENT OF NATIONAL POLICIES FOR RPL, CAT, AND ASSESSMENT

SAQA published South Africa's first RPL policy in 2002, and criteria and guidelines for RPL one year later (SAQA, 2002; 2003). Five years later, an Organisation of Economic Cooperation and Development (OECD) study of RPL across 18 countries positioned South Africa in a cluster of five countries at 'Stage 5 of 7' in terms of setting up a national RPL system - a stage which comprised 'islands of good RPL practices' (OECD, 2009)<sup>23</sup>. In 2010, a year after the promulgation of the NQF Act (Act No. 67 of 2008), SAQA hosted the National RPL Workshop to identify the blockages to expansion to a national RPL system. Four key blockages/needs were identified, namely, (a) to share effective delivery models for RPL; (b) to enhance the quality of RPL; (c) to develop workable funding models for RPL; and (d) to address some remaining legislative barriers. SAQA's 2011 National RPL Conference was designed to find ways to address these challenges.

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<sup>23</sup> The study found four countries at 'Stage 6 of 7' or 'in the process of setting up national RPL systems', and no countries with 'Stage 7' or fully-fledged national RPL systems (Ibid.). South Africa was described in the study as having a vision for RPL, many practices, access for people from different backgrounds, and sporadic funding. The research report also commented that 'not all levels or sectors were open' to RPL (OECD, 2009; OECD-SAQA, 2009:23).

One of the outputs of the conference was the Resolution and Working Document on RPL (SAQA, 2011), an agreed way forward which was endorsed by the 350 participating delegates. SAQA's revision of its RPL policy followed – using SAQA's robust policy development method<sup>24</sup> – as did the establishment of a Ministerial Task Team to develop proposals for a national implementation strategy for RPL.

From the start, it appeared that there was wide buy-in for SAQA's NQF Act-aligned RPL policy (SAQA, 2013/2016)<sup>25</sup>. Following the publication of SAQA's (2013/2016) RPL policy, each of the Quality Councils were required to develop their own RPL policies for their Sub-Framework contexts which are aligned to SAQA's RPL policy. Umalusi did so in 2015, with the Council on Higher Education (CHE) and Quality Council for Trades and Occupations (QCTO) doing so in 2016. The Ministerial Task Team for RPL recommended *inter alia* the establishment of a National RPL Coordinating Mechanism; Ministerial Policy for the Coordination and Funding of RPL (DHET, 2016) provided for the establishment of this mechanism.

Based on the NQF Act (Act No. 67 of 2008) [Section 13(1)(h)(iii)] in 2014, SAQA published policy on CAT after consultation with the three Quality Councils (SAQA, 2014b). The Quality Councils are responsible for developing CAT policies for their respective NQF Sub-Frameworks, after considering SAQA's policy. Umalusi published its CAT policy in 2015; the CHE and the QCTO did so in 2016 and 2017 respectively. In 2017, the DHET published its overarching Articulation Policy for the Post-School Education and Training System in South Africa.

In addressing SAQA Question 1A, an analysis of the alignment of the Quality Council RPL policies (Umalusi, 2013; CHE, 2016c; QCTO, 2016d) with SAQA's RPL policy (SAQA, 2013, reprinted in 2016), was carried out by the SAQA research team. This analysis also included comparing the SAQA and Quality Council RPL policies, with the later-developed Ministerial RPL policy (DHET, 2016).

### ***SAQA's documentary analysis of RPL, CAT, and Assessment policy alignment: Method***

SAQA's documentary alignment analysis examined general trends regarding relationships of similarity across the policies analysed, and whether the Quality Council policies appear

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<sup>24</sup> SAQA develops policy with a democratically elected Reference Group, which include representatives of NQF stakeholder groups across the board. SAQA policy development is based on research; its RPL policy development drew on long-term SAQA-University of the Western Cape (UWC) partnership research into a maximally inclusive RPL model for use across the NQF contexts in the country (Cooper and Ralphs, 2016).

<sup>25</sup> Over 400 people – a high number for a South African Education and Training event – participated in SAQA's 2014 *National RPL Conference* for example, which focussed on sharing examples of, and data from, good RPL practice. Between 2011 and 2015, around 100 individuals were assisted annually by SAQA, and SAQA supported 20 large national RPL initiatives. SAQA's (2002; 2003) early RPL policies were revised, printed and disseminated in 2013; this revised policy was reprinted in 2016. It has been mandatory for organisations to submit RPL data to SAQA for uploading in the NLRD; there are currently around 1.5 million records of achievement of qualifications and part-qualifications through RPL, in the NLRD.

to have been shaped by SAQA's policies. The presence of gaps, differences or areas of misalignment, and the general degree of policy alignment, that is, determining whether there are high or low degrees of alignment, were considered.

The following assumptions were made:

- that the Quality Councils' RPL, CAT and assessment policies would be aligned to the related SAQA policies, since SAQA's policy was published first, and the Quality Councils are required to develop their corresponding NQF Sub-Framework policies after considering the related SAQA policies (RSA, 2008: Clause 27[h](ii));
- that there was a possibility that neither the SAQA nor the Quality Council policies for RPL, CAT, and assessment, would be aligned to the Ministerial policies for RPL and articulation (DHET, 2016; 2017), as they had been published before these, or around the same time; and
- that Umalusi's assessment policy would have been shaped by the DBE's extensive assessment policy regime.

## **5.2 FINDINGS AND ANALYSES FOR SUB-PROJECT 1: POLICY ALIGNMENT**

### ***Thematic area categories used for the comparison of the RPL policy documents***

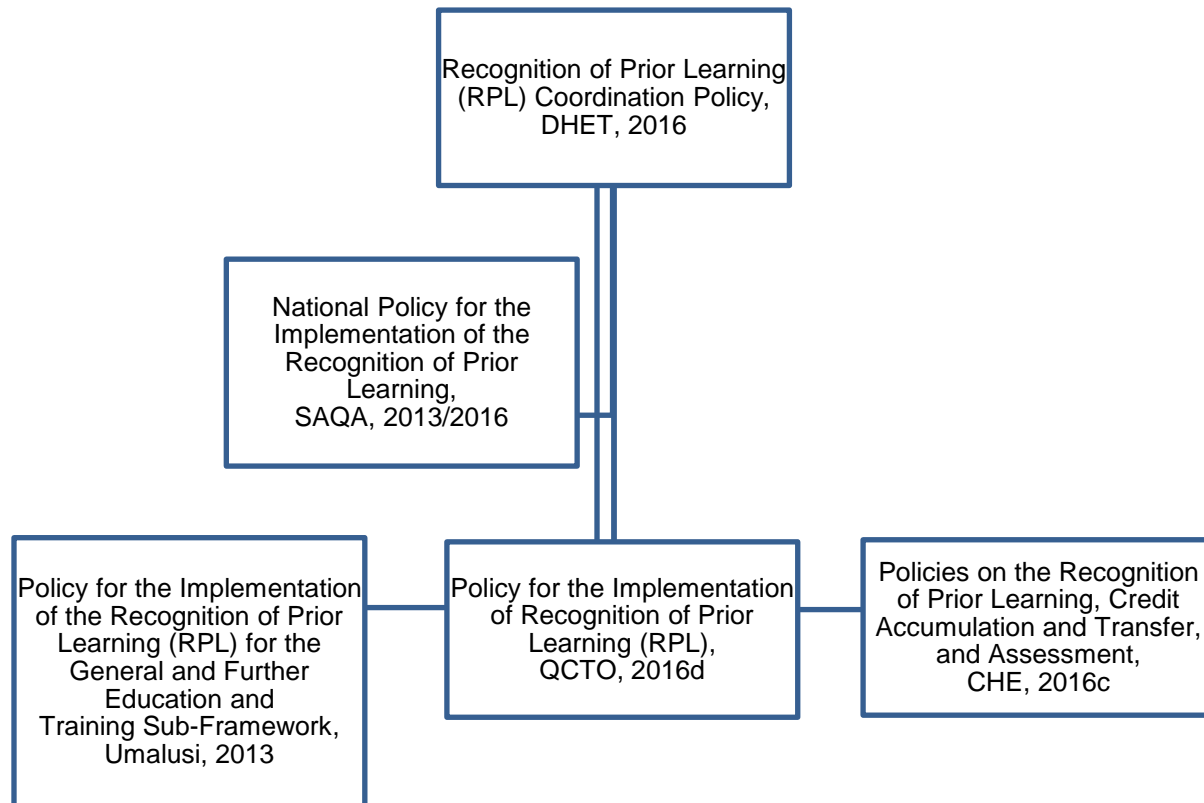
The following categories were used to analyse (a) the alignment of the Quality Council RPL policies, with those of SAQA, and (b) the alignment between the RPL policies of SAQA and the Quality Council, and the Ministerial Policy for the Coordination and Funding of RPL (DHET, 2016).

- a) Background to the policy.
- b) Purpose of the policy.
- c) Objectives of the policy.
- d) Scope of the policy.
- e) Glossary/definitions.
- f) Main content of the policy/policy priorities/policy principles/policy development.
- g) Criteria and guidelines.
- h) Implementation/responsibilities regarding implementation.
- i) Types of RPL.

### ***Analysis of the alignment of the Quality Council RPL policies with SAQA's RPL policy, and SAQA's RPL policy alignment with the DHET Policy for Coordinating and Funding RPL***

Figure 1 below shows the RPL policies that were analysed by SAQA researchers.





**Figure 1: RPL policy documents analysed by SAQA researchers**

The analysis which follows considers the alignment of the Quality Council RPL policies, with that of SAQA.

### **Similarities between the Umalusi and SAQA RPL policies**

Large areas of similarity were found between the RPL policies of SAQA (2013/2016) and Umalusi (2013).

#### *Similarity 1: Purpose statement*

Umalusi’s policy contains a clear purpose statement. Its RPL policy is a guide to the implementation of RPL for qualifications on the GFETQSF. Similarly, SAQA’s RPL policy provides for the implementation of RPL within the context of the NQF Act.

#### *Similarity 2: Legislative background*

Umalusi made note of the NQF Act (No. 67 of 2008); in the same way SAQA’s RPL policy specifies, where the required standard setting functions in respect of qualifications shifted from SAQA to the Quality Councils. In terms of RPL this meant quality and standards were to be respected in qualifications for the GFETQSF. In terms of the NQF Act and the General and Further Education and Training Quality Assurance Act (GENFETQA Act No. 58 of

2001), Umalusi is responsible for the GFETQSF; Section 27 of the NQF Act outlines the functions of the Quality Councils. In this sense Umalusi must develop and implement a policy and criteria for assessment, RPL, and CAT for its Sub-Framework.

*Similarity 3: Scope*

Umalusi’s policy includes a section on ‘scope’ in the same way SAQA’s policy does. According to Umalusi, its RPL policy applies to all qualifications and part-qualifications registered on the GFETQSF, education institutions, and accredited public and private training providers.

*Similarity 4: Definitions*

The definition of RPL used by SAQA is taken up by Umalusi (Umalusi, 2013). Table 3 shows the definitions used by SAQA and Umalusi.

**Table 3: Definitions used in the NQFPedia, and by SAQA and Umalusi**

<b>Term</b>	<b>NQFPedia Definition (2014)</b>	<b>SAQA RPL Policy (2013, reprinted 2016)</b>	<b>Umalusi RPL Policy (2013)</b>
<b>RPL</b>	The principles and processes, through which the prior knowledge and skills of a person are made visible, mediated and assessed for the purposes of alternative access and admission, recognition and certification, or further learning and development	The principles and processes, through which the prior knowledge and skills of a person are made visible, mediated and assessed for the purposes of alternative access and admission, recognition and certification, or further learning and development [Definitions section]. [The prior knowledge and skills primarily includes informal and non-formal Knowledge and skills]	The principles and processes through which the prior knowledge and skills of a person are made visible and assessed for the purposes of alternative access and admission, recognition and certification, or further learning and development (Umalusi, 2013:3) [RPL involves distinguishing between ‘mastery of a body of knowledge in formal education’ and ‘mastery of work-based competences’ - informal and non-formal learning ( <i>Ibid.</i> )]

*Similarity 5: Principles*

Umalusi concurs with SAQA on certain principles which seek to guide RPL implementation: (a) Umalusi embraces democratic principles where implementation should be based on the principles of equity, access, inclusivity and redress of past unfair discrimination with regard to educational opportunities; (b) Umalusi mentions the point that qualifications and

part qualifications registered on the NQF may be awarded in whole or in part through RPL; and (c) Umalusi included the point made in SAQA's policy that RPL must be conducted in a way that provides educational opportunities for life-long learning.

#### *Similarity 6: Context*

SAQA's RPL policy emphasises the need for context-specificity within the Quality Council RPL policy documents which should undergird RPL procedures. SAQA's policy states that RPL is multi-contextual, RPL can be developed and implemented differently and how it takes place may differ from one context to another. Umalusi discusses processes for implementing RPL but explains that RPL is not as easily implementable for the GFETQSF. According to Umalusi's RPL Policy, it is important to take cognisance of the purpose and characteristics of qualifications on the GFETQSF and the profile of learners most likely to be enrolled in these qualifications. The GFETQSF is taken up by learners who are in the basic or compulsory education phase, or who have progressed to the post-school phase, in which learners will be in the 16 to 24 age range. The post-school group "would not have much in the way of substantial previous learning and/or experience to be considered for RPL. Attempting to implement any form of RPL at this level would undermine the teaching and learning enterprise designed for this level" (Umalusi, 2013:4).

#### *Similarity 7: Entry requirements*

Alternative access requirements are provided for in the SAQA policy. According to the SAQA policy, qualifications registered on the NQF must include provision for alternative entry level requirements so that candidates who do not have formal qualifications or meet formal entry requirements can be admitted to study towards the qualification through RPL. Umalusi states that minimum admission requirements for a qualification will be specified for access to a qualification – this will provide for immediate recognition of previous certified. Alternative access to basic qualifications will be provided in cases where access is restricted in terms of admission – the National Senior Certificate (NSC) for instance is not available out of school, thus the GFETQSF will make provision for alternative qualifications which provide equal access to further education and training opportunities).

#### *Similarity 8: Credits*

RPL for credits focuses on the awarding of credits for, or towards, a qualification. In line with SAQA's requirement, Umalusi states that credits will be granted for prior learning through an approved formal examination.

#### *Similarity 9: Assessment*

SAQA's RPL policy notes that prior learning is made known through assessment or other methods (teaching-learning, mentoring, and so on) that determine the development of knowledge, skills and competencies gained; and assessment of experiential learning for credit is compared against existing formal qualifications or part qualifications. Umalusi points out that credit will be granted for prior learning through an approved formal

examination – this will test the standard as set out in the prescribed curriculum. However, the policy recognised like SAQA that RPL may be conducted through a variety of approaches where appropriate. RPL processes can also include guidance and counselling, and extended preparation for assessment. These points align to the SAQA RPL policy.

#### *Similarity 10: Types and practices*

Umalusi subscribes to the two main forms of RPL, which SAQA’s policy outlines, that is RPL for access (which seeks to provide alternative access into a programme of learning for those who do not meet formal entry requirements) and credit (which seeks to provide for the awarding of credits for a qualification). Umalusi, like SAQA, also states that RPL is multi-dimensional (it is a process through which non-formal or informal learning is measured and mediated for across different contexts “and certified against the requirements for credit, access, inclusion or advancement in the formal education and training system, or workplace”) and multi-contextual (it can differ in different contexts, and the purpose and context determine the practices and outcomes of RPL in different cases) (Umalusi, 2013:5-6). Umalusi also uses SAQA’s approaches to RPL where “RPL processes can include guidance and counselling, and extended preparation for assessment” and RPL “may be conducted by a variety of methods using a combination of teaching and learning, mentoring and/or assessment approaches, as appropriate” (*Ibid.*).

#### **Differences between the Umalusi and SAQA RPL policies**

Six differences were found between the SAQA and Umalusi RPL policies.

##### *Difference 1: Political and socio-economic background*

Similar to SAQA’s RPL policy, Umalusi mentions that its RPL policy is in line with national policy discourse on education since 1994, namely transformation, accreditation, lifelong learning and the NQF; however, it does not mention the broader context of government policies to which its RPL policy relates like the National Development Plan (NDP) 2030.

##### *Difference 2: Policy development process*

SAQA’s RPL policy mentions its policy development process, while Umalusi’s policy does not do so. It is therefore unclear whether consultation, internal processes and public comment informed the policy and also what context, research and existing policy environment was drawn upon for the development policy.

##### *Difference 3: Principles*

(a) SAQA’s RPL policy requires that there should be an emphasis on the point that RPL “may be carried out at any level of learning and at any NQF level” (SAQA, 2013:6/2016). How this principle could be applied in the GFETQSF context, is not elaborated in Umalusi’s (2015) RPL policy. (b) According to SAQA, focus should be placed on “returning-to-learning youth and adults” in collaboration with all relevant stakeholders in the labour market and

the national learning system (SAQA, 2013:8/2016); Umalusi's RPL policy does not deal with this aspect. (c) SAQA's RPL policy makes clear that RPL processes involve making informal and non-formal prior learning visible, and mediating this knowledge, as well as assessing it for the purposes of alternative access and admission; recognition and certification; or further learning and development; Umalusi's RPL policy foregrounds the assessment aspect, while neglecting the other aspects. (d) SAQA's RPL policy emphasises that the focus needs to be on learning, and not where the learning was obtained; Umalusi's policy is silent on this matter; neither does it address the point that "[n]o distinction, other than that required for data analysis, must be made between records of learner credits and achievements for qualifications and/or part qualifications awarded as a result of RPL processes and those obtained via conventional means" (SAQA, 2013:7/2016).

#### *Difference 4: Barriers and resources*

SAQA's RPL policy discusses the barriers to RPL implementation in the education and training system, which include: limited incentives, lack of resources to develop and sustain services at affordable prices, lack of trained RPL personnel, inadequate supporting systems such as administrative systems that are unable to grant credits for part qualifications and admission systems without robust alternative access routes, and institutional resistance and lack of capacity. Related to the barriers, SAQA's RPL policy engages with the "resourcing of RPL", which encompasses a broad definition of capacity, as direct and indirect physical, infrastructural, human (qualified personnel) and financial capacity (SAQA, 2013:5/2016). A resource can include, for instance, bursaries to RPL candidates or to providers for RPL services, or incentivising the sharing of facilities, staff and expertise across the RPL system. Umalusi does not address the barriers to RPL in the GFETQSF context.

#### *Difference 5: Quality Assurance*

Quality Assurance, as specified in SAQA's RPL policy, includes aspects of delivery, and monitoring and evaluation of RPL provisioning. Umalusi's RPL policy, in contrast, only refers to the quality assurance of learner assessment, based on its existing policies and practices; there is no reference to the monitoring and evaluation of RPL in the GFETQSF context. SAQA's policy states that RPL "[p]rocesses followed must be credible, quality assured and consistent with accepted and approved principles, criteria and regulations of SAQA, the relevant Quality Council and the institution concerned" (SAQA, 2013:7/2016). SAQA's policy also refers to data capturing which forms a crucial part of monitoring and evaluation, where providers, through the relevant Quality Council, must record RPL data and submit the data to SAQA, as this will inform the monitoring and evaluation of access and redress indicators – data must also respect confidentiality and may not be shared with those not directly involved in the recording of data (SAQA, 2013/2016). Umalusi does not mention this requirement in its policy. Part of SAQA's emphasis on the effective delivery of RPL includes taking into account the lessons learned from RPL and research, and that RPL in the workplace and in educational institutions should be expanded (SAQA, 2013:8/2016). Umalusi's (2013) RPL policy is silent in this regard, and in the matter of

appeals linked to RPL processes, where SAQA's policy states that RPL candidates and others are permitted to lodge complaints with the relevant Quality Council, and education institutions and skills development providers should establish "an appeal process for RPL candidates to engage with RPL-related judgements" (SAQA, 2013:11/2016).

### *Difference 6: Responsibilities*

While SAQA clearly states that the implementation of RPL is the responsibility of various entities and also outlines this in a dedicated 'responsibilities' section, Umalusi does not include a responsibilities section in its RPL policy document.

## **Similarities between the CHE and SAQA RPL policies**

Considerable similarity was found between the RPL policies of the CHE and SAQA.

### *Similarity 1: Purpose statement*

The CHE's (2016c) policy outlines the purpose behind its RPL policy, which, like SAQA's (2013/2016) RPL policy, seeks to provide guidance for implementation. The CHE explains that given that the Higher Education Qualifications Sub-Framework (HEQSF) operates within the context of 'a single but recognisably diverse and differentiated' Higher Education system, it is the purpose of the CHE policy on RPL to provide guidelines for the Higher Education sector, both private and public institutions, to develop and facilitate the implementation of RPL across this diversity. The CHE also mentions Quality Assurance as feeding into the purpose of the RPL policy: "the policy seeks to ensure that implementing bodies in the higher education sector facilitate RPL in a manner that protects the quality and standards of qualifications" (CHE, 2016c:iv).

### *Similarity 2: Background*

In a similar vein to SAQA's citing of the legal framework, for the CHE, the Higher Education Act (No. 101 of 1997, as Amended) assigns responsibility for quality assurance in Higher Education to the CHE. From this, the mandate of the CHE includes the development and implementation of a system of quality assurance for all Higher Education Institutions (HEIs), both public and private – this responsibility is discharged through its permanent sub-committee, the Higher Education Quality Committee (HEQC). In addition, the CHE's policy indicates that the NQF Act assigns to the CHE, the role of Quality Council for Higher Education which mandates the CHE to develop and implement policy and criteria for the development, registration and publication of qualifications; for assessment, RPL and CAT.

### *Similarity 3: Policy development process*

Like SAQA, the CHE discusses its policy development process. The CHE, following the finalisation of SAQA's RPL policy in 2013 (reprinted in 2016), and the DHET's (2016) RPL Coordination and Funding Policy, developed integrated policies for RPL, CAT and assessment, after a consultative process. In this sense, the CHE built RPL tenets for the

Higher Education sector on SAQA's and DHET's RPL policies. The CHE also mentions that its RPL policy complements and/or supplements existing policies and frameworks as developed by DHET, SAQA, and the other Quality Councils. A specific section on policy development processes would be useful.

*Similarity 4: Definitions*

The definition of RPL used by SAQA is adopted by the CHE. Table 4 shows the definitions used by SAQA and those used by the CHE.

**Table 4: Definitions used in the SAQA and CHE RPL policies**

<b>Term</b>	<b>NQFpedia Definition (SAQA, 2014c)</b>	<b>SAQA RPL Policy (2013, reprinted 2016)</b>	<b>CHE RPL Policy (2016c)</b>
<b>RPL</b>	The principles and processes, through which the prior knowledge and skills of a person are made visible, mediated and assessed for the purposes of alternative access and admission, recognition and certification, or further learning and development	The principles and processes through which the prior knowledge and skills of a person are made visible, mediated and assessed for the purposes of alternative access and admission, recognition and certification, or further learning and development (SAQA, 2013:5/2016). [The prior knowledge and skills include informal and non-formal learning]	The principles and processes through which the prior knowledge and skills of a person are made visible, mediated and rigorously assessed and moderated for the purposes of alternative access and admission, recognition and certification, or further learning and development (CHE, 2016c:1;3). RPL is the process through which non-formal and/or informal learning are measured, evaluated and translated into their perceived formal equivalents for recognition across different contexts (CHE, 2016c:6)

*Similarity 5: Types and practices*

The CHE subscribes to the idea of RPL for access and credit. Its RPL policy explains that learning resulting from formal routes will normally be recognised via CAT, but in cases where CAT is found not to be applicable, the RPL route may be explored.

*Similarity 6: Principles*

As in the SAQA policy, certain principles should guide the application of RPL. The CHE's RPL policy (a) adheres to democratic principles; (b) the CHE recognises that RPL is more

than a process of assessment; according to the CHE it is a “specialised pedagogical process” which involves “translation of informal and non-formal bodies of knowledge into their formal and structured equivalents based on specified competencies”, it requires “close consideration of the associated epistemologies and specifically of the differentiation between experiential and academic knowledge, and hence of the areas and levels to which RPL can appropriately be applied”, and it also requires “clear understanding of the possible contribution of such informal and/or non-formal knowledge to each particular qualification type in higher education” (CHE, 2016c:7); (c) the CHE gives expression to RPL and its association to lifelong learning as described in the SAQA policy; and (d) the CHE’s RPL policy embraces the principle behind certification received through RPL: certificates awarded signifying successful completion of a qualification ‘will not reflect that a candidate has gained access to a programme or been awarded advanced standing through an RPL process’, but the academic transcript of those exempted from some modules will reflect exemptions achieved through RPL but with no credit points attached.

### *Similarity 7: Context*

Context, especially in relation to the Sub-Frameworks of the NQF, plays a central role in the SAQA policy. The CHE states that implementation of RPL is context-specific, in terms of institution, discipline, programme and level. The CHE, however, ascribes a degree of independence and freedom to implementing bodies such as institutions and other education providers in the application of RPL, which includes for instance the admission criteria.

### *Similarity 8: Assessment*

Assessment forms a critical part of RPL, as expressed in the SAQA policy. The CHE’s assessment requirements for RPL states that Higher Education Institutions (HEIs) are required to spell out in detail their assessment criteria for RPL, including advanced standing to a postgraduate level without a learner having a primary degree. Assessment criteria should not simply replicate those for mainstream study but “should seek to accommodate the knowledge and skills gained in practices outside the HEI in terms of their value for the envisaged course of study” (CHE, 2016c:9). Furthermore, the CHE’s policy states that an RPL assessment process should be used to evaluate knowledge of applicants – pass levels will be the same as those accepted for direct admission, and that assessments should be undertaken within the institution and not by a central RPL office; this is because the disciplinary expertise of academic staff plays a crucial role in assessing learning achieved by RPL.

### *Similarity 9: Quality assurance*

SAQA’s requirements for considering lessons learnt about RPL implementation and capturing RPL-related data were included in the CHE policy. According to the CHE, HEIs should ensure that Quality Assurance processes, such as regular quality reviews of RPL policies and practices that address RPL are in place both prior and subsequent to RPL, and this includes application, assessment, reporting, administrative systems, resourcing



and fair administration of RPL practices, and data management systems. The CHE has also included a complaint and an appeal process; its policy states that HEIs must work within the interest of transparency to make admission requirements available to the public, and make appeal processes fair and transparent and available to candidates who are dissatisfied with the outcome of the application for RPL.

### **Differences between the CHE and SAQA RPL policies**

Eight differences were found between the RPL policies of SAQA and the CHE.

#### *Difference 1: Objectives*

The CHE's RPL policy does not include an objectives statement in contrast to SAQA's RPL policy. The CHE expresses that the NQF relates to redress, equity and access, but does not specify how its RPL policy objectives meet the aims and objectives of the NQF in the HEQSF context, in a clear way.

#### *Difference 2: Political and socio-economic background*

While SAQA's RPL policy was published before the White Paper PSET (DHET, 2013c), the CHE's RPL policy echoes a critical point in the White Paper which stated that RPL is central to the development of an equitable Higher Education system: HEIs should make every effort to avoid unfair and irrational barriers to acceptance and credit transfer and should be committed to providing "equitable and flexible opportunities for students to 'enter and succeed' in higher education" (CHE, 2016c:v). However, the CHE's RPL policy does not consider the broader context of government policies to which its policy relates.

#### *Difference 3: Scope*

While SAQA's RPL policy provides a clear scope section, the CHE's policy does not make its scope clear.

#### *Difference 4: Credits and a whole qualification*

SAQA's RPL policy provides for RPL for access, and RPL for credit: a whole qualification can awarded through RPL. The CHE's policy (CHE, 2016c:1) provides for access, advanced standing, and exemption via RPL, but not for credit. While a student may complete a qualification with fewer credits for the exemption granted via RPL, students may not be compelled to do additional work to make up for the 'missing credits'. Further, RPL cannot be used to grant a learner exemption from more than 50% of the modules required for a qualification. Neither can a whole qualification be obtained via RPL.

#### *Difference 5: Principles*

The CHE's RPL policy does not fully incorporate the RPL principles elaborated in SAQA's RPL policy.

### *Difference 6: Entry requirements*

SAQA's policy for registering qualifications on the NQF specifies that in order to be registered, qualifications must specify alternative access routes. In the CHE's policy, an RPL application is evaluated against the entry requirements of a qualification; an RPL applicant may be granted access, advanced standing, or exemption through an RPL process. Candidates will however "be admitted at the institution's discretion in accordance with the institution's RPL policy" (CHE, 2016c:8). According to the CHE, it is the responsibility of HEIs to determine the criteria for RPL within the context of their admission policies – this principle allows for a variety of interpretations of RPL, opening the chance of barriers as well as enablers to RPL. In addition, the CHE policy creates an admission rule, whereby not more than 10% of a cohort of students may be admitted into a Higher Education programme through an RPL process. The CHE argues that the purpose of this rule is to support programme accreditation requirements/ quality assurance, and notes separately (not in the RPL policy), that motivations to exceed the 10% cohort quota, will be considered by the CHE's Higher Education Quality Committee (HEQC) on request. While SAQA encourages context-specificity, the CHE's 10% admission rule is restrictive and limits the numbers of students able to gain access through RPL.

### *Difference 7: Quality assurance*

While the CHE's RPL policy considers some aspects of quality assurance requirements, not all of the criteria in SAQA's RPL policy provisions are given full attention: for example, the CHE's RPL policy does not elaborate sufficiently on the monitoring and evaluation of, and the reporting on, RPL.

### *Difference 8: Responsibilities*

Unlike the SAQA policy which outlines the responsibilities of various entities and which also has a dedicated 'responsibilities' section, the CHE's does not include these aspects.

## **Similarities between the QCTO and SAQA RPL policies**

Large areas of similarity were found between the SAQA (2013/16) and QCTO (2016d) RPL policies.

### *Similarity 1: Purpose statement*

While SAQA's policy provides guidance for all the Quality Councils, the purpose of the QCTO's RPL policy is to set out what RPL means in its Sub-Framework context; its guidance is related to qualifications on the QQSF.

### *Similarity 2: Background*

Just as SAQA makes mention of the legislative and regulatory framework, the QCTO, explains that in Section 26(d) of the Skills Development Act (No. 97 of 1998) RPL is

recognised as a route towards access to a Trade Test, and Section 27(h) states that the QCTO must develop and implement policy and criteria for assessment, RPL and CAT for qualifications in its Sub-Framework.

*Similarity 3: Scope*

Like SAQA’s policy, the QCTO’s policy includes a scope section, which refers to all OQSF stakeholders, and all occupational qualifications and part-qualifications registered on the NQF.

*Similarity 4: Definition*

The definition of RPL used by SAQA is taken up to some degree by the QCTO but the exact wording is not used and some features are missing. Table 5 shows the definitions used by SAQA and those used by the QCTO. The QCTO focuses more on the aspect of making informal, non-formal or experiential learning visible, assessed and recognised but does not emphasise other primary routes of the RPL process which include certification and further learning and development (the QCTO only makes mention of credits and access to a qualification).

**Table 5: Definitions used in the SAQA and QCTO RPL policies**

Term	NQFpedia Definition (SAQA, 2014c)	SAQA RPL Policy (2013, reprinted in 2016)	QCTO RPL Policy (2016d)
RPL	The principles and processes through which the prior knowledge and skills of a person are made visible, mediated and assessed for the purposes of alternative access and admission, recognition and certification, or further learning and development	The principles and processes through which the prior knowledge and skills of a person are made visible, mediated and assessed for the purposes of alternative access and admission, recognition and certification, or further learning and development (SAQA, 2013:5/2016). [The prior knowledge and skill includes informal and non-formal learning]	A process by which individuals who had gained skills and knowledge through informal, non-formal or experiential learning [or unstructured learning experiences] can be assessed, recognised and awarded credits for such learning if it meets the requirements of an NQF registered qualification or part qualification (QCTO, 2016d:7). The recognition of prior learning is the evaluation and acknowledgement of the knowledge and skills that a candidate has gained to enable access to [qualifications on the OQSF, and the external integrated summative

Term	NQFpedia Definition (SAQA, 2014c)	SAQA RPL Policy (2013, reprinted in 2016)	QCTO RPL Policy (2016d)
			assessment] (QCTO, 2016d:9)

#### *Similarity 5: Types and practices*

The QCTO following SAQA, discusses the two main types of RPL which reflect the different purposes and different processes within which RPL takes place, namely RPL for access and RPL for credit.

#### *Similarity 6: Principles*

There are a number of principles which the QCTO and SAQA share regarding the implementation of RPL. The QCTO (a) embraces democratic principles in line with social justice where implementation should avoid unfair exclusion and must empower learners by correctly placing them in formal and non-formal training. This includes RPL benefitting persons of all languages to ensure effective delivery. RPL should target candidates who may not be fluent in the mainstream language – the QCTO recognises that there are occupations that do not necessarily require fluency in a mainstream language. The aim is to ensure that candidates are not disadvantaged from enrolling for RPL for reasons pertaining to language; are assisted by translators and interpreters, where necessary; and have their portfolios translated, transcribed and professionally presented. (b) The QCTO adheres to the notion that qualifications and part-qualifications may be awarded in whole or in part through RPL. (c) The target groups specified for RPL in the OQSF emphasises youth and adults which is similar to SAQA’s policy focus – the QCTO mentions that the White Paper PSET also states that RPL must be applied more widely, especially for young adults who wish to access programmes in colleges. (d) The QCTO’s policy mentions that RPL is a complex process of credit being awarded for knowledge and skills acquired through experience and not for experience alone, and it involves the preparation of evidence for assessment. (e) The QCTO mentions that RPL is linked to life-long learning – its policy states that the idea of ‘no RPL without learning’ should be strengthened.

#### *Similarity 7: Context*

The QCTO considers the context of its Sub-Framework for the application of RPL, as required by SAQA. The nature of RPL implementation in the OQSF context, especially regarding assessment type, quality assurance, and stakeholder responsibilities, are considered.

#### *Similarity 8: Assessment*

In accordance with SAQA’s requirement for the assessment of prior learning, the QCTO states that implementation must recognise the diversity of knowledge, skills and learning styles, and provide “holistic and flexible assessment”, and ensure that evidence assessment practices include on-the-job observation (QCTO, 2016d:9). Furthermore, the QCTO’s policy states that RPL implementation must also use methodologies that are fit-

for-purpose, especially considering the QCTO's three-part learning and qualification structure – knowledge, practical skills and workplace experience. These qualifications require a formal teaching environment, a practical or simulation environment, and actual workplace experience. Additionally, the QCTO policy states that knowledge and practical skills are both assessed through a formal External Integrated Summative Assessment (EISA). In relation to RPL, the AQP will design and implement a tool to conduct RPL at the assessment stage to support learners who might have difficulties to sit for an assessment. The underlying principle is that achievement of learning outcomes has to be appropriately assessed.

#### *Similarity 9: Credits*

Similar to SAQA's provision for credits, the QCTO refers to candidates being awarded credits for non-formal and informal learning towards a qualification, which meets the requirement of the SAQA policy.

#### *Similarity 10: Quality Assurance*

While the QCTO considers some aspects of Quality Assurance requirements, not all SAQA's provisions are given full attention. The QCTO states that RPL processes must be fair, reliable, valid, ethical and transparent; and be consistent across time, place, role-players and respond to non-sectoral demand. In addition, RPL services and programmes must meet the quality standards of a qualification. The QCTO's RPL policy also refers to Quality Assurance and monitoring. RPL forms part of the overall quality assurance system and quality criteria. Similar to SAQA, the QCTO states that the quality assurance of RPL is manifested by the establishment and adherence to policies, standards, processes and associated practises that ensure that the knowledge, skills and values of learners are recognised and validated so that they can engage in further learning. The QCTO requires that QQSF stakeholders engage in ongoing evaluation, where all (especially learners) are encouraged to provide feedback on RPL processes. Institutions must enhance and monitor RPL services towards increasing effectiveness and efficiency, and ensure that these processes are in line with national standards. The standardisation of RPL must grow within sectors. Quality assurance must protect the integrity of processes and outcomes.

The aspect of complaints and appeals was included in the QCTO policy. In this regard, its policy states that complaints about RPL by learners should be lodged with the accredited training providers, and that the procedure to be adopted should be decided by the institution. The candidate has a right to know what procedure is to be followed, and the notice of an appeal must state the grounds on which the applicant is seeking the appeal.

#### *Similarity 11: Responsibilities*

Similar to SAQA's policy which states that the implementation of RPL is the responsibility of various entities and also outlines this in a dedicated 'responsibilities' section, the QCTO is very clear and specific about this. Table 6 below shows some of the similarities in the responsibilities for Quality Councils, professional bodies and Skills Development Providers

(SDPs), which were taken from the SAQA and the QCTO RPL policies. Table 6 provides some evidence that the QCTO RPL policy drew on the SAQA RPL policy with regard to the responsibilities for implementing RPL in the OQSF.

Some responsibilities pertaining to particular entities were, however, not considered. Some of the excluded points are mentioned in the implementation plan of the QCTO but should be clearly indicated as part of the responsibilities section in its RPL policy.

**Table 6: Responsibilities for implementing RPL in the SAQA and QCTO RPL policies**

Responsibilities	SAQA's (2013, reprinted 2016) RPL policy	QCTO's (2016d) RPL policy
<b>1. Quality Council/QCTO</b>	Monitor and evaluate the implementation of RPL within the specific Sub-Framework they oversee, including the development and implementation of standardised approaches, where appropriate	Monitor and evaluate the implementation of RPL within the OQSF, including the development and implementation of standardised approaches, where appropriate
	Foster close working relationships with Professional Bodies in and across the Sub-Frameworks, where appropriate, to facilitate RPL	Foster close working relationship with Professional Bodies in and across the Sub-Frameworks, where appropriate, to facilitate RPL
	Support and monitor the training of RPL advisors, facilitators, assessors, moderators, and administrators in their sectors	Support and monitor the training of RPL advisors, facilitators, assessors, moderators and administrators to ensure consistency in the application of RPL policies by providers and delegated bodies (where relevant)
	Monitor the RPL admission rates of providers and make this information public in an appropriate format, while maintaining the strictest confidentiality with respect to individual candidates and individual institutions	Monitor the RPL admission rates of providers and make this information public in an appropriate format, while maintaining the strictest confidentiality with respect to individual candidates and individual institutions
<b>2. Education institutions and Skills Development Providers</b>	Seek accreditation from the relevant Quality Council(s)	Seek accreditation from the QCTO
	Progressively develop and enhance capacity to implement RPL in accordance with this policy and the specific RPL policy of the Sub-Framework(s) within which their qualifications are offered	Progressively develop and enhance capacity to implement RPL in accordance with this policy
	Ensure that they have the necessary staff capacity to deliver quality RPL services and programmes	Ensure that they have the necessary staff capacity to deliver RPL services and programmes
	Ensure effective planning and funding for RPL administrative and logistical systems to support all programmes and services	Ensure effective planning and funding for RPL administrative and logistical systems to support all programmes and services
	Put systems and procedures in place to incentivise and support the registration	Put systems and procedures in place to incentivise and support the registration

Responsibilities	SAQA's (2013, reprinted 2016) RPL policy	QCTO's (2016d) RPL policy
	and continuing professional development of RPL practitioners	and continuing professional development of RPL practitioners
	Provide advice, counselling and support services to assist RPL candidates prior to, during, and after RPL processes	Provide advice, counselling and support services to assist RPL candidates prior to, during, and after RPL processes
	Establish an appeal process for RPL candidates to engage with RPL-related judgements	Establish an appeal process for RPL candidates to engage with RPL-related judgements
3. Recognised Professional Bodies	Collaborate with SAQA, the Quality Councils and the relevant providers to incentivise and advance quality RPL provisioning in the sector	Collaborate with SAQA, the Quality Councils and the relevant providers to incentivise and advance quality RPL provisioning in the sector
	Progressively develop and enhance its capacity to initiate and support RPL provision in accordance with this policy.	Progressively develop and enhance their capacity to initiate and support RPL provision in accordance with this policy.
4. RPL practitioners	Adhere to the requirements as set out in this policy and as determined by the relevant bodies and governance structures, which may include a Quality Council, a workplace and a professional body	Adhere to the requirements as set out in this policy and as determined by the relevant bodies and governance structures, which may include a Quality Council, a workplace and a professional body
	Meet professional requirements, including the participation in continuing professional development activities, to be developed and agreed with the community of RPL practitioners, relevant bodies and governance structures through the national coordination of RPL as set out in this policy	Meet professional requirements, including the participation in continuing professional development activities, to be developed and agreed with the community of RPL practitioners, relevant bodies and governance structures through the national coordination of RPL as set out in this policy
5. RPL candidates	Accept co-responsibility as an equal partner in the RPL process	Accept co-responsibility as an equal partner in the RPL process
	Expect to be treated without unfair discrimination	Expect to be treated without unfair discrimination
	Respect the processes and procedures of institutions and workplaces.	Respect the process and procedures of institutions and workplaces

### Differences between the QCTO and SAQA RPL policies

Seven areas of difference were found between the QCTO and SAQA RPL policies.

#### *Difference 1: Objectives*

The QCTO's RPL policy states that RPL "is a fundamental tenet of the NQF and provides for access, progression, support and career guidance for learners at all levels in formal education and training as well as workplace" (QCTO, 2016d:7). However, the QCTO's RPL policy does not state its objectives clearly.

### *Difference 2: Political and socio-economic background*

The QCTO recognises that based on the White Paper PSET (although this was published before SAQA's RPL policy), RPL remains a key approach to redressing past injustices and recognising competencies gained through practical workplace learning and experience. The QCTO does not however, link its RPL policy to the range of national policies applicable.

### *Difference 3: Policy development process*

SAQA elaborates its RPL policy development process clearly; the QCTO's RPL policy describes some aspects of its policy development process, but does not provide a full and clear description.

### *Difference 4: Principles*

The QCTO's RPL policy does not elaborate in detail, regarding RPL principles in the OQSF context.

### *Difference 5: Barriers and resources*

While SAQA's RPL policy attempts to address general barriers to the implementation of RPL, the QCTO's RPL policy does not elaborate on how to address barriers to RPL implementation in the OQSF context.

### *Difference 6: Entry requirements*

Alternative access requirements in the OQSF context are not specified clearly, in the QCTO's RPL policy.

### *Difference 7: Quality Assurance*

SAQA's RPL policy sketches broad quality assurance principles; the QCTO's RPL policy does not elaborate fully on the quality assurance of RPL in the OQSF context.

## **Common aspects regarding the Quality Council RPL policies**

In summary, there are large areas of similarity between the SAQA(2013/2016) and Quality Council (CHE, 2016c; QCTO, 2016d; Umalusi, 2015); RPL policies, and there are commonalities in terms of what the Quality Councils need to address. The common aspects are summarised as follows.

- The Quality Council RPL policies all have clear purpose statements which make reference to RPL environments, and guidance for implementing RPL in their Sub-Frameworks contexts.



- The Quality Council definitions of RPL are broadly similar to that of SAQA; all three refer to RPL for access, but there are some differences regarding RPL for credit. There could be more elaboration regarding 'RPL for advanced standing', and 'RPL for credit', with more motivation for the positions taken – and more elaboration of the specific RPL principles in an aligned way, in the NQF Sub-Framework contexts.
- For the sake of implementation, all three Quality Councils could elaborate regarding the RPL-related roles and responsibilities of the stakeholders in their NQF Sub-Framework contexts.

### **Analysis of the alignment of SAQA's RPL policy with the DHET's RPL coordination and funding policy**

This section presents the analysis of the alignment of SAQA's (2013/2016) RPL policy, with the DHET's (2016) policy for the coordination and funding of RPL.

#### **Similarities between the DHET and SAQA RPL policies**

Large areas of similarity were found between SAQA's (2013/2016) RPL policy, and the DHET's (2016) policy for the coordination and funding of RPL.

##### *Similarity 1: Objectives*

SAQA's RPL policy goes further than that of the DHET, in terms of specifying its objectives, but is still in line with the DHET's policy.

##### *Similarity 2: Purpose statement*

The RPL policies of both SAQA and the DHET have clear purpose statements based on the implementation of RPL. Both seek to strengthen further, the enabling environment for the implementation of RPL; both speak to the range of NQF stakeholders.

##### *Similarity 3: Policy development process*

Both the DHET's and SAQA's RPL policies provide the backgrounds to, and details of, the policy development processes – the DHET's policy to a greater extent than SAQA's policy.

##### *Similarity 4: Scope*

SAQA's (2013/2016) RPL policy is generally aligned to that of the DHET (2016). Where the two policies differ, is in Clause 49, which provides for the national coordination of RPL. SAQA's (2013/2016) RPL policy preceded that of the DHET's (2016) policy for coordinating RPL, and notes that SAQA will provide this function in the absence of another dedicated national body with this function. The DHET's (2016) policy provides for a National RPL Coordinating Mechanism. The DHET's policy also allocates additional responsibilities to

SAQA, such as supporting the National RPL Coordinating Mechanism, and reporting on RPL. Both the DHET and SAQA policies however, address the coordination of RPL in an aligned way.

*Similarity 5: Definitions*

According to the DHET, RPL is defined as “recognising competence gained through practical workplace learning and experience” (DHET, 2016:4). SAQA’s definition of RPL is more comprehensive, but still aligned to that of the DHET. Table 7 shows the respective definitions.

**Table 7: Definitions of RPL in the SAQA and DHET RPL policies**

<b>Term</b>	<b>NQFpedia Definition (SAQA, 2014c)</b>	<b>SAQA RPL Policy (2013/2016)</b>	<b>DHET RPL Policy (2016)</b>
<b>RPL</b>	The principles and processes through which the prior knowledge and skills of a person are made visible, mediated and assessed for the purposes of alternative access and admission, recognition and certification, or further learning and development	The principles and processes through which the prior knowledge and skills of a person are made visible, mediated and assessed for the purposes of alternative access and admission, recognition and certification, or further learning and development (SAQA, 2013:5/2016). [The prior knowledge and skills include informal and non-formal learning]	Recognising competence gained through practical workplace learning and experience (DHET, 2016:4)

*Similarity 6: Types and practices*

Both the SAQA and DHET RPL policies refer to RPL for access, and RPL for credit.

**Differences between the DHET and SAQA RPL policies**

Five areas of difference were found between the SAQA and DHET RPL policies.

*Difference 1: Background*

Both the DHET and SAQA provide some background to RPL in South Africa; the DHET’s background section is extensive. SAQA’s RPL policy could link more specifically to key related national policy and initiatives such as the Human Resources Development Strategy (HRDS), National Skills Development Strategy (NSDS), the National Development Plan (RSA, 2011a), the New Growth Path (RSA, 2011b), and the White Paper for Post-School Education and Training (DHET, 2013c).

### *Difference 2: Benefits of RPL*

The benefits of RPL are stated clearly in the DHET’s RPL policy. RPL has two main benefits; the first is that it is developmental, as noted by the Ministerial Task Team on RPL, “will enhance economic, environmental, social and personal development. RPL is emancipatory and can and should provide access to lifelong learning opportunities, and to the global knowledge economy” (DHET, 2016:6). In addition, RPL is integral to lifelong learning.

The second benefit elaborated by the DHET (2016), is inclusivity. The DHET’s (*Ibid.*) policy states that the concept of inclusivity should be given expression in the policies and practices of statutory bodies like SAQA and the Quality Councils. SAQA’s RPL policy elaborates on inclusivity to a lesser extent.

### *Difference 3: Implementation/ Coordination*

The RPL policies of DHET and SAQA discuss the implementation of RPL at different levels: the DHET’s policy focuses on the coordination and resourcing of RPL, while SAQA’s policy provides more detail regarding the implementation and quality assurance of RPL.

### *Difference 4: Resources*

The DHET’s RPL policy addresses the resourcing of RPL in a phased approach, and with clear operational implications. The first phase focuses on the RPL Coordinating Mechanism; entities must provide RPL without additional funding. However, the policy envisages that in future, RPL will be funded following annual planning. SAQA’s policy, which preceded that of the DHET, provides higher-level resourcing principles, and some guidance regarding fair resourcing and fees, for implementing entities.

### *Difference 5: Responsibilities*

There are a number of differences in the RPL responsibilities allocated in the DHET and SAQA policies – Table 8 summarises these differences.

**Table 8: Revised entity responsibilities in relation to DHET’s RPL policy**

<b>Current responsibilities of SAQA based on the SAQA RPL policy</b>	<b>Suggestions for the revised SAQA responsibilities based on the DHET RPL policy</b>
Develop national policy and criteria, after consultation with the Quality Councils, for RPL. <i>Comment: DHET requires that SAQA’s RPL policy is aligned to its policy.</i>	SAQA: Develop and implement national policy and criteria, after consultation with the Quality Councils, for RPL which is aligned to the RPL policy of the Minister.
Coordinate the Sub-Frameworks of the NQF, including the alignment of Sub-Framework policies on RPL, and articulation across the system. <i>Comment: DHET’s main requirement pertaining to SAQA’s oversight of the Quality Councils is to ensure the implementation of RPL policies in the</i>	<i>Quality Councils:</i> (a) Coordinate and provide overarching leadership to the Sub-Frameworks of the NQF, including the alignment of the Quality Councils policies on RPL and articulation across the system, and implementation regarding their own RPL policies.

<p><i>Sub-Frameworks, and moreover, to ensure that the Quality Councils develop ‘certification policies’ which include RPL as an alternative access option.</i></p>	<p>(b) Ensure that the Quality Councils develop certification policies which include RPL as a route to achieve qualifications and part-qualifications – and such policies must state that certificates will not be differentiated on the basis of whether the learner has achieved the certificate through RPL.</p>
<p>Oversee the national coordination of RPL, including RPL-related research as required for the further implementation and development of the NQF, professionalisation of RPL practices and practitioners, strategic RPL projects, support and advice, monitoring and evaluation, and advocacy and marketing of RPL.</p> <p><i>Comment: all these functions (including fund management, reporting to the MHET, management of information, referrals by learners, policy development, and collaboration with career development services) are now under the auspices of the NCM which operates under DHET’s directives. In other words, the national coordination of RPL will be overseen by the NCM. SAQA’s role in this is mainly to support this body in a variety of areas.</i></p>	<p><i>NCM:</i> (a) Provide advice, guidance and support to the NCM of the DHET in terms of the further development, implementation and sustainability of RPL.<sup>26</sup> (b) Support the advocacy and communication initiatives of the NCM as required. (c) Partnership with the NCM on research projects as commissioned by them, this includes examining technologies to support adult learning, providing new and leading research into widening access to RPL, identifying best practice across RPL implementation environments, identifying and providing solutions to barriers to wide-scale RPL implementation, and benchmarking with international practice. (d) Information for quarterly reports, which will be of a monitoring and evaluation nature, to the MHET about progress made in RPL coordination will be provided by the NQF Directorate, SAQA and the Quality Councils. SAQA will assist in the reporting of RPL coordination across the education and training sector, including reporting on the quality of RPL implementation, and identifying barriers to RPL implementation with recommendations for legislative amendments, if necessary.</p>
<p>Recognise Professional Bodies and register Professional Designations that meet the SAQA Policy and Criteria for the Recognition of Professional Bodies and the Registration of Professional Designations (2012), including the specification of an RPL route as an integral requirement for attainment of the professional body’s professional designations.</p> <p><i>Comment: DHET did not mention anything related to SAQA and Professional Bodies.</i></p>	<p><i>Professional Bodies:</i> Recognise Professional Bodies and register Professional Designations that meet the SAQA Policy and Criteria for the Recognition of Professional Bodies and the Registration of Professional Designations (2012), including the specification of an RPL route as an integral requirement for attainment of the professional body’s professional designations.</p>
<p><i>Comment: SAQA did not previously specify anything related to RPL research; DHET requires that SAQA undertake a specific study on RPL. SAQA may broaden the scope of the research, such that it includes a statement such as “SAQA will be responsible to conduct a sector-wide study of RPL development and implementation, including</i></p>	<p><i>Research:</i> Conduct a sector-wide study of a feasible and sustainable model for RPL Quality Assurance, including assessment, verification and awards, across the education and training institutions, after considering inputs from the Quality Councils, SETAs, HEIs, Technical and Vocational Education and Training (TVET) colleges, Professional Bodies, organised</p>

<sup>26</sup> This includes collaboration with the NCM during phase one where DHET intends to “collaborate, cooperate and communicate and consider advice from SAQA” and the three Quality Councils regarding “all aspects related to the development, implementation and funding of RPL across the education and training system” (DHET, 2016:10;12).

<p><i>identifying a viable model for RPL Quality Assurance”.</i></p>	<p>business, organised labour, and other organisations and institutions.</p>
<p><i>Comment: SAQA did not specify anything specific related to its role in the management of RPL information. SAQA only mentioned this for the Quality Councils, and education institutions and skills development providers. DHET requires that a specific statement on this be included in SAQA’s RPL policy. SAQA can add that it will receive data uploads from the Quality Councils, and education institutions and skills development providers – since the latter entities are not included in DHET’s statement. DHET, however, requires that SAQA must determine the format of the data for the NCM to submit.</i></p>	<p><i>Management of information:</i> SAQA must receive data uploads of RPL assessments from the Quality Councils for recording on the NLRD, and determine the format of such data for various entities, including the NCM.</p>
<p><b>Current Quality Council responsibilities based on the SAQA RPL policy</b></p>	<p><b>Suggestions for the revised Quality Council responsibilities based on the DHET RPL policy</b></p>
<p>Develop a policy on RPL for their sectors, taking into account the relevant national SAQA policies, and the broader context of their specific Sub-Frameworks and related policies. <i>Comment: DHET requires that the RPL policies of the Quality Councils are aligned to its policy and to SAQA’s policy and are also published.</i></p>	<p><i>Policy:</i> Develop and publish a policy on RPL for each sector, ensuring that the policy is aligned to the RPL policies of the MHET and SAQA, and taking into account the broader context of their specific Sub-Frameworks and related policies.</p>
<p>Monitor and evaluate the implementation of RPL within the specific Sub-Framework they oversee, including the development and implementation of standardised approaches where appropriate. <i>Comment: DHET requires that Quality Councils work with providers to ensure they have policy and are implementing it.</i></p>	<p><i>Monitor and evaluate:</i> (a) Monitor and evaluate the development and implementation of RPL within the specific Sub-Framework they oversee, including the development of standardised approaches where appropriate, and working with accredited providers to ensure that they have RPL policies and are implementing RPL within the institution and organisation. (b) Monitor providers that offer RPL in their sectors, in accordance with criteria established for this purpose. (c) Ensure consistency in the application of RPL policies by providers and delegated bodies in their sectors (where relevant). (d) Monitor the RPL admission rates of providers and make this information public in an appropriate format, while maintaining the strictest confidentiality with respect to individual candidates and individual institutions.</p>
<p>Collaborate with SAQA, NAMB, the SETAs, and other role players to advance the development of RPL in their sectors. <i>Comment: DHET requires the Quality Councils to advocate robustly for RPL.</i></p>	<p><i>Advocacy and communications:</i> Collaborate with SAQA, NAMB, SETAs, and other role players to advance the development of RPL in their sectors, including robustly advocating RPL as a means for access, articulation and CAT within and between the Sub-Frameworks to the respective education and training institutes.</p>
<p>Foster close working relationships with Professional Bodies in and across the Sub-Frameworks where appropriate, to facilitate RPL.</p>	<p><i>Professional Bodies:</i> Foster close working relationships with Professional Bodies in and across the Sub-Frameworks where appropriate, to facilitate RPL.</p>

<i>Comment: DHET's policy did not make mention of Professional Bodies.</i>	
Facilitate and monitor enabling agreements to increase RPL provisioning in their sectors. <i>Comment: DHET did not mention this point.</i>	<i>Expanding RPL:</i> Facilitate and monitor enabling agreements to increase RPL provisioning in their sectors.
Support and monitor the training of RPL advisors, facilitators, assessors, moderators, and administrators in their sectors. <i>Comment: DHET did not mention this point.</i>	<i>Support and training:</i> (a) Support and monitor the training of RPL advisors, facilitators, assessors, moderators, and administrators in their sectors. (b) Support the co-ordinated development of generic RPL toolkits and instruments relevant to the particular context for their sectors, wherever appropriate and possible.
Monitor providers that offer RPL in their sectors, in accordance with criteria established for this purpose. <i>Comment: This point is merged in the category 'Monitor and evaluate'.</i>	N/A
Ensure consistency in the application of RPL policies by providers and delegated bodies in their sectors (where relevant). <i>Comment: This point is merged in the category 'Monitor and evaluate'.</i>	N/A
Support the coordinated development of generic RPL toolkits and instruments relevant to the particular context for their sectors, wherever appropriate and possible. <i>Comment: This point is merged in the category 'Support and Training'.</i>	N/A
Monitor the RPL admission rates of providers and make this information public in an appropriate format, while maintaining the strictest confidentiality with respect to individual candidates and individual institutions. <i>Comment: This point is merged in the category 'Monitor and evaluate'.</i>	N/A
Ensure that no distinction, other than for data analysis, is made between qualifications awarded through conventional and RPL routes. <i>Comment: DHET requires the Quality Councils to 'certificate learners' – but does not mention the 'no-distinction' principle.</i>	<i>Certificates:</i> Certificate learners who achieve qualifications or part-qualifications through an RPL route, and ensure that no distinction, other than for data analysis, is made between qualifications awarded through conventional and RPL routes.
Develop and maintain an information management system that is compatible with NLRD and other relevant government information management systems, and submit the relevant data to SAQA. <i>Comment: DHET did not mention this point.</i>	<i>Management of information:</i> Develop and maintain an information management system that is compatible with the NLRD and other relevant government information management systems, and submit the relevant data to SAQA.
Conduct and oversee RPL-related research in the Sub-Framework sector in collaboration with SAQA. <i>Comment: DHET did not mention this point.</i>	<i>Research:</i> Conduct and oversee RPL-related research in the Sub-Framework sector in collaboration with SAQA.

<i>Comment: DHET's RPL policy requires that the Quality Council engage in 'quarterly reporting' of RPL in their sector – this was not previously included in the SAQA policy.</i>	<i>Reporting: Provide quarterly reports to SAQA for inclusion in the CEO Committee about the implementation of RPL across their accredited provider base.</i>
<b>Current responsibilities of implementing entities based on SAQA's RPL policy</b>	<b>Responsibilities of implementing entities based on the DHET's RPL policy</b>
Seek accreditation by the relevant Quality Council(s) <i>Comment: DHET did not make mention of the issue of accreditation and registration.</i>	<i>Accreditation and registration: Education institutions and skills development providers must seek accreditation, and registration (where applicable) by the relevant Quality Council(s). In the case of private education providers that offer qualifications and part-qualifications located in the Higher Education and General and Further Education and Training (GFET) Sub-Frameworks, registration with either the DHET and Training or the DBE respectively, is also required. Private SDPs that offer qualifications and part-qualifications in the Trade and Occupations (TO) sector are required to be accredited by the QCTO, but not required to be registered.</i>
In the case of private education providers that offer qualifications and part-qualifications located in the Higher Education and GFET Sub-Frameworks, registration with either the DHET or the DBE, respectively, is also required. Private skills development providers that offer qualifications and part-qualifications in the TOT sector are required to be accredited by the QCTO, but not required to be registered. <sup>27</sup> <i>Comment: This measure must be reviewed in light of existing Communiqués. This point is merged with the above point in the category 'Accreditation and Registration'.</i>	N/A
Progressively develop and enhance capacity to implement RPL in accordance with this policy and the specific RPL policy of the Sub-Framework(s) within which their qualifications are offered. <i>Comment: DHET made no mention of capacity.</i>	<i>Capacity: Progressively develop and enhance capacity to implement RPL in accordance with this policy and the specific RPL policy of the Sub-Framework(s) within which their qualifications are offered, including ensuring that the necessary staff capacity to deliver quality RPL services and programmes is in place.</i>
Collaborate with SAQA, NAMB and the Quality Councils to advance the implementation, monitoring and evaluation of RPL. <i>Comment: DHET requires collaboration with the NCM, and collaboration, especially to mitigate barriers to broad RPL implementation.</i>	<i>Collaboration: Work collaboratively with the NCM, SAQA, Quality Councils, NAMB, and other education and training institutes to advance the implementation and monitoring and evaluation of RPL, including ensuring that challenges and barriers to wide-scale RPL implementation become known and are mitigated.</i>
Ensure that they have the necessary staff capacity to deliver quality RPL services and programmes.	N/A

<sup>27</sup> This requirement for the TO sector was made known through the Joint Communiqué issued by the DHET, SAQA and the Quality Councils in August 2012.

<i>Comment: This point is merged with the previous point on capacity in the category of 'Capacity'.</i>	
Ensure effective planning and funding for RPL administrative and logistical systems to support all programmes and services. <i>Comment: DHET did not mention this point.</i>	<i>Planning and funding:</i> Ensure effective planning and funding for RPL administrative and logistical systems to support all programmes and services, including an equitable fee structure for all RPL programmes and services, including those programmes and services that involve the assessment of experiential learning for credit against existing formal qualifications or part qualifications.
Put systems and procedures in place to incentivise and support the registration and continuing professional development of RPL practitioners. <i>Comment: DHET did not mention this point.</i>	<i>RPL practitioners:</i> Put systems and procedures in place to incentivise and support the registration and continuing professional development of RPL practitioners.
Provide advice, counselling and support services to assist RPL candidates prior to, during, and after RPL processes. <i>Comment: DHET made no mention of advisory services.</i>	<i>RPL candidates:</i> Provide advice, counselling and support services to assist RPL candidates prior to, during, and after RPL processes, including the establishment of an appeal process for RPL candidates to engage with RPL-related judgements.
Establish an appeal process for RPL candidates to engage with RPL-related judgements. <i>Comment: DHET made no mention of an appeal process. This point is included in the category 'RPL candidates'.</i>	N/A
Ensure an equitable fee structure for all RPL programmes and services, including those programmes and services that involve the assessment of experiential learning for credit against existing formal qualifications or part qualifications. <i>Comment: DHET made no mention of a fee structure. This point is included in the point above on funding, it is included in the category 'Planning and funding'.</i>	N/A
Develop an information management system that meets the requirements of the relevant Quality Council, the NLRD, and other relevant government information management systems. <i>Comment: DHET made no mention of the management of information.</i>	<i>Management of information:</i> Develop an information management system that meets the requirements of the relevant Quality Council, the NLRD, and other relevant government information management systems.
<i>Comment: SAQA's policy makes no mention of reporting, DHET requires that education institutions and SDPs submit reports. However, DHET is not clear about <u>which statutory body</u> these reports need to be submitted to – perhaps it should be provided to the Quality Councils.</i>	<i>Reporting:</i> Provide reports about the progression of RPL students within the institution to the relevant Quality Council(s), which will inform further development of RPL research and future policies and legislation.
<i>Comment: SAQA's policy makes no mention of policy development; DHET requires that education institutions and skills development providers establish policies with articulation routes – DHET,</i>	<i>Policy development:</i> Establish policies which clearly state RPL and articulation routes within the institution, through the mechanism of CAT.



<i>however, refers to policies as generics and does not specify whether this should include an RPL route.</i>	
<i>Comment: SAQA's policy makes no mention of professionalisation; DHET requires that education institutions and SDPs part of the NCM.</i>	<i>Professionalisation: Establish an institutional forum of RPL practitioners, which will be part of the professional forum of the NCM, and register all RPL practitioners in the institution with the NCM professional forum.</i>

### **Summary of the similarities between the SAQA and DHET RPL policies**

- SAQA and the DHET share the purposes behind their respective RPL policies, that is, to strengthen and provide for the further development and implementation of RPL within the context of the NQF.
- Both SAQA and the DHET developed their RPL policies through extensive stakeholder engagement processes. SAQA (2013/2016) sought to revise its earlier RPL policy to be aligned to the NQF Act; the revised policy speaks to all of the aspects of implementing RPL. The DHET's RPL policy focuses on the national coordination and resourcing of RPL. Both policies define RPL in an aligned way, although SAQA's definition is more comprehensive, and both allocate in detail, the responsibilities of all the categories of NQF stakeholders.
- The DHET and SAQA policies both mention two forms of RPL, that is, RPL for access and RPL for credit.

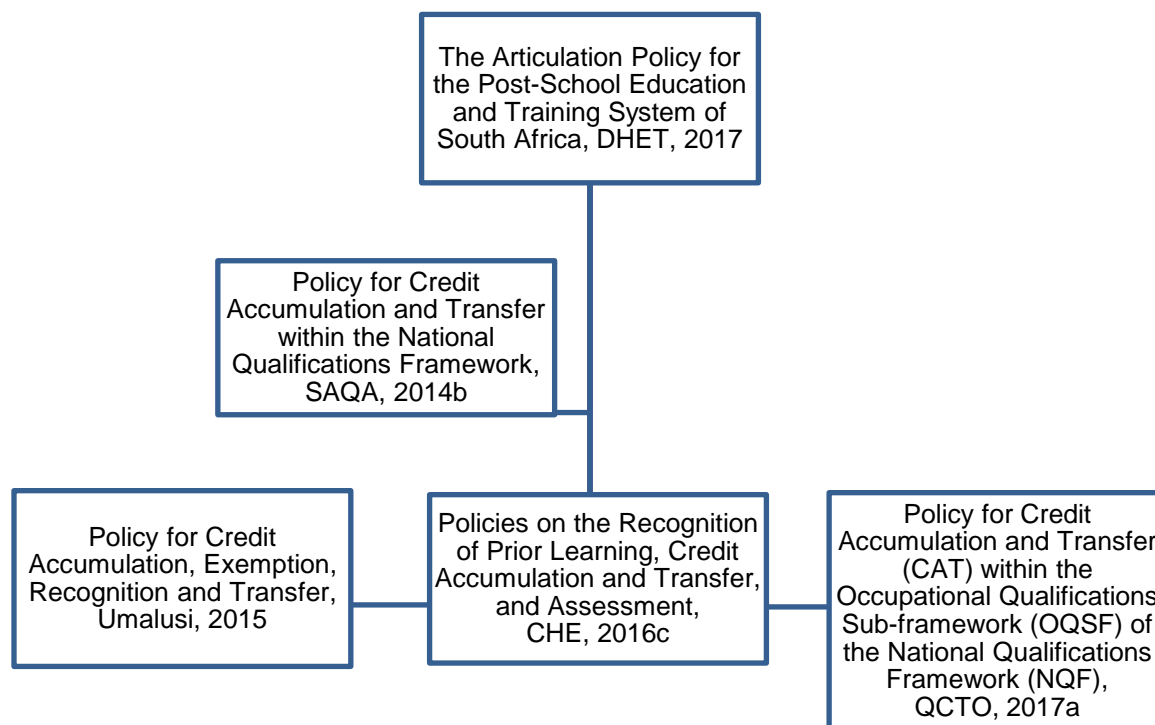
### ***Thematic area categories used for comparing the CAT policy documents***

As part of the policy alignment exercise, each of the Quality Councils' CAT policies was compared with the SAQA's CAT policy to identify areas of similarities and differences. The following broad categories emerged during the policy-alignment process.

- a) Policy development process.
- b) Scope of the policy.
- c) Definitions in the policy.
- d) Principles for CAT.
- e) Articulation process.
- f) Credit accumulation process.
- g) Credit transfer.
- h) Responsibilities for CAT implementation.

### ***Analysis of the alignment of the Quality Council CAT policies with SAQA's CAT policy***

Figure 2 below shows the CAT policies that were analysed by the SAQA researchers.



**Figure 2: CAT policy documents analysed by SAQA researchers**

### **SAQA's CAT policy**

The NQF Act (RSA, 2008) mandates SAQA to develop policy on CAT after consultation with the Quality Councils. SAQA's (2014b) CAT policy was the first CAT policy to be developed in the country. SAQA's consultation with the Quality Councils and other NQF stakeholders is evident in the policy document, where members of SAQA's CAT Reference Group are acknowledged. The policy was published in 2014, six years after the promulgation of the NQF Act. The policy promotes articulation between qualifications within and across the three NQF Sub-Frameworks. It requires CAT implementation in line with five principles, as follows.

- 1) **Access for success:** institutions and providers facilitate the bridging of theory and/or practice components that are identified during admission and/or RPL processes, in order to promote CAT. Steps should be taken to support individuals starting on courses in new sectors or more advanced courses, by identifying gaps in knowledge and/or skills and making arrangements to address these gaps, through bridging courses or other supplementary work.
- 2) **Articulation by design:** possibilities for articulation pathways, including within and between the NQF Sub-Frameworks and the world of work, are included in the design and purposes of new qualifications and part-qualifications in order to promote CAT.

- 3) Comparison based on credible methods:** qualifications are compared based on credible methods that determine the extent to which their curricular properties, and their content and outcomes match, as guided by the NQF Level Descriptors. The degree of similarity between qualifications ensures that students have the necessary knowledge and background to be successful in more advanced courses. The decisions of receiving departments or institutions regarding the transfer of credit may be appealed by providers or learners using the processes agreed by the Quality Councils.
- 4) Supplementarity:** where there are differences in prerequisites, the rigour of the curriculum, or the topics covered, the relevant authority may require the learner to do supplementary work before credits are awarded. This supplementary work must be determined in a fair, consistent and transparent manner, using credible methods, and in consultation between the two institutions. The amount of credit awarded for transfer may be set by a pre-existing agreement or may be decided by the authority responsible for the programme into which credit is being transferred. The amount of credits will vary according to the comparability of the outcomes gained, to the outcomes required.
- 5) Transparency:** rules, regulations and any register of precedents which inform, influence or govern decisions taken in respect to CAT must be valid, fair, reliable and transparent. They must be publicly available and brought to the attention of intending students prior to enrolment. This should include clear information about fees for CAT where fees are applicable.

Section 27[h](ii) of the NQF Act mandates the Quality Councils to develop and implement policy for CAT after consideration of SAQA's CAT policy.

### **Umalusi policy for Credit Accumulation, Exemption, Recognition and Transfer (CAERT)**

The purpose of Umalusi's (2015) CAERT policy is to provide for the implementation of Credit Accumulation, Exemption, Recognition and Transfer for qualifications registered in the GFETQSF.

### **Similarities between the Umalusi and SAQA CAT policies**

Three areas of similarity were found in the Umalusi (2015) and SAQA (2014b) CAT policies.

#### *Similarity 1: Scope of CAT policies*

Both the Umalusi and SAQA CAT policies provide detailed information on scope. SAQA's CAT policy provides the overall scope for CAT, which includes all of the NQF stakeholders involved, all qualifications and part-qualifications registered on the NQF, and recognised professional bodies with their professional designations. Umalusi's CAT policy similarly includes all qualifications and part-qualifications registered in the GFETQSF as well as all GFETQSF stakeholders.

### *Similarity 2: Definition of CAT*

While the Umalusi CAT policy defines Credit Accumulation, Exemption, Recognition and Transfer, the SAQA CAT policy defines CAT differently. According to SAQA's CAT policy, CAT is "an arrangement whereby the diverse features of both credit accumulation and credit transfer are combined to assist lifelong learning and access to the workplace" (SAQA, 2014b:3). Credits obtained previously may be recognised as meeting the requirements for a different qualification, and, subject to identified limits, the credits achieved towards one qualification may be recognised as meeting part of the requirements for another qualification (SAQA, 2014b). Decisions regarding the transfer of credit are made by the Quality Council(s) responsible for the qualifications in question, once the necessary evaluations have been completed (*Ibid.*). Umalusi's CAERT policy provides similar definitions of Credit Accumulation, Exemption, Recognition and Transfer, summarising these as 'the process whereby learners' achievements are recognised'. Umalusi's definition of credits is the same as that in SAQA's policy.

### *Similarity 3: Articulation process*

SAQA's CAT policy promotes articulation between qualifications within and across the three NQF Sub-Frameworks; Umalusi's policy also addresses articulation within and between the NQF Sub-Frameworks. Umalusi's policy emphasises that articulation, for instance, with the Higher Education Qualifications Sub-Framework (HEQSF) is likely because there is an understanding between Umalusi and the CHE, regarding the GFETQSF qualification purposes, national curricula, and quality assurance processes. The processes of identifying access possibilities in line with the DHET's (2017) articulation policy, the formal relationships between these qualifications; the research done on the extent and nature of curriculum overlap/alignment for articulation, and recent curriculum revisions, all serve to facilitate connections between the GFETQSF and HEQSF qualifications.

## **Differences between Umalusi's SAQA's CAT policies**

Four differences were found between the CAT policies of Umalusi (2015) and SAQA (2014b).

### *Difference 1: Definitions*

SAQA and Umalusi define CAT differently in their respective policies; Table 9 below shows the different CAT-related definitions.

**Table 9: CAT-related definitions in the SAQA and Umalusi CAT policies**

<b>Term</b>	<b>NQFpedia Definition (SAQA, 2014c)</b>	<b>SAQA's CAT Policy (2014b)</b>	<b>Umalusi's CAT Policy (2015)</b>
<b>Articulation</b>	The process of forming possibilities of connection between qualifications and/or	Means facilitating the progress and mobility of learners within and across each of the three	The process which formally creates recognisable (and recognised) connections

<b>Term</b>	<b>NQFpedia Definition (SAQA, 2014c)</b>	<b>SAQA's CAT Policy (2014b)</b>	<b>Umalusi's CAT Policy (2015)</b>
	part-qualifications to allow for the vertical, lateral and diagonal movement of learners through formal education and training systems and its linkages with the world of work	Sub-Frameworks and to the world of work, which is achieved by the intentional design of structure and content of qualifications [Definitions section]	between qualifications and part-qualifications [Definitions section]
<b>Credit accumulation</b>	The totalling of credits towards the completion of a qualification or part-qualifications (Policy and Criteria for the Registration of Qualifications and Part-Qualifications)	Means the totalling of relevant credits required to complete a qualification or part-qualifications [Definitions section]	The practice of allowing the achievement of credits over a period of time and across examination sittings to be recognised for the completion of a qualification or a part-qualification [Definitions section]
<b>NQF</b>	The comprehensive system, approved by the MHET, for the classification, coordination, registration, and publication of articulated and quality-assured national qualifications and part-qualifications. The South African NQF is a single integrated system comprising three coordinated qualifications Sub-Frameworks for General and Further Education; Higher Education; and Trades and Occupations, based on NQF Act No. 67 of 2008	A comprehensive system approved by the MHET for the classification, registration, publication and articulation of quality-assured national qualifications [Definitions section]	The South African 10-level framework provided for the registration of national qualifications [Definitions section]
<b>Part-qualification</b>	An assessed unit of learning with a clearly defined purpose that is, or will be registered on the NQF	Means an assessed unit of learning that is registered as part of a qualification [Definitions section]	An assessed unit of learning or subject that is registered as part of a qualification/recognition to the achievement of part of a qualification registered on the Sub-Framework [Definitions section]

Ideally, the definition of the NQF should be based on the NQF Act No. 67 of 2008 (RSA, 2008).

#### *Difference 2: Types of articulation*

SAQA describes articulation as being 'systemic' (qualifications and other elements of learning 'connected' for learning-and-work-pathways, or 'specific' (comprising inter-institutional arrangements). Umalusi does not refer to these types of articulation.

#### *Difference 3: Conceptualisation of credit accumulation*

The SAQA and Umalusi CAT policies provide different levels of detail regarding the credit accumulation process. In Umalusi's policy, credit accumulation is about the process of achieving subject statements/certificates progressively towards a qualification. Some qualifications stipulate the maximum number of years allowed to achieve the qualification. SAQA's policy provides guidance for systemic and specific articulation: credit accumulation occurs through the recognition and accumulation of credits within and across institutions/ departments within institutions.

#### *Difference 4: Responsibilities for CAT implementation*

SAQA's CAT policy describes at a high level, the stakeholder roles and responsibilities for implementing CAT; Umalusi does not provide the details needed for implementation in the GFETQSF context.

### **CHE policies for RPL, CAT, and assessment in the HEQSF context**

The purpose of the CHE's (2016c) CAT policy is to provide guidelines for the Higher Education sector, for the development and implementation of institutional CAT policies in the context of the HEQSF. It provides for student movements towards the completion of their qualifications, and for articulation across the NQF Sub-Frameworks, along learning-and-work pathways. It includes elaborations appropriate for the HEQSF context, which go beyond SAQA's policy but are still in line with it.

### **Similarities between the CHE and SAQA CAT policies**

Four similarities were found between the CHE's (2016c) and SAQA's (2014b) CAT policies.

#### *Similarity 1: Policy development process*

Both the CHE and SAQA CAT policies provide information on their policy development processes.

### *Similarity 2: CAT process*

Both the CHE and SAQA CAT policies provide detail on CAT processes; the process is the same in both policies, but was found to be more reader-friendly in the CHE's CAT policy. In the CHE's policy, the CAT process brings together the diverse features of credit accumulation and credit transfer in order to facilitate lifelong learning. It allows a student's achievements to be recognised even if the student does not achieve a qualification. Any or all credits for an incomplete qualification may be recognised by the same or a different institution as meeting part of the requirements for a different qualification or may be recognised by a different institution as meeting part of the requirements for the same qualification. This is aligned with SAQA's CAT policy.

### *Similarity 3: Credit accumulation and specific articulation*

Both the CHE and the SAQA CAT policies discuss specific articulation and again, the text was found to be more reader-friendly in the CHE's CAT policy. Credit accumulation can occur within and between institutions.

### *Similarity 4: Credit transfer*

Both the CHE and the SAQA CAT policies deal with credit transfer similarly; the text was found to be more user-friendly in the CHE's policy. The CHE's policy provides detail regarding the transfer of credits either horizontally at the same level of study, or vertically between levels of study. In the HEQSF context, horizontal credit transfer allows for credit transfer within and between departments and institutions when the learning outcome and curriculum contents are identical or comparable. Vertical credit transfer is permitted when the credits of a preceding level of study at one department/ institution are accepted for entry into the next level of study in another department/ institution.

## **CHE elaborations which remain in line with SAQA's CAT policy**

Two areas of elaboration were found in the CHE's (2016c) CAT policy, which go beyond SAQA's (2014b) CAT policy and remain in line with it.

### *Elaboration 1: Credits*

In addition to the definition of credit being provided, the CHE CAT policy adds a statement that credits represent a measure of all the learning activities engaged in by the student and include, amongst others, contact time, self-study, work integrated learning (WIL), assignments, projects and examinations. Although the CHE's policy goes beyond SAQA's in this regard, it is in line with SAQA's policy.

*Elaboration 2: Incomplete qualification studies that do not lead to a qualification, and short courses*

SAQA’s CAT policy does not provide direction regarding incomplete qualification studies that do not lead to a qualification, or short courses; the CHE’s CAT policy does deal with these aspects, as follows – and its elaboration is in line with SAQA’s policy.

- Credits for an incomplete qualification may be recognised by the same or a different institution, as meeting part of the requirements for a different qualification, or may be recognised by a different institution as meeting part of the requirements for the same qualification.
- Credits obtained from studies that do not lead to a qualification (for example, non-degree studies comprising of modules or courses that are part of a programme which normally leads to qualifications registered on the HEQSF) should count for the credit accumulation and transfer mechanism towards relevant qualifications in the same or different institutions.
- Short courses offered outside the HEQSF are non-credit bearing and, thus, individuals who register for and attend such short courses, are not awarded credits against any level on the NQF. This means that no credit will be accumulated and/or transferred from such short courses. However, the learning acquired could count for RPL.

**Differences between the CHE and SAQA CAT policies**

Four differences were found between the CHE’s (2016c) and SAQA’s (2014b) CAT policies.

*Difference 1: Definitions*

There are small differences in how concepts have been defined in the SAQA and CHE CAT policies as indicated in Table 10.

**Table 10: Definitions used in the SAQA and CHE CAT policies**

<b>Term</b>	<b>NQFpedia Definition (SAQA, 2014c)</b>	<b>SAQA CAT Policy (2014b)</b>	<b>CHE CAT Policy (2016c)</b>
<b>Assessment</b>	In the Higher Education context, assessment takes place against a learning programme	Assessment refers to the process used to identify, gather and interpret information and evidence against the required competencies in a qualification, part-qualification, or professional designation in order to make a	Assessment refers to the systematic evaluation of a student’s ability to demonstrate the achievement of the learning goals intended in a curriculum [Definitions section]



Term	NQFpedia Definition (SAQA, 2014c)	SAQA CAT Policy (2014b)	CHE CAT Policy (2016c)
		judgement about a learner's achievement [Definitions section]	
<b>Credit</b>	Credit is a measure of the volume of learning required for a qualification or part-qualification, quantified as the number of notional study hours required for achieving the learning outcomes specified for the qualification or part-qualification. One credit is equated to ten (10) notional hours of learning	Credit means the amount of learning contained in a qualification or part-qualification whereby one (1) credit is equated to ten (10) notional hours of learning [Definitions section]	Credit refers to the measure of the volume of learning required for a qualification, quantified as the number of notional study hours required for achieving the outcomes specified for the qualification [Definitions section]
<b>Credit Transfer</b>	Credit Transfer means the vertical, horizontal or diagonal relocation of credits towards a qualification or part-qualification registered on the same or different Sub-Framework	Credit Transfer means the vertical, horizontal or diagonal relocation of credits towards a qualification or part-qualification on the same or different level, usually between different programmes, departments or institutions [Definitions section]	Credit transfer refers to the vertical, horizontal or diagonal relocation of credits towards a qualification [Definitions section]
<b>Qualification</b>	Qualification means a registered national qualification consisting of a planned combination of learning outcomes, which has a defined purpose or purposes, intended to provide qualifying learners with applied competence and a basis for further learning, and which has been assessed in terms of exit-level outcomes, registered on the NQF, and certified and awarded by a recognised	Qualification means a registered national qualification [Definitions section]	Qualification refers to a registered national qualification consisting of a planned combination of learning outcomes which has a defined purpose, intended to provide qualifying students with applied competence and a basis for further learning, and which has been assessed in terms of exit-level outcomes, registered on the NQF, and certified and awarded by a recognised institution [Definitions section]

### *Difference 2: Principles for CAT*

The CHE's CAT policy refers to the SAQA principles for CAT, although it does not address the concept of supplementarity.

### *Difference 3: Residency clause*

SAQA's CAT policy notes the 'residency clause' as the rule emanating from the Joint Statutes of 1955 (Section 18), which sets a limit to the number of credits that may be transferred between Higher Education Institutions, as a requirement for certification and funding. The CHE's CAT policy, while not referring to the Joint Statutes, contains a clause that specifies that a maximum of 50% of the credits of a qualification may be transferred to another department/institution, as 'protection for the integrity of qualifications'.

### *Difference 4: Responsibilities for CAT implementation*

SAQA's CAT policy lists the responsibilities of particular groups of NQF stakeholders, for the implementation of CAT; the CHE's CAT policy does not do so.

## **QCTO policy for CAT in the OQSF context**

### **Similarities between the QCTO and SAQA CAT policies**

A large degree of similarity was found between the QCTO's (2017a) CAT policy, and that of SAQA (2014b).

#### *Similarity 1: Policy development process*

Both the QCTO and the SAQA CAT policies emphasise that Reference Groups were established to oversee the development of the respective CAT policies. The members of both Reference Group members are also listed in each of the policy documents. Interestingly, SAQA and the QCTO were represented on both Reference Groups. It is thus evident in this section that SAQA played a role in shaping the QCTO CAT policy.

#### *Similarity 2: Scope of CAT policies*

With regard to the scope, both the QCTO and the SAQA CAT policies provide detailed information on the scope of the CAT policies. In the QCTO CAT policy; the scope extends to the QCTO, accredited SDPs and Occupational Training Institutions, Development Quality Partners (DQPs), AQPs, Professional Bodies, Workplaces, and all other entities working in the OQSF space; and all occupational qualifications and part-qualifications in the OQSF offered in South Africa, including modules and other units of learning in these qualifications and part-qualifications.

### Similarity 3: Systemic and specific articulation

Similar definitions of ‘systemic’ and ‘specific’ articulation are used in both the QCTO and SAQA CAT policies. Systemic articulation is based on legislation, national policy and formal requirements, including within and between the Sub-Frameworks of the NQF, and the steering mechanisms available to the State, such as funding and planning within the education and training system. Specific articulation is based on formal and informal agreements within the education and training system, mostly between two or more training sub-systems, between specific institutional types, and guided by guidelines, policies, and accreditation principles.

### Similarity 4: Definitions

The QCTO elaborates in more detail, regarding articulation in the OQSF context, than does SAQA’s CAT policy, but the elaboration is still in line with SAQA’s policy. Key definitions are presented in Table 11 below.

**Table 11: Definitions used in the SAQA and QCTO CAT policies**

Term	NQFpedia Definition (SAQA, 2014c)	SAQA CAT Policy (2014b)	QCTO CAT Policy (2017a)
<b>Articulation</b>	Articulation is the process of forming possibilities of connection between qualifications and/or part-qualifications to allow for the vertical, lateral and diagonal movement of learners through the formal education and training system and its linkages with the world of work	Articulation means facilitating the progress and mobility of learners within and across each of the three NQF Sub-Frameworks and to the world of work, which is achieved by the intentional design of structure and content of qualifications [Definitions section]	Articulation can be understood as ‘systemic articulation’ or a ‘joined up’ system incorporating qualifications, professional designations, policies, and other official elements aligned to, and supportive of, learning-and-work pathways. Articulation could also be seen more specifically, in terms of structuring or aligning qualifications to enable progression in practice, with or without intra or inter-institutional agreements, such as Memoranda of Understanding, CAT, and other mechanisms. Thirdly, articulation could refer to the pathways followed by individuals as they progress and are supported in their learning and work – by institutions that are

Term	NQFpedia Definition (SAQA, 2014c)	SAQA CAT Policy (2014b)	QCTO CAT Policy (2017a)
			flexible. In practical terms, articulation means the process of forming possibilities of connection between qualifications and/or part qualifications to allow for the vertical, horizontal, and diagonal movement of learners through the formal education and training system and its linkages with the world of work. It means learner progression within the OQSF and between the OQSF, the GFETQSF, and the HEQSF – which signals the capacity of one qualification to give access or partial access to another cognate qualification, or to allow for learning achievements in one context to be recognised in a different context [Definitions section]
<b>Part-qualification</b>	A part-qualification is an assessed unit of learning with a clearly defined purpose that is, or will be registered as part of a qualification on the NQF	Part-qualification means an assessed unit of learning that is registered as part of a qualification [Definitions section]	A part-qualification in the OQSF context refers to employable skills as embodied in the applicable exit level outcome(s), which are extracted from the occupational qualification, registered and assessed under the OQSF as a part-qualification. Part-qualifications shall consist of a combination the Knowledge/Theory, Practical and Workplace Experience components [Definitions section]
<b>Qualification</b>	A qualification is a registered national	Qualification means a registered national	[No definition provided]

Term	NQFpedia Definition (SAQA, 2014c)	SAQA CAT Policy (2014b)	QCTO CAT Policy (2017a)
	qualification consisting of a planned combination of learning outcomes which has a defined purpose or purposes, intended to provide qualifying learners with applied competence and a basis for further learning, and which has been assessed in terms of Exit Level Outcomes (ELO), registered on the NQF and certified and awarded by a recognised body	qualification [Definitions section]	

*Similarity 5: Principles for CAT*

In the section on ‘processes for recognising credit and credit transfer’, the QCTO CAT policy references the principles for CAT from the SAQA CAT. The specific principles are a) comparison must be based on credible methods; b) supplementarity; and c) transparency (see Section on SAQA Policy for CAT within the NQF for more detail).

*Similarity 6: Credit transfer*

SAQA’s CAT policy provides explanations of ‘credit transfer’ as the vertical, horizontal or diagonal relocation of credits towards a qualification or part-qualification on the same or different level, usually between different programmes, departments or institutions. The QCTO’s CAT policy elaborates on credit transfer that is horizontal, vertical and diagonal, but is still in aligned with SAQA’s CAT policy. In the QCTO’s CAT policy, horizontal credit transfer means transferring the credits obtained for modules or other units of learning, from one occupational qualification or part-qualification to another, at the same NQF level. Vertical transfer is when the credits obtained for a module or other unit of learning in an occupational qualification or part-qualification are accepted for entry into, or towards another occupational qualification or part-qualification, at a higher NQF level. Diagonal transfer can take place from one level of an NQF Sub-Framework to another level of one of the other NQF Sub-Frameworks.

*Similarity 7: Roles and responsibilities for CAT implementation*

It is clear from the roles and responsibilities section for implementing CAT in the QCTO CAT policy that the QCTO CAT policy drew heavily on the SAQA CAT policy for implementing CAT in the QCTO sector.

## **QCTO elaborations which remain in line with SAQA's CAT policy**

An area of elaboration was found in the QCTO's CAT policy, which goes beyond SAQA's policy and remains in line with it.

### *Elaboration 1: Short courses*

The QCTO CAT policy argues that short courses are non-credit-bearing and thus individuals, who register for, attend, and successfully complete short courses, are not awarded credits against NQF levels. Furthermore, no credit will be accumulated and/or transferred from short courses. However, the learning may be considered in RPL processes. SAQA's CAT policy is silent on the matter of short courses, but this QCTO elaboration is not out of line with SAQA's CAT policy.

## **Differences between the QCTO and SAQA CAT policies**

One difference was found between the QCTO and SAQA CAT policies.

### *Difference 1: Transfer of credits*

The QCTO CAT policy has a clause that the same set of credits cannot be transferred to more than one qualification or part-qualification; credits cannot be duplicated. SAQA's CAT policy does not include such a clause.

## ***Articulation policy for the Post-School Education and Training (PSET) system in South Africa***

The DHET does not have an over-arching policy for CAT, but has published 'Articulation Policy for the PSET System of South Africa' (DHET, 2017). This policy links to policies for RPL and CAT; neither SAQA nor the Quality Councils have dedicated 'articulation policies', but the RPL and CAT policies of SAQA and the Quality Councils, link directly to articulation.

## **Similarities and differences between SAQA's CAT policy and the DHET's articulation policy**

The definition of articulation in SAQA's CAT policy is aligned with that in the DHET's articulation policy, although the DHET's conceptualisations are far more elaborated. The DHET's articulation policy conceptualise articulation in three ways, namely, (1) as 'systemic articulation' (based on legislation, policy and formal requirements, and comprising qualifications and other elements in learning-and-work pathways); (2) as 'specific articulation' (involving inter institutional arrangements such as Memoranda of Understanding [MoU] or Memoranda of Agreement [MoA], and/or CAT arrangements), and (3) in terms of learner support as learner encounter, and navigate, barriers in their learning-and-work pathways. In fact, these understandings were developed on the basis of SAQA research partnership studies into aspects of articulation, and SAQA currently regularly uses the concepts in its articulation documentation. SAQA's CAT policy however, was

developed three years before the publication of the DHET's articulation policy – and SAQA's CAT policy has not yet come up for review.

SAQA fulfils the responsibilities assigned to it in the DHET's articulation policy, as expressed in the NQF policy suite developed and published by SAQA, after consultation with the Quality Councils. Two of the key articulation responsibilities assigned to SAQA by the DHET, are (a) providing guidance for articulation between the three NQF Sub-Frameworks, and (b) intervening in cases of unfair articulation barriers. These responsibilities are effected through SAQA's CAT policy, where SAQA's responsibilities include establishing and managing, in collaboration with the Quality Councils, a monitoring and mediation process to advise and alert institutions of potential and actual contraventions to the SAQA and Quality Council CAT policies.

One aspect not carried out until 2019 by SAQA in this regard, was reporting on articulation. However, early in 2019, SAQA called for the Quality Councils' articulation reports, so that it could, in turn, develop a comprehensive report on its articulation work, including that of the Quality Councils.

The DHET articulation policy elaborates regarding credit transfer. SAQA's CAT policy defines credit transfer as the process whereby credits awarded in one learning programme can count towards (a) the same learning programme in another institution; (b) another learning programme on the same or different level of the NQF, the same or different NQF Sub-Framework, a different department in the same institution, or in a different institution. The DHET's policy goes further, stating that the act of recognising and transferring credit implies the acceptance of a course/part-course in place of a course/part-course offered at the receiving institution, or in place of an institutional/ programme requirement.

### ***Analyses to compare the alignment of the assessment policies of the Department of Basic Education (DBE) and the Quality Councils, with that of SAQA***

The assessment policy regimes of the Department of Basic Education (DBE) and Umalusi are extensive; the methodology used to select policies for analysis is described below.

#### **Selection of DBE assessment policies for analysis**

The DBE's 2005-2007 National Assessment Protocol was situated within the framework of the National Curriculum Statements (NCS), Learning Programme Guidelines (LPGs) and Subject Assessment Guidelines (SAGs) for school Grades R-12. These documents stipulate policy on curriculum and assessment for the schooling sector. The documents were amended in 2012: the comprehensive Curriculum and Assessment Policy Statements (CAPS) were developed for each school subject, replacing the NCS, LPG, and SAGs documents. The current curriculum and assessment policy regime for schooling comprises:

- CAPS documents for all listed school subjects for Grades R-12;

- National Policy for the Programme and Promotion Requirements, Grades R-12, henceforth referred to as the ‘National Policy’; and
- the National Protocol for Assessment, Grades R – 12, henceforth referred to as the ‘National Protocol’.

The National Protocol acts as an overall guiding policy for assessment in the GFETQSF sector – the DBE requires that the CAPS documents be read in conjunction with the National Policy and National Protocol. A close analysis of the CAPS documents for the Foundation, Intermediate, Senior and Further Education and Training (FET) phases in the ‘soft’ and ‘hard’ sciences subjects at school, show that the National Protocol provides an overarching framework for the kind of detailed specifications required for each subject and school grade. In addition, learner assessment per subject in the different phases, the National Policy requires that the National Protocol and CAPS be used. The current analysis therefore considers the National Protocol as the DBE’s main policy on assessment.

The 2015 Assessment Guidelines for the Annual National Assessments (ANA) were not considered in the current analysis, because these assessments are not school-based, and are not used for learner progression or promotion<sup>28</sup>. The Assessment Guidelines for the ANA are rooted in the national curriculum documents. Further, in terms of the National Policy on the Conduct, Administration and Management, the ANA Assessment Guidelines must be read in conjunction with the CAPS, the National Protocol, and the National Policy documents.

### **Selection of Umalusi assessment policies for analysis**

Umalusi’s policies and directives for GFETQSF qualifications do not detail types of assessment. At times these documents briefly specify the type of assessment and moderation required for a qualification; the weighting of internal and external assessments; and the responsibilities of the Assessment Bodies. Most of the qualification-specific policy documents explicitly state that in fulfilment of all the requirements for assessment, especially for ensuring that assessments are credible, relevant stakeholders such as the Assessment Bodies, are required to refer to the policies and regulations of the DBE and DHET where applicable, as well as Umalusi’s policies, which are listed as follows.

- Umalusi’s 2016 Policy for the Quality Assurance of Assessment: Policies, Directives, Guidelines and Requirements, focusing on Umalusi’s 2016 Policy.
- Umalusi’s 2015 Policy for the General Education and Training Certificate for Adults (GETCA): A Qualification at Level 1 on the General and Further

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<sup>28</sup> The ANA are standardised national assessments for languages and Mathematics in the Intermediate Phase (school Grades 4-6 and Senior Phase (Grades 7-9), and literacy and numeracy in the Foundation Phase (Grades 1-3). The The question papers and marking memoranda are supplied by the DBE; the schools manage the conduct of the tests, and the internal marking and moderation. The tests are conducted for the purposes of benchmarking, assessing the extent to which learner support is needed, and the development of school improvement plans.



Education and Training Qualifications Sub-Framework of the National Qualifications Framework.

- Umalusi's 2014 Policy for the National Senior Certificate for Adults (NASCA): A Qualification at Level 4 on the General and Further Education and Training Qualifications Sub-Framework of the National Qualifications Framework.
- Umalusi's 2013 Directives for the Certification of the General Education and Training Certificate (GETC).
- Umalusi's 2013 Directives for the Certification of the National Certificate (Vocational), NQF Levels 2-4.
- Umalusi's 2013 Directives for the Certification of the National Senior Certificate (NSC) (schools).
- Umalusi's 2013 Directives for the Certification of the Senior Certificate (SC), National Senior Certificate (NSC: FET Colleges), N3 Certificate, General Education and Training Certificate (Adult Basic Education and Training [ABET] Level 4).

### **CHE and QCTO assessment policies analysed**

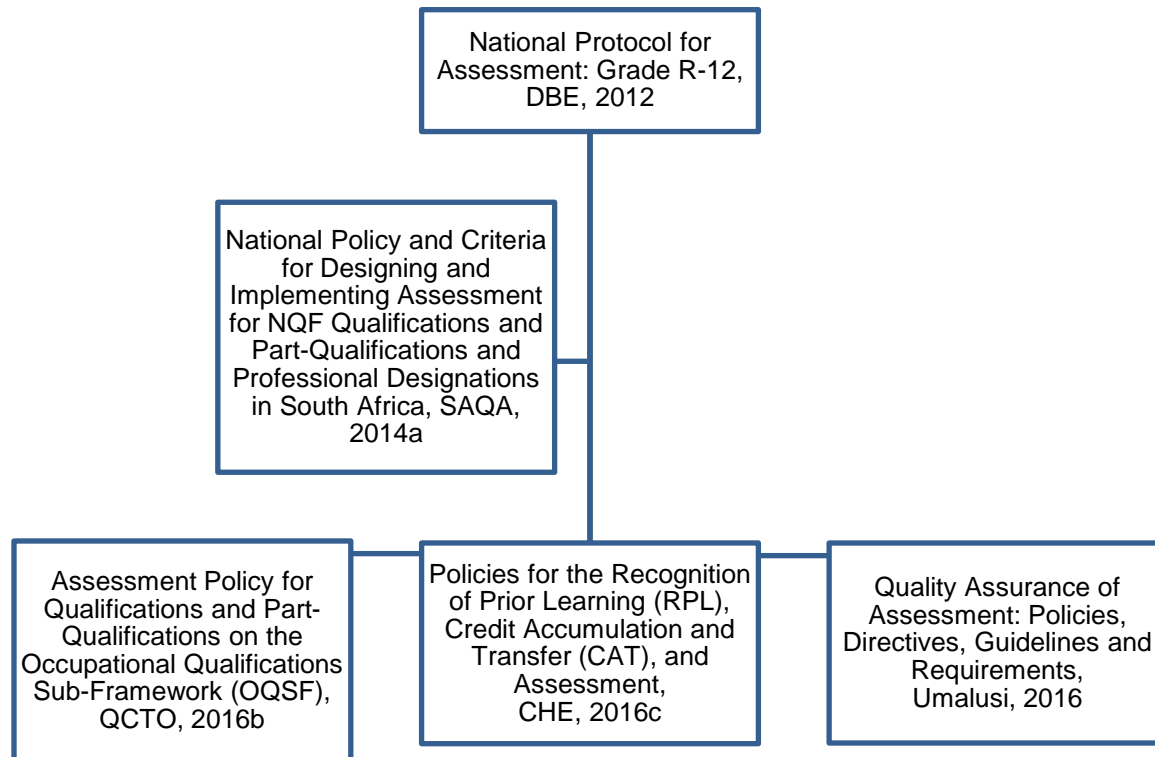
The CHE and the QCTO each have a single assessment policy; these policies were analysed.

### **Categories used in the analysis of the alignment of the DBE and Quality Council assessment policies, with that of SAQA**

The following categories were used to analyse the alignment of the DBE and Quality Council assessment policies, with that of SAQA.

- a) Background to the policy.
- b) Purpose of the policy.
- c) Objectives of the policy.
- d) Scope of the policy.
- e) Glossary/definitions.
- f) Main content of the policy/policy priorities/policy principles/policy development.
- g) Criteria and guidelines.
- h) Implementation/responsibilities regarding implementation.
- i) Types of RPL.

Figure 3 below provides a diagrammatic representation of the policies that were analysed.



**Figure 3: Assessment policy documents analysed**

The analyses which follow, focus on the similarities and differences between the assessment policies of the DBE and the Quality Councils on one hand, and SAQA’s assessment policy on the other.

### **Similarities between the assessment policies of Umalusi and SAQA**

Umalusi’s (2016) assessment policy was found to be largely similar to SAQA’s (2014a) assessment policy, with some differences.

#### *Similarity 1: Legislative background*

The NQF Act No. 67 of 2008 mandates SAQA to develop policy and criteria, after consultation with the Quality Councils, and the Quality Councils to develop policies for RPL, CAT and assessment, taking into account SAQA’s related policies. Umalusi quality assures assessment at ‘exit points’, and issues certificates to candidates who achieve the qualifications.

#### *Similarity 2: Purpose*

SAQA’s (2014a) assessment policy sets minimum criteria and guidelines “for effective, valid, reliable and consistent, fair and transparent, and appropriate assessment in the context of the NQF” (*Ibid.*:2); the policy also intends to “be enabling, to provide sufficient information, guidance and clarity that makes possible its implementation in the spirit

intended”, and “facilitate differing sectoral approaches in a way that is not restricting of innovation but that is aligned with NQF principles and international best practice” (*Ibid.*:10). Umalusi’s (2016) assessment policy does not have a separate ‘purpose’ section, but states the underlying purpose of the policy as being to create an operational framework within which Umalusi conceptualises, approaches, organises and implements assessment for the certification of the qualifications in the GFETQSF context. Umalusi uses its assessment policy to protect the integrity of the assessments it quality assures, to ensure that assessments are conducted in accordance with the required regulations and to ensure that the assessment processes and outcomes are valid, reliable and credible.

### *Similarity 3: Objectives*

The objectives of SAQA’s (2014a) assessment policy are to stipulate assessment policy requirements for the three NQF Sub-Frameworks; enable Sub-Framework-specific assessment; develop shared understandings around good assessment practice; make visible the principles and criteria for a holistic approach to assessment for learning, and clarify the various stakeholder roles and responsibilities regarding assessment.

Umalusi’s (2016:3) assessment policy similarly provides guidance for assessment for certification, articulating “an integrated and workable framework to guide and standardise the management of the quality assurance of assessment across Assessment Bodies [both private and public] for qualifications registered in the GFETQSF”. By specifying the processes, procedures and directives, the policy seeks to “establish a coherent, coordinated and integrated system for the [development,] improvement and maintaining of standards in assessment” (*Ibid.*). The policy outlines the related quality assurance processes; various phases in the assessment moderation and monitoring processes; attendant decision and review procedures and approvals; and Umalusi’s holistic approach to assessment.

### *Similarity 4: Scope*

SAQA’s (2014a) assessment policy clearly outlines its scope, which includes the range of types of NQF stakeholders, all qualifications and part-qualifications registered on the South African NQF; and all the registered professional designations of the SAQA-recognised professional bodies. Similarly, Umalusi’s assessment policy outlines its GFETQSF stakeholders, which comprise the public and private Assessment Bodies including the DBE and its nine Provincial Education Departments, DHET, and the private Assessment Bodies accredited by Umalusi to manage and administer the examinations conducted by the private entities offering qualifications registered on the GFETQSF.

### *Similarity 5: Policy development*

Information on the policy development process for Umalusi’s (2016) assessment policy is included in the document, although this section is quite brief.

*Similar 6: Definitions*

The assessment-related definitions used in Umalusi’s (2016) assessment policy, are aligned to those in the NQFpedia, the DBE policies, and SAQA’s (2014a) assessment policy – as shown in Table 12 below.

**Table 12: Definitions used in the SAQA, DBE and Umalusi assessment policies**

<b>Term</b>	<b>NQFpedia Definition (SAQA, 2014c)</b>	<b>SAQA’s Assessment Policy (2014a)</b>	<b>DBE Assessment Policy (2012)</b>	<b>Umalusi Assessment Policy (2016)</b>
<b>Assessment</b>	Assessment is the process used to identify, gather and interpret information against the required competencies in a qualification or part-qualification in order to make a judgement about a learner’s achievement	Assessment means the process used to identify, gather and interpret information and evidence against the required competencies in a qualification, part-qualification, or professional designation, in order to make a judgement about a learner’s achievement. Assessment can be formal, non-formal, and informal; it can be of learning already done, or towards learning to inform and shape teaching and learning still to be done [Definition section]	Assessment is the process of collecting, analysing and interpreting information to assist teachers, parents and other stakeholders in making decisions about the progress of learners [Definition section]	Assessment is the process of identifying, gathering and interpreting information about learner achievement in order to: (a) assist learner development and improve the process of learning and teaching; and (b) evaluate and certify competence in order to ensure qualification credibility [Definition section]

*Similarity 7: Internal and external assessment*

In its assessment policy, Umalusi uses the same definitions of internal and external assessment, as those used in SAQA’s assessment policy.

### *Similarity 8: Principles*

The assessment policies of both SAQA and Umalusi emphasise particular principles that guide the application of assessment, including those of validity, reliability, integrity, fairness, measures to reduce bias, accountability, credibility, and the use of language in such a way that it does not become a barrier to learning.

### *Similarity 9: Curriculum and competencies*

For Umalusi, the standards in each assessment, including all the examination papers, must be compliant with the qualification and curriculum policy prescripts. In SAQA's assessment policy, this concept is addressed through the requirement for validity, and its definition of validity, as being when "assessment measures what it sets out to measure .... [and] there must be a match between the content assessed, learning outcomes [in the curriculum], and purpose of assessment..." (SAQA, 2014a:11). Further, SAQA's 'content of assessment' section states that the scope of assessment needs to be based on 'content covered in the curriculum', and that the full range of competences covered in the curriculum, need to be tested, amongst others (*Ibid.*:12). Similarly, Umalusi's assessment policy requires that the assessment design process must include a variety of cognitive skills. Umalusi's assessment policy mirrors that of SAQA's, while SAQA's is appropriately written at a higher level of generality.

### *Similarity 10: Recording and reporting*

The recording of assessment results is provided for in SAQA's assessment policy, and similarly, Umalusi's assessment policy requires that the teachers' files or the learners' Portfolios of Evidence, must record learner progress, including evidence of the conversion and electronic capturing of marks, and the consolidation and conversion of scores, which are the responsibility of the teacher and school. In terms of reporting, SAQA requires that feedback be communicated to learners, regarding assessment results. Umalusi also outlines the reporting procedures for assessments, for both internal and external assessments. Umalusi embraces the idea that "[a]ssessment is used to set challenging targets for students, check progress and give feedback to the students" (Umalusi, 2016:142).

### *Similarity 11: Complaints and appeals*

SAQA's assessment policy requires "standardised appeals processes which are the same for all similar instances within an institution" (SAQA, 2014a:17). Umalusi's assessment policy considers the processes and procedures to be followed to deal with grievances and irregularities. Further, Umalusi is required to approve the publication of results of learners at exit points, when the Assessment Body has conducted the assessments free of any irregularities that could jeopardise the integrity of the assessment outcomes, and when it has complied with the requirements for conducting the assessment.

### *Similarity 12: Moderation and monitoring*

SAQA's (2014a) assessment policy requires Quality Councils to oversee assessment in their Sub-Framework contexts, in a way that is aligned with SAQA's policy. Umalusi's (2016) assessment policy specifies assessment principles and their application for implementation in the GFETQSF context. Umalusi defines moderation in a SAQA-aligned way. Its policy sets out the moderation procedures for internal and external assessment; the criteria for moderation, including the administrative requirements, submission dates and norm times for moderation; reporting formats, and the roles and responsibilities of Umalusi and the Assessment Bodies in this regard. Its policy makes clear that, "It is Umalusi's mandate is to ensure that the examination system is managed smoothly, effectively and efficiently"; that the moderation processes are fair, valid, and reliable, and the assessment instruments are in line with national standards (Umalusi, 2016:15). To this end, Umalusi's assessment policy deals with monitoring the state of readiness, and the capacity – financial, physical and human – of public and private Assessment Bodies, to administer credible examinations, including the writing and marking of the examinations, marking guidelines, the verification of marking, the management of and reporting on, irregularities. Umalusi's policy sets out the dates for the self-evaluation reports needed, and other aspects, and provides the norm forms for monitoring, verification and the conduct/administration of the examinations; sample reporting documents, and the requirements for monitoring. All of this detail was found to make the responsibilities, procedures, and timelines for assessment in the GFETQSF context, very clear, in an aligned way.

### *Similarity 13: Management systems*

SAQA's (2014a) assessment policy makes reference to the need for providers to develop the capacity progressively to implement the assessment policies required. Umalusi's (2016) policy similarly emphasises the importance of ensuring a state of readiness for the administration of credible national examinations, and the competencies associated with moderators.

### *Similarity 14: Responsibilities*

The SAQA (2014a) and Umalusi (2016) assessment policies are clear about the responsibilities of entities involved in the assessment processes. Umalusi outlines a whole range of responsibilities for different phases of the implementation process, throughout its policy. Most of the responsibilities for the roles regarding moderation and monitoring are allocated to the Assessment Bodies in the GFETQSF context, and to Umalusi, although other entities like the DBE and DHET are also involved. Responsibilities are outlined in depth, for each of the described aspects of assessment. Umalusi's assessment policy was found to be clear and comprehensive. While SAQA's assessment policy refers to a range of principles to guide assessment, and Umalusi's policy does not elaborate on the principle of transparency in an explicit way – this detail and comprehensiveness render it transparent.

## **Differences between the Umalusi and SAQA Assessment policies**

Five areas of difference were found between the SAQA and Umalusi assessment policies.

### *Difference 1: Formal and informal assessment*

SAQA's (2014a) assessment policy states that formal assessment is "assessment for which assessment processes, tools, and results are recorded towards achievement of a qualification, part-qualification or professional designation"; informal assessment comprises "any judgements made or feedback given in the course of teaching and learning activities. Informal assessments may be in written form but are not usually recorded" (SAQA, 2014a:5-6). Umalusi's (2016) assessment policy does not provide clear definitions for formal and informal types of assessment.

### *Difference 2: Assessment sub-types*

SAQA's (2014a) assessment policy refers to a range of assessment types, including formative, summative, integrated and diagnostic, while Umalusi's policy does not engage explicitly with different types of assessment.

### *Difference 3: Articulation*

SAQA's (2014a) assessment policy highlights that assessment should support articulation and agreements between entities, towards articulation between the NQF Sub-Frameworks; Umalusi's (2016) assessment policy does not engage with these aspects.

### *Difference 4: RPL and CAT*

SAQA's (2014a) assessment policy requires the consideration of RPL and CAT in assessment; Umalusi's (2016) policy is not fully elaborated in this regard.

### *Difference 5: Data management systems*

SAQA (2014a) policy requires that the Quality Councils develop and maintain information management systems for the recording of assessment results, in which the systems are compatible with the NLRD and other relevant government information management systems. While Umalusi's (2016) policy requires that assessment results are recorded; there is no emphasis on a data management information system.

## **Similarities between the CHE and SAQA assessment policies**

Large areas of similarity were found between the SAQA (2014a) and the CHE (2016c) assessment policies.

### *Similarity 1: Purpose statement*

SAQA's (2014a:2;10) assessment policy sets minimum criteria and guidelines "for effective, valid, reliable and consistent, fair and transparent, and appropriate assessment in the context of the NQF", and intends to "be enabling, to provide sufficient information, guidance and clarity that makes possible its implementation in the spirit intended", and "facilitate differing sectoral approaches in a way that is not restricting of innovation but that is aligned with NQF principles and international best practice". In turn, the purpose of the CHE's (2016c) assessment policy is to provide guidelines and directives appropriate for the Higher Education sector, in a way that is aligned with SAQA's policy. Noting the diverse and differentiated Higher Education system, which includes public and private institutions, the CHE's policy notes the importance of Higher Education Institutions adhering to the same set of procedures for the "development, application and assessment of the effectiveness of their internal mechanisms in relation to RPL, CAT and assessment" (*Ibid.*:iv;v).

### *Similarity 2: Legislative background*

The NQF Act No. 67 of 2008 mandates SAQA to develop policy and criteria, after consultation with the Quality Councils, and the Quality Councils to develop policies for RPL, CAT and assessment, taking into account SAQA's related policies. The NQF Act, and the Higher Education Act No. 101 of 1997, Amended, mandate the CHE to quality assure assessment in Higher Education, including in the public and private Higher Education sectors.

### *Similarity 3: Policy development process*

Both the SAQA and CHE assessment policies describe the related policy development processes; there is less detail in this regard, in the CHE's policy.

### *Similarity 4: Definitions*

The assessment-related definitions in the CHE's (2016c) assessment policy mirror those in SAQA's (2014a) assessment policy (see Table 13).

**Table 13: Definitions used in the SAQA and CHE assessment policies**

<b>Term</b>	<b>NQFpedia definition (SAQA, 2014c)</b>	<b>SAQA assessment policy (2014a)</b>	<b>CHE assessment policy (2016c)</b>
<b>Assessment</b>	The process used to identify, gather and interpret information against the required competencies in a qualification or part-qualification in order to	Assessment is the process used to identify, gather and interpret information and evidence against the required competencies in a qualification, part-qualification, or	Assessment is the systematic evaluation of a student's ability to demonstrate the achievement of the learning goals intended in a curriculum (CHE, 2016c:1;3). Assessment



Term	NQFpedia definition (SAQA, 2014c)	SAQA assessment policy (2014a)	CHE assessment policy (2016c)
	make a judgement about a learner's achievement	professional designation, in order to make a judgement about a learner's achievement [Definition section]	is the critical process that is employed to identify, gather and interpret information and evidence, which would enable reasonably objective judgments to be made regarding the extent to which a student has achieved the learning outcomes of a course or module that leads to a qualification (CHE, 2016c:6). Assessment is central to learning and teaching because it is the key mechanism for evaluating the performance of students. As such, it is the basis for awarding credits, and ultimately of qualifications ( <i>Ibid.</i> )

#### *Similarity 5: Internal assessment*

The CHE's (2016c) assessment policy, like that of SAQA, provides a clear definition of internal assessment, that is similar to SAQA's definition. In SAQA's (2014a:6) policy, internal assessment means "any assessment conducted internally by a provider of learning. It is assessment conducted by a person, institution or body directly involved in the development and/or delivery of the learning being assessed". Similarly for in the CHE's (2016c:14) policy, internal assessment "is assessment of student learning achievements by academic staff [directly] responsible for teaching a course or module within a programme in a system".

#### *Similarity 6: Assessment sub-types*

SAQA's (2014a) assessment policy elaborates on a range of assessment sub-types, including formative, summative, integrated and diagnostic assessment. The CHE's (2016c) policy refers to formative, summative, and integrated assessment, but does not define these terms. The CHE's policy goes further, referring to peer and self-evaluation, and criterion and non-criterion assessment – which ensure that learning outcomes are validly assessed – although it does not elaborate on the meaning of these terms.

### *Similarity 7: Principles*

Both SAQA and the CHE elaborate on assessment principles such as validity, reliability, integrity, fairness, non-bias, transparency, accountability, and credibility, in their assessment policies. In most instances, the CHE uses SAQA's interpretation of the principles. The CHE goes on to point to the need for academic integrity in assessment processes, and the need for assessment processes to be based on transparent communication. The CHE policy notes that assessment judgments should be justifiable (explained and defended) to ensure responsibility and accountability in translating the assessment policy into good assessment practice. To avoid bias, the CHE's policy states that suitable learning opportunities should be provided to students, to facilitate their acquisition of the knowledge and skills specified in the programme outcomes, and to ensure that the students are not disadvantaged in assessments. The CHE's assessment policy points to the need for language sensitivity in the design and administration of assessment processes. The CHE's policy elaborates the assessment principles in SAQA's policy, in ways appropriate for Higher Education, and provides further useful elaboration.

### *Similarity 8: Curriculum and competencies*

In terms of the requirement in SAQA's (2014a) assessment policy, for assessment to consider the curriculum and its range of competences, the CHE's (2016c) assessment policy requires that qualification standards be maintained by ensuring that assessment is appropriate to the particular modules and exit-level outcomes of the programme in question, and that the outcomes must include disciplinary knowledge and competences at the appropriate NQF levels. In addition to these competences, the CHE's policy requires that the assessment criteria must specify the understanding, knowledge, skills, actions, values and attitudes, which a student must display in order to provide suitable evidence that outcomes and foundational, practical and reflective competences have been achieved. Further, in the CHE's policy, effective assessment practices which include internal and external assessment and moderation, should test student competence to achieve the intended learning outcomes and also be used to improve the quality of teaching and learning. The level of challenge of the assessment, whether formal or any other type, in a programme, should be appropriate to the level of the qualification to which it leads. The CHE elaborates the principles in SAQA's assessment policy, in ways which will aid implementation in the HEQSF context.

### *Similarity 9: Articulation and RPL*

SAQA's (2014a) assessment policy encourages the fostering of articulation in relation to assessment, especially within and between the NQF Sub-Frameworks. The CHE's (2016c) policy in turn notes that in terms of the assessment system, rules governing assessment procedures such as articulation should be published and communicated to students and relevant stakeholders in the HEQSF context. Regarding SAQA's requirement of the provision for the inclusion of RPL in assessment, the CHE's policy specifies that a comprehensive and inclusive institutional assessment policies should incorporate all

institutional policies related to assessment, such as those for RPL and Work Integrated Learning (WIL), among others.

#### *Similarity 10: Recording*

In line with SAQA's (2014a) assessment policy requirement for the recording and record-keeping of marking and assessment results, the CHE's (2016c) policy highlights that the secure and reliable recording of assessment results and record-keeping systems that ensure the security of the assessment system must be put in place, especially with regard to preventing plagiarism and other assessment-related misdemeanours. Systems (for the marking and grading of results, aggregation of marks and grades, progression and final award, and credit allocation and articulation) should be published and communicated to students and the relevant stakeholders, and must be transparent and defensible to all stakeholders. Breaches of assessment regulations must be dealt with effectively and timeously.

#### *Similarity 11: Management systems*

According to SAQA's (2014a) assessment policy, it is crucial for the necessary systems to be in place to implement assessment policies. The CHE's (2016c) policy refers to the need for an efficient management system, processes and procedures that must be put into place to administer the process, the promotion of good practices for grading, and the provision of feedback to students. HEQSF institutions must take measures to ensure the reliability, rigour and security of their assessment systems – which are in operation for maximising the accuracy, consistency and credibility of results, including the consistency of marking, and the concurrence between assessors and external examiners on the nature and quality of the evidence that indicates the achievement of learning outcomes. This work includes the development of staff competence in assessment, whereby academic staff members are provided with training support to enable them to assess validly and consistently, to enhance the overall quality of the module/course/qualification with which they are involved.

#### *Similarity 12: Complaints and appeals*

SAQA's (2014a) assessment policy requires that during the administration of assessment, a complaints and appeals process needs to be in place. The CHE's policy also states that in relation to assessment, "[a]n open and transparent appeal process should be put into place and institutions need to ensure that there are mechanisms in place to provide administrative support" (CHE, 2016c:16).

#### *Similarity 13: Moderation*

In line with SAQA's (2014a) assessment policy moderation requirements, the CHE's (2016c) policy explains that for internal assessment, staff members not directly involved in teaching and setting the assessment tools, should review and report on the internal assessment process. Academic staff members in the HEQSF context are responsible for designing, implementing and marking both formative and summative student

assessments, for recording the results, and for providing feedback to students. For summative assessments, especially where more than one marker is involved, internal moderation should be undertaken to ensure the reliability of the assessment procedures and marks. For external moderation, institutional assessment policies must provide for the system of external moderation, whereby the learning achievements of students at the exit level of a qualification are moderated by appropriately qualified external academics who have been appointed according to clear criteria and procedures, and who conduct their responsibilities in terms of clear guidelines. External moderators are recommended by the examining academic department, must be independent experts in their fields, and should have qualifications that are at least one level above the level of the qualification being examined, but preferably higher.

### **Differences between the CHE and SAQA Assessment policies**

While the CHE's (2016c) assessment policy is largely similar to that of SAQA (2014a), three differences were found.

#### *Difference 1: Objectives*

While SAQA's (2014a) assessment policy provides a clear 'objectives' section, in the CHE's (2016c) policy, the objectives are embedded and inferred throughout the text of the document.

#### *Difference 2: CAT*

While the CHE's (2016c) assessment policy mirrors that of SAQA (2014a) when it calls for RPL and WIL to be included in institutional assessment policies, it does not mention the requirement that Credit Accumulation and Transfer (CAT) also be included in these assessment policies.

#### *Difference 3: Data management system*

SAQAs (2014a) assessment policy emphasises the requirement for entities to develop and maintain information management systems for the recording of assessment results, which are compatible with SAQA's National Learners' Records Database, and other relevant government information management systems. The CHE's (2016c) policy does not mention an assessment information management system as such, nor does it mention the need for receiving assessment-related data submitted by providers and other stakeholders in the HEQSF space.

### **Similarities between the QCTO and SAQA assessment policies**

Large areas of similarity were found between the SAQA (2014a) and QCTO (2016b) assessment policies.

### *Similarity 1: Purpose statement*

SAQA's (2014a:2;10) assessment policy sets minimum criteria and guidelines "for effective, valid, reliable and consistent, fair and transparent, and appropriate assessment in the context of the NQF", and seeks to "be enabling, to provide sufficient information, guidance and clarity that makes possible its implementation in the spirit intended", and "facilitate differing sectoral approaches in a way that is not restricting of innovation but that is aligned with NQF principles and international best practice". The purpose of the QCTO's (2016b) policy is not in a separate section, but is embedded in the body of the document, as being "to establish and maintain a national standard of valid and reliable assessments, to ensure the credibility of occupational qualifications".

### *Similarity 2: Legislative background*

The NQF Act No. 67 of 2008 mandates SAQA to develop policy and criteria, after consultation with the Quality Councils, and the Quality Councils to develop policies for RPL, CAT and assessment, taking into account SAQA's related policies. The QCTO was established in February 2010. It is responsible for the development, maintenance and quality assurance of qualifications within the Occupational Qualifications Sub-Framework (OQSF). In fulfilling its requirement for the quality assurance of assessment, the QCTO's (2016b:9) assessment policy states that "[a] nationally standardised External Integrated Summative Assessment (EISA) is an integral part of the quality assurance of occupational qualifications, Trades and part qualifications".

### *Similarity 3: Objectives*

SAQA's (2014a) assessment policy requires that the Quality Councils, for/in their Sub-Framework contexts, (a) develop policy and criteria for designing and implementing assessment, in a way that is aligned with SAQA's policy; (b) oversee, support, monitor, and evaluate, assessment-related work; (c) develop and maintain an information management system that is compatible with the NLRD and other government management information systems; (d) monitor the equitability of assessment-related fees; and (e) monitor assessment feedback mechanisms. The objectives of the QCTO's (2016b) assessment policy are to outline how the External Integrated Summative Assessment (EISA) will be conducted, by whom, how and where, its requirements, and ensure that it is the model used. The QCTO's policy also outlines the requirements for the assessment of Trade and part-qualifications, and presents information to guide all assessment in the OQSF context, and ensure that it is aligned to NQF policy.

### *Similarity 4: Scope*

SAQA's (2014a) assessment policy clearly outlines its scope. The QCTO's (2016b) policy also specifies its scope, in an aligned way.

### *Similarity 5: Definitions*

The assessment definitions used by SAQA and the QCTO are similar (see Table 14).

**Table 14: Definitions used in the SAQA and QCTO assessment policies**

<b>Term</b>	<b>NQFpedia (SAQA, 2014c)</b>	<b>SAQA Policy Definition (2014a)</b>	<b>QCTO Policy Definition (QCTO, 2016b)</b>
<b>Assessment</b>	Assessment is the process used to identify, gather and interpret information against the required competencies in a qualification or part-qualification in order to make a judgement about a learner's achievement	Assessment is the process used to identify, gather and interpret information and evidence against the required competencies in a qualification, part-qualification, or professional designation in order to make a judgement about a learner's achievement [Definitions section]	Assessment is the process of collecting evidence of learner's work to measure and make judgements about the competence or non-competence of specified NQF occupational standards or qualifications and part qualifications (QCTO, 2016b:5)

### *Similarity 6: Internal and external assessment*

Both the SAQA (2014a:5) and the QCTO (2016b:6) assessment policies define internal and external assessment in the same way. SAQA's policy states that external assessment must be conducted by qualified and competent persons or bodies not directly involved in the development and/or delivery of the learning being assessed. The QCTO's policy (*Op.Cit.*) elaborates external assessment in the OQSF context in the form of an EISA which is "[a]n assessment managed by a body appointed by the QCTO, using nationally developed assessment instruments at end of sections of learning or the end of the whole learning process to facilitate demonstration of both theory and practical competence in achieving the outcomes of the occupational qualification or part qualification". Internal assessment in both the QCTO and SAQA policies, refers to the feedback given during teaching and learning activities; the QCTO's policy adds the idea that internal assessment is used to reinforce learning and support the learner.

### *Similarity 7: Principles*

The QCTO's (2016b) assessment policy, like SAQA's (2014a), emphasises particular principles that guide the application of assessment; these include validity, reliability, integrity, fairness, non-bias, and credibility. The QCTO's policy uses the same interpretations that SAQA uses, to define these principles.

### *Similarity 8: Curriculum and competencies*

In accordance with SAQA's (2014a) assessment policy requirement for relevant aspects of the curriculum to be covered in assessment, the QCTO's (2016b) policy explains that

the outcomes of occupational qualifications are important; assessment instruments, derived from the curriculum content, must be based on the outcomes. SAQA's policy also specifies that competences should be tested in appropriate ways; in this regard, the QCTO's policy states that assessment must use fit-for-purpose methodologies that reflect consistent levels of high cognitive challenge.

#### *Similarity 9: Recording*

SAQA's (2014a) assessment policy specifies that assessment results must be recorded. In this regard, while the EISA results, as part of a formalised process, are fully recorded, the QCTO's (2016b) assessment policy also outlines that its stakeholder entities (such as Skills Development Providers [SDPs], and Assessment Quality Partners [AQPs]), must record the learning achievements resulting from formative assessment, in Statements of Results. Workplaces offering work experience must complete a Work Experience Record, as well as specifications for collecting the related supporting evidence for these Records.

#### *Similarity 10: Complaints and appeals*

SAQA's (2014a) assessment policy requires a standardised appeals process for dealing with grievances relating to assessment/ assessment processes. The QCTO's (2016b) assessment policy requires that OQSF stakeholders follow specified processes in relation to complaints and appeals. Learner complaints about the assessments and assessment processes, should be lodged with the relevant accredited Assessment Centres or approved assessment/ examination sites. Learner appeals relating to assessments and assessment processes should be lodged with the relevant AQP; the decisions of the AQP Appeals Committee, are final.

#### *Similarity 11: Moderation and monitoring*

SAQA's (2014a) assessment policy requires the moderation and monitoring of assessment. The QCTO's (2016b:7) policy specifies that AQPs are responsible for all of the moderation procedures for internal and external assessment, to ensure "that the assessment of the learning outcomes described in the NQF occupational standards, qualifications and part-qualifications is fair, valid, reliable and unbiased". The QCTO policy also requires regular monitoring and review of the effectiveness, efficiency, economy and impact of assessment, against set quality assurance standards and associated performance indicators. Further, the AQPs' management of the EISA is monitored by the QCTO, and the AQPs and the QCTO monitor the performance of the SDPs with respect to implementing internal formative assessments, and the internal self-evaluations of their performance.

#### *Similarity 12: Responsibilities*

Both the SAQA (2014a) and QCTO (2016b) assessment policies specify clearly, the roles and responsibilities of all entities involved in assessment. In SAQA's policy, these entities comprise SAQA itself; the Quality Councils; assessment bodies; providers of education

and training; recognised professional bodies; and all those involved in assessment processes, including learners. In the QCTO's policy, the entities comprise the QCTO itself; AQPs; assessment centres; systems auditors; invigilators and administrators; SDPs; and learners.

### **Differences between the QCTO and SAQA assessment policies**

Four differences were found between the QCTO (2016b) and SAQA (2014a) assessment policies.

#### *Difference 1: Policy development process*

The QCTO policy makes no reference to its policy development process; SAQA's policy presents its development process, which included consideration of the extensive body of existing assessment policy and research, collaboration with SAQA's Assessment Reference Group, and rounds of public comment.

#### *Difference 2: Sensitivity to language*

SAQA's (2014a) assessment policy requires that all those involved in assessment must be aware of the use of language in assessments and assessment processes, so that language does not become a barrier to learning; the QCTO's (2016) policy does not address the issue of language.

#### *Difference 3: Articulation, RPL and CAT*

As part of ensuring fairness in assessment, SAQA's (2014a) policy requires fair RPL and CAT processes; the QCTO's (2016b) assessment policy does not refer to RPL and CAT.

#### *Difference 4: Management systems*

SAQA's (2014a) assessment policy requires that the Quality Councils develop and maintain information management systems for the recording of assessment results and trends, that are compatible with the NLRD and other relevant government information management systems. In addition, providers must develop such systems, in line with the Quality Council specifications in this regard. The QCTO (2016b) assessment policy does not address these aspects.

### **Summary of the similarities between the SAQA and Quality Council assessment policies**

While each of the Quality Councils needs to work on aspects of their assessment policies to align these policies with that of SAQA, large areas of alignment were found between each of the Quality Council assessment policies, and that of SAQA, as follows.



- The underpinning legislation and regulatory backgrounds for the assessment policies, were commonly referred to by SAQA and the Quality Councils.

SAQA's holistic and outcomes-based approach to assessment has been adopted by all three Quality Councils: formative and summative assessments are conducted to evaluate learning in relation to the curriculum and competences in registered qualifications and part-qualifications, and assessment is seen as being part of learning.

- All of the policies are in line with good assessment practice, and all embrace the principles of validity, reliability, integrity, fairness, non-bias and credibility.
- The criteria and guidelines for the implementation of assessment in all of the policies, include assessment content and procedures; links to curriculum, competences and learning outcomes; fair processes that include moderation, the recording and reporting of results, and complaints and appeals processes.

## **Similarities between the SAQA and DBE assessment policies**

### *Similarity 1: Purpose statement*

The purposes of both the SAQA (2014a) and DBE (2012) assessment policies is to set the minimum standards and guidelines for assessment nationally. SAQA's policy refers to the NQF context and stakeholders – which include the DBE; the DBE's policy refers to the schooling sector.

### *Similarity 2: Objectives*

Both the SAQA (2014a) and DBE (2012) assessment policies set clear policy objectives. Those of SAQA's policy include setting minimum standards, and providing guidelines for assessment, in line with good assessment practice, and in ways which do not restrict sectoral innovation. It elaborates the concepts of holistic assessment, good practice principles, and the roles and responsibilities of all entities involved in assessment. It seeks to align the systemic monitoring, evaluation and quality assurance of assessment, while considering the different contexts of the three NQF Sub-Frameworks. The objectives in the DBE's (2012) assessment policy are in line with those SAQA objectives: it seeks to standardise assessment in the schooling sector. The DBE policy provides for an extensive procedural framework for the implementation, maintenance and quality assurance of assessment, including regulating how the evidence of learner performance is recorded and reported.

### *Similarity 3: Scope*

Both the SAQA (2014a) and DBE (2012) assessment policies make their scopes of engagement clear. The scope in SAQA's policy comprises all registered qualifications, part-qualifications, and professional designations – and all NQF stakeholders. The scope

for the DBE is its ordinary and special public schools; subsidised private schools; and independent schools – and internal (school-based) assessment, as well as the end-of-year examinations.

*Similarity 4: Definitions*

The definitions of assessment used by the DBE (2012) and SAQA (2014a) are similar, as shown in Table 15 below.

**Table 15: Definitions used in the SAQA and DBE assessment policies**

Term	NQFpedia (SAQA, 2014c)	SAQA Assessment Policy (2014a)	DBE Assessment Policy (2012)
<b>Assessment</b>	Assessment is the process used to identify, gather and interpret information against the required competencies in a qualification or part-qualification in order to make a judgement about a learner’s achievement	Assessment is the process used to identify, gather and interpret information and evidence against the required competences in a qualification, part-qualification, or professional designation in order to make a judgement about a learner’s achievement [Definition section]	Assessment is a process of collecting, analysing and interpreting information to assist teachers, parents and other stakeholders in making decisions about the progress of learners (DBE, 2012:3).

*Similarity 5: Formal and informal assessment types*

Both the SAQA (2014a) and DBE (2012) assessment policies elaborate on the formal and informal types of assessment, and the DBE’s policy provides clear examples of what constitutes formal and informal assessment activities.

*Similarity 6: Internal and external assessment*

Both the SAQA (2014a) and DBE (2012) assessment policies provide similar definitions of internal assessment, as ‘any assessment conducted internally by a provider of learning... [any] person, institution or body directly involved in the development and/or delivery of the learning being assessed’. The DBE policy focus in relation to internal assessment comprises school-based assessments, practical assessment tasks, and end-of-year examinations which are not exit examinations.

Both the SAQA (2014a) and DBE (2012) policies also define external assessment similarly. SAQA’s policy describes it as “assessment developed by a qualified and competent person or body not directly involved in the development and/or delivery of the learning being assessed” (*ibid.*:5). While the DBE’s policy states that external assessment is “any assessment activity, instrument or programme where the design, development and implementation has been initiated, directed and, coordinated by Provincial Education

Departments and the Department of Basic Education either collectively or individually” (*Op.Cit.:viii*) – these bodies are outside the learning delivery sites, which are schools..

### *Similarity 7: Principles*

Both the SAQA (2014a) and DBE (2012) assessment policies elaborate common assessment principles, including those of reliability, validity, fairness, sensitivity to language, accountability and transparency. The DBE’s policy elaborates in detail, the requirement of sensitivity to language, through the Language of Learning and Teaching [LOLT] sections; and accountability and transparency, particularly in terms of the feedback systems built into the moderation and monitoring processes, such as the teacher files.

### *Similarity 8: Implementation*

SAQA’s (2014a) assessment policy echoes much of what is contained in the DBE’s (2012) policy regarding specific implementation procedures, criteria and guidelines – which include a focus on aligning assessment with curriculum content, and particular learning outcomes and competences; recording, reporting, developing and implementing complaints and appeal processes, moderation, and monitoring.

## **Differences between the DBE and SAQA assessment policies**

Two differences were found between the SAQA (2014a) and DBE (2012) assessment policies.

### *Difference 1: Policy development*

While SAQA’s (2014a) assessment policy details its development process, the DBE’s (2012) policy does not do so.

### *Difference 2: RPL and CAT*

As part of ensuring fairness in assessment, SAQA’s (2014a) policy requires fair RPL and CAT processes; the DBE’s (2012) assessment policy does not refer to RPL and CAT.

## **Summary of the similarities between SAQA and DBE assessment policy**

The SAQA (2014a) and DBE (2012) assessment policies are largely aligned regarding purpose, objectives, scope, definitions of assessment, formal and informal assessment types, internal and external assessment, and the particular principles and procedures for implementing good assessment practice. The DBE’s (2012) policy does not detail its policy development process; neither does it refer to RPL and CAT.

### 5.3 RECOMMENDATIONS: SUB-PROJECT 1

Two sets of recommendations emerged from Sub-Project 1.

#### **Recommendation 1: Align RPL, CAT, and assessment policies**

To address the non-aligned aspects of SAQA, DBE, and Quality Council policies, it is recommended that:

- the DBE, SAQA, and the Quality Councils consider revisions of the affected policies; and
- SAQA sets up dialogue mechanisms to address any contested aspects, and possibly to develop criteria for exceptions.

#### **Recommendation 2: Develop an 'Implementation Plan for RPL and CAT'**

To ensure the aligned, system-wide implementation of RPL and CAT, it is recommended that:

- SAQA facilitates information-sharing events with NQF stakeholders to deepen understandings and agree on an 'Implementation Programme for RPL, CAT, and Articulation', and
- the NQF Implementation Framework and System of Collaboration be updated to include (a) RPL, CAT and assessment policy alignment, (b) implementation of the aligned RPL, CAT, and assessment policies, and (c) RPL and articulation data and reporting.

## 6. Sub-Project 2: Evidence of the Impact of SAQA and Quality Council Policies for the Recognition of Prior Learning (RPL), Credit Accumulation and Transfer (CAT), and Assessment

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The considerable extent of alignment between the Quality Council policies for the Recognition of Prior Learning (RPL), Credit Accumulation and Transfer (CAT), and assessment, and those of SAQA – as shown in Section 5 of this report – could be interpreted as a proxy for, or an indication of, the impact of SAQA’s policies. The Quality Council policies for RPL, CAT, and assessment were developed after those of SAQA; SAQA representatives made extensive inputs into these Quality Council policies; Quality Council representatives participated in the Reference Groups established by SAQA as part of the development processes for its RPL, CAT, and assessment policies, and in many cases these same representatives also participated in the development of the respective Quality Council policies.

Looking generally across the differences between the Quality Council policies for RPL, CAT, and assessment on one hand, and SAQA’s related policies on the other – as elaborated in Section 5 of the report – it appears that many of the differences are omissions which could be added to the Quality Council policies, without causing changes in the character or essence in these policies. In a small number of instances however, the differences are more substantial. Sub-Project 2 focused on the impact of SAQA’s policies for RPL, CAT and assessment, on the related work of the Quality Councils, and selected stakeholders in the three NQF Sub-Framework contexts. SAQA and Umalusi worked independently on this sub-project; Umalusi’s findings (Sections 6.2, 6.3, and 6.4 below) triangulate those of the SAQA research team.

Sub-Project 2 focused on the following questions:

- **SAQA Question (1B):** How did the publication of the SAQA policies for RPL, CAT, and assessment impact on the related work of the Quality Councils?
- **Umalusi Question (1):** How has the National Qualifications Framework (NQF) Act informed Umalusi’s policy development, and the development of the General and Further Education and Training Qualifications Sub-Framework (GFETQSF)?
- **SAQA Question (1C):** What impact have SAQA’s policies for RPL, CAT, and assessment had, on selected Quality Council stakeholders?
- **SAQA Question (1D):** What evidence is there, of the impact of RPL and CAT policies on Public Universities, in (a) University websites; (b) University Statutes; and (c) University Handbooks/ Yearbooks

## **6.1 METHOD AND SAMPLING FOR THE FIRST PART OF SUB-PROJECT 2: IMPACT OF SAQA POLICIES FOR RPL, CAT, AND ASSESSMENT ON THE WORK OF THE QUALITY COUNCILS**

SAQA researchers interviewed a sample of seven present and past senior policy developers in the Quality Councils (the interview schedules comprise Appendices 1-5 of this report).

## **6.2 FINDINGS AND ANALYSIS FOR THE FIRST PART OF SUB-PROJECT 2: IMPACT OF SAQA POLICIES FOR RPL, CAT, AND ASSESSMENT ON THE WORK OF THE QUALITY COUNCILS**

One Quality Council developed a framework for RPL and CAT in 2005 under the SAQA Act, and had conducted research to inform it. This policy was updated under the NQF Act. The related policy was developed within the Quality Council, with consultation across its units. While the NQF Act required this policy, and SAQA's corresponding policies were reported to have influenced it directly, at the end of the day, the respondents noted that there were differences, and that there had been difficulties in implementing the policy due to the nature of the Sub-Framework context.

The second Quality Council commenced its RPL and CAT policy development in 2014, taking it through many drafts as it consulted within and outside its organisation and integrated the inputs. SAQA's policies and SAQA research into RPL had been the starting points for this policy development. There had been extensive advocacy of the policy, and it was being implemented in the Sub-Framework context. However, the Quality Council was not monitoring this implementation closely.

The third Quality Council commenced its RPL and CAT policy development in 2015, working closely with SAQA staff as well as a stakeholder reference group. While SAQA's impact was integral to the development of these policies, some aspects remain, which are not aligned with SAQA's RPL and CAT policies. There had been some advocacy of the policy, and it was being implemented in the Sub-Framework context. However, the Quality Council was not monitoring this implementation closely.

Two of the Quality Councils developed assessment policies in response to the NQF Act requirements, and reported being guided and impacted by SAQA's assessment policy; the third had a long history assessment policy, and reported influencing SAQA's assessment policy.

## **6.3 METHOD AND SAMPLING FOR THE SECOND PART OF SUB-PROJECT 2: UMALUSI ANALYSIS OF THE IMPACT OF SAQA POLICIES FOR RPL, CAT, AND ASSESSMENT, ON RELATED UMALUSI POLICY DEVELOPMENT**

Umalusi's documentary analysis regarding the impact of SAQA's (2013/2016; 2014a; 2014b) policies for RPL, CAT, and assessment, on the development of its related policies, was divided into three stages, based on the type and status of the documents reviewed.

### ***Umalusi method of analysis Stage 1, starting with the NQF Act***

First, the NQF Act (No. 67 of 2008) was thoroughly analysed, as it forms the foundational legislation governing the NQF as a whole, and in an overarching way, the inter-relationships between NQF stakeholders. The NQF Act specifies the requirements for the functioning of the NQF as a system, and it is in this founding legislation that the requirements for the Quality Council policies on RPL, CAT, and Assessment are articulated. The NQF Act requires SAQA to “develop policy and criteria, after consultation with the Quality Councils (QCs), for assessment, recognition of prior learning and credit accumulation and transfer” (NQF Act, 13(1)(h)(iii)). Similarly, the Act also requires each of the Quality Councils to “develop and implement policy and criteria, taking into account the policy and criteria contemplated in section 13(1)(h)(iii), for assessment, recognition of prior learning and credit accumulation and transfer” (NQF Act, 27(1)(h)(ii)).

### ***Umalusi method of analysis Stage 2, focusing on SAQA’s policies for RPL, CAT, and Assessment***

Stage two of Umalusi’s document review consisted of an analysis of SAQA’s (2013/2016; 2014a; 2014b) policies for RPL, CAT, and assessment. These documents represent the second tier of the framework that gives RPL, CAT, and assessment their form under the NQF Act. SAQA’s role as a coordinating body for the NQF is defined both by legislation and by policy, and the policies of interest developed by SAQA provide the direct link between operational policies at Quality Council level, and the NQF Act at the higher legislative level. It was necessary to analyse the SAQA policies because the related policies at Quality Council level need to be linked to the respective SAQA’s policies.

### ***Umalusi method of analysis Stage 3, focusing on Umalusi’s policies for RPL, CAT, and Assessment***

The final level of Umalusi’s document analysis involved working with the policies for RPL, CAT, and assessment developed by Umalusi in fulfilment of the requirements of the NQF Act. These policies formed the primary unit of analysis for Umalusi’s first research question, which focused on the development, underlying intentions, and implementation of the policies. The policies were analysed independently in their own right, and also in relation to the NQF Act and SAQA’s policies for RPL, CAT, and assessment. Attempts were made to trace the thinking from the original imagined future represented by the NQF Act, through SAQA’s policies, into the policies that govern the operational aspects of RPL, CAT and assessment in the GFETQSF context.

### ***Umalusi’s sample for documentary analysis***

Data from the three stages of Umalusi’s analysis were collected and collated to understand the impact of the NQF Act on the policies and work of Umalusi in the GFETQSF context. Table 16 shows the documents consulted in Umalusi’s analysis.

**Table 16: Policy documents analysed for Umalusi Research Question 1**

<b>Background Policy</b>		
<b>Title</b>	<b>Date Published</b>	<b>Original Source</b>
National Qualifications Framework Act, 2008 (No. 67 of 2008)	2008	Government Gazette
General and Further Education and Training Quality Assurance Act, 2001 (Act No. 58 of 2001) (as Amended in 2009)	2001	Government Gazette
Articulation Policy for the Post-School Education and Training System in South Africa	2017	Department of Higher Education and Training (DHET)
Recognition of Prior Learning (RPL) Coordination Policy	2016	DHET
Policy for the Implementation of RPL	2013 reprinted 2016	SAQA
Policy for Credit Accumulation and Transfer (CAT)	2014	SAQA
Policy and Criteria for Designing and Implementing Assessment for NQF Qualifications and Part-Qualifications, and Professional Designations in South Africa	2014	SAQA
<b>Umalusi Policy</b>		
Quality Assurance of Assessment: Policies, Directives, Guidelines and Requirements	As amended 2016	Umalusi
Umalusi Policy for the Implementation of the Recognition of Prior Learning (RPL) for the General and Further Education and Training Sub-Framework	As amended 2013	Umalusi
Policy for Credit Accumulation, Exemption, Recognition and Transfer	As amended 2015	Umalusi

## **6.4 FINDINGS AND ANALYSIS FOR THE SECOND PART OF SUB-PROJECT 2: UMALUSI ANALYSIS OF THE IMPACT OF SAQA'S POLICIES FOR RPL, CAT, AND ASSESSMENT, ON RELATED UMALUSI POLICY DEVELOPMENT**

Data analysis for the first research question posed by Umalusi, namely *How has the NQF Act informed Umalusi's policy development in the area of RPL, CAT and Assessment* was conducted in a tiered approach. Initially a documentary analysis was conducted to determine the scope of the policies in question, and to analyse these policies in the context of the wider policy framework. The second tier of analysis involved semi-structured interviews with key policy-makers who had been directly responsible for the creation of the policies in question, in order to determine both underlying policy intent as well as a sense of how successfully the policy-makers believed the policy intent/s had been achieved. This section of the report presents a synthesis of the findings for both tiers of the analysis.



## ***Document and interview analysis***

### **Background: NQF legislation**

The investigation began with a thorough analysis of the NQF Act (No. 67 of 2008), with an emphasis on the interrelationships embedded in that legislation. The NQF Act envisions a collaborative system with direct reporting lines that ultimately culminate with the Minister of Higher Education and Training (MHET) as the final responsible party for the NQF as a system. While the MHET oversees the NQF, the Act mandates SAQA to play a coordinating role within the system, while the Quality Councils provide oversight and policy-making in the NQF Sub-Framework contexts. In this way the NQF Act realises the diversity of the Sub-Framework contexts within a single integrated system.

This diversity within the NQF system and the associated collaboration fostered was a key improvement achieved with the replacement of the SAQA Act (No. 58 of 1995) with the NQF Act (No. 67 of 2008). Under the NQF Act there is recognition that the NQF Sub-Frameworks need to be 'fit for purpose' and serve the needs of the sectors in which they are embedded. At the same time, the need for the unified system envisioned in the SAQA Act, was elaborated under the NQF Act, in which the diverse stakeholders in the Sub-Framework contexts collaborate to form a single integrated education and training system that draws strength from its diverse institutions.

The promulgation of the NQF Act required that the founding legislation for Umalusi, the General and Further Education and Training Quality Assurance (GENFETQA) Act (No. 58 of 2001 – amended in 2008), be modified and updated to take cognizance of the new way in which the NQF system was managed. Under the GENFETQA Amendment Act of 2001, Umalusi is mandated to be the quality assurance body for qualifications at NQF Levels 1–4 in the General and Further Education and Training Qualifications Sub-Framework (GFETQSF) context. Umalusi's responsibilities include monitoring and reporting on the performance of Provincial Education Departments (PEDs), and the adequacy and suitability of qualifications and standards in the sector. Umalusi also quality assures exit point assessments in this sector; certifies learner achievements; and accredits private schools, Technical and Vocational (TVET) Colleges, and Adult Basic Education and Training (ABET) or Adult Education and Training (AET) centres. Umalusi's mandate includes accrediting at its discretion, private assessment bodies.

The NQF Act (No. 67 of 2008) expanded the mandate of Umalusi quite significantly, in that the organisation moved from being a band education and training quality assessor (responsible for qualifications at NQF Levels 1-4) to being one of three Quality Councils, alongside the Council on Higher Education (CHE) and the Quality Council for Trades and Occupations (QCTO). The expansion of Umalusi's mandate included the responsibility for the development and management of the GFETQSF. In terms of Paragraph 27 of the NQF Act, Umalusi as a Quality Council must, in respect of its Sub-Framework:

- develop and manage its Sub-Framework of qualifications;
- advise and make recommendations related to the GFETQSF to the Ministers of Basic Education (MBE), and Higher Education and Training (MHET);

- consider and agree to NQF Level Descriptors, and ensure that these descriptors remain current and appropriate;
- propose policy for the development, registration and publication of qualifications for its Sub-Framework, in accordance with requirements outlined in the NQF Act;
- ensure the development of such qualifications – and part-qualifications – as necessary for the sector, along with indicators of appropriate measures for the delivery and assessment of learning achievements, and recommendations to SAQA for registration;
- propose policy for quality assurance within the Sub-Framework;
- ensure the autonomy, integrity, and credibility of quality assurance for qualifications registered on its Sub-Framework;
- maintain a database of learner achievements and related matters;
- conduct or commission, and publish research on issues relevant to the development and implementation of the Sub-Framework;
- provide information regarding the Sub-Framework to the public; and
- perform any other functions required by the NQF Act, or functions consistent with this Act, which the relevant Minister may determine.

The DHET and SAQA policies cited in Table 16 above were consulted in order to establish the degree of congruence between Umalusi's key policies on RPL, CAT, and assessment, and the relevant SAQA and DHET policies. Ultimately it was necessary to establish that the single integrated system envisioned by the NQF Act has in fact been carried through in policy.

### **How did the NQF Act inform the development of Umalusi policy, and the GFETQSF in general? Interview findings**

The interview sample consisted of three senior executives from the targeted assessment bodies (the Department of Basic Education [DBE]), the Independent Examinations Board (IEB), and the South African Comprehensive Assessment Institute (SACAI)), and eight policy-makers from Umalusi. Of the eight policy-makers, four were no longer employed at Umalusi, but were interviewed since they had had direct influence of the policy process at the time that the policies were written. In total, 11 interviews were conducted.

The main finding was that there was a surprising degree of congruence between the documents analysed, or at least that there was a lack of significant contradiction across the policies. Initially this finding was unexpected, but the eight interviews with the policy-makers revealed that this brace of policies were introduced in a manner that followed and codified systemic trends that were *already in existence* in some form. This view represents an understanding by the majority of policy-makers interviewed, that no policy is introduced in a vacuum, and that systems which require governance are often well established either in earlier policy, or by practice.

This finding is an important insight, since there seems to have been recognition (tacit or otherwise) by the policy-makers interviewed, that systems often already exist outside of

regulation, and that policies do not always *create* the systems that they regulate. A policy can create a degree of certainty, and can shape the management of a system, but when policy is introduced in a previously unregulated or under-regulated space, ideally it needs to take account of the *de facto* operating environment, with its best practice and underlying research, that predates the introduction of the policy concerned.

As revealed in the interviews with Umalusi's policy-makers, a key weakness of the SAQA Act of 1995 was that in its quest to create a unified education system, it failed to take into account sufficiently the pre-existing structures for education that existed before its introduction; under the SAQA Act (No. 58 of 1995) the diverse needs of the different sectors of the education system were not well understood. In this failure to recognise that unity of purpose can be achieved through diversity of practice, the SAQA Act led to a period of "policy paralysis" as one of the policy-makers interviewed put it. While *de facto* operations continued within the three main sectors of the education and training system (General, Occupational, and Higher Education), operations could not always achieve congruence under the SAQA Act, which focused heavily on the newly introduced 'Unit Standards'. This created a tension in that implementing agencies across the system had to "pay lip service to the current policy" as an interviewee put it, while the operations within the sector remained often unchanged and in contradiction with the SAQA Act, since many existing qualifications in the sector did not lend themselves to a Unit Standards-based approach.

The policies in the current analysis were written at different times, and with the benefit of hindsight, it is clear that the current policy framework is generally well integrated and embraces the diversity of operations and needs within the GFETQSF context.

### **Umalusi analysis of the impact of the NQF on Umalusi Policy for Assessment, RPL, and CAT**

#### *NQF Act and Umalusi's Assessment policy*

Umalusi's (2016) policy on assessment (Umalusi Quality Assurance of Assessment: Policies, Directives, Guidelines and Requirements) is by far the most established of the three policies of interest for this research question. The document runs to some 267 pages and details every aspect of how the assessment system/s within the GFETQSF context operate and are quality assured. Significantly, this policy reflects practice that has developed throughout the history of Umalusi and its progenitors (the South African Certification Council [SAFCERT], and before that, the Joint Matriculation Board [JMB]). When Umalusi was established by the GENFETQA Act of 2001, it took over the responsibilities of SAFCERT, as well as a brace of additional quality assurance responsibilities.

Crucially, it must be understood that the primary responsibilities of SAFCERT revolved around the management of school exit-point assessments in the country, and indeed that organisation had taken over this responsibility from the JMB which had been established in 1918. Thus, when Umalusi was passed the baton of responsibility for the quality assurance of this assessment, it was able to draw on almost a century of experience and policy development in this arena. This unparalleled 'institutional memory' and well-

developed policy apparatus in the sphere of assessment, meant that Umalusi's assessment policies have been in existence since long before the organisation's official establishment in its current form, in 2001. Thus, in contrast with Umalusi's RPL and CAT policies, Umalusi's current assessment policy resulted from revising an already well-developed and established policy, to bring it in line with current legislation and practice.

The historical trajectory of Umalusi's assessment policy lends it a comprehensive and nuanced approach born out of many revisions over time, based on practical experience. While this is understood as a great strength of the document, it also represents an area of potential contestation in the face of policy shifts in the wider environment. With an assessment system that is so well established and fully understood, policy-makers encounter a scenario in which fundamental systemic changes (such as the promulgation of the SAQA and NQF Acts) can be very difficult to comply with, given the existing structures. A particular example of this was the Unit Standards-based approach under the SAQA Act, which did not fit with the established school-level methodologies which relied on comprehensive curricula and final assessments of competence. Indeed, it is argued that this is an example of policy introduction that did not take full cognisance of existing systemic arrangements, or full account of the unique needs in the Sub-Framework context.

As such, the assessment policy trajectory within Umalusi seems to have been generally uninterrupted by the SAQA Act, and has become re-aligned with national policy and legislation since the promulgation of the NQF Act. All the policy-makers interviewed made the point that during the time of the SAQA Act, Umalusi championed the ideas of curricula and summative assessments, and the documentary analysis suggests that these arguments have had a significant effect within the wider GFETQSF system. Indeed, the majority of the GFETQSF qualifications registered on the NQF currently, follow the approach of curricula and assessment in line with Umalusi's original position in favour of this approach. The key takeaway from these findings is that legislation and policy need to take account of the lived reality of the sector that they seek to regulate. One of the interviewees phrased the problem metaphorically, saying that, "if you want to steer the ship, you don't need to build a new boat every time".

Given that much of the assessment related policy was in place in some form before the promulgation of the NQF Act (No. 67 of 2008), there was no significant change of direction for Umalusi in the sphere of assessment. Rather the documentation was refined and targeted more specifically at the qualifications on the GFETQSF.

#### *NQF Act, SAQA's CAT policy, and Umalusi's policy for CAT*

In contrast with the extensive nature of Umalusi's assessment policy, Umalusi's CAT policy is surprisingly short, and provides only broad conceptual guidance around how CAT must be dealt with in the GFETQSF context. The primary thrust of Umalusi's CAT policy is to define the nature of credit accumulation, exemption, recognition and transfer, with an emphasis on research to investigate the relationships between qualifications and between other credit-bearing activities (such as single courses, part-qualifications, incomplete qualifications, and others). On an initial reading, the policy is very open in nature, and does

not fully articulate the possible relationships that it regulates. When read in conjunction with the directives for certification for the various qualifications on the GFETQSF, it becomes clear that much of the work envisioned in this policy has been completed and is well codified in these directives.

When interviewing the Umalusi policy-makers, it emerged that the intent behind the CAT policy was a desire to provide a framework for regulating relationships and recognition between qualifications on the NQF – both for those already on the GFETQSF, and also at the points of intersection where these qualifications articulate with others on one of the two other NQF Sub-Frameworks. As one of the Umalusi policy-makers said in an interview, “the aim of this policy is flexibility”, and when read in that context, the thinking behind the document becomes clear.

Where Umalusi’s assessment policy had a long history and was among the most established policies of its kind in South Africa, Umalusi’s CAT policy was developed as a direct result of the promulgation of the NQF Act, and this fact is highlighted in the foreword of the document. As such, the Umalusi policy-makers interviewed noted that they were at pains to write a policy that could be flexible enough to remain relevant in what was perceived to be a “shifting policy environment”, but also flexible enough to deal with the myriad possible inter-relationships between qualifications. The policy-makers pointed out that the document is indeed not only a CAT policy, and instead also seeks to provide for Credit Exemption and Recognition as reflected in its name. This point should not be overlooked, as the accumulation and transfer of credits from one qualification to another is not the only possible relationship or vehicle for transfers. It is possible that learning has taken place which does not conform to a straight transfer of credits (also understood as set amounts of notional hours of learning) but nonetheless such learning can exempt an individual from needing to complete a comparable learning programme with comparable outcomes only for the purposes of gaining a set amount of credits. Similarly, it may be possible to recognise qualifications and part-qualifications as articulating with other qualifications or providing essential fundamental learning that is contained within another qualification, even without carrying credits across from one qualification to another.

The thinking behind this process is sound, and indeed the policy notes that the nature of the relationships and transfers between qualifications is “determined by the nature and structure of the receiving qualification and is established through an evaluation of their comparability at curriculum level” (Umalusi, 2015:13). Many of these relationships have been investigated by Umalusi, and are provided for in the Directives for Certification, and the policy is flexible enough to accommodate future qualifications or currently opaque relationships between existing qualifications, should they emerge.

While the policy is commendable in its desire to provide for flexibility so that it might avoid what one interviewee termed “a bureaucratic straight jacket”, in some cases it lacks detail that for user-friendliness needs to be foregrounded in the document. While several of the policy-makers interviewed noted that in the thinking behind the inclusion of terminology around Credit Exemption and Credit Recognition, little is made in the document itself of these additions – indeed, these terms remain largely undefined and unelaborated. This is

surprising, given that the policy-makers interviewed have argued that they were explicit in their intent in providing these alternative pathways for learners who could not engage directly in straight transference of earned credits. The recognition of policy-makers that learners are able to follow unique paths through, into, and out of the South Africa education and training system emerged strongly in the interview data, but is only lightly sketched in the policy as written, and further development of these aspects is recommended.

SAQA's (2014) CAT policy was published immediately before the publication of Umalusi's policy. While Umalusi was able to ensure that the Umalusi policy was not in conflict with that of SAQA, the concurrent developmental trajectories of the documents meant that Umalusi could not rely on the SAQA document during the development of its own CAT policy. Nonetheless, the Umalusi policy was guided by both the NQF Act and SAQA's policy, and the synergy is visible.

#### *NQF Act, SAQA's RPL policy, and Umalusi's RPL policy*

Umalusi's RPL Policy (Umalusi Policy for the Implementation of the Recognition of Prior Learning (RPL) for the General and Further Education and Training Sub-Framework, 2013), like the Umalusi CAT policy, was developed explicitly as a result of the promulgation of the NQF Act (No. 67 of 2008). Like the CAT policy, this policy was developed with flexibility in mind. Particularly given the relatively recent nature of the promulgation of the NQF Act at the time this policy was being developed, it was an important consideration for the policy-makers to create 'agile' policy that could accommodate the rapidly changing nature of the NQF landscape. Unlike the CAT and assessment policies, however, in this instance a majority of the Umalusi policy-makers felt that this policy had met with only limited success in its current form.

As argued by several of the policy-makers interviewed, due to the fact that the majority of qualifications quality assured by Umalusi are qualifications of 'first entry' to the system, it is often very difficult to implement RPL in this context. As such, Umalusi's RPL policy in essence focuses on a summative assessment of skills in order to provide either RPL for access to a given programme of learning, or for recognition of previously acquired learning for the purposes of awarding credits. Umalusi's RPL policy notes that:

*Within the context of the GFETQSF, the recognition of prior learning is the evaluation and acknowledgment of the knowledge and skills that a candidate has gained to enable access to qualifications on the GFETQSF or to further education and training (Umalusi, 2013: Paragraph 36)*

The policy goes on to detail the four principles governing RPL in the GFETQSF context, provided in full below.

- a. Credit will be granted for prior learning through an approved formal examination (which tests the standards as set out in the prescribed curriculum).
- b. Access to qualifications would be specified in the minimum admission requirements for each qualification, thus providing for immediate recognition of previous, certified learning.

- c. Accredited institutions offering these qualifications are entitled to take into consideration RPL for purposes of access and placement only. Institutions will be required to submit RPL policies as part of their accreditation applications.
- d. Where access is restricted in terms of admission to basic qualifications, the GFETQSF would make provision for alternate qualifications which provide equal access to further education and training opportunities. For example, the [National Senior Certificate] NSC which is a basic, institutional qualification has admission requirements and a progression route which prevent it from being readily accessed out of school. The [National Senior Certificate for Adults] NASCA would have open access [for] adults (Umalusi, 2013: Paragraph 38)

Particular attention should be paid to paragraph (d) above, since contained within this paragraph are the seeds of Umalusi's thinking around RPL. As described by the policy-makers interviewed, because of the dearth of certificated qualifications at NQF Levels 1-3, almost the only way to achieve RPL in the GENFET sector is through summative assessments that cover the skills and knowledge assumed to be associated with those levels. In addition, the Level Descriptors (SAQA, 2012a) for these levels of the NQF in particular are deemed to be inadequate, as the differences between these particular adjacent levels are thought not to be significant enough to guide teaching, learning and assessment. This criticism of the Level Descriptors was limited to these levels, as the policy-makers interviewed acknowledged that the differences between the higher NQF levels were well articulated and understood.

In the interviews it was revealed that it was due to these perceived difficulties within the GFETQSF that policy-makers within Umalusi began the development of the National Senior Certificate for Adults (NASCA) – specifically referenced in the extract above. According to the interviewees, this qualification was to a large extent the vehicle through which Umalusi intended to use RPL for adult learners, at first entry without requiring the learners first to obtain a General Education and Training Certificate (GETC) or equivalent qualification. In other words, the NASCA was a shortcut that could be taken by adults with prior non-formal and informal learning and work experience. The NASCA was intended to be an examination-on-demand structure, with no tuition or portfolios of previous work required, and integrated subjects that can be assessed in a small number of examination sittings. At the time of writing, the NASCA had been curriculated and registered on the NQF, but the DHET had not rolled out the qualification in the system, due to financial constraints. As one policy-maker bluntly put it during the interview process, "The failure of the NASCA represents the failure of RPL in the GENFET sector."

Umalusi's RPL policy development predated SAQA's RPL policy, and while both were developed using the NQF Act as a guide, it is unlikely that Umalusi's RPL policy development was tied to that of SAQA's. A summary of the findings for Umalusi Question 1 is shown in Table 17 below.

**Table 17: Summary of the findings for Umalusi Question 1**

**Finding 1:** The promulgation of the NQF Act (No. 67 of 2008) allowed for the inclusion of diverse sectors within an integrated education and training system while maintaining each sector's diversity. This represents a key impact on the education and training system and has allowed for specialisation in the three NQF Sub-Framework contexts while maintaining a co-ordinated system through overarching national policy and a system of collaboration. Due to the legislative mismatch between Umalusi's historical qualifications and operations under the SAQA Act (No. 58 of 1995), Umalusi took on something of an 'activist' role in arguing for the need for curricula coupled with final assessments of learning in opposition to the unit-standards approach at the time. These efforts probably contributed towards steering the course of the development of the NQF Act in this regard, which recognised the need for diverse operating methodologies within the NQF Sub-Framework contexts.

**Finding 2:** There is substantial high-level coherence between the assessment, RPL, and CAT policies of Umalusi, SAQA, and the DHET. Much of this seems to have arisen out of the experience of working with the SAQA Act, and that many contradictions in the system were identified and rectified with the promulgation of the NQF Act. The current policy framework is well integrated and embraces the diversity within the various NQF Sub-Frameworks. While there is general alignment, there are specific areas of contradiction that need to be addressed.

**Finding 3:** Umalusi's assessment policy is historically coherent and has been brought back within the legislative stable with the promulgation of the NQF Act. Under the SAQA Act, there was insufficient recognition of how qualifications within Umalusi's mandate functioned, and in that era the assessment policy was not in line with the Unit Standards-based approach. With the promulgation of the NQF Act, Umalusi's original position around assessment was re-asserted, and thus the existing policy could be amended to be completely in line with SAQA's without a large-scale re-write. In this instance the policy maintained its pre-NQF Act (and to some extent its pre-SAQA Act) form, and was used as a basis for Umalusi inputs into SAQA's assessment policy.

**Finding 4:** Umalusi's CAT policy is premised on the idea of flexibility within a stable policy framework. Where clear pathways exist within and between the qualifications certificated by Umalusi, such relationships have been captured in the certification policies for each qualification. This overarching CAT policy allows for previously unseen relationships to be investigated and considered for credit accumulation and transfer. The terms *Credit Exemption* and *Credit Recognition* need to be defined in the CAT policy, and the reasons for their inclusion should be elaborated. The policy intention in including these terms in the title of the policy was clearly explained by several of the policy-makers interviewed, but without adequate definitions and explanations of these terms, and elaboration of their intended function in the policy, it is unlikely that the processes envisioned to be associated with these terms can be fully realised in the system. This policy was written concurrently with that of SAQA, and as such, did not draw on SAQA's policy, although the Umalusi policy developers made inputs into SAQA's policy. While the policies are aligned at a macro level, since both stem from the NQF Act, the SAQA policy contains more detail about the envisioned pathways than does the Umalusi policy.

**Finding 5:** Umalusi's RPL policy, similarly to its CAT policy, was designed with 'policy agility' in mind. Thus, the policy aims to allow Umalusi enough regulatory space to investigate unique relationships between qualifications and previously learned non-formal and informal skills and to come to access or advanced placement-related decisions that 'make educational sense'. In all instances, RPL would be concluded with the completion of a written assessment by a learner in order to demonstrate that learners had indeed acquired the requisite levels of skill to have their prior learning recognised and/or



certificated. This policy was also developed during the same time-frame as that of SAQA's RPL Policy, and thus although discussions at a sectoral level were undertaken in terms of general principles, Umalusi's policy was largely developed with the NQF Act as a guiding document rather than the SAQA-developed policy. Umalusi's policy errs on the side of flexibility, while the SAQA policy contains more detail about the envisioned roles, responsibilities and relationships in RPL.

**Finding 6:** Since the GFETQSF comprises qualifications on NQF Levels 1-4, Umalusi relies on the NQF Level Descriptors for positioning learning at these levels. Several of the policy-makers interviewed noted that RPL is made extremely challenging in this space due to the Level Descriptors for NQF Levels 1-3 being too vaguely differentiated, so that it becomes challenging to discern substantive differences between these levels. As such, the policy-makers interviewed noted that RPL at these NQF levels has generally been unsuccessful, also due to the lack of qualifications against which RPL processes could take place.

**Finding 7:** In order to mitigate the effects of the challenges associated with RPL in the GFETQSF context, the Umalusi policy-makers interviewed noted that they lobbied for the creation of a qualification against which RPL could be conducted for adults, without requiring adult learners first to complete qualifications at NQF Levels 1-3. This "RPL vehicle" was envisioned to be the NASCA, a qualification at NQF Level 4 that is equivalent to the National Senior Certificate (NSC) but requires only final examinations in order to verify competence and provide certification. The implementation of the NASCA has been delayed due to funding constraints, and in the GFETQSF environment where RPL is a challenge to implement, the policy-makers interviewed argued that, "the failure of the NASCA represents the failure of RPL" in the GFETQSF context.

### ***Triangulation of the Umalusi findings for Umalusi Question 1***

Umalusi's findings were compared with those from SAQA's analysis of the alignment of Umalusi's RPL, CAT and assessment policies, with SAQA's corresponding policies. The SAQA analysis also showed broad alignment between the policies. The anomalies of (a) lack of up-front specification of RPL routes, and references to previously certified learning but not to non-formal and informal learning (especially for adults), and (b) the fact that the NASCA is put forward as a formal examination not requiring formal preparation, are not in line with the SAQA policy. These issues were raised by the Assessment Body representatives interviewed by Umalusi (See Section 6.9 of this report).

## **6.5 METHOD AND SAMPLING FOR THE THIRD PART OF SUB-PROJECT 2: GENERAL IMPACT OF NATIONAL POLICIES FOR RPL/CAT/ARTICULATION ON PUBLIC UNIVERSITY STATUTES AND RULEBOOKS**

In order to assess the extent of alignment to SAQA's RPL, CAT, and assessment policies in the documents of key gatekeepers in the NQF system – the 26 public Universities – the Statutes of these public Universities were analysed. The intention was to assess the extent of alignment and triangulate this information with University responses to surveys on the experienced effects of SAQA's (2013/16; 2014b; 2014a) policies for RPL, CAT, and assessment, on aspects of the institutions' work.

Upon initial analysis, it appeared that the Statutes were generally aligned to SAQA's policies: there was nothing obvious blocking or enabling articulation, RPL and CAT. The researchers deepened the analysis to include University Handbooks/ Yearbooks/ Rulebooks. The analysis was undertaken in three phases.

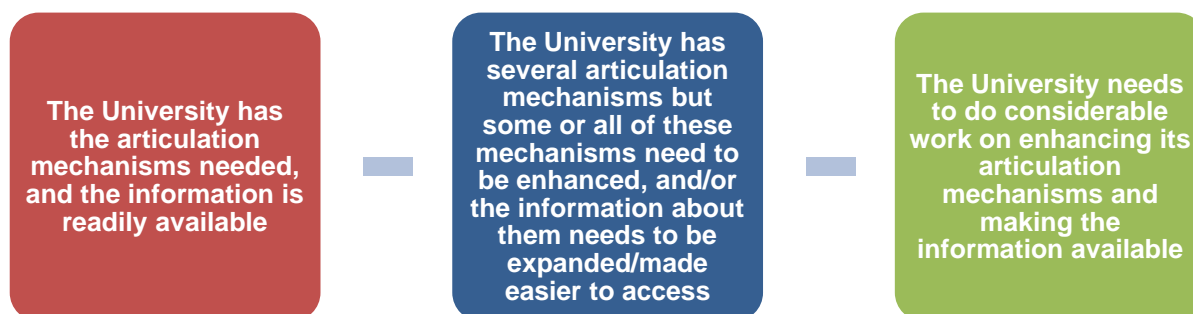
### ***Phase 1: Analysis of RPL/CAT/Articulation information on Public University websites***

This phase involved an analysis of all 26 public University websites in South Africa to determine the availability of the following documents and information:

- a) Statutes;
- b) General rules;
- c) Yearbooks/Handbooks/Rulebooks;
- d) Prospectus/Calendars;
- e) CAT/RPL/Articulation policies;
- f) Alternate access criteria/RPL;
- g) Funding information;
- h) Career advice facility;
- i) Ombud; and
- j) General student support information.

### ***Phase 2: Rating of mechanisms that public Universities have, to support access and articulation***

Drawing on the results from Phase One, researchers developed a rating criterion for mechanisms that Public Universities had in place to support access and articulation (see Figure 4).



**Figure 4: Rating mechanisms of public Universities that support access and articulation**

### ***Phase 3: Analysis of selected Handbooks/ Yearbooks in public Universities***

The intention was that the third phase would involve an analysis of selected University Handbooks/ Yearbooks/ Rulebooks, for their support of, or barriers to, RPL and articulation.

Public Universities have between three and ten Faculties each, and these Faculties are made up of a number of Schools and Departments. Each Department has Yearbooks, Handbooks or Rulebooks or combinations of these, for both undergraduate and postgraduate studies. The length/number of pages of these Handbooks/ Yearbooks/ Rulebooks varied, and ran up to a maximum of 600 pages. The timeframes for the 2017 NQF Impact Study therefore did not permit the researchers to analyse enablers and barriers in a fair sample of the Handbooks/ Yearbooks/ Rulebooks. An attempt was made to assess general patterns in these books, and to look at a small randomly selected sample in detail.

## 6.6 FINDINGS AND ANALYSIS FOR THE THIRD PART OF SUB-PROJECT 2: GENERAL IMPACT OF NATIONAL POLICIES FOR RPL/CAT/ARTICULATION ON PUBLIC UNIVERSITY STATUTES AND RULEBOOKS

This section of the report presents findings on the impact of national policies for RPL/ CAT/articulation on public University Statutes and Rulebooks according to three categories (indicated by sub-headings):

- a) Analysis of RPL/CAT/articulation information on public University websites;
- b) Rating of mechanisms that public Universities have, to support access and articulation; and
- c) Analysis of selected Handbooks/ Yearbooks/ Rulebooks in public Universities.

### ***Analysis of RPL/CAT/articulation information on public University websites***

Each of the 26 public University websites was examined in detail to determine the availability of documents/information on: (a) Statutes; (b) general rules; (c) Yearbooks/ Handbooks/ Rulebooks; (d) Prospectus/ Calendars; (e) CAT/RPL/articulation policies (f) alternate access criteria/RPL; (g) funding information; (h) career advice facilities; (i) ombud facilities; and (j) general student support information. The following observations were made, based on the analysis of the University websites (see Table 18).

**Table 18: RPL/CAT/articulation information available on public Higher Education Institution websites (n=26)**

<b>RPL/CAT/articulation criteria</b>	<b>No. of public HEI</b>
Statute available on University website	16
General Rules available on University website	21
Availability of Yearbooks/ Handbooks/ Rulebooks ( <i>includes RPL + articulation information</i> )	13
Availability of Prospectus/ Calendar ( <i>with administration dates</i> )	25
Availability of University CAT/RPL/articulation policy	10
Alternative access criteria/RPL information available on University website	20
Funding information available on University website ( <i>loans, bursaries</i> )	26
Career advice facility information available on University website	23

Ombud facility information available on University website	5
General student support information available on website ( <i>IT, library, accommodation, transport</i> )	24

## **Statutes**

Sixteen Universities (n=26) had published their Statutes on their websites; it was easy to locate these. For the remaining ten, Statutes were not available on the websites, but it was relatively easy to access these through a general internet search.

## **General Rules**

Twenty-one Universities (n=26) were found to have General Rules, of which ten referred to General Rules being included in either the General Prospectus/ General Calendar/ General Handbook, or general admission requirements/ student yearbooks/ information brochures for prospective students. The General Rules contained information on admission, registration, fees, attendance, curricula, qualification requirements, RPL, exemptions, and so forth. Five Universities did not have General Rules.

## **Yearbooks/ Handbooks/ Rulebooks**

It was found that 13 Universities (n=26) did not have Yearbooks or Handbooks or Rulebooks. However, six Universities were found to have Handbooks, three had Yearbooks, and one had a Rulebook. Three Universities were found to have both Yearbooks and Handbooks. The Yearbooks were found to include general information, information on the qualifications offered, rules for programmes, faculty regulations, admission requirements, and information on the recognition of modules and RPL. Handbooks were found to have academic and administrative information, and provide detail on faculties, programmes, and coursework. The Handbooks also contained information on RPL and the exemption from subjects for which credits had been received through RPL. Rulebooks appeared to be similar to Handbooks, and contained general and faculty rules, admission requirements, and information on the recognition of credits and exemption from modules.

## **Prospectus/Calendar**

Twelve Universities (n=26) were found to have a Prospectus; seven had Calendars; six had both Prospectus and Calendar. One University had neither Prospectus nor Calendar. The Prospectus documents contained general admission and registration rules and regulations; general information on qualifications and requirements; course content fees, academic dates and so on. Some Calendars contained academic dates whilst others comprised general information, policies, and academic rules.

### **CAT/RPL/articulation policy**

Sixteen Universities (n=26) did not have policies for articulation/RPL/CAT. The other 10 had either policies or guidelines for RPL, or both. Five of the 10 made these policies/guidelines available on their websites.

### **Alternate access criteria/RPL**

The majority of Universities (20, n=26) had *information* (as opposed to policies) on alternative access criteria/RPL, on their website; six Universities did not present this kind of information. For the Universities with information on RPL, details were located mainly under admission requirements, in Yearbooks, or in Faculty Handbooks.

### **Funding information, career advice facility and general student support information**

All University websites (n=26) provided information on funding available; 23 provided career advice service information; 24 made general student support information available.

### **Ombud function**

The majority of Universities (22, n=26) did not have Ombud facility information available on their websites; four had dedicated Ombud Offices. These offices were independent and their role was to investigate students' academic complaints.

### ***Rating of mechanisms that Universities have, to support access and articulation***

The information from the previous section – obtained on (a) Statutes; (b) general rules; (c) Yearbooks/ Handbooks/ Rulebooks; (d) Prospectus/ Calendars; (e) CAT/RPL/articulation policies (f) alternate access criteria/RPL; (g) funding information; (h) career advice facilities; (i) ombud facilities; and (j) general student support information – was used to determine ratings for Universities, to indicate the level of access and articulation-support the Universities provided. Researchers examined in detailed, information in the following three categories, to inform the rating score (see Table 19).

- a) Availability of CAT/RPL or articulation policies.
- b) Information on alternative access criteria/RPL.
- c) Existence of an Ombud facility.

**Table 2: Rating mechanisms of Universities that support access and articulation**

<b>RATING MECHANISMS</b>	<b>University has the articulation mechanisms needed, and the information is readily available</b>	<b>University has several articulation mechanisms but some or all these mechanisms need to be enhanced, and/or the information about them needs to be expanded/ made easier to access</b>	<b>University needs to do considerable work on enhancing its articulation mechanisms, and making the information available.</b>
<b>NUMBER OF UNIVERSITIES</b>	<b>10</b>	<b>11</b>	<b>5</b>

Universities had to have two or more of the above criteria in order to fall in the first rating column. For the second column, Universities had to have information only on ‘alternative access criteria/RPL’ but no ‘CAT/RPL or articulation policies’ and no ‘Ombud facility’. The third column comprises Universities where none of the above criteria were available on their websites.

It was encouraging to find that ten Universities met either two or all of the criteria, which included development/publication of ‘CAT/RPL/articulation polices’; information on ‘alternative access criteria/RPL’; and ‘an Ombud facility’.

A further 11 Universities only provided information on ‘alternative access criteria/ RPL’; it is hoped that these entities are now developing policies for CAT, RPL, and articulation.

Five Universities did not have ‘CAT/RPL or articulation policies’; neither did they have information on ‘alternative access criteria/RPL’ or ‘an Ombud facility’. It is hoped here too, that these Universities will develop, publish and implement, policies for RPL, CAT, and articulation.

### ***Analysis of selected Handbooks/ Yearbooks in public Universities***

An attempt was made to analyse a sample of the Handbooks and Yearbooks of faculties and departments in public Higher Education Institutions (HEI). Given the scope and the timeline of the 2017 NQF Impact Study, and the high number of such books, however, this task proved too large: there are thousands of Handbooks and Yearbooks each year, and each covers the rules for hundreds of qualifications. In addition, the qualifications are not always comparable. A careful read of three randomly selected Handbooks showed that in a single department, the RPL and articulation requirements for the different qualifications offered, could differ. In a single department, for some qualifications there was a statement ‘RPL/Alternative access is available’, while for others there was a different statement, ‘Alternative access is at the discretion of the University Senate’. For the remainder of the qualifications, there were no references to alternative access. The numbers of qualifications with no mention of alternative access differed across Departments within the Faculties studied. In one Department, for example, there was RPL for over half of the qualifications offered; in another, very few mentioned RPL possibilities. What was clear, was that while a University Statute may promote RPL and articulation, the Handbooks and

Yearbooks at the University may contain rules that present barriers to RPL and articulation. Systematic requirements for HEI to report to the CHE on their RPL and articulation initiatives, may go some way towards addressing these issues.

### ***Summary of findings on the general impact of national policies for RPL/ CAT/ Articulation on public University Statutes and Rulebooks***

#### **Summary of RPL/ CAT/ articulation information on public University websites**

- Sixteen Universities (n=26) had published their Statutes on their websites and the documents were easy to locate.
- The majority of Universities (21, n=26) had General Rules.
- In all, 13 Universities (n=26) did not have any Yearbooks or Handbooks or Rulebooks; six had Handbooks, three had Yearbooks; one had a Rulebook; three had both Yearbooks and Handbooks.
- Twelve Universities (n=26) had a Prospectus; seven had Calendars; six had both Prospectus and Calendars; one had neither a Prospectus nor a Calendar.
- Sixteen Universities (n=26) did not have policies for CAT/RPL/articulation'10 had either policies or guidelines for RPL. Of the latter, five made the policies/ guidelines available on their websites.
- The majority of Universities (20, n=26) presented information on alternative access criteria/RPL on their websites.
- Most Universities (22, n=26) provided information on funding, career advice and general student support, on their websites.
- The majority of Universities (22, n=26) did not have Ombud facility information on their websites; a small number (four) did provide this information.

#### **Rating public Universities mechanisms to support access and articulation**

- Ten Universities were found to have the articulation mechanisms needed, and to present this information in a readily available way, on their websites; these Universities had two or more of: (a) development/publication of 'CAT/RPL or articulation policies'; (b) information on 'alternative access criteria/RPL'; and (c) 'an Ombud facility'.
- 11 Universities had several articulation mechanisms but some or all of these mechanisms needed to be enhanced, and/or the information about them needed to be expanded/made easier to access. These Universities provided information on 'alternative access criteria/RPL'.
- Five Universities needed to do considerable work on enhancing their articulation mechanisms and making the information available. These Universities did not have 'CAT/RPL or articulation policies'; information on 'alternative access criteria/RPL'; or 'Ombud facilities'.

## 6.7 METHOD AND SAMPLING FOR THE FOURTH PART OF SUB-PROJECT 2: EXPERIENCES AND IMPACT OF NATIONAL RPL/CAT AND ASSESSMENT POLICIES FOR PRIVATE ENTITIES

To ascertain the effects of the SAQA and Quality Council policies for RPL, CAT, and assessment on the work of a representative sample of stakeholders across the NQF Sub-Framework contexts, (a) the Statutes and Rulebooks of Public Universities were analysed (see Sections 6.5 and 6.6 of this report), and (b) the SAQA researchers developed a ‘e-surv’ survey for a range of mainly private entities (See Appendices 6 to 8 to this report).

The survey focused on the following areas:

- a) awareness of SAQA’s policies for RPL, CAT, and assessment and how the entities became aware of the policies;
- b) awareness of the Quality Councils’ policies for RPL, CAT, and assessment and how the entities became aware of these policies;
- c) how RPL is conducted and reported in the entities surveyed;
- d) the impact of RPL on the work of the entity surveyed (before and after 2010, i.e. under the SAQA Act and NQF Act respectively);
- e) the implementation of CAT in the entity;
- f) whether assessment practices had changed due to the NQF Act; and
- g) challenges experienced in relation to RPL, CAT, and assessment.

The surveys were emailed to a sample of private Higher Education Institutions (HEIs) and Colleges, Skills Development Providers (SDPs), and employers during the months of September and October 2017, as shown in Table 20. The specific sampling was selected in order to produce manageable responses as explained in the footnotes below.

**Table 20: Sampling frame for the private entities surveyed on the impact of SAQA and Quality Council policies for RPL, CAT, and assessment**

Sector	Population	Intended sample	Attained sample
Private HEIs and Colleges <sup>29</sup>	622	153	38
SDPs <sup>30</sup>	809	100	5
Employers <sup>31</sup>	61	61	8

<sup>29</sup> The CHE provided a list of all private accredited HEIs, which numbered 99. A list of private accredited Colleges) was sourced from Umalusi’s website; 523 were found, and a random 10% sample was selected.

<sup>30</sup> The QCTO provided a list of Skills Development Providers (SDPs), Development Quality Partners (DQPs), and Assessment Quality Partners (AQPs); samples of 10% were selected per category of entity.

<sup>31</sup> Surveys were sent to all members registered with Business Unity South Africa (BUSA) and the Black Business Council (BBC). All 61 members including BUSA and BBC were included in the sample.

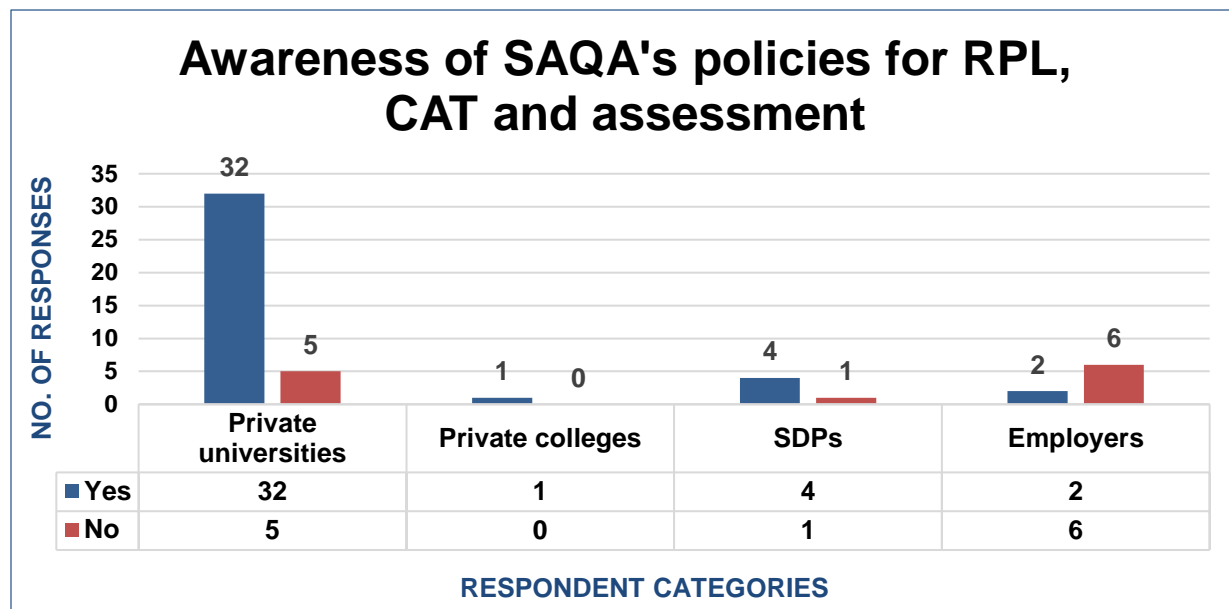


## 6.8 FINDINGS AND ANALYSIS FOR THE FOURTH PART OF SUB-PROJECT 2: EXPERIENCES AND IMPACT OF NATIONAL RPL, CAT AND ASSESSMENT POLICIES FOR PRIVATE ENTITIES

The response rate to the surveys for this part of the project, of between 5%-25%, was low and cannot therefore be seen to present a full picture of the stakeholder experiences and reported impact. However, the responses received provide a rough sketch of some of the perceptions, views, and realities of the surveyed stakeholders. For a fuller view, more extensive efforts would need to be focused on specific groups of stakeholders.

### ***Awareness of SAQA policies for RPL, CAT and assessment***

It was found that there were various levels of awareness of SAQA's policies for RPL, CAT, and assessment. Figure 5 below shows the actual numbers of respondents who claimed to be aware of these SAQA policies. Thirty-two private HEIs (n=37), one private College, four SDPs (n=5) and two employers (n=6) were aware of SAQA's national policies.



**Figure 5: Awareness of SAQA's policies for RPL, CAT, and assessment**

A number of private HEIs (32) elaborated on how they learnt of SAQA's policies for RPL, CAT, and assessment, saying that they learned of the policies from the relevant websites (SAQA and DHET), through consultative meetings, workshops, conferences, and some private HEIs received newsletters/memos or the policies and guidelines were emailed/mailed to them. Other private HEIs found out about the policies through their routine work activities that involved applications for accreditation, the development of organisational policies, and the review of institutional policies, amongst other ways.

Of the four SDPs aware of these SAQA policies, one reported having seen the CAT policy published in a Government Gazette; another noted that a Sector Education and Training Authority (SETA) had provided an update and supporting documents, and that they had

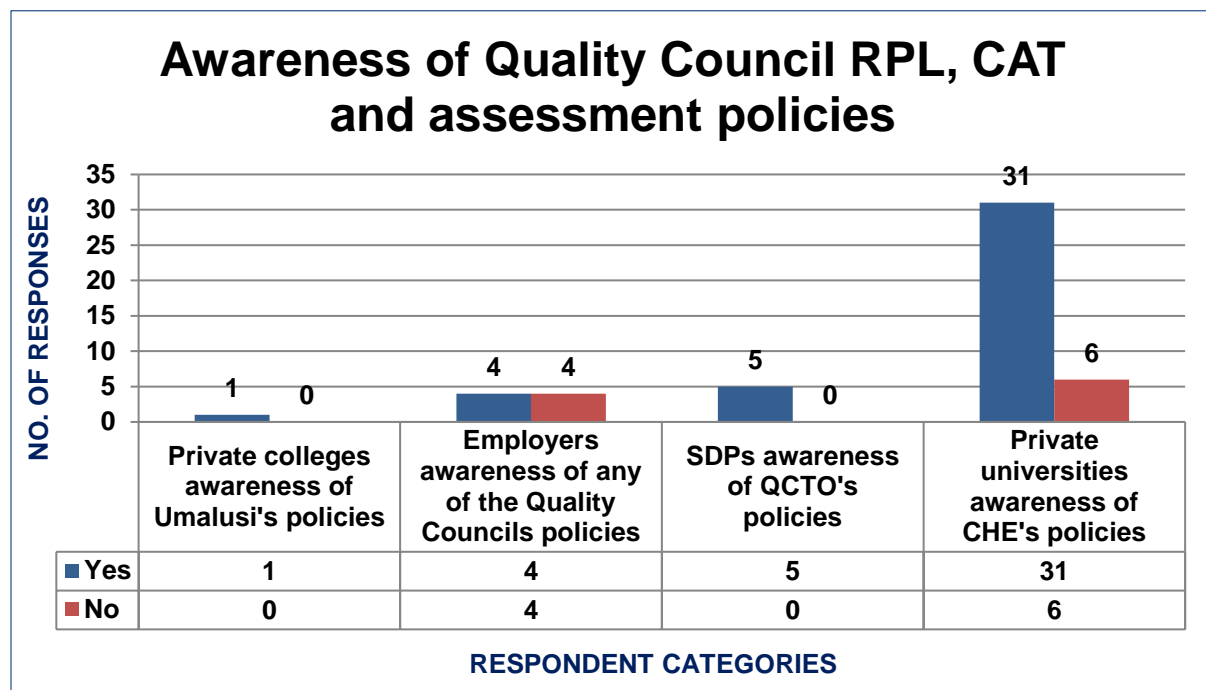
also become aware through the National Artisan Moderation Body (NAMB) sessions. The other two SDPs learned about the policies through the nature of the work of their organisations (accreditation-related matters).

Concerning employers, (two, n=8) described how they had learned about the respective policies: one had been alerted through ‘school’ (no additional detail was provided in the actual response in the survey) and through ‘meetings and forums’ (again, this was the response; no detail was provided regarding the nature of meetings and forums). The second employer indicated that subject content experts are required to keep abreast of SAQA’s legislative changes. Furthermore, employers also attend SETA briefings and forums where they are updated on policy changes<sup>32</sup>.

### **Awareness of the Quality Councils’ policies for RPL, CAT and assessment**

Private HEIs were asked a question specifically on their awareness of the CHE’s policies for RPL, CAT, and Assessment, SDPs about the related QCTO policies, employers about all the related Quality Councils’ policies, and Private Colleges about the related Umalusi policies.

Figure 6 below shows the responses regarding awareness of the Quality Councils’ policies for RPL, CAT, and Assessment.



<sup>32</sup> The e-survey approach preserves the anonymity of the respondents, and therefore prevents follow-up interviews.

## **Figure 6: Awareness of the Quality Councils' policies for RPL, CAT, and assessment**

### **Private Higher Education Institutions (HEIs)**

Of the 37 private HEIs that responded to this question, 31 reported that they knew of the CHE's policies for RPL, CAT, and assessment. These HEIs explained how they became aware of these policies; SAQA researchers have grouped the responses into six categories, namely:

- (a) attendance at meetings and workshops (CHE, SAQA, SETA);
- (b) publication of policies on the CHE and/or SAQA websites;
- (c) distribution of policies to institutions;
- (d) processes for preparing documents for accreditation;
- (e) annual institutional reviews and alignment processes; and
- (f) policy development processes.

Twenty private HEIs reported that they had learned about the CHE's policies through attendance at meetings and workshops; or publication of policies on the CHE/SAQA website(s), or they had received the policies directly from the CHE. There were also a few responses noting policy learning through education colloquia; networking with people who have published books on RPL and who work with RPL; recent amendment of the Acts that support the work of DHET, SAQA, and the QCTO; and feedback from the CHE in its Annual Report. Interestingly, one respondent was a member of the National Review Committee of the CHE.

### **Private College**

The single private College respondent stated that it was aware of relevant policies through newsletters and by working through the policies themselves.

### **Skills Development Providers (SDPs)**

All five of the SDP respondents knew about the QCTO's policies for RPL, CAT, and assessment. They had learned about the policies through the application process for accreditation with the QCTO (in 2016), attendance at QCTO workshops and forum meetings, and briefings with SETAs. One of the SDP respondents pointed out that the QCTO policies were published in Government Gazettes.

### **Employers**

Half (four) of the employer respondents reported that they knew about some of the Quality Councils' policies for RPL, CAT, and assessment. They heard about the policies through participation in National Artisan Moderation Body (NAMB) SETA meetings, and other workshops; the CHE and some of the SETAs had forwarded the policies to them; one of the employers had undertaken research on media reports. Another employer had recently been accredited and then learned of these policies, was familiar with the RPL and assessment policies (regarding 'formative assessment' and the External Integrated

Summative Assessment [EISA]), but 'CAT' as a concept was new, even although the idea of credit accumulation was not entirely new.

## ***Implementation of RPL in private Higher Education Institutions (HEI)***

### **RPL structures/staff dedicated to RPL provision**

The private HEIs were asked to elaborate on the RPL structures/dedicated staff in their institutions, for RPL processes. There were 33 responses to this question.

Two private HEIs provided their staff numbers responsible for RPL: one reported two staff members from the Admissions Department who oversee the RPL processes; in the second HEI, an RPL Committee consisted of all the lecturers (four in total). Three private HEIs reported not having dedicated staff for RPL (in this HEI, no RPL was taking place). One private HEI explained that it did not have dedicated staff members who focus only on RPL provision and that furthermore, RPL cases were few in number, and were dealt with by the Faculty as a whole and coordinated by the Faculty Head.

Five responses referred to institutional RPL or Admission policies. Amongst these, the following were reported:

- RPL policies set standards for the structures in place and staff involved;
- RPL is conducted in accordance with the institutional RPL policy and is handled by an internal panel appointed by the Chief Operating Officer;
- the RPL policy describes structures and procedures;
- the RPL policy, procedure and process provide clear guidelines to full-time and part-time staff, current and future students and all internal and external Quality Management Committee members for [the] admission via RPL to programmes; and
- RPL is specified in the Admissions Policy and is dealt with by the Registrar and considered by the Academic Committee.

Typical RPL staff mentioned were 'the RPL panel', 'Academic Head', 'RPL Facilitator/Academic Development Coordinator', 'Subject Specialist' and/or 'Academic Board member' and 'Admissions Coordinator'.

### **RPL processes in private Higher Education Institutions (HEIs)**

Thirty-two private HEIs responded to this question on RPL processes. Six of the 32 responses related to policy development. Four private HEIs emphasised that their RPL frameworks outline their RPL processes; example responses included: (1) "RPL processes are in the policy document, which is available to all Heads of Department and staff concerned"; (2) "policies on RPL are informed by the guidelines provided by SAQA and CHE"; (3) "RPL processes are outlined in the institutional RPL policy", and (4) "[We have] CAT policies which conform to the requirements of all regulatory bodies". One private University was in the process of developing its institutional RPL policy; another had institutional RPL policy in place, but had not yet conducted any RPL due to the lack of

requests for RPL from students. In all of the reported cases, the RPL processes consisted of the students applying for a specific programme, submitting a specific Portfolio of Evidence, which is reviewed and assessed by relevant committees. A summary of the types of responses from the private HEIs regarding RPL processes, follows.

### *RPL structures and responsibilities*

- “The Head of Academics at each campus reviews the application for RPL at registration, and thereafter submits it to the Dean who reviews the application and the evidence provided. The Dean, with the Assessment Committee, provides the campus with the outcome. Appeal cases are referred to the Academic Board.”
- “The office of the Registrar is responsible for RPL and in some cases, manages the RPL process whilst the Deans arrange assessments.”
- “The written request for RPL is submitted to the Academic Head and is presented to a meeting of the Exemptions Committee (consisting of the Registrar, Academic Dean and all HODs). In other Universities, evidence is reviewed by an internal Assessment Committee led by the Education Head and the recommendations are submitted to the Academic Board for approval.”
- “In some Universities, RPL documents are reviewed by the Student Recruitment, Admission and Selection Committee, and a supplementary interview with the applicant is conducted. In other institutions, the lecturing staff consider the evidence and compare it to the outcomes of the programme and level, which the student is applying to. Also, in some Universities, the RPL Committee makes a recommendation to the Quality Committee, which will inform the student of the outcome.”
- “The portfolio and documents are assessed by the RPL Panel (Academic Head, RPL/CAT Facilitator/Academic Development Coordinator, subject specialist and/or Academic Board member). The decision of the RPL Panel is ratified by the Management Committee. The candidate receives a response advising of the panel’s decision via the Admissions Coordinator. For appeals, the candidate must complete the necessary form within ten working days of issue of the notification of the outcomes of the assessment, and state the reasons for appeal and provide any further evidence.”

### *RPL application and requirements*

- “Students are provided with RPL forms which indicate the process and documents/evidence required. Students submit the application fee, form, and a PoE [Portfolio of Evidence] in accordance with institutional policy requirements.”

- “Applicant submits a breakdown of formal, non-formal, and informal learning that might qualify them for exemption from modules. For non-formal or informal learning, candidates are required to submit evidence of the volume and level, usually a PoE [Portfolio of Evidence]. An academic is assigned to assess the portfolio to determine from which courses (if any) the applicant merits exemption. In some cases, the assessment takes the form of an interview (i.e. an oral examination).”
- “In some Universities, RPL is considered on the basis of evidence indicating activities undertaken – acknowledgement of training, references, entrance test results and a verbal interview. Repetition of learning is avoided and students do not need to attend classes in areas for which he/she has already achieved competence. However, there must be sufficient evidence of such prior learning, and the candidate undergoes the assessments that other students are subjected to, or equivalent assessments.”
- “Other forms of non-formal prior learning can be seen as equivalent to the prescribed minimum requirements for admission. Applicants may have knowledge, skills and competencies gained through non-formal or workplace learning that can be recognized as relevant, provided it meets the programme’s outcome requirements.”
- “Admission pathways are assessed on an individual basis for those who seek credit-bearing recognition or transfer of modules at a Higher Education and Training (HET) level. It entails the submission of appropriate documentation of results, transcripts, Degree or Diploma certificate, programme outlines, practical or written work, and evidence of workplace experience, so that the content alignment can be assessed.”

### *Assessment*

- “Appropriate assessment tools are developed so that the competencies of candidates can be assessed. The ‘claimed’ prior learning is verified by means of authentic and relevant documentation/evidence (e.g. PoE [Portfolio of Evidence]).”
- “Each subject in the programme course for which exemption is applied, is evaluated in terms of NQF level, number of credits, subject content and Exit Level Outcomes (ELOs). When fulfilment of the requirement is not clearly demonstrated, the applicant may be invited for an interview by an evaluation panel or granted access to an examination in the subject, to demonstrate that the requirements are satisfied.”
- “The Senate/Academic Board considers RPL candidates on a case-by-case basis, granting the candidate provisional acceptance on successful completion of an appropriate assessment.”

## Numbers of RPL candidates in private Higher Education Institutions (HEIs) over the past five years

In all, 29 private HEIs provided approximate numbers of their RPL students; two HEIs reported not having any RPL students. The numbers of RPL students reported ranged from zero to over 100 candidates. Table 21 below provides the actual numbers of students provided by each responding private HEI.

**Table 21: Numbers of RPL candidates provided by private HEIs (n=29)**

No. of candidates	No. of private HEIs providing information
Zero candidates	2
1-5 candidates	11
6-10 candidates	4
11-25 candidates	3
60-100 candidates	2
100+ candidates	3
Insufficient information provided	4

## Percentages of students private Higher Education Institutions (HEIs) would consider for admission/advanced standing via RPL

In all, 31 private HEIs indicated the percentages of students who could be considered for admission/advanced standing via RPL. The vast majority (23 private HEIs) said 10%. Further related comments were (1) that “each case is assessed on merit and the actual proportion of students involved”; and (2) “the 10% is based on CHE guidelines, as legislated in the Higher Education Quality Council (HEQC) Criteria for Programme Accreditation”. One University considered 5% of cohorts of RPL; another said that it considered 50%.

Four private HEIs did not provide percentages. Of these, one said “none”. Another reported that it offered “Higher Certificates and Diplomas for school leavers with little room for applying advance standing/admission through RPL”. A further private HEI noted that “it [RPL] has not been determined yet”; and another commented that “the percentages [of RPL candidates] are not that significant”. A further two private HEIs considered all [RPL] applications received: the first had no experience with RPL, and the second did not limit the numbers of RPL candidates to percentages, but rather gave anyone who qualified, an opportunity as appropriate.

## ***Implementation of CAT in private Higher Education Institutions (HEIs)***

### **Accommodation of CAT**

There were 36 responses on how CAT is accommodated in private HEIs. Three of the 36 had not made use of CAT; an additional four referred to national policies as follows.

- “CAT is an enabling policy that is closely related to the revised SAQA National Policy for the Implementation of the Recognition of Prior Learning (RPL) (2013), and the revised SAQA National Policy and Criteria for Designing and Implementing Assessment for NQF Qualifications, Part-qualifications and Professional Designations (2014).”
- “CAT is implemented within the context of the NQF Act 67 of 2008 within South Africa; RPL and CAT processes are outlined in the institutional RPL and CAT policies that conform to the requirements of all regulatory bodies.”
- “CAT is done in accordance with CHE guidelines published in 2016.”
- “The [HEI] has prioritised the CAT policy for review and adoption by management.”

The detailed processes regarding CAT are summarised below from the various responses.

#### ***CAT applications***

- “Candidates complete the CAT form and pay the prescribed application fee prior to being considered for the CAT application, and they submit the necessary portfolios and other documentation (e.g. details of the curriculum followed).”
- “[The] student applies for CAT through a formal letter. The Manager engages with the candidate who completes a CAT application form and submits relevant learning/evidence done at a DHET-registered and CHE-accredited institution.”

#### ***CAT Documentation***

- “A full certified transcript is required in all cases from the previous institution. Students have to submit evidence of achievement at a previous accredited and registered institution.”
- “Vertical articulation is only used if an applicant applies for a higher qualification and the submitted transcripts have been thoroughly perused at the Admissions Committee.”



## *CAT Assessments*

- “Universities use a variety of self-designed assessment methods to determine the academic value of prior achievement. Credits are assigned on the learner management system and taken into account upon students finalising their studies.”
- “Concerning theoretical subjects, the alignment of the programmes should be considered by the relevant theory lecturers concerned in assessing the programme modules and written assessment, made available by the applicant. Should this not be completely satisfactory, additional assessments would be set and completed by the applicant.”
- “Some institutions verify the accreditation status of the other institution, using the DHET Register for South African Qualifications or equivalent national registers (foreign qualifications) and in cases of uncertainty, the applicant is advised to apply to SAQA for an evaluation of a foreign qualification.”

## *Credits*

- “Most, if not all institutions allow only a 50% transfer of credit. In other words, a maximum of 50% of the credits of a completed qualification may be transferred to another qualification (vertically or horizontally between/within institutions).”
- “The accumulated credits that a student has requested to transfer are analysed by the Programme Coordinator (PCO) and the Academic Board to ascertain the level of similarity and relationship between the qualifications and the specific subject curricula. It is emphasised that a full qualification cannot be earned through CAT.”
- “Credit is assessed [in] the programmes studied and their content (especially with practical subjects), to assess that the level of competencies aligns with those of the programme applied for.”
- “The qualification completed is used as formal learning that took place and credits are awarded towards the new qualification, enabling the student to complete the qualification within a different timeframe, provided that all requisites are met. Due to the nature of the qualifications being offered by the provider, the subject content is similar for overlapping subjects and the learning can be transferred to the new qualification. Again, credits given do not exceed 50% of the total amount of credits for the qualification.”

- One private HEI highlighted the importance of ensuring that the knowledge gained is aligned with the credits and is relevant to the qualification that the student wants to enrol for. In this case, the HEI recognises relevant credits with a maximum of 120 credits.
- “The Academy recognises prior learning where a candidate has completed part(s) of the programme at another institution or an aligned discipline. The rule of 50% credits is applicable and students cannot be granted exemption for more than 50% of the credits through CAT.”
- “Where the same module(s) has been successfully completed at another HEI that is both registered and accredited, the student would be exempted from submitting the relevant assignments. Where the modular outcomes are similar or overlap by at least 60% to those of a module successfully achieved at another registered and accredited HEI the student would be exempted from submitting any assignments. Credit transfer will be considered for subject areas in relation to the qualification, and the modules that make up the qualification, if the subject areas coincide with the modules that the student chooses to register. A maximum of 50% of the credits of a completed qualification at another accredited and registered (HEI) may be transferred to a qualification.”

### *Appeals*

In some private HEIs, appeals are referred to the Academic Board. In others, the portfolio and documents are assessed by the CAT panel. In the event of an appeal against the decision of the CAT panel the candidate should complete the necessary form within ten working days of issue of the notification of the outcome of the assessment, stating the reasons for appeal and providing any further applicable evidence.

### **Numbers of students permitted for CAT in private Higher Education Institutions (HEIs)**

Twenty private HEIs provided the approximate numbers of students permitted for CAT. Of these HEIs, three did not receive requests for CAT, and one could not provide data due to challenges with its capturing system. The number of students permitted in different HEIs annually for CAT ranged from two to roughly 200. Table 22 below shows the approximate numbers of students permitted for CAT, provided by each responding HEI.

**Table 22: Reported number of students permitted for CAT in private HEIs (n=20)<sup>33</sup>**

No. of students	No. of private HEIs
Zero students	3
1-5 students	7
6-10 students	2
11-50 students	4
135-325 students	2
1 000 students	1
No information provided	1

### **Impact of the QCTO'S policy on RPL, on the work of Skills Development Providers (SDPs)**

SDPs were asked to elaborate how the QCTO policies impacted on their work; how RPL was accommodated in their organisations; whether there were differences before and after 2010, and to provide the numbers of RPL candidates, where possible. There were four responses to this question.

One SDP reported that it was not accredited to offer RPL, due to its lack of capacity to deliver RPL services. A second SDP had “not tried and tested the policy as yet”. A third had attended an RPL information session at NAMB in 2017, where RPL was explained in detail. Cost implication issues were raised and it was noted further, that the SDP would understand the effects of RPL on its budget, at the end of its fiscal cycle. The fourth SDP responded that the RPL policies had impacted on its work in terms of the way in which RPL had been implemented since 2010.

### **Impact of the Quality Councils' policies for RPL, CAT, and assessment on the work of employers**

Three employers discussed the impact of the policies for RPL, CAT and assessment on their work. The first responded that the policies provided opportunities to align institutional policies with the policies of the legislative bodies, and that “it extends services and product offerings to clients and allows for participation in the national skills development initiative”. This respondent said that “employers need to resource themselves accordingly to ensure that staff and management are appropriately capacitated. They need to provide career advice services and have mechanisms in place to ensure people are not treated unfairly.”

The second employer respondent reported that the QCTO policies have not yet impacted on its work but that they would do so in the future. This employer reported that the QCTO policies would ensure that assessments are conducted in accordance with SAQA and QCTO requirements to ensure that quality and integrity are upheld.

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<sup>33</sup> The numbers provided in this Table 22 do not refer to a sliding scale; the numbers refer to those provided by the private HEIs.

The third employer noted that it was busy with the [related] consultation process and had not yet implemented the policies.

## **Regarding changes in assessment practices**

### *Private Higher Education Institution (HEI) responses*

Private HEIs were asked to elaborate on whether assessment at their institutions had changed as a result of the NQF Act and related assessment policies. There were a total of 36 responses to this question. Seventeen private HEIs reported that their assessment practices had not changed; 16 noted that their practices had indeed changed under the NQF Act. These responses included that assessment development processes and physical assessments had become more rigorous in nature, and that assessments were of better quality. RPL assessments were reported to be based on the quality of evidence submitted against set criteria – and that if evidence was lacking, “candidates then [do additional work to] complete [the] assessments of the learning programmes that they want to achieve”. Amongst the responses of these HEIs, were comments to the effect that quality management systems “had been designed in line with assessment policy under the NQF Act” and that “all academic policies will be reviewed and restructured to ensure that quality is managed in all academic processes”.

### *Moderation of assessment in private Higher Education Institutions (HEIs)*

Private HEIs reported having broadened under the NQF Act, the number of moderators that review examinations, assignments, and learning material content, and had also contracted staff for additional assessment and lecturing support. One private HEI commented that, “as assessments have improved, so too has the moderation of all Higher Education qualifications offered”. Another private HEI noted that, “internal moderation has also improved and external examination is implemented”. And another said that, “the formalisation of pre and post-assessment internal moderation for formative assessments and summative assessments are externally moderated.”

### *Private Higher Education Institution (HEI) comments on changes in the NQF Sub-Frameworks*

Two private HEIs commented on changes regarding the Quality Councils. One noted that the establishment of the QCTO had introduced new requirements. The second reported that the HEQSF requirements had changed over time, and had become stricter over time. Theoretical and clinical assessments were applied according to the new HEQSF levels; the assessments focused on the critical cross-field outcomes, as well as on theory, and on psychomotor and affective skills for each practical assessment.

### *Private Higher Education Institution (HEI) comments on the NQF levels*

One private HEI noted that the NQF levels are key considerations in CAT assessments. Another stated that assessment was guided by the exit-level outcomes of the qualification,

and the NQF level of the specific modules that make up the qualification. A third HEI commented that module outcomes and assessment criteria for each programme were designed according to the NQF Level Descriptors.

#### *Skills Development Provider (SDP) responses*

SDPs were asked whether assessment at their institutions had changed after 2010 and if so, how it had changed. There were five responses: two addressed the question directly. One SDP noted that internal assessment had not changed, and that the institution continued to apply formative and summative assessments to both theory and practical subjects, and that the EISA has to be implemented in order for students to be evaluated for the Trade Tests. Another SDP noted that assessment *had* changed since 2010 and was more time-consuming due to the large amount of paperwork needed, as well as the loading of the credits onto the online system. Furthermore, there had been problems with the online system, which resulted in delays for institutions. The remaining three SDP respondents reported respectively that (1) a student's previous experience was considered in the assessment process and credit was awarded to informal prior learning; (2) assessment currently takes more time and is costly to develop; and (3) assessment policies were kept up to date to meet legislation requirements.

#### *The private College on assessment*

The private College which responded to some of the other questions in the questionnaire, did not respond to the question regarding if/how assessment had changed after 2010.

### **Challenges reported by institutions in relation to RPL, CAT, and assessment policies**

Some 18 key challenges were reported by private HEIs, regarding the SAQA and Quality Council policies for RPL, CAT, and assessment. These challenges are summarised below.

#### *Interpretation of policies*

One private HEI response was that, "the same policies from the different regulatory bodies are not in agreement. The interpretation of the RPL, CAT, and assessment requirements and ensuring common understanding has proved to be challenging at the institution. Furthermore, determining appropriate assessment mechanisms for RPL admissions and credit have presented some difficulty". A second private HEI noted "the lack of explicit guidelines or parameters on how to translate achieved learning into the 'currency' of credits and to then make decisions about their value in terms of levels, and the total credits the learning represents in order to admit or achieve a student application from candidates from unregistered schools."

#### *Nature of assessments*

One private HEI raised concerns about the subjective assessment of qualifications between local institutions, "some students have little difficulty in being accepted to further

their studies at European Universities and struggle to gain admission to higher qualifications at South African Universities”. Another private HEI noted challenges in adapting theoretical assessments to the relevant NQF level – at NQF Level 1, it did not apply RPL or CAT. A third private HEI noted difficulties in ensuring balance between maintaining the integrity of the institute and the qualification, while not disadvantaging the student.

#### *Challenges with documentation*

One private HEI noted that students who previously studied at other institutions had indicated how complicated the process was, to get the relevant documentation from those institutions. A second HEI wrote that candidates for RPL and CAT expect feedback within a day and get frustrated when the institution requests additional documents and evidence for RPL and CAT.

#### *Language-related problems*

One private HEI noted that students who were well-developed in the language of instruction and assessment, differed very much from those students for whom the language was a second or third language. Assessment results were greatly influenced by students’ language skills.

#### *Nature of Higher Education Institutions (HEIs)*

Two private HEIs noted that in small institutions, it could become burdensome to implement additional comprehensive policies and procedures for RPL and CAT. In addition, external examinations were difficult to implement as there were few academics in the niche markets.

#### *RPL-related challenges reported*

Specific RPL challenges reported, included problems relating to students who had difficulties adjusting to the learning environment as mature students. A second reported challenge was the labour-intensive nature of assessing each applicant’s prior learning (this comment was mentioned twice). And lastly, challenges were noted concerning implementation of the CHE’s RPL policy whereby only 50% of the qualification could be given for exemption – “RPL candidates applying are employed and do not have the time to complete the requisite 50% that is left over for the completion of the qualification.”

#### *CAT-related challenges reported*

For CAT, the reported challenges included differences in the knowledge that is taught across different institutions. Secondly, there were difficulties verifying whether foreign qualifications are accredited: although it was noted that SAQA offers this service, it was also noted that there are time delays in this service, that pose the risks of losing potential students. Thirdly, the challenge was noted, of the expectations of applicants, especially

where module names were similar to those in other HEIs but the learning outcomes differed, and CAT was therefore not approved. Fourth, there were problems with credits where module content and outcomes, levels and credits were not always in line with the module allocation of programmes, and there were mismatches between what institutions do at different levels, for CAT.

#### *Balance of use: RPL, CAT, and assessment policies*

The single private College which responded, noted that it uses the assessment policy more often than the policies for RPL and CAT. Assessment was a daily task, where students were assessed in line with the Curriculum and Assessment Policy Statements (CAPS).

#### *Challenges noted by Skills Development Providers (SDPs)*

SDPs raised three challenges they had experienced. The first difficulty related to the financial restrictions on organisational structures (a moratorium had been placed on establishing additional structures) – and when structures did not exist, then the required personnel could not be appointed. A second issue raised was that the Quality Councils do not embrace RPL equally, and “the CHE usually relegates RPL only to occupational qualifications and (the institution) do not recognise occupational qualifications for the purpose of exemptions”. A third SDP noted that it welcomed qualification review as the content (of qualifications) may not have kept up with the changes in the business and technology landscape – and noted that NAMB/SETA transitional arrangements appeared to be unclear at times.

#### *Challenges noted by employers*

Two employer responses elaborated on challenges experienced. One noted four challenges, as follows.

- Firstly, the employer wrote that although RPL was critical for the development of an equitable Higher Education system that facilitates student access, mobility and progression, and there are policies in place, RPL is still underutilised and undervalued, possibly since it required resources and investment to implement, and there were insufficient incentives.
- Secondly, the employers noted that “it has been a challenge to unpack how the transition will be managed between the QCTO's processes and structures, and those of the SETAs, and the communications are not always clear” [referring to the pre-QCTO, and current QCTO models for occupational qualifications respectively]. “The communications from various SETAs are conflicting”.
- Thirdly, “the duration of a Learnership and the administrative load can deter some workplaces from implementing Learnerships more regularly.”

- The fourth challenge related to the lack of clear online learning policies and implementation, “the take-up of Learnerships and skills programmes would be higher, and the impact greater, with a general acceptance of online learning or e-learning as a method/channel of learning.”

The second employer’s response pointed out that the employer’s trade association did not have a Human Resource division; nor did it offer skills development directly. However, its members had fully-fledged Human Resource divisions and were encouraged to provide Skills Development programmes.

## **Comments on other NQF-related issues**

### *Additional comments by private Higher Education Institutions (HEIs)*

There were four ‘additional comments’ in the section provided for this purpose on the NQF and NQF-related matters.

- The first was quite positive, it was about the value of the NQF, “[The NQF] is important to ensure transformation, address redress, and contribute to the Human Resource development of the country; it is a user-friendly tool that is influential in programme design and articulation, and the NQF levels set a wonderful framework for education. Furthermore, it provides easy access to all the relevant information through its website (qualifications, information about verification, and information on providers and government policy documents).”
- Secondly, there was an observation that “it [the NQF] is valuable to align practices and policies among institutions. SAQA should hold an annual workshop to update and create greater awareness on the various aspects related to the NQF.”
- Third, concerns were raised about the registration of programmes on the NQF, “where the communication between CHE, SAQA and DHET seems to get crossed. CHE and SAQA should use the same codes for qualifications, so that programmes are identifiable and that the DHET issues registration certificates with the correct details.”
- Concerns were also raised about learners who receive SETA stipends and enrol for Adult Education and Training (AET) Level 4, fail the Independent Examinations Board (IEB) Level 4 exam, and then proceed to an NQF Level 3 Learnership and are successful as it involves a Portfolio of Evidence (PoE), “This disadvantages people who need AET below NQF Level 1, but never achieve it. Due to this issue as well as general perceptions, it is often thought that anything lower than NQF Level 3 is a waste of time.”



## **6.9 METHOD AND SAMPLING FOR THE FIFTH PART OF SUB-PROJECT 2: UMALUSI ANALYSIS OF THE IMPACT OF ITS RPL, CAT, AND ASSESSMENT POLICIES, ON THE WORK OF SELECTED GFETQSF STAKEHOLDERS**

The Umalusi researchers, having undertaken the policy analysis and interviews with key policy-makers to assess the impact of the NQF Act and related policy on Umalusi policies – as reported in Section 6.3 above – went on to interview key implementers of the Umalusi policies of interest to Umalusi in this study. The research question informing this part of the study was: *What impact has the implementation of Umalusi’s policies for RPL, CAT, and assessment under the NQF Act, had on the work of selected stakeholders in the GFETQSF context?* Essentially this work comprised interviews conducted with key individuals within the major Assessment Bodies in the GFETQSF context in South Africa.

Assessment Bodies form the key implementers of Umalusi policy for assessment, CAT, and RPL. This sub-set of policies would not have *direct* impact on learners in the GFETQSF context, and although it is possible that certain institutions may utilise some aspects of the CAT and/or RPL policies, the policies themselves do not speak *directly* to those at institutional level either. Indeed, the CAT and RPL policies in particular require substantive research to be done to identify links between different qualifications and/or learning experiences, and as such, are largely unsuited for use within individual schools or Colleges.

Of course, some policies written by Umalusi are focused on institutions and learners, and have relevance at those levels of the system, but it is perhaps unsurprising that the policies specifically called for by the NQF Act are of a generally systemic nature, and their immediate targets for intervention are at the higher levels in the system. This being the case, role-players within the NQF system will indeed be impacted by the legislation and policy framework that has been created – albeit that many will experience such impacts at several levels of remove. This creates a likelihood that many important players in the NQF system do not have *direct* interaction with NQF policy, and as such, would have limited knowledge and expertise when it comes to understanding the framework that informs the system in which they operate.

Since the policies of interest in this research were focused in terms of implementation, on Assessment Bodies, attempts were made to interview key individuals within four of the major Assessment Bodies in the GFETQSF context – the IEB, DBE, DHET, and the South African Comprehensive Assessment Institute (SACAI) – about their experiences in working with, and implementing, these policies. The respondents remain anonymous, but were all extremely senior in their respective organisations, operating at the executive level within each institution. For the reasons given, it did not make sense to interview individuals at the education provider or learner levels, given their lack of direct experience in *implementing* the policies in question, although providers and learners no doubt have experienced the effects of such implementation.

This form of purposive sampling allowed for rich qualitative information to be gathered about the experience of implementing the policies of interest, but was also warranted due to the need for this question to provide deep specific understanding rather than generalisable data. Qualitative research does not lend itself to generalisability in any event, and in this case, the question of interest revolved around the experiences of specifically identified implementing agencies that have unique differences in their institutional forms and functions within the GFETQSF context.

The sample for this second Umalusi research question drew first on the resources gathered in the first Umalusi question regarding the impact of the NQF and SAQA policy on Umalusi's policies for RPL, CAT, and assessment. It should be understood that all information gathered in addressing that first question formed part of the sample for this second research question as well – and thus the information provided above regarding the first sample will not be repeated here.

## **6.10 FINDINGS AND ANALYSIS FOR THE FIFTH PART OF SUB-PROJECT 2: UMALUSI ANALYSIS OF THE IMPACT OF ITS RPL, CAT, AND ASSESSMENT POLICIES, ON THE WORK OF SELECTED GFETQSF STAKEHOLDERS**

This section of the report presents Umalusi's analysis and findings regarding the impact of its assessment, RPL and CAT policy on the work of key stakeholders – the main Assessment Bodies – in the GFETQSF context. The sample consisted of three senior executives from the targeted Assessment Bodies (the DBE, the IEB, and the SACAI), and eight policy-makers from Umalusi. Of the eight policy-makers, four were no longer employed at Umalusi, but were interviewed since they had had direct influence of the policy process at the time that the policies were written. In total, 11 interviews were conducted.

### ***Umalusi analysis of the impact of its assessment policy***

The representatives of all three Assessment Bodies interviewed showed full understanding of Umalusi's assessment policy and the related regulations. This was an important finding, but also one that was to be expected. The Assessment Bodies deal directly and comprehensively with the assessment of learners within the GFETQSF context. The assessment practices, from those conducted within institutions to those undertaken as summative or national assessments, are governed in many respects by Umalusi's assessment policy and related documents. The centrality of this policy and its supporting documents in the national assessment system in the GFETQSF context cannot be understated, and it is clearly well known and fully utilised by all the Assessment Bodies.

As noted in Section 6.3, Umalusi's assessment policy is by far the most fully developed of the three policies of interest in this study, and this fact speaks to the primary manner in which Umalusi's quality assurance mandate is envisioned by the organisation. Although Umalusi has a quality assurance role within institutions of teaching and learning, this role is of a strictly delineated nature and takes the form of accreditation. Umalusi is empowered to accredit private institutions to offer a qualification(s) on the GFETQSF – and thus

inspects institutions and provides accreditation (which can be understood as a licence to operate) to institutions that meet the required standards. In line with legislation, public institutions are deemed accredited by Umalusi – and thus are not subject to direct inspection or accreditation processes. Since the public sector education providers that fall within Umalusi’s mandated area of operation vastly outnumber those in the private sector, the accreditation function of Umalusi is currently limited in its scope and potential impact. This can be contrasted with the quality assurance of assessment mandate of Umalusi, which provides stringent quality assurance for all assessments that lead to certification for qualifications in the GFETQSF.

Discussions with the key stakeholders within the Assessment Bodies revealed that the quality assurance of assessment is viewed in the sector as Umalusi’s primary role within the system. When the DBE representatives were interviewed about the assessment system and Umalusi’s role within it, a discussion emerged around the anomalous nature of public assessment being housed within the DBE itself. Many other countries delineate the functions of national or federal education departments in terms of political oversight, funding, policy and infrastructure – while assessment is often conducted by an independent examinations body. Indeed, the lack of an independent national examinations body is what necessitates the stringent nature of Umalusi’s quality assurance of assessment processes. Without such fully developed policy for quality assurance, it is doubtful that the credibility of national examinations could be maintained in the face of the centralised functioning of the DBE itself. The discussion in this regard noted the foresight of the NQF Act (Act No. 67 of 2008) in ensuring that the policy framework for assessment was robust and guarantees the independent quality assurance of assessment and related functions.

It was during the interview with the DBE representatives that the concept of ‘related functions’ for assessment emerged, and the issues of RPL and CAT were framed in that light. In many ways, it was argued, RPL and CAT are forms of sometimes direct or sometimes quasi-assessment that allows for certification outside the normal path laid down within individual qualifications. The presence of the RPL and CAT policies in their current forms, which emphasise the dynamic linking of qualifications and skills through the process of dedicated research, allows for alternate avenues for the assessment or appraisal of skill levels in pursuit of a certificated qualification. In some ways, the processes of CAT and RPL could be understood as ‘dynamic assessment’ systems that allow for the non-standard progression or certification of learners that do not follow the standard path laid down in each qualification document.

It must be noted, however, that not all Umalusi’s assessment processes were always well received by the Assessment Bodies. Comments from particularly the private Assessment Bodies indicated that Umalusi does not always engage stakeholders during the policy review process, and provides short timeframes for feedback upon the publishing of new policies or directives. In the interviews, no substantive issues were identified with the Umalusi policies as they stood, but the feeling from assessment bodies was that the operations of Umalusi were perceived to be ‘top down’ in some instances.

All entities interviewed engaged around the assessment system and the policy that surrounds it, and described in various ways a system that is 'robust' and 'credible'. In contrast, some evidence exists that public perceptions of the national examinations system (generally as embodied by the NSC, since the other qualifications on the GFETQSF are not as well known) is not always favourable. Examples are the recurrent media reports on how Umalusi 'manipulates' the results of examinations.

It is clear that there is a disjuncture between the perceptions of the Assessment Bodies that deal directly with Umalusi, and the perceptions of the general public that has little direct interaction with the organisation. A central role of Umalusi is to assure the quality of national GFETQSF-related assessments, and indeed Umalusi's assessment policy is robust in this regard, but a perhaps unspoken mandate is to offer assurance to the public that the examinations are credible. It is in this regard that more could be done to inform the public about how Umalusi is able to provide assurances that the examinations are of an acceptable standard, and are indeed internationally benchmarked against a range of assessments internationally. In addition, while Umalusi's policy was said by the Assessment Bodies interviewed to be clear in its delineation of how the standardisation of results must occur, the practice remains opaque to the South African public. For some time, Umalusi has been producing materials for the public, to explain how assessment processes work and are quality assured by Umalusi, but more could be done in this regard to begin to shift public opinion closer to the perceptions of the Assessment Bodies that work directly with Umalusi.

### ***Umalusi analysis of the impact of its RPL and CAT policies***

This section deals with interview data gathered from the Assessment Bodies regarding how they perceive RPL and CAT within the GFETQSF context, and the role that they see Umalusi playing in this space. The data deal with views on Umalusi's (2013; 2015) RPL and CAT policies respectively, since very little was mentioned in the interviews that related directly to RPL and CAT in the GFETQSF context. Indeed, the common sentiment among the Assessment Bodies interviewed, was that the need for RPL and CAT is limited in the GFETQSF context since the qualifications in this Sub-Framework are normally qualifications of first entry into the system, and all require formal assessment even in the cases which involve RPL and/or CAT.

### **The Recognition of Prior Learning (RPL) in the GFETQSF context**

Where previously Umalusi policy-makers had argued that great importance was ascribed to the NASCA as a vehicle for RPL – this view was not shared universally among the Assessment Bodies. The DBE representatives, for instance, argued that the features that align NASCA with an RPL approach (such as no need for formal tuition, combined subjects, a focus on flexibility and the adult learner) are still held back by the ultimate need for study of a formal curriculum and a final assessment. The argument was that if a learner must study a formally constructed curriculum then that learning cannot be 'prior', and if the recognition of the learning is done through a formal standardised assessment, then it is not a smooth process of 'recognition'. As an example, the DBE noted that if NASCA

represented an RPL approach, then so too did the Amended Senior Certificate (SC[A]), which also requires independent study of a formal curriculum and final assessment before certification.

Ultimately thorny questions must be asked about whether, in requiring the assessment of learning, the process remains one of recognition and, if so, how then does it differ from the formal assessment process? Following this line of thinking, if a formal curriculum must be studied before recognition can be granted, the learning that emerges from that course of study cannot be understood as existing prior to such study. It must be emphasised that while formal assessment remains part of Umalusi's policy on RPL, the use of qualifications such as NASCA or the SC(A) as 'vehicles' for taking care of the need for RPL in the NQF Level 1-4 space only emerged in the interviews with policy-makers. This view is not part of Umalusi's formal position regarding RPL and how best to implement it in the GFETQSF context, but it is nonetheless instructive to understand some of the thinking that surrounds RPL in this context.

A common comment encountered across both the interviews with the Umalusi policy-makers and the representatives of the assessment bodies, was that "RPL does not fit" into this Sub-Framework. When the point was pursued, all interviewees showed that they indeed had a nuanced understanding of the space, and that they believed that the scope for RPL was available in the GFETQSF context, but that it was understood to be an outlier in terms of the general operations in the Sub-Framework context. Ultimately, it can be concluded that RPL is an uncommon practice within the GFETQSF context, and thus the value of the Umalusi policy is that it provides a loose framework for how RPL cases can be dealt with on the basis of research into individual circumstances. Given the rarity of RPL being applied at NQF Levels 1-4 in this context (for qualifications in the GFETQSF), it makes a great deal of sense for Umalusi policy to be flexible in nature rather than providing rigid procedures that may not be applicable when the individual RPL requests are received.

### **Credit Accumulation and Transfer (CAT) in the GFETQSF context**

Umalusi's CAT policy is also constructed to be flexible in nature so that dynamic or unanticipated relationships between qualifications can be addressed, with these relationships featuring in the Directives for Certification; the policy makes provision for other relationships to emerge as requests are made for credit recognition, exemption, accumulation and transfer. In the interviews with stakeholders, CAT was seldom referred to, and the Assessment Bodies were of the view that it is adequately controlled in the GFETQSF context. All the Assessment Bodies were aware that relationships between qualifications could be determined through research, but both the IEB and the DBE made the point that there has not been a proliferation of qualifications in the GFETQSF, so the relationships where CAT is required are generally established and well known. This finding is probably unsurprising, since the stakeholders interviewed were Assessment Bodies and as such, would be well aware of how the various qualifications in the Sub-Framework fit together. Future research could investigate how the inter-qualification relationships are understood at provider level, since it is at the level of provision that learners must be

advised on their pathway/s through the system. Table 23 summarises the findings for Umalusi Question 2.

**Table 23: Summary of findings for Umalusi Research Question 2**

<p><b>Finding 1:</b> The systemic or ‘high level’ nature of the policies called for by the NQF can make them remote from the direct experiences of stakeholders at the provider or learner levels in the GFETQSF context. Ongoing policy advocacy is required to ensure that the policy framework set up by the NQF Act (No. 67 of 2008) and related legislation is understood outside of policy-making organisations.</p>
<p><b>Finding 2:</b> Umalusi’s assessment policy is well understood by Assessment Bodies in the GFETQSF context, and is felt to be comprehensive and fully utilised across the board. Umalusi’s assessment policy could be said to be impacting on the work of the Assessment Bodies, in that the policy shapes and controls their work.</p>
<p><b>Finding 3:</b> Although not directly investigated in this project, the issue of accrediting institutions to provide qualifications in the GFETQSF context was raised by two different Assessment Bodies. The main issue was that private providers are directly accredited by Umalusi, while the public sector provision is <i>deemed</i> accredited but not directly quality assured by Umalusi.</p>
<p><b>Finding 4:</b> There was significant praise for Umalusi’s assessment policy and procedures from all of the Assessment Body representatives interviewed, but the contrast between these views and public perceptions was noted in the interviews. The media, for example, revealed negative public perceptions of the processes for the standardisation of assessment results. It is clear that considerable advocacy and education must be provided to ensure that the public gains enough understanding of the processes to view them in a similarly favourable light.</p>
<p><b>Finding 5:</b> In the interviews, CAT and RPL were seldom referred to by the Assessment Bodies within the GFETQSF context, primarily due to the small number of qualifications in the NQF Sub-Framework, the clarity of articulation between many of these, and the fact that the qualifications are at entry-level in the system. It was unclear if the policies and procedures were understood at provider level, and more work is needed to ensure that providers are able to give learners the correct information and advice. Umalusi’s idea of RPL was contested in the interviews, with the question being asked as to whether the RPL was in fact RPL, when study of a formal curriculum (albeit an accelerated one) and formal assessment were needed.</p>

## 6.11 RECOMMENDATIONS: SUB-PROJECT 2

Two sets of recommendations emerged from Sub-Project 2.

### Recommendation 3: Address GFETQSF stakeholder difficulties

To address GFETQSF stakeholder difficulties, it is recommended that Umalusi (in collaboration with SAQA):

- adds criteria and guidelines for implementation to its assessment and CAT policies;

- clarifies the terms 'Credit Exemption', 'Credit Recognition', and the operationalisation of these terms;
- conducts information-sharing sessions with GFETQSF stakeholders, to enhance awareness and implementation of RPL and CAT; and
- addresses articulation pathways for adults – eg through implementing the National Senior Certificate for Adults (NASCA), or offering the National Senior Certificate (NSC) in different ways (part-time/ extended time/ etc.). SAQA should arrange a dialogue with the relevant stakeholders, to this end.

#### **Recommendation 4: Review Umalusi quality assurance of public provision**

Review and revise how Umalusi quality assures public provision so as to improve its effectiveness.

## 7. Sub-Project 3: Impact of selected aspects of the transparency apparatus of the NQF

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This section of the report discusses the second research question addressed by the South African Qualifications Authority's (SAQA). It covers specifically, the stakeholder experiences and impact of (a) selected aspects of the transparency tools of the NQF, and (b) SAQA's Record of Learning (RoL) service. The research questions are presented in the box immediately below.

### **SAQA Question 2A:**

Where do NQF stakeholders obtain information on qualifications, part-qualifications, professional bodies, professional designations, providers, learner achievements, and the verification of qualifications in South Africa?

### **SAQA Question 2B:**

What do stakeholders know about SAQA's searchable databases?

### **SAQA Question 2C:**

If SAQA's searchable databases are used, how are they used, and how useful were they found to be?

### **SAQA Question 2D:**

Are stakeholders aware of the National Learners' Records Database (NLRD) Trends Reports? If so, how were these reports used, and what impact did they have?

### **SAQA Question 2E:**

How useful is SAQA's Record of Learning Service? What impact has this service had, on stakeholders' lives and work?

Sections 7.1 to 7.5 that follow, focus on the searchable databases of the NLRD, and the NLRD Trends Reports, and Sections 7.6 and 7.7 cover the research into SAQA's RoL Service.

### **7.1 METHOD AND SAMPLING FOR THE FIRST PART OF SUB-PROJECT 3: AWARENESS, UNDERSTANDINGS, AND USES OF THE SEARCHABLE DATABASES OF THE NATIONAL LEARNERS' RECORDS DATABASE (NLRD), AND THE NLRD TRENDS REPORTS**

A survey comprising questions on the searchable databases of the NLRD, and the NLRD Trends Reports was developed on 'esurv' and the link was emailed to NQF stakeholders



as shown in Table 24 below. The survey link was sent to public and private institutions of learning; national, provincial and local government departments, Quality Councils, statutory bodies, the recognised professional bodies, Sector Education and Training Authorities (SETAs), Skills Development Providers (SDPs) and employers, between September and October 2017.

In all, the survey link was emailed to 589 organisations. A 10% sample was selected for categories of entities with 500 or more members, namely private Higher Education Institutions (HEIs), and SDPs; purposive sampling was used for government departments to ensure the inclusion of equal numbers of 'high, moderate, and low' NLRD users; for other categories of entities, all members were surveyed. Altogether 199 responses were received; the overall response rate was 34%. The survey was an anonymous online initiative to enable stakeholders to express their views freely. A limitation of this approach was that responses could not be linked back to particular entities.

Given SAQA's working relationship with the 26 public Universities and 50 Technical and Vocational Education and Training (TVET) Colleges as a group following intensive articulation-related research conducted between 2016 and 2017, SAQA did not ask this group to complete the online survey. Instead, the researchers emailed a more detailed version of the survey to them electronically. Responses were received from 16 public Universities (62% response rate) and 17 public TVET Colleges (34% response rate) (see Table 24).

**Table 24: Survey sample for the research questions relating to the searchable databases of the NLRD, and the NLRD Trends Reports**

Stakeholder category	Population	Intended sample
National Government Departments	47	9
Provincial Government Departments (PEDs)	127	57
Public Universities	26	26
Public TVET Colleges	50	50
Private Higher Education Institutions (HEIs)	99	99
Private Colleges	523	54
Quality Councils	3	3
Statutory Bodies	5	5
Professional Bodies	96	96
SETAs	21	21
Accredited Skills Development Providers (SDPs)	291	29
SDPs for Old Trades Qualifications	173	17
SDPs for New Trades Qualifications	137	14
SDPs for other New Occupational Qualifications	106	11
Assessment Quality Partners (AQPs)	36	14
Development Quality Partners (DQPs)	28	11
Qualification Development Facilitators (QDFs)	38	4
Employers	61	61
<b>TOTAL</b>	<b>1 867</b>	<b>589</b>

## **7.2 FINDINGS AND ANALYSES: INFORMATION AND UNDERSTANDINGS OF THE SEARCHABLE DATABASES OF THE NLRD**

SAQA Research Question 2A focused on the extent to which NQF policy-makers, implementers and beneficiaries knew about, and used, the searchable databases of the NLRD, and the NLRD Trends Reports.

### ***Responses regarding where organisations obtain information on qualifications registered on the NQF***

There were a total of 181 responses on where organisations obtained information on qualifications that are registered on the NQF. The majority of organisations (130) (72%) reported that they got information on qualifications that are registered on the NQF from “SAQA and/or the NLRD”.

There were a few organisations (15) which said that they obtained information from either the “SETAs, SAQA, Department of Higher Education and Training (DHET), Department of Basic Education (DBE), or the Quality Councils”. Thirteen responses were unclear; examples are the “yes”, or “NQF” or “Occupational Certificate/ Higher Certificate/ Diploma/ industry qualifications” responses. Six responses indicated “SAQA and the Quality Council for Trades and Occupations (QCTO)”. Five responses gave “the internet or website”, and a further five wrote “no” or “don’t know”. The remaining few wrote “SAQA and internet” (four), “Universities” (two), and “service provider” (one).

### ***Responses regarding where organisations obtain information on part-qualifications registered on the NQF***

Most organisations (120, n=176) (68%) reported that they got information on part-qualifications that are registered on the NQF, from “SAQA”.

A few organisations (19) wrote that they did not know where to obtain information, or that they did not need information on part-qualifications; 17 indicated that they obtained information on part-qualifications from one or more of “the SETAs, SAQA, DHET, DBE, Quality Councils or Quality Assurance Bodies (QABs)”. Six organisations noted that they sourced this information from “the internet or website”; a further six gave unclear responses such as the “yes”, or “NQF” responses. Three organisations said “SAQA and the internet”; three said “SAQA and QCTO”; one noted “Universities”, and one, “service provider”.

### ***Responses regarding where organisations obtain information on professional bodies listed on the NQF***

Some 114 organisations (n=171) (67%) reported that they got information on recognised professional bodies, from “SAQA and/or the NLRD.”

A few organisations (19) responded that they obtained information on professional bodies from either “SETAs, SAQA, DHET or the Quality Councils”; 15 pointed out that they did not know where to get information on professional bodies; and eight provided unclear responses such as “NQF” or “yes”. Four organisations reported that they obtained this information from the “internet or website”; three said “SAQA and internet”, and a further three said “academic networks” or “Credit Management”, or “information manual”. Two organisations reported “Universities”; a further two, “professional bodies” and one, “service provider”.

### ***Responses regarding where organisations obtain information on professional designations listed on the NQF***

The majority of organisations (104, n=167) (62%) reported that they obtained information on professional designations listed on the NQF, from “SAQA and/or the NLRD”.

Some 30 organisations reported that information on professional designations was not applicable to them; 11 obtained this information from either “the SETAs, SAQA, DHET or the Quality Councils”. Six organisations said that they sourced information “via the internet” or “website”; five said that they did so “through professional bodies” or (their) “own register”, and four provided responses that were not clear, such as “yes”, or “NQF”. Small numbers of responses were that this information was obtained “from universities (two); via correspondence from external bodies” (two); an “information manual or the “Organising Framework for Occupations (OFO) (one); from “SAQA and/or NLRD” (one), and from a “service provider” (one).

### ***Responses regarding where organisations obtain information on accredited providers in South Africa***

Most organisations (80, n=172) (47%) reported that they obtained information on accredited providers in South Africa from a combination of “SETAs, SAQA, DHET, DBE, Quality Councils or QABs”.

A further 61 organisations responded that they obtained this information from “SAQA and/or the NLRD”. A few organisations (11) indicated that this item was “not applicable” or “don't use this”; seven specified “internet” or “website”; five gave unclear responses (“yes”); three said “SAQA and internet”; two reported “information manual or register of private providers”; two said “external bodies”, and one organisation, “service provider”.

### ***Responses regarding where organisations obtain information on RPL providers in South Africa***

About a third of the organisations (50, n=149) (34%) indicated that this question was “not applicable/not relevant”, or that they were not sure where to get information on RPL providers.

Forty-three organisations (29%) reported that they obtained information on RPL providers in South Africa from “SAQA and/or the NLRD”; 29 reported obtaining this information from one or more of “SETAs, SAQA, DHET, National Artisan Moderation Body (NAMB)”. Eight organisations specified the “internet” or “website”; four said “own RPL providers”; three reported “SAQA and internet” and a further three said “Universities”. Small numbers of responses included “professional body” (two); “NQF Helpdesk” (one); “accredited SA providers” (one); “information manual” (one); “Department of Public Service and Administration (DPSA)” (one); “service provider” (1), or were unclear responses such as “yes” (two).

### ***Responses regarding where organisations obtain information on learner achievements in South Africa***

There were 82 organisations (n=160) (51%) that reported that they obtained information on learner achievements in South Africa from “SAQA and/or the NLRD”.

A further 39 organisations said that they got this information from a “combination of SETAs, SAQA, Education and Training Quality Assurance (ETQA) bodies, Department of Education (DoE)<sup>34</sup> or Quality Councils”. Some 29 organisations responded that they did not need information on learner achievements. Four organisations specified “internet” or “website”, and one or two each respectively responded “SAQA and internet”; “external bodies”; “South African School and Administration Management System (SA-SAMS)”, “service provider”, and “Statistics South Africa (StatsSA)”. One entity gave an unclear response, “yes”.

### ***Responses regarding where organisations obtain information on the verification of qualifications in South Africa***

The majority of organisations (117, n=172) (68%) reported that they obtained information on the verification of qualifications in South Africa from “SAQA and NLRD and Verifications” (SAQA’s Verification Service).

Twenty-four organisations noted that they got information from combinations of “SETAs, SAQA, Universities South Africa (USAf) or Quality Councils”. Ten organisations responded “no need”, or “not applicable”, or “not relevant”, or “haven’t searched”; six reported “issuing institution”; whilst four said “Managed Integrity Evaluation (MIE) or other verification institutions”. There were two responses for “SAQA and internet”; one for “Internet or website”; one for “SAQA and verification company”; one for “provider for Post-School Education and Training (PSET) and DBE for matric”; one said “policy documents” and one said “service provider”. There were four unclear responses of “yes”.

It is clear from the findings in Section 7.2, that many stakeholders are aware that they can access information on qualifications, part-qualifications, professional bodies, professional

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<sup>34</sup> This reference was to a Provincial Department of Education.

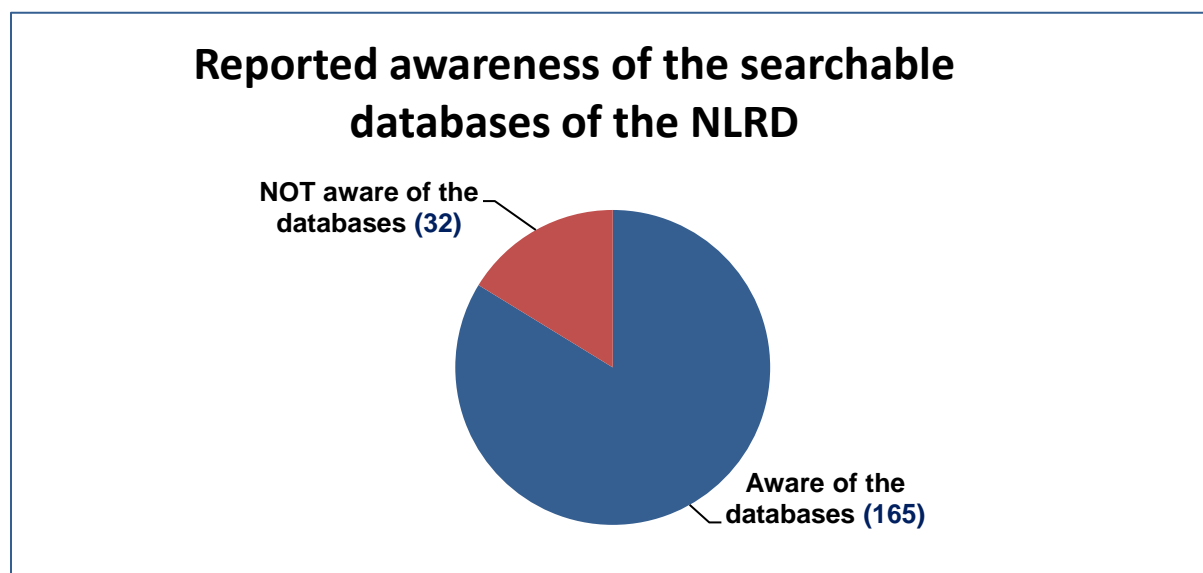
designations and the verification of qualification-related information, from the searchable databases of the NQF.

### **7.3 FINDINGS AND ANALYSES: REPORTED AWARENESS AND USES OF THE SEARCHABLE DATABASES OF THE NLRD**

This section presents the findings from SAQA Research Questions 2B and 2C, on what NQF stakeholders know about the searchable databases of the NLRD, and if they use these databases, how the databases were used, and how useful they were found to be.

#### ***Reported awareness of the searchable databases of the NLRD***

The NQF stakeholder survey included a question on whether organisations knew about the searchable databases of the NLRD. There were 197 responses to this question. The majority of organisations, (165) (84%) were aware of the databases; 32 (16%) of the responding organisations were not aware of the databases. Figure 7 below shows a visual representation of these responses.



**Figure 7: Organisational awareness of the searchable databases of the NLRD**

#### ***Reported NQF searchable databases that organisations use***

The NQF stakeholder survey asked respondents to specify which of the searchable databases of the NLRD they had used. There were 177 responses to this question. Most organisations (29) indicated that they used the registered qualifications database; 28 organisations noted that they used combinations of the databases for “qualifications, part-qualifications, learner achievements, professional bodies, and professional designations”. Combinations reported by a further 26 organisations included “professional bodies, designations, qualifications, part-qualifications, unit standards, accredited providers, RPL providers, assessors, and moderators”, and “learner database”.

**Reported purposes and uses of the searchable databases of the NLRD**

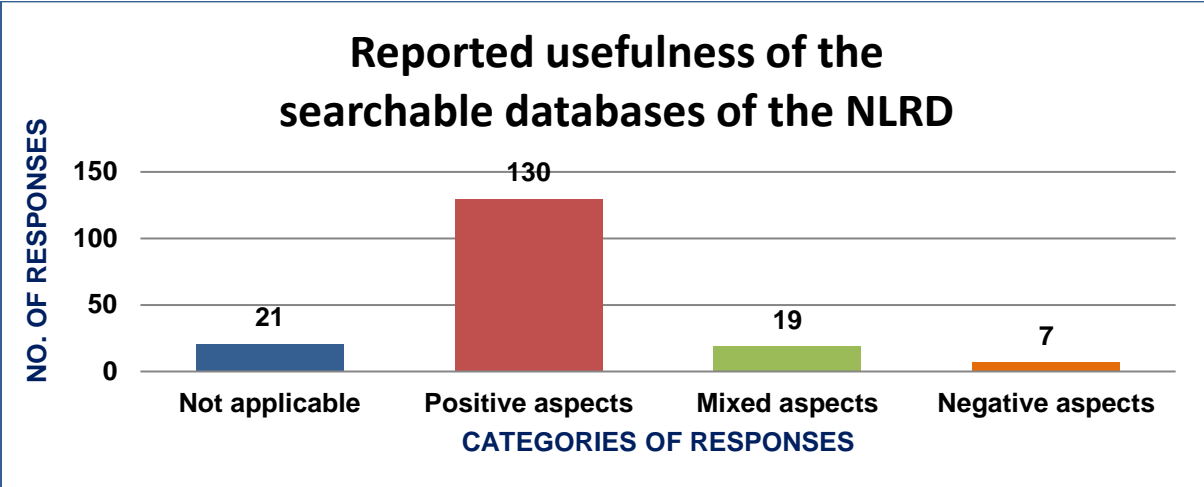
In all, 178 organisations reported on how they used the searchable databases of the NLRD. The main reasons reported for using the databases were to get information on qualification development (90), for verification of information (36), and for professional body information (19). Twenty-two organisations indicated that this question was “not applicable” for them. The responses are graphically represented in Table 25 below. In some cases, there was more than one response per organisation; the numbers of responses therefore do not correspond with the numbers of organisations which answered this question.

**Table 25: Categories and numbers of responses on how organisations use the searchable databases of the NLRD**

Category of responses on how organisations use the searchable databases of the NLRD	Number of responses
Qualification development-related usage	90
Verification of information	36
Professional body-related usage	19
Other (responses included “general information”, “research”, “planning”, “recruitment”)	42
“Not applicable” response	22

**Reported usefulness of the searchable databases of the NLRD**

Respondents were asked to describe the usefulness of the searchable databases of the NLRD; Figure 8 below shows the nature of the responses. It is clear from Figure 8 that the databases are viewed as being useful: 130 (74%) of the 177 responses were positive.



**Figure 8: Responses on the usefulness of the searchable databases of the NLRD**

## ***Reported benefits of the National Learners' Records Database (NLRD)***

In all, 182 organisations responded to the question regarding the benefits experienced in relation to the NLRD. Relatively large numbers of responses noted the usefulness of the NLRD for the “verification of information” (32); “accessibility of information and awareness” (31); and “confirmation of qualifications” (24). Interestingly, 51 (28%) of the responses noted either that they did not use the NLRD, or that they had not experienced any benefits relating to the NLRD. The categories and numbers of responses are shown in Table 26 below. In many instances there was more than one response per organisation and therefore, the numbers of responses do not correspond with the numbers of responding organisations.

**Table 26: Responses regarding the benefits of the NLRD**

<b>Categories of responses regarding the benefits of the NLRD</b>	<b>No. of responses</b>
“No benefit”/ “not sure”/ “do not use the NLRD”	51
Verification of information	32
Access to information and awareness	31
Confirmation of qualifications	24
Research and analysis, decision making and planning	21
“Useful”	13
Credible and reliable information	9
Minimal benefit	8

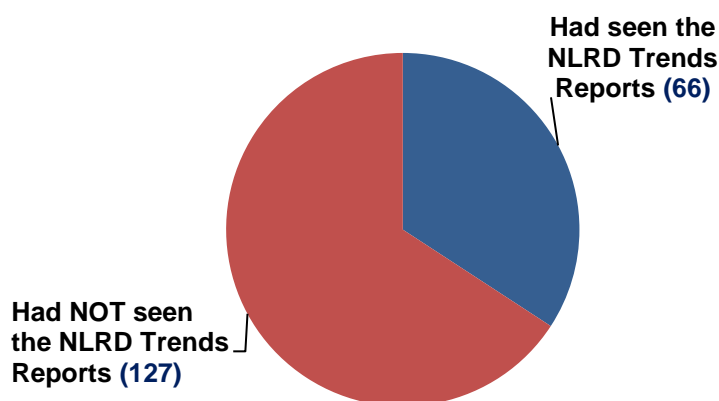
## **7.4 FINDINGS AND ANALYSES: REPORTED AWARENESS AND USES OF SAQA'S NLRD TRENDS REPORTS**

Section 7.4 presents the findings from SAQA Research Question 2D, namely ‘Are NQF stakeholders aware of the NLRD Trends Reports? And if so, were the reports used; how were they used, and what impact did they have?’

### ***Reported awareness of the NLRD Trends Reports***

The first question in the survey sought to determine whether respondents were aware of the existence of the NLRD Trends Reports. There were 193 responses to this question. Disappointingly, 127 (66%) of these organisations had not seen any of the NLRD Trends Reports. However, 66 (34%) of the respondents had seen the NLRD Trends Reports. This information is shown graphically in Figure 9.

## Proportions of organisations which had seen/not seen the NLRD Trends Reports



**Figure 9: Reported awareness of the NLRD Trends Reports**

### ***Reported NLRD Trends Reports seen by organisations***

For respondents who reported having seen the NLRD Trends Reports, there were follow-up questions as to which NLRD Trends Reports they had seen; if and how they had used these NLRD Trends Reports; and if they had used the reports, how useful the reports were found to be. In all, 66 organisations reported that they had seen one or more of the NLRD Trends Reports – and since organisations may have seen more than one of the reports, the numbers of ‘report sightings’ differ from the numbers of responding organisations. Fifty-five organisations reported seeing NLRD Trends Report 4, whilst 45 had seen Report 3; 34 had seen Report 2, and 22 organisations had seen Report 1. These responses are shown in Table 27 below.

**Table 27: NLRD Trends Reports seen by organisations**

NLRD Trends Reports seen by organisations	No. of responses
<b>Report 1:</b> Trends in Public Higher Education 1992 - 2001	22
<b>Report 2:</b> Trends in Public Higher Education 1995 - 2004	34
<b>Report 3:</b> Work-Related Qualifications and Part-Qualifications Registered on the NQF: Trends 2002 - 2011	45
<b>Report 4:</b> Pathway Trends: Qualifications Awarded and Learners’ Movement across the South African Education and Training System, 1995 - 2014	55

### ***Reported usefulness of the NLRD Trends Reports***

Regarding the survey question on the usefulness of the NLRD Trends Reports, 147 organisations responded. In all, 72 (49%) of the responses indicated that organisations



had not seen/used the NLRD Trends Reports, or that the question was “not applicable”. On the other hand, a fair proportion of the responses showed that organisations used the NLRD Trends Reports to see trends, for planning and decision-making (33) or found the Reports “useful and interesting” (22). The categories and numbers of the responses are shown in Table 28 below; some organisations provided more than one response, so the numbers of responses and the numbers of responding organisations may differ.

**Table 28: Responses regarding the usefulness of the NLRD Trends Reports**

Reported usefulness of the NLRD Trends Reports	No. of responses
Not seen/used the NLRD Trends Reports/ “not applicable”	72
Used the NLRD Trends Report(s) to see trends/ for planning/ for decision-making	33
“Useful”/ “interesting information”/ “insightful”	22
“Don’t know”/ “not sure”	7
Used the NLRD Trends Reports for research	6
“Not useful”/ “not much use”	2

### ***Reported impact of the NLRD Trends Reports***

Regarding a follow-up question in the survey, as to whether or not the NLRD Trends Reports had impacted on the work of the responding organisations, there were 143 responses, of which 89 (62%) indicated that the reports had not had an impact. However, it was encouraging to find that the NLRD Trends Reports were reported to have impacted on the work 54 (38%) organisations.

### ***Types of impact of the NLRD Trends Reports***

Regarding a further survey follow-up question, regarding the *types of impact* the NLRD Trends Reports were thought to have had, there were 131 responses, of which 45 marked the question as “not applicable”. The categories of responses are shown in Table 29 below; responding organisations may have provided more than one description of impact, thus the numbers of responses and organisations differs.

**Table 29: Responses regarding the impact of the NLRD Trends Reports**

Reported impact of the NLRD Trends Reports	No. of responses
“Not applicable”	45
Impacted on strategic discussions, planning, decision-making	28
Had not seen/used the NLRD Trends Reports	20
Used to see skills/ trends/ in general	16
“No impact”/ “not much impact”	15
Impacted on programme/ qualification development	10

## **7.5 CONCLUDING REMARKS REGARDING THE AWARENESS, UNDERSTANDINGS, USES AND IMPACT OF THE SEARCHABLE DATABASES OF THE NQF, AND THE NLRD TRENDS REPORTS**

### ***Where organisations obtained information***

The following list summarises where responding organisations reported sourcing and finding information. From the list, it is clear that over a third of respondents obtained information on qualifications, part-qualifications, recognised professional bodies, and the professional designations of these bodies, from SAQA. Around half obtained information on accredited providers and learning achievements from SAQA, while under a third obtained RPL provider information in this way.

- 130 organisations (n=181) (72%) obtained information on qualifications that are registered on the NQF from “SAQA and/or the NLRD”.
- 120 organisations (n=176) (68%) obtained information on part-qualifications that are registered on the NQF from “SAQA”.
- 114 organisations (n=171) (67%) reported obtaining information on recognised professional bodies, from “SAQA and/or the NLRD”.
- 104 organisations (n=167) (62%) obtained information on the professional designations of the recognised professional bodies, from “SAQA and/or the NLRD”.
- 80 organisations (n=172) (47%) obtained information on accredited providers from a combination of “SETAs, SAQA, DHET, DBE, Quality Councils or QABs”; a further 61 (35%) obtained information from “SAQA and/or the NLRD”.
- 50 organisations (n=149) (34%) indicated that RPL providers’ information was not applicable/not relevant or they were “not sure where to get it”, while 43 (29%) obtained this information from “SAQA and/or the NLRD”.
- 82 organisations (n=160) (51%) obtained information on learner achievements in South Africa from “SAQA and/or the NLRD”, while 39 (24%) obtained this information from a “combination of SETAs, SAQA, ETQA, DoE<sup>35</sup> or Quality Councils”.
- 117 organisations (n=172) (68%) obtained information on the verification of qualifications in South Africa from “SAQA/ the NLRD/ SAQA’s Verification Service”.

### ***Reported awareness and uses of the searchable databases of the NQF***

The following points summarise respondent awareness of the searchable databases of the NQF, how respondents have used these databases, and the benefits they have derived from doing so.

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<sup>35</sup> This reference is to a Provincial Department of Education.

- One hundred and sixty-five organisations (n=197) (84%) reported being aware of the searchable databases of the NQF; 29 reported using the registered qualifications database, while 28 reported using combinations of the databases for qualifications, part-qualifications, learner achievements, professional bodies, and professional designations – and the verification of information, including in related to foreign qualifications.
- The main reasons reported by 178 organisations for using the databases were, to obtain information for qualifications development (90), for the verification of information (36), and for information relating to professional bodies (19).
- One hundred and eighty-two responses (n=214) (85%) discussed the benefits regarding information in the NLRD, which included being able to access qualification-, part-qualification-, professional body- and professional designation-, provider-, and learner-related information; verifying information; and accessing information for awareness. Thirty-two responses revealed that the NLRD was not used.

### ***Awareness and usefulness of the NLRD Trends Reports***

The following points summarise respondent awareness of the NLRD Trends Reports, and the reported usefulness of these reports.

- One hundred and twenty-seven organisations (n=193) (66%) had not seen any of the NLRD Trends Reports; 55 reported that they had seen Report 4; 45 reported seeing Report 3; 34 had seen Report 2; and 22 had seen Report 1.
- In all, 72 (n=147) (49%) of responding organisations indicated that the survey question on the usefulness of the NLRD Trends Reports, was not applicable. Thirty-three organisations reported using the NLRD Trends Report for trends, planning and decision making; 22 noted that the reports were useful and had interesting information and insights.

### ***Impact of the NLRD Trends Reports on organisations***

In summary regarding the survey responses on the impact of the NLRD Trends Reports, 89 organisations (n=143) (62%) said that the NLRD Trends Reports had not had an impact on their organisations, while 54 (38%) of the organisations did report impact, including impact on their strategic discussions, planning and decision-making (33).

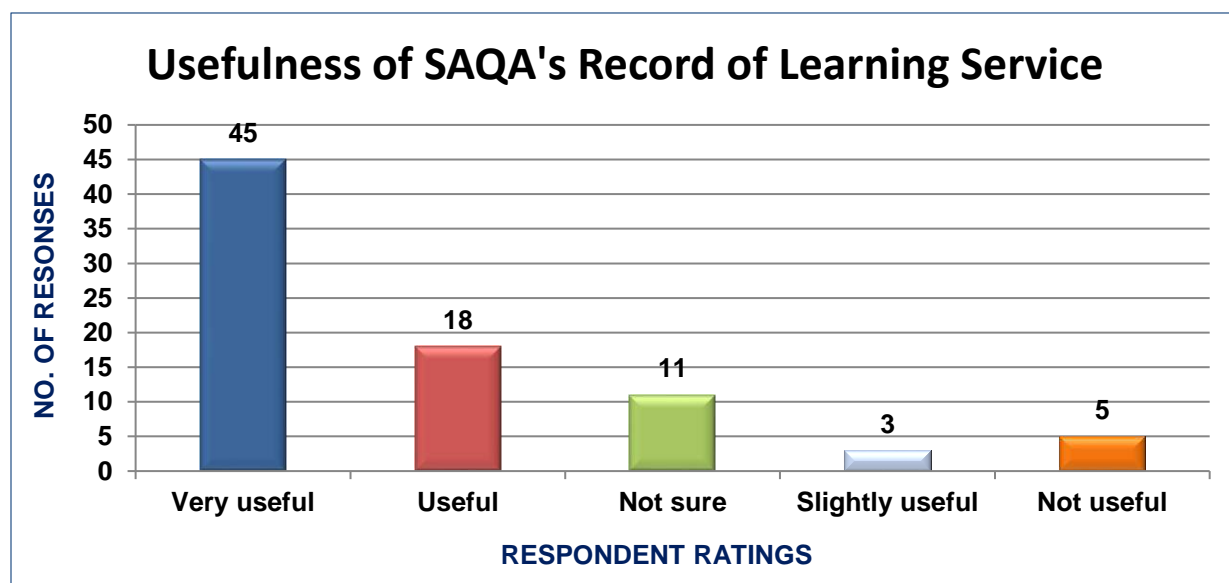
## 7.6 METHOD AND SAMPLING FOR THE SECOND PART OF SUB-PROJECT 3: THE IMPACT OF SAQA'S RECORD OF LEARNING (RoL) SERVICE

This section of the report presents the findings from SAQA's Research Question 2E, on the usefulness and impact of SAQA's Record of Learning (RoL) Service. Through SAQA's RoL Service, individuals can request statements of their own learning, based on the NLRD records held by SAQA. A brief survey was sent via Short Messaging Service (SMS) to clients who had used SAQA's RoL service, with the questions: (a) how useful is SAQA's Record of Learning Service? (b) Has SAQA's Record of Learning Service impacted on your life and work?

A sample of 1 000 individuals was randomly selected from the 35 807 clients who had used SAQA's RoL Service in the period 2015-2017 (inclusive)<sup>36</sup>. Attempts were made to SMS the short survey to the 1 000 clients; however, after 520 messages had been sent, the SMS provider blocked any further messages as 'spam'. Further attempts were made to send the surveys by creating dedicated email accounts (Yahoo, Hotmail and Live Mail) for this purpose. Ultimately 81 messages were undelivered (in these cases, client contact details had changed); messages were blocked for 399 clients (as 'spam'). The total number of clients receiving the surveys was therefore 520. There was a 16% response rate to this survey: 82 clients responded.

## 7.7 FINDINGS AND ANALYSIS: THE IMPACT OF SAQA'S RECORD OF LEARNING (RoL) SERVICE

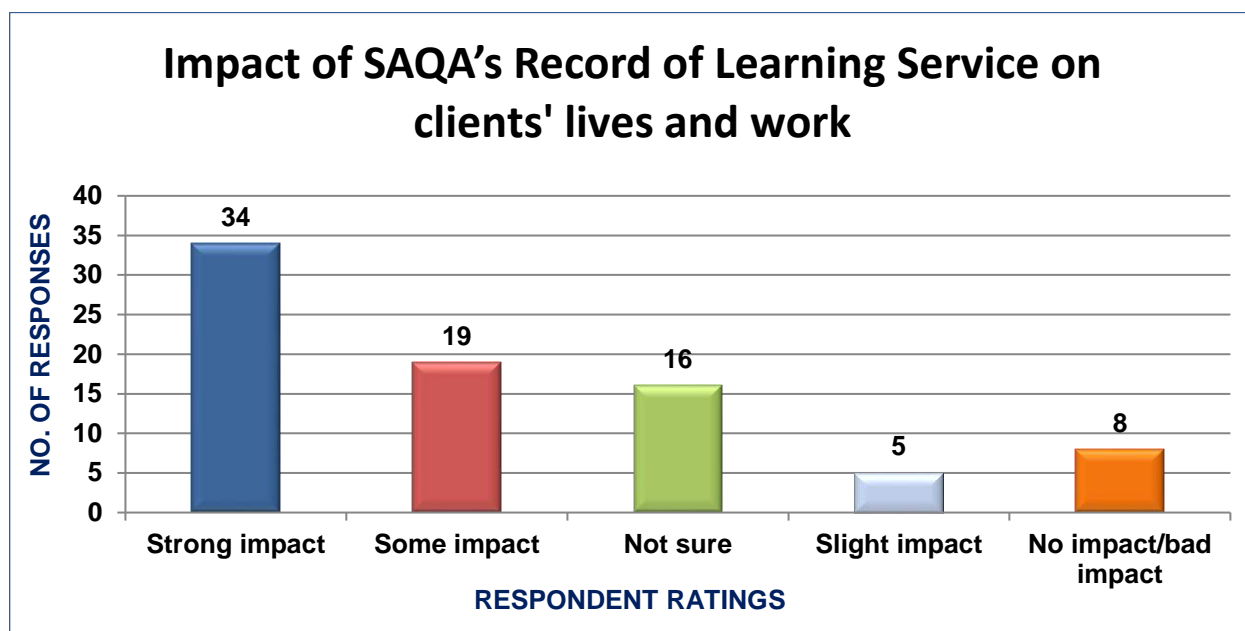
The majority of clients (45; n=82) (56%) rated SAQA's RoL Service as being "very useful"; all the ratings are shown in Figure 10 below.



<sup>36</sup> It was thought that using client contact details older than three years would result in many of the contact details being out of date, and the messages sent to these pre-2015 clients not reaching them as a result.

**Figure 10: Reported usefulness of SAQA’s Record of Learning Service**

All 82 clients responded to the second question, on the impact SAQA’s RoL Service on their lives and work. Thirty-four rated SAQA’s RoL Service as having had a “strong impact” and 19 as having had “some impact”. Eight clients thought that SAQA’s RoL Service had had “no impact”/ “bad impact”.



**Figure 11: Reported impact of SAQA’s Record of Learning Service on the lives and work of clients**

Some 30 clients provided comments; responses have been grouped into three categories, (a) requests for information, (b) compliments and, (c) complaints.

There were four requests for information on the work of SAQA, SAQA services, updates on NQF developments, and contact details for the RoL Service. There were almost equal numbers of compliments and complaints. Compliments were positive with clients praising SAQA’s service with comments such as “very helpful”; “best experience”; “really working”; and “service was prompt”. Complaints pointed out that “updates should be done regularly”; “the information was out-dated”; “records aren’t up to date”; “I finished the course in 2015 but have not received certificates”; “couldn’t see credits”, and “qualifications not listed”. Tables 30 and 31 below summarise the compliments and complaints.

**Table 30: Positive comments from clients, for SAQA’s Record of Learning Service**

Categorisation of responses	No. of responses
Access-related	8
Efficiency-related	3
General	2

**Table 31: Negative comments from clients, for SAQA’s Record of Learning Service**

<b>Categorisation of responses</b>	<b>No. of responses</b>
Need for updated information	6
General	4
Unable to access records	2

## **7.8 CONCLUDING REMARKS: RECORD OF LEARNING (ROL) ANALYSIS**

In summary, the majority (65%) of SAQA clients responding to the Record of Learning survey, reported that SAQA’s Record of Learning Service was useful, and that it had impacted on their lives and work. A number of compliments on the service were received. Some complaints were also provided in the ‘comments’ section, mostly linked to information being out of date.

## **7.9 RECOMMENDATION: SUB-PROJECT 3**

There was one recommendation from Sub-Project 3, which focused on the transparency apparatus of the NQF.

### **Recommendation 5: Enhance information-sharing regarding NQF transparency tools**

It is recommended that SAQA continues and enhances information-sharing to advocate use of the searchable databases of the NLRD, and RoL and Verification Services. Clarify what is meant by ‘prospective employee’.

# 8. Sub-Project 4: Experiences and Impact of the National Qualifications Framework (NQF) Level Descriptors

The South African Qualifications Authority's (SAQA) policy document '*Level Descriptors for the South African National Qualifications Framework [NQF]*' (referred to in this section of the report, as NQF Level Descriptors or Descriptors) assigns qualitative criteria and descriptions of competences, to NQF Levels 1 to 10 (SAQA, 2012a). It is important to understand the extent to which this document, which acts as a guiding policy text for the NQF community, is providing clarity for, and being implemented by, stakeholders in the education, training, development and work contexts in the country. Sub-Project 4 focused on how the NQF Level Descriptors have been used and experienced, and on their impact, as follows.

## **SAQA Question 3A:**

How have the NQF Level Descriptors been used, and what impact have they had?

The following sub-questions framed the interviews and surveys conducted.

- Where did stakeholders learn about the NQF Level Descriptors?
- How/What are the ways in which the NQF Level Descriptors are understood and used currently/what have the Descriptors enabled?
- How have the NQF Level Descriptors been used in qualification registration processes under the NQF Act, as opposed to how they were used under the SAQA Act?
- What impact have the Level Descriptors had?

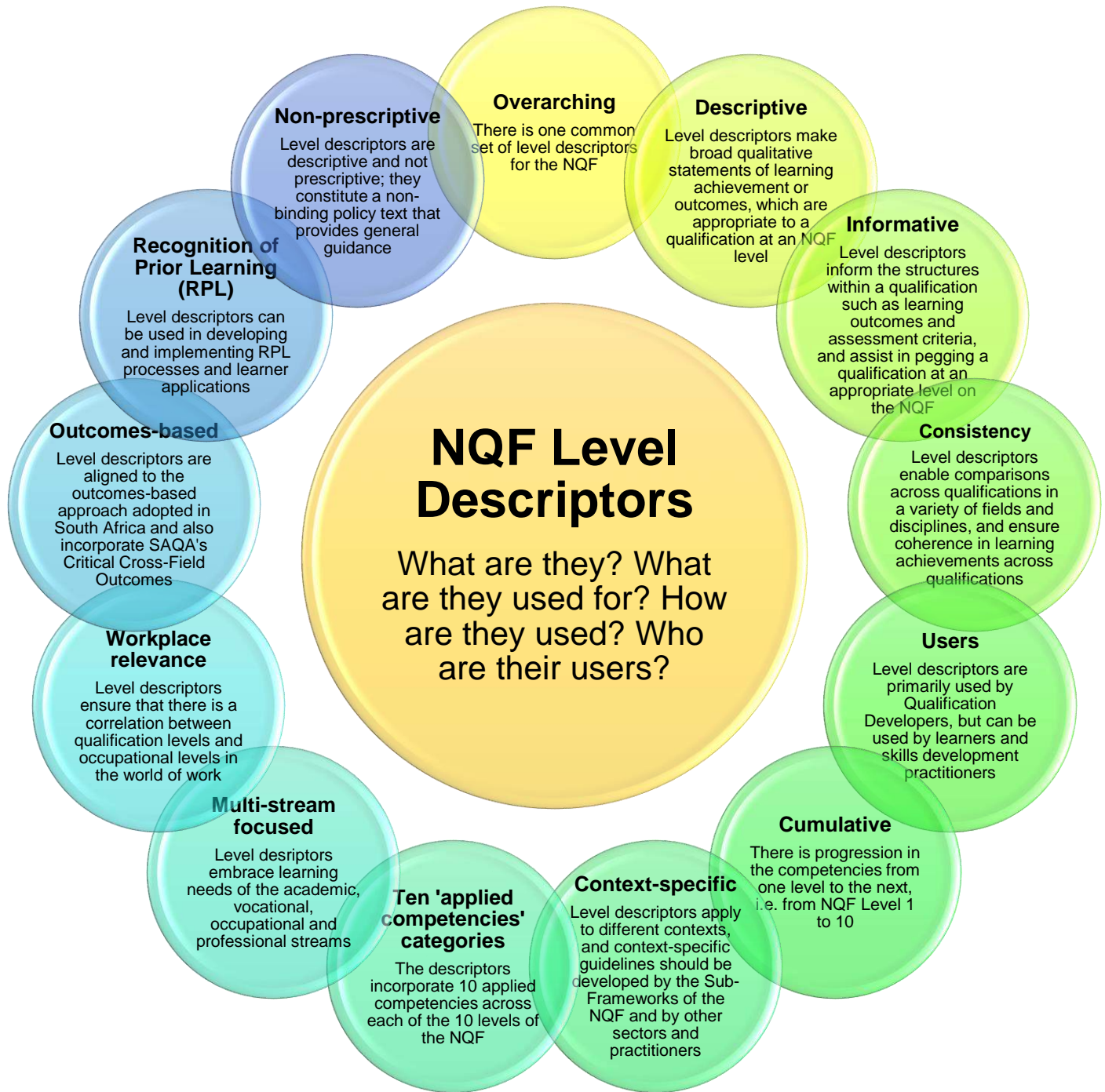
## **SAQA Question 3B:**

How have the NQF Level Descriptors aided or blocked learning pathways, and what could be done to strengthen the Level Descriptors in this regard?

Section 8 of the report begins by sketching the NQF Level Descriptors, and the method and samples through which SAQA's Research Questions 3A and 3B were addressed. It presents the related analyses and findings, and closes with some reflections and a recommendation.

## **8.1 SOUTH AFRICAN NQF LEVEL DESCRIPTORS IN SAQA POLICY**

SAQA's (2012a:4) policy for the NQF Level Descriptors defines the Descriptors as statements "describing learning achievement at a particular level of the NQF, that provides a broad indication of the types of learning outcomes and assessment criteria that are appropriate [for] a qualification at that level"; Figure 12 shows aspects of the principles underpinning the Descriptors, and aspects of their contextual application.



**Figure 12: Understanding the South African NQF Level Descriptors**

Each of the 10 NQF Level Descriptors is described in terms of ten sets of competences, namely: (1) scope of knowledge, (2) knowledge literacy, (3) methods/ability to use tools and instruments, (4) problem-solving, (5) ethics and professional practice, (6) accessing, processing and managing information, (7) producing and communicating information, (8) contexts and systems, (9) managing learning, and (10) accountability (SAQA, 2012a:5-6).



## 8.2 METHOD AND SAMPLING FOR SUB-PROJECT 4: EXPERIENCES AND IMPACT OF THE NQF LEVEL DESCRIPTORS

SAQA's Research Questions 3A and 3B were addressed through a mixture of surveys and in-depth interviews, with a wide range of NQF stakeholders.

### *Sampling*

In all, 145 surveys were administered, and 67 in-depth interviews conducted, according to the sample described in Table 32 below. The selection principles per sector are included in the footnotes to this table.

**Table 32: Sampling and response rates for the Level Descriptor surveys and interviews**

Tool	Stakeholder group	Population	Intended sample	Attained sample
Interviews	SAQA staff <sup>37</sup>	200 <sup>38</sup>	36	33
Interviews	Quality Councils	N/A <sup>39</sup>	6	7 <sup>40</sup>
Interviews	Department of Basic Education (DBE) and Department of Higher Education and Training (DHET)	N/A <sup>41</sup>	15	7 <sup>42</sup>
Interviews	Qualification Developers	N/A <sup>43</sup>	N/A <sup>44</sup>	18

<sup>37</sup> The following interviews were conducted with SAQA's internal Directorates: Registration and Recognition (8), Foreign Qualifications Evaluation and Advisory Services (10), Advocacy and Communication Services (5), National Learners' Records Database (3), Verification Services (2), International Liaison (1), Information and Communications Technology (1), Human Resources (1), and the Executive Office (2). Interviewees were selected based on their roles within their Directorates, including those who had worked for 2-5 years, 5-10 years, and 10 years or more).

<sup>38</sup> This number varies over time, roughly between 190 and 210.

<sup>39</sup> The staff complements of the Quality Councils were roughly between 50 and 180 respectively; the SAQA researchers sought to interview at least two senior officials from each of these entities.

<sup>40</sup> Initially two interviewees were selected per Quality Council; it was possible to interview an additional person at one of the Quality Councils.

<sup>41</sup> The staff complements of the DHET and DBE run into the 100s; what was sought in this sample, were key senior officials who may have used the Level Descriptors.

<sup>42</sup> This number includes interviews with four DHET and three DBE officials, based on their roles and potential use of the NQF Level Descriptors. Senior officials were selected, in the areas of Inclusive Education, Curriculum Implementation and Monitoring, General Education and Training (GET), Further Education and Training (FET), Higher Education, the NQF, Research, and Monitoring and Evaluation (M&E).

<sup>43</sup> OQSF stakeholders numbered over 700; interviewees in this category were identified through 'snowballing'.

<sup>44</sup> 'Snowballing' or extending the sample, was based on recommendations by the Quality Councils and other original interviewees, which pointed to additional stakeholders in the NQF Sub-Framework contexts; consultants and institution-based people involved in qualifications development, and others. In addition, where low responses to the surveys were evident, particularly when a stakeholder was identified as critical in the qualification development process, follow-ups were made in the form of interviews.

Tool	Stakeholder group	Population	Intended sample	Attained sample
Interviews	Private Higher Education Institutions (private HEIs)	N/A <sup>45</sup>	N/A <sup>46</sup>	5
Surveys	Assessment Quality Partners (AQPs) and Development Quality Partners (DQPs)	64	25 <sup>47</sup>	4
Surveys	Public HEI and TVET Colleges	76 <sup>48</sup>	58 <sup>49</sup>	25
Surveys	Private HEI and Colleges	622 <sup>50</sup>	153 <sup>51</sup>	39
Surveys	Sector Education and Training Authorities (SETAs)	21	21	4
Surveys	Skills Development Providers (SDPs)	707	71 <sup>52</sup>	2
Surveys	Employers	61	61 <sup>53</sup>	6
Surveys	Professional bodies	96	96 <sup>54</sup>	65

### **Method of data analysis**

The responses regarding the stakeholder experiences of the NQF Level Descriptors whether obtained through the survey instruments or in-depth interviews – were analysed according to the following themes, which emerged from the survey and interview questions:

- definition/understanding of the NQF Level Descriptors;
- usefulness of the NQF Level Descriptors;
- usage of the NQF Level Descriptors;
- challenges experienced regarding the NQF Level Descriptors; and
- NQF Level Descriptors under SAQA Act No. 58 of 1995, and NQF Act No. 67 of 2008, respectively.

<sup>45</sup> There are 622 private HEIs and Colleges; interviewees in this category were identified through 'snowballing'.

<sup>46</sup> While a survey was sent out to the private HEIs, interviews were held primarily with providers who were involved in qualification development for the types of qualifications frequently recommended to SAQA for registration on the NQF, the assumption being that they would have used the Level Descriptors extensively.

<sup>47</sup> Based on databases of QQSF stakeholders provided by the QCTO, a random sample of 25 (39%) of the stakeholders was selected. Surveys were distributed via email to individual institutions.

<sup>48</sup> This population included 26 public Universities and 50 public Technical and Vocational Education and Training (TVET) Colleges.

<sup>49</sup> The survey was sent to public Universities and Colleges which had been invited to participate in the SAQA-DUT National Articulation Baseline Study (SAQA, 2017), and which had reported articulation initiatives. Some of these institutions had reported more than one articulation initiative; the survey was sent to all which had reported articulation initiatives. Surveys were distributed via email to individual institutions.

<sup>50</sup> This number is made up of 523 private Colleges and 99 private HEIs.

<sup>51</sup> Regarding the 523 private Colleges and 99 private HEIs, the survey was sent to all in the latter group but a random sample of 10% was selected for the private Colleges, given their high number.

<sup>52</sup> Given the high numbers of SDPs, a random sample of 10% was selected. Surveys were distributed via email to individual institutions.

<sup>53</sup> Lists of member companies were obtained from the websites of the Black Business Council (BBC) and Business Unity South Africa (BUSA). Surveys were distributed via email to all of the entities named.

<sup>54</sup> Although there are currently 106 recognised professional bodies, the surveys were distributed individually via email to the 96 professional bodies recognised at the time of data collection. Surveys were distributed via email to individual institutions.

### **8.3 FINDINGS AND ANALYSES: EXPERIENCES AND IMPACT OF THE NQF LEVEL DESCRIPTORS**

This section of the report presents the findings from the analyses of the interview and survey data, by theme and category of responding stakeholder.

#### ***Definitions and understandings of the NQF Level Descriptors***

This sub-section provides the various definitions and understandings of Level Descriptors provided by categories of respondents – from SAQA, the Quality Councils, DHET, DBE, qualification developers, public and private HEIs and Colleges, SETAs, SDPs, and employers.

#### **SAQA respondent responses**

Fifteen respondents from SAQA (n=33) defined the Level Descriptors in terms of the complexity of learning; a further 15 (n=33) defined the Descriptors in terms of qualifications; one respondent (n=33) mentioned the progression/articulation aspect of the Descriptors.

#### ***SAQA responses that were 'learner-centred'***

According to 15 SAQA respondents (n=33), the Descriptors were qualitative descriptions that outlined generic learning, competencies and attributes that a learner must display at any one of the ten levels of the NQF. These responses showed learner-centred understandings of the Descriptors, since they focussed on the skills, competences and knowledge that learners had to demonstrate after completing the learning needed for particular qualifications.

#### ***SAQA responses that were 'qualification centred'***

Regarding a different 15 SAQA respondents (n=33), the basic meaning of the Level Descriptors was linked to qualifications. One respondent (n=33) described the Descriptors as a 'crude' or 'loose' tool for assessing the complexity of any learning material or qualification. These 15 respondents (n=33), felt that the Descriptors provided an indication of the cognitive development that occurred at particular levels, by outlining competency categories. The Descriptors were said to outline what a qualification at a particular level allowed a person to know and do, such as the extent to which tasks could be performed independently. The Descriptors were also said to offer, to some extent, content-based distinctions between the levels of learning. It was noted that, given the resemblance of the Descriptors to learning outcomes, the competency statements making up the levels needed to be understood in terms of learning outcomes. These understandings were based on the notion of Outcomes-Based Education (OBE), as reflected through the Exit-Level Outcomes (ELO) in qualifications. Respondents with these understandings explained that the Descriptors resonated with the OBE system adopted in South Africa, where rubrics were critical. In addition, the Level Descriptors were said to provide generic guidance, rather than being specific to particular qualifications. The Descriptors were

understood to assist with the benchmarking of qualifications, both within South Africa, and across countries.

### *SAQA responses that mentioned 'articulation'*

On the aspect of articulation, it was noted by 15 SAQA respondents (n=33), that the Level Descriptors were progressive in terms of each NQF level building on the preceding level. It was explained that the Descriptors were structured as a hierarchy or ranking of cognitive demands, from the lowest to the highest level of complexity, in terms of what learners were expected to know, do and understand (which comprised their learning achievements) at the end of learning for a qualification at any given NQF level. It was noted that the Descriptors provided clear means for vertical articulation, as well as assisting horizontal and diagonal articulation.

### **Quality Council responses**

Most (six) respondents based in the Quality Councils (n=7), highlighted that the Level Descriptors served as a policy reference to determine the content and substance of learning at particular levels of complexity. It was noted across the board, that the Descriptors classified learning and development, showing the competences needed for a learner to function at a particular level, in terms of knowledge, skills, and values<sup>55</sup>. Two respondents (n=7) said that the Descriptor document was an overarching one, and that qualifications should be benchmarked across the Descriptors. Descriptors could be used to question whether a 'qualification package' was meeting particular NQF level requirements. Two respondents (n=7) stated that the NQF and the Level Descriptors had changed the whole way in which education and training were conceptualised in the NQF Sub-Framework context, in that the focus had shifted to Learning Outcomes; "now [since the advent of the NQF], learning is seen in terms of Learning Outcomes – before, we had objectives, which were not as outcome-focused".

### **Departments of Basic Education (DBE), and Higher Education and Training (DHET) responses**

Most (four) respondents in the DBE and DHET (n=7), provided a view of the Level Descriptors as relating to the complexity of learning. These respondents said that the Descriptors provided an understanding of what the level of learning, competences and outcomes should be, at particular NQF levels. Two respondents (n=7) defined the Descriptors as "a benchmark" for learning and cognitive abilities, in the process of qualification development.

### **Qualification developer responses**

Just over half of the qualification developers (n=22) conveyed learner-centred

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<sup>55</sup> It was pointed out that competency is not theory or academic knowledge, but a generic definition of knowledge; competency involves being able to know and do.

understandings of the Level Descriptors, and a further third of this category of respondents provided qualification-centred definitions.

#### *Qualification developer responses that were 'learner-centred'*

Twelve respondents (n=22) defined the Descriptors in terms of their ability to guide the complexity of learning, including knowledge, skills and practical components – which were contained in the ten Descriptor competence categories. These respondents noted that the Descriptors provided tools to associate learning with the levels of knowledge to be acquired, and the levels of competences learners should be able to demonstrate, in order to achieve a qualification at a particular NQF Level. It was noted that these competences increased as the NQF levels increased.

#### *Qualification developer responses that were 'qualification-centred'*

Seven qualification developer respondents (n=22) defined the Level Descriptors in relation to qualifications. These respondents conveyed that the Descriptors were able to guide qualification developers in terms of the different competences needed for learning, and the extent to which the competences fitted specific levels. Further, the Descriptors were said to assist with the design and development of assessments. It was acknowledged that the Level Descriptors described the Exit Level Outcomes (ELO) of a qualification, enabling the qualification developers to rank the levels of different learning programmes. One respondent (n=22) stated that the Descriptors demystified what should form the basis of a qualification. The respondent went on to say that the Descriptors removed the perception that one qualification was 'better' than another, and in this way acted as a 'clearing house' for preconceived notions around qualifications. The respondent also noted that the Descriptors challenged the social systems of hierarchy, such as when one institution of learning was considered as being more prestigious than another.

### **Private Higher Education Institution (HEI) and College responses**

The responses of private HEIs and Colleges tended to link 'qualification development and the Descriptors' or 'learning programmes and learner competences', to the Descriptors'.

#### *Private Higher Education Institution and College responses that linked qualifications and NQF levels*

Three quarters (30) of the respondents (n=39) from private HEIs and Colleges defined the Level Descriptors in terms of how the Descriptors supported the design of qualifications and programmes. This 'group' spoke about the level of a qualification, and the academic levels of programmes, courses, modules, standards and assessments, which in turn informed the levels of the learning outcomes. It was noted that all of the qualifications offered by institutions have to be "pegged to an NQF level", and the Descriptors enabled the pitching of programmes at appropriate levels. The respondents highlighted that the Descriptors formed an integral part of curriculum design and learning outcomes, and ensured that modules were at the correct levels, with the levels of their various components

outlined in the ten competency categories of the Descriptors – such as such as the scope of knowledge; methods; problem-solving, and so on. By including these categories of knowledge and skills in programme design, the Descriptors enabled the quality assurance of programme offerings. Thus, the Level Descriptor document was said to act as a benchmark that guides qualification design; without it, “the design process would be an open and fluid process where qualifications would straddle the various levels, making it hard to differentiate between them”.

### *Private Higher Education Institution and College responses that linked learning programmes and learner competences, to the NQF Level Descriptors*

Three respondents (n=39) in the private HEI and College group defined the Descriptors as providing the criteria for “entry into a programme”. Besides supporting programme design, the Level Descriptor document was understood as being a tool for evaluating the outcomes of what a programme was intended to achieve, against the actual outcomes of learning shown by learners, and what competences the learners were supposed to display, in order to gain access to a programme. In this way, the Descriptors were seen as being measures to indicate learner competency, or cognitive and practical abilities, and to define the outcomes that should be achieved at various stages of learning development. One respondent (n=39) explained that the Descriptors were “a group of statements that describe learning achievements at particular levels”.

### **Sector Education and Training Authority (SETA) and Skills Development Provider (SDP) responses**

Four SETA and SDP respondents (n=6) defined the Level Descriptors in terms of the complexity of learning. These respondents mentioned that the Descriptors guided the determination of the levels of learning for occupational qualifications, and provided a scaffold from which more specific descriptors could be developed. Two respondents (n=6) stated that the Descriptors were meant to underpin qualifications, and that the Level Descriptors document helps to pitch qualifications at the right levels of learning. A further two (n=6) spoke of articulation, where the Descriptor document was noted as being helpful for facilitating progression in the system, so that learners could “build on” (progress from) their existing school qualifications.

### **Employer responses**

While employers mentioned that they did not use the Level Descriptors on a daily basis, three (n=6) indicated that the Descriptor document provided a structure and framework for curriculum development; it guided the development of qualifications at different levels of complexity.

### ***Responses regarding the usefulness of the Level Descriptors***

This sub-section presents respondent views on the usefulness of the Level Descriptors, by respondent category and theme.

## **South African Qualifications Authority (SAQA) responses**

The SAQA respondents explained in various ways, that the NQF could not function without the NQF Level Descriptors. The SAQA respondents mostly related the usefulness of the Level Descriptors, to judging the adequacy of qualifications submitted for registration on the NQF; for assessing foreign qualifications in order to assign them South African NQF levels; for assessing the uniformity/ comparability in the complexity and levels of difficulty of qualifications on the same NQF levels, and for ascertaining learner competency levels.

### *SAQA responses linked to qualification development*

Seven SAQA respondents (n=33) associated the usefulness of the Level Descriptors with qualification development. These respondents noted that the Descriptors acted as a mechanism for institutions to peg their qualifications at the right level. It was noted that qualification developers could use the Descriptors to design specific curriculum content and ensure that it was at the appropriate level. The respondents also noted that the Descriptors helped to translate learning achievements at particular NQF levels, into actual learning content and learning outcomes, irrespective of the field of specialisation. Also, when cases of “legacy qualifications” (pre-NQF and pre-2009 qualifications) arose, the Descriptors in a minimal way, assisted in helping evaluators to peg the qualifications according to NQF levels – while pairing or alignment was not always possible under these circumstances, given that the legacy qualifications were not written in ways that corresponded with the Descriptors, the Descriptors were however said to provide some basis for evaluation.

### *SAQA responses linked to the evaluation of foreign qualifications*

Six SAQA respondents (n=33) stated that the Descriptors facilitated the comparison of national and foreign qualifications. The Descriptors assisted the SAQA evaluators in assigning foreign qualifications to appropriate South African NQF levels, and helped the evaluators to minimise errors and rely less, on subjective judgments, by providing actual formal texts. The Descriptors were also said to serve as tools for improving international comparability for prospective learners intending to study outside South Africa. Ensuring that the South African qualifications were at appropriate levels assisted learners to progress along learning pathways internationally as well as within the country.

### *SAQA responses linked to the uniformity/comparability of qualifications*

Four SAQA respondents (n=33) mentioned that the Descriptors created a measure of uniformity. It was noted that there is some consistency between different qualifications at the same NQF level, for all institutions and all fields. A related point raised, was that the Descriptors acted as tools for transparency, by defining what learners should know, understand, and be able to do, at particular NQF levels. The Descriptors set minimum standards, potentially providing a basis to allow different ‘constituencies’ (such as those in the different NQF Sub-Framework contexts), to work together to enhance the articulation between qualifications.

### *SAQA responses linked to learner and worker competency levels*

Three SAQA respondents (n=33) discussed how the Level Descriptors could be used to establish learner and worker competency levels. The Descriptors were said to serve as helpful guides to indicate what a learner was expected to know and be able to do, at a particular NQF level, regardless of qualification type and field of study. One respondent (n=33) linked the usefulness of the Descriptors to articulation, noting that the Descriptors helped learners to transition between institutions for the same qualification, for instance, if a learner was relocating and needed to complete their studies elsewhere in the country. Another respondent said that the Descriptors were useful for the development and categorisation of professional designations, which, when linked “to the correct NQF level”, reflected the appropriate complexity in a way that was aligned to (the supporting) qualifications.

### **Quality Council responses**

While half of the Quality Council respondents (n=4) did not comment on the usefulness of the Level Descriptors, two (n=4) associated their usefulness with qualifications. The Descriptors were said to be used to clarify contested issues relating to qualifications, because the Descriptors made the requirements linked to NQF levels, very clear.

### **Department of Basic Education (DBE), and Higher Education and Training (DHET) responses**

While most respondents from the DHET and DBE did not provide responses to the question on the usefulness of the Level Descriptors, one (n=7) explained that the document was probably one of the most useful documents used, as it provided “a sense of the gradueness” of a learner or prospective employee. Another departmental respondent said that the document allowed for consistency, especially in terms of judging the parity of esteem between qualifications.

### **Qualification developer responses**

Nine qualification developers (n=22) related the usefulness of the Level Descriptors to qualifications, while under a third described their uses in terms of uniformity and articulation. The current Descriptors were said to be useful in that they assist different constituencies such as those in the industry, to interpret qualifications with regard to particular complexities. The Descriptors enabled qualification developers to pitch particular qualifications at specific levels, with particular competences – which included assigning specific levels to teaching, learning, development, and assessment – and were indicative, directive and helpful in this regard. The Descriptor document was said to be useful for clarifying “outstanding issues” relating to qualification development, such as when there were debates about the NQF level of a qualification. By being used in this way, the Descriptors became tools for the qualification developers “to work in a scientific way”, and to enhance the transparency in the industry (of qualification development).



Five qualification developer respondents (n=22) stated that the Descriptors were useful for creating uniformity between qualifications at the same NQF levels, in different disciplines or fields, and in so doing allowed developers and institutions to maintain standards. One respondent (n=22) mentioned that the Descriptors were useful in their ability to aid articulation processes, and that the Descriptors helped to embed career pathways in the education system.

### **Responses from public Higher Education Institutions (HEIs) and Colleges**

Twenty-three respondents from public institutions (n=25) said that the Level Descriptor document was “very useful/essential” or “useful”; two said it was of “some limited use/and not of much use”. From the responses, several said that the document was useful for the purpose of qualifications (seven respondents, n=25); some mentioned that the Descriptors were useful for defining learner competency (three respondents, n=25); others mentioned its usefulness for articulation and the uniformity of qualifications of the same NQF level (two respondents, n=25).

#### *Public Higher Education Institution (HEI) and College responses linked to qualifications*

Twenty-three respondents (n=25) said that the Level Descriptor document is very useful for designing qualification offerings/ learning programmes, including setting the learning outcomes and assessment criteria (the document was also said to be used in programme advisory committees to guide staff in the qualification processes). One respondent (n=25) felt that the document was reliable and up-to-date, and that the language used was accessible and generic, facilitating flexibility and adaptability, and allowing for a wide range of applications. The respondent said that the Descriptors indicate the level of knowledge required for a learner to achieve his/her qualification, and help to resolve misunderstandings related to the allocation or pitching of a qualification or learning programme, at an NQF level (the example given was that an NQF Level 4 qualification is not the same as an NQF Level 2 or an Adult Basic Education and Training [ABET] qualification).

Regarding the point around articulation and uniformity, four respondents (n=25) mentioned that the Descriptors simplify career and study guidance such as the minimum requirements to qualify for a qualification, and they sensitise teachers to developing progressive learning. The respondents said that the Descriptors standardised qualifications nationally and ensured coherence in learning achievements. However, one respondent (n=25) mentioned that there is still a need for an advocacy programme around the Level Descriptors, for the general public.

### **Responses from private Higher Education Institutions (HEIs) and Colleges**

Four respondents from private institutions (n=39) stated the Level Descriptors were beneficial in pegging qualifications at particular levels. In the process of informing qualification design, the Descriptors were said to be useful for establishing uniformity (two

respondents raised this aspect). The respondents also noted that the Descriptors helped to ensure that qualifications were on par with national standards, as they enabled accuracy and fairness, and a measure of standardisation, in module choices, assessments, and other elements of qualifications, including the whole qualification design process. Further, the respondents noted that the Descriptors helped to ensure that learners ended up with a particular range of cognitive competences after achieving particular qualifications. The Descriptors were seen as cutting across courses and programmes to achieve the same standards at the same levels. Two respondents (n=39) spoke about articulation and jobs, noting that positions in companies required qualifications at particular NQF levels; employers needed to think about NQF levels. The Descriptors were found to assist in articulation, when they enabled the comparison of learning achievements at particular levels.

### **Sector Education and Training Authority (SETA) and Skills Development Provider (SDP) responses**

SETA and SDP respondents generally felt that the Level Descriptor document was useful. Two respondents (n=6) said that it was “very useful/essential”, and two (n=6) that it was “useful/of some limited use”. Four respondents (n=6) associated the usefulness of the Descriptors, with qualifications. The Descriptors were seen to be useful for pegging qualifications and related content, to standards, and serving as broad indications of the levels of learning achievements or outcomes, for qualifications at specific levels. It was pointed out that without the Descriptors, it would be challenging to understand the levels of competency required by learners; stakeholders such as qualification developers and employers, may have difficulties in describing the levels of learning needed for particular occupations. Two respondents (n=6) found that the Descriptors created uniformity, since they allowed for the determination of equivalency, both horizontally and vertically, between qualifications, and ensured coherence in the learning achievements of different qualifications.

### **Professional body responses**

Of the 65 responses from professional bodies, 28 thought that the Level Descriptors were “very useful/essential”; 30 said that they were “useful”; seven were of the view that the Descriptors were “of some limited use”. Further, 13 respondents (n=65) saw the Descriptors as being useful in qualification development processes; nine said they were useful for pegging professional designations, eight saw them as being useful for comparing foreign qualifications; three associated usefulness with articulation, and two associated them with learner competency types and levels. The qualitative elaborations in the responses were similar to those given for the question regarding understandings of the Descriptors.

#### *Professional body responses linked to qualification development*

The 13 professional bodies (n=65) which explained that they found the Level Descriptors useful for developing qualifications and programmes, noted that they used the Descriptors

to set the standards for the levels of cognitive difficulty, and the comprehensive nature of programmes (and curricula, and other aspects), and to provide guidance in defining the levels at which to pitch qualifications. Furthermore, the Descriptors were described as allowing for the assessment of equivalence between different qualifications. The Descriptor document was said to explain, through its competency categories, the differences between learning programmes at different levels, such as those for the Higher Certificate, Diploma and Bachelor's Degree. The Descriptors served as indicators to measure what the industry standard requirements were, for the quality of work that an institution needed to produce.

#### *Professional body responses linked to professional designations*

Regarding professional designations, nine professional body respondents (n=65) stated that the Descriptors were useful for categorising the applications from candidates for professional designations, and determining where applicants were positioned in terms of the competences required. The Descriptors were also noted to assist in the professional registration processes, in that they provided the broad outcomes and competences required at specific levels. It was difficult to determine what informed entry into a professional designation, and having a benchmark like the Descriptors, was said to be useful. In this sense, the Descriptors decreased ambiguity for professional bodies, when determining candidates' educational achievements, and eliminating applications that were inappropriate. Respondents noted that the Descriptors enabled the holders of the designations, to meet the profession and industry standards, and to acquire skills that were current. It was also acknowledged that as tools, the Descriptors enabled the professional bodies to meet the requirements in SAQA's policies.

#### *Professional body responses linked to foreign qualifications*

Regarding foreign qualifications, eight professional body respondents (n=65) explained that the Level Descriptors helped to align foreign qualifications and part-qualifications (held by South African and foreign candidates), with South African qualifications and part-qualifications: the Descriptors provided benchmarks for this work. The respondents noted that the Descriptors and common understandings of the NQF levels, helped in the professional registration of foreign citizens, and enabled the professional bodies to achieve quality and consistency when assessing the validity of foreign qualifications in the registration process. It was noted that it was difficult to compare and determine the extent of candidate competence, in the absence of comparable measures.

#### *Professional body responses which mentioned articulation*

Three professional body respondents (n=65) explained that the Level Descriptors assisted articulation, especially by enabling qualification planning. As qualifications and professional designations were informed by the Descriptors, learning and work pathways were established for learners. The Descriptors were also said to be useful as a standard framework to link people with particular qualifications, to various jobs, job placements, and practice levels.

## ***Reported uses of the South African NQF Level Descriptors***

This sub-section discusses the uses of Level Descriptors based on responses from SAQA, the Quality Councils, DHET and DBE, qualification developers, public and private HEIs and Colleges, SETAs and SDPs, employers, and professional bodies.

### **SAQA staff responses**

Given that respondents within SAQA worked in different units or directorates, their varied usage of the Descriptors was expected.

#### *SAQA respondent use of the NQF Level Descriptors to moderate, compare and evaluate qualifications*

Eleven SAQA respondents (n=33) stated that they used the Level Descriptors to compare and evaluate foreign qualifications. For those within SAQA's Directorate: Foreign Qualifications Evaluation and Advisory Services (DFQEAS), the Descriptors provided a basis for evaluating foreign qualifications and part-qualifications, and comparing them with their South African equivalents. The Descriptors were used "to confirm the (evaluation/ comparison) decisions taken". When evaluating the foreign qualifications from countries which also had NQFs and Level Descriptors, the processes followed by the SAQA evaluators, included examining the content of the foreign qualifications, against the two sets of Descriptors: the Descriptors of the qualification-issuing countries, were compared with the South African NQF Level Descriptors. It was noted that the Descriptors were also used during "the appeals process", when applicants judged their qualification evaluations as being unfair, and appealed. In these cases, the Level Descriptors were used to explain the rationales for particular evaluation decisions, and enabled applicants with foreign qualifications, to understand how their qualifications had been benchmarked against the South African NQF.

Eight SAQA respondents (n=33) mentioned that they used the Descriptors to moderate and evaluate local qualifications, for the purposes of registration on the NQF. Staff in SAQA's Directorate for Registration and Recognition (DRR), who evaluate qualifications submitted to SAQA by the Quality Councils for registration on the NQF, check for compliance with SAQA's policy for registering qualifications, as part of the quality assurance of this process. Checking is also done to ensure that the submitted qualifications are appropriate for the NQF levels stated in the qualification documentation. Staff reported that they drew on the Descriptors to assess the appropriateness of the Exit Level Outcomes (ELOs) and the assessment criteria of the submitted qualifications; the Descriptors enabled them to see whether there was synergy between the various components of the qualification concerned.

#### *SAQA respondents' reported use of the NQF Level Descriptors in training, advocacy, and data capturing*

Four SAQA respondents (n=33) explained that the Descriptors were used for training by

employers; to support articulation; and to pitch professional designations at the desired levels. These respondents were located in SAQA's Directorate: Advocacy, Communication and Support (ACS), and received and addressed queries from members of the public, daily. The ACS staff members noted that the developers of programmes and curricula who phoned with queries, often enquired about the NQF levels and Level Descriptors. The Descriptors were also used by the ACS staff members to advise people, especially employment recruiters who phoned SAQA to enquire about how the NQF levels could be applied in job shortlisting processes. For instance, recruiters would want to advertise a job at a particular level, or they would need to respond to people with qualifications at lower NQF levels than those required – in such cases, the ACS staff would explain the competences in the Descriptors, and increasing complexity with the rise in NQF level. The respondents noted that “learners and ordinary people” rarely enquired about the NQF levels. In most instances the people calling for assistance, were those who were dissatisfied with the outcomes of their foreign qualification evaluations, such as when they received Certificates of Evaluation that showed their foreign qualifications to be at South African NQF Level 7, when they thought the qualifications should be at NQF Level 8.

Two SAQA respondents (n=33) mentioned that they used the Level Descriptors in data capturing. These SAQA staff members in the Directorate: National Learners' Records Database (NLRD), indicated that they used the Descriptors in the process of capturing qualification data on the system, which included capturing the specific NQF level of a qualification.

#### *Methods of using the NQF Level Descriptors*

SAQA staff described using either the verbs, or the adjectives, or both the verbs and the adjectives, in the practices of applying the Level Descriptors and differentiating between them. For instance, in the 'scope of knowledge' criterion of the Level Descriptors, adjectives/verbs such as 'general' knowledge (Level 1), 'basic operational' knowledge (Level 2), 'basic understanding' of knowledge (Level 3), 'fundamental' knowledge (Level 4), 'informed understanding' (Level 5), 'detailed' knowledge (Level 6), 'integrated' knowledge (Level 7), 'knowledge of and engagement in ...and application of' (integrated) knowledge' (Level 8), 'demonstrate specialist' knowledge (Level 9), and 'demonstrate expertise and critical knowledge' (Level 10), were used to differentiate between levels. What were described as 'handles' were also used to help staff distinguish between the levels by grouping the levels according to a particular shared aspect such as “Levels 1 to 4 build foundational knowledge”; Levels 5 to 7 involve “knowledge-doers where learners are required to take what they know and apply it”; and Levels 8 to 10 are about “knowledge-creators, where learners have to add new knowledge or new ways of thinking (in a discipline or area)”.

#### **Quality Council staff responses**

All of the Quality Council respondents (n=4) mentioned that the Level Descriptors were used to pitch qualifications at the desired levels; two (n=4) said they were used to frame training; one (n=4) explained that they were used to moderate or evaluate qualifications.

The Quality Councils refer the Level Descriptor document to qualification developers in their Sub-Framework contexts. The Quality Council respondents reported using the Descriptors to evaluate and moderate the qualifications submitted to them by providers, to ensure that the standards set out in the Level Descriptors and SAQA's policy for registering qualifications are met, before submitting the qualifications to SAQA for registration on the NQF. All of the Quality Council respondents (n=4) explained regarding qualification development, that the tasks included in the learning programmes developed by providers, were examined by the Quality Council staff, and the curriculum, modules, activities, competences and assessment were assessed against the Level Descriptors to ensure that all of these aspects were at the correct levels. The respondents reported that the Descriptors helped to scaffold learning; understand levels of learning; and understand the levels at which qualifications should be pitched. The QCTO respondents said that in the occupational context, the "Level, Activities, Roles, Focus (LARF) document" – which focused on applied skills rather than academic knowledge – was used. This document was said to assist in developing the knowledge and workplace components of occupational qualifications, and to support the Level Descriptors by customising them for the occupational context.

### **Department of Basic Education (DBE), and Higher Education and Training (DHET) staff responses**

Most (six) respondents from the DHET and DBE (n=7) used, or saw the usage of the Level Descriptors as being, for pitching qualifications at the desired levels. The DHET respondents noted that the Descriptors were used in the design of qualifications and assessment tools. One also mentioned that DHET staff used the Descriptor document to guide RPL candidates who approached the DHET for assistance. The DBE respondents noted that they were not direct users of the Descriptors, apart from when they developed qualifications for the schooling sector, such as the General Certificate of Education (GCE), which was then handed over to Umalusi for finalisation and submission to SAQA for registration on the NQF. In such cases, DBE staff used the Descriptors to design the generic content and learning outcomes for the qualification. It was observed that the DHET and DBE staff, while making use of the Descriptors, did not use the Level Descriptor document with the same frequency as did the interviewed staff from SAQA and the Quality Councils.

### **Qualification developer responses**

All the qualification developer respondents (n=22) indicated that they relied on the Level Descriptors to develop qualifications; some also reported that they used the Descriptors for items used in training, and job-related items.

#### *Qualification developer responses linked to qualifications*

According to these respondents, the Descriptors were used as benchmarks, to pitch the particular levels of qualifications and the learning required; without the Descriptors, it "would be difficult" to assign levels to qualifications and learning. The respondents

indicated that in the qualification development process, they pitched each learning area at the level needed, and then determined the “average level” of the qualification – by, for instance, aligning most modules to the Descriptor criteria. An NQF Level 3 qualification, for instance, would not necessarily comprise all modules at NQF Level 3; it could contain elements at NQF Levels 2 and 4, but overall, it would be at NQF Level 3. In the same way, an NQF Level 4 qualification would build on Level 3 elements, and point to Level 5 elements; if the qualification being designed contains too many ‘lower level’ or too many ‘higher level’ elements, it is adjusted accordingly.

Qualification developers working in the OQSF context noted that occupational qualifications needed consideration of the specificities of particular workplace contexts. These particularities were not explicitly stated in the Descriptor document, which was said by the qualification developers to be a generic guiding document. In the OQSF context, qualification developers used the LARF document – also mentioned by the Quality Councils – which maps the Descriptors to work-related content, also at specific levels. The OQSF consultants interviewed, reported using the LARF document in conjunction with the Descriptor document. They would start with the content of the qualification, review the content against the LARF requirements, and then determine activities and match these activities to the learning outcomes required. They would then proceed with a detailed review of the Descriptors to determine whether the qualification was at the right level, and whether or not its activities matched that level. If components did not match, the learning outcomes or the level of the qualification, would be adjusted. The LARF document was not seen as an alternative to the NQF Level Descriptors, but rather as an interpretative and reinforcing tool. Qualification developers in the OQSF context found the LARF document suited to their needs, as it provided for workplace skills.

#### *Qualification developer responses linked to workplaces*

Three qualification developer respondents (n=22) observed that the Descriptors were used for developing job descriptions and deliberating industry needs. Employers were using the Descriptors for job advertising and evaluation; consultants like the qualification developers sometimes helped in these processes, by designing the kind of work an employee needed to do. One respondent (n=22) mentioned the use of the Descriptors in training: qualification development consultants worked with training providers and used the Descriptor document in training sessions with other consultants, and industry experts.

#### **Public Higher Education Institution (HEI) and College responses**

Some TVET Colleges clearly did not use, nor were they familiar with, the NQF Level Descriptors<sup>56</sup>. Over half (14) of the respondents from public HEIs and Colleges (n=25) said that they used the Descriptor document for pitching qualifications; over a third (nine)

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<sup>56</sup> Some public TVET Colleges were found not to use the NQF Level Descriptors, because they worked within the framework of other government policies, syllabi, subjects and assessment guidelines, and DHET and SETA requirements. Others did not use the Descriptors, because their curriculum material was developed by external providers. Several Colleges reported that not all of their staff were familiar with the Descriptors; nor did they use the Descriptors on a regular basis.

reported using it to support articulation and CAT; one noted that the document informed job and industry items.

#### *Public Higher Education Institution (HEI) and College responses linked to qualifications*

The Descriptors were said to provide information about the categories of competence required in the development of learning programmes and courses, especially for new qualifications or for 're-curriculation' (some institutions were running curriculum renewal or review projects). When new modules were initiated or changed, modules were developed at specific NQF levels and the learning outcomes were matched against the Descriptors. It was felt that the Descriptor document enabled coherence in learning achievements, by helping to align competences and levels of complexity.

#### *Public Higher Education Institution (HEI) and College responses linked to articulation*

Two public HEI/College respondents (n=25) mentioned that the Descriptor document was used to facilitate articulation and CAT, as it guided stakeholders, including learners, parents and employers, regarding CAT and articulation routes. The Descriptor document was used to determine comparable or appropriate qualifications for entry into programmes. It helped the respondents to check how qualified a learner was, to upgrade into a qualification, and to set out an articulation route for the learner.

In the process of designing formal articulation agreements (such as Memoranda of Understanding [MoU] or Memoranda of Agreement [MoA]) between institutions, the Descriptors were reported to assist with the benchmarking of modules against NQF levels, which made articulation agreements easier. The institutions brokering these agreements used the Level Descriptors document as a basis for comparing the modules of their qualification offerings, and for allowing access and progression.

One respondent (n=25) also mentioned that in the OQSF context, the Descriptor document was used to prepare learning packages for students, to help them to acquire skills which they could use in the workplace while obtaining a qualification, which subsequently prepared them for a job.

#### **Private Higher Education Institution (HEI) and College responses**

The private HEI and College responses were linked to qualifications development, and training, respectively.

#### *Private Higher Education Institution (HEI) and College responses linked to qualifications development*

A large number of respondents from private HEIs and Colleges (35) (n=39) stated that they used the Descriptors to design new programmes, and to re-design existing qualifications and programmes when these were reviewed. The respondents noted that they examined the criteria for particular NQF levels, such as Levels 6, 7 and 8, to make sure that



qualifications were not “overstated or understated”. They integrated the ten categories of criteria contained in each Level Descriptor, into compact and manageable formulations of programmes and course outcomes, contextualised according to the specific nature of the qualifications and related assessments. In addition, guidelines relating to teaching and lesson delivery, were set at NQF levels. Further, quality assurance was noted as being enhanced through the usage of the Descriptors, which in turn, was reported to help learners to attain the appropriate skills and knowledge required at particular NQF levels.

#### *Private Higher Education Institution (HEI) and College responses linked to training*

Two respondents (n=39) stated that they used the Descriptors for training; a further two mentioned their use in articulation processes; and one (n=39) mentioned using the Descriptors for job and industry items. Some of the private HEI/College respondents noted that they trained academic staff on how the Descriptors were to be used in teaching and learning, and that as part of Continuing Professional Development (CPD), staff were tested on their understandings and usage of the Descriptors, as this ultimately enhanced the competences of the staff. The Descriptors were also used to identify qualification pathways, in that they served as reference points when designing programmes and learning pathways, and supported academic planning. In addition, the Descriptors were used in the identification of qualifications for skills development purposes, to ensure that the selected programmes were correct for the specified job levels, and prepared students for workplaces, in line with industry needs.

#### **Sector Education and Training Authority (SETA) and Skills Development Provider (SDP) responses**

All SETA and SDPs respondents (n=6) stated that the Descriptors were used to pitch qualifications at the levels desired. While the Descriptors, as a generic group of statements, were used in qualification development processes, their application was influenced by the field, discipline or context of a qualification. Nevertheless, the Descriptors were reported to guide the degree of complexity of activities/modules/assessment associated with particular NQF levels. The respondents mentioned that if internal components were not designed strictly in line with an NQF level, it was likely that the entire qualification would end up being at higher or lower levels. One respondent (n=6) said that the Descriptors were used to train qualifications development practitioners, and organisations and stakeholders in charge of curriculum design, to assist them to understand the levels of competence or skills sets required for particular occupations; the learning outcomes had to be aligned to the Level Descriptors.

#### **Employer responses**

Four employers (n=6) stated the Descriptors were used in the process of job selection and designing industry needs; two (n=6) mentioned that they were used for pitching qualifications at the correct levels; and one said they were important for articulation. The respondents explained that their Human Resource units used the Descriptors to determine the level of qualification that people needed to perform particular jobs. One employer (n=6)

mentioned that the Descriptors guide job specifications. The employer respondents noted that the Descriptor document assisted them in pitching training and training assessments at the right levels, and provided guidance on what to expect learners to achieve in terms of theoretical and practical knowledge. A point was also made about articulation, that the Descriptors assisted a company in identifying progression and articulation options, learning outcomes which informed assessment, and entry requirements (for a qualification or a job).

### **Professional body responses**

Professional bodies reported using the Descriptors for five main purposes: to evaluate local qualifications; to evaluate and compare foreign/international qualifications; to pitch qualifications being developed, at NQF Levels; for training; and for structuring professional designations.

#### *Professional body responses linked to professional designations*

Half of the professional body respondents (33) (n=65) said they applied the Descriptors when designing new professional designations, given that the professional designations had to be aligned with NQF levels. The Descriptors were said to assist in designing professional designation levels, and their associated entry criteria, all of which were aligned to NQF levels. Descriptors determined the qualifying requirements for professional designations by providing the basis for structuring the registration and membership criteria, which were used to assess whether candidates qualified for membership. In the process of designing the designations, the Descriptors were used to benchmark/determine the underlying qualification level and experience needed for the designation<sup>57</sup>.

Descriptors were also said to help to map out the outcomes or competences that the holders of particular professional designations needed in order to function optimally in the profession. Respondents mentioned that the Descriptors helped to ensure that there was consistency in the awarding of designations – in line with the NQF levels. The Descriptors provided the professional bodies with tools to identify academic or qualification requirements, and work experience; to assess competence for membership into the professional body, and to register and award designations to candidates. Ultimately these processes focused on core candidate competences, which the Descriptors helped to describe.

#### *Professional body responses linked to qualification development*

Twenty-seven (n=65) professional body respondents stated that they used the Descriptors in qualification development – in the development of new or revised qualifications – to benchmark the qualifications and ensure that they were at the desired levels. The

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<sup>57</sup> The general process when assessing candidate applications for registration with a professional body, is for candidates to submit a 'Portfolio of Evidence' that shows their qualifications and work experience. The NQF level of the candidate's portfolio is determined, and assessed against designation requirements. Professional bodies use the Level Descriptors to see which designation candidates should apply for.

Descriptors were also reported to help in setting the assessments that test the ability of candidates to apply knowledge to solve problems. The professional bodies noted that they were qualification developers in their industries, and used the Level Descriptors for this work.

#### *Professional body responses linked to training*

Eight (n=65) of the professional body respondents used the Descriptors for training purposes. They designed training, such as that for Continuing Professional Development (CPD), at particular NQF levels. They also referred employers and employment agencies to the Descriptors, for these entities to understand the competency levels pertaining to particular professional designations.

#### *Professional body responses linked to the evaluation of qualifications*

Eight (n=65) professional body respondents reported using the Descriptors to evaluate foreign qualifications and compare these to local qualifications, and moderate/evaluate local qualifications. The Descriptors were used in the evaluation of foreign qualifications to assess their levels against South African qualifications, industry standards and various other criteria. SAQA was recognised as the authority which evaluated and assigned South African NQF levels to foreign qualifications. The Descriptors were used in local accreditation to offer the qualifications that would form the basis of professional body membership, given that the professional bodies were responsible for upholding particular industry standards. The professional bodies used the Descriptors to develop standards for qualifications in their fields, that provider institutions needed to abide by, to enable the eventual professional registration of candidates on the basis of these qualifications.

### ***Challenges encountered regarding the South African NQF Level Descriptors***

This sub-section presents challenges experienced with the Level Descriptors from the perspectives of SAQA, Quality Council, DHET and DBE staff; qualification developers, the management of public and private HEIs and Colleges, SETAs, SDPs, and professional bodies.

#### **SAQA staff responses**

SAQA respondents identified a number of challenges regarding the Level Descriptors, with a high number (21) (n=33) noting that the Descriptors were difficult to understand. A further 15 respondents (n=33) stated that in some instances the differences between the NQF Levels were unclear, and the Descriptors tended to overlap. Some of these respondents reported having difficulties distinguishing between NQF Levels 2 and 3; others had this difficulty between NQF Levels 7 and 8. Others noted that outside SAQA there was a lack of knowledge and understanding of the Level Descriptors; some stakeholders were simply avoiding using the Descriptors; others noted that the Descriptors did not deal adequately with occupational competences.

*SAQA respondent reports that the NQF Level Descriptors are too academic, technical and complex*

Twenty-one respondents (n=33) stated that the Descriptors were too academic, technical and complex in nature. It was noted that although consistent language was used across the Descriptors, the problem was that the Descriptor statements were too wordy, technical, academic, theoretical, repetitive, and difficult to understand or interpret in practice. It was noted that this had been the experience of the staff themselves, and was also true for stakeholders outside SAQA, including learners. Qualification evaluators inside SAQA observed that it seemed more difficult for people in the occupational sector to make sense of the Descriptors, especially because in this sector, many of the competences were practical as opposed to being academic and theoretical. Respondents argued that while the verbs and adjectives in the Descriptors could be drawn upon, there are no specific verbs and adjectives: some were repeated across NQF levels. One example of this repetition, was the word “demonstrate”. It was noted that the original intention was that the Descriptors would be clear and unambiguous, and that was not the case in practice.

*SAQA respondent points around the need to simplify the NQF Level Descriptors*

Some SAQA respondents suggested that the Descriptors should be reworded to be less complex – and that such steps could make them more extensively used within the NQF community. The respondents elaborated that the Descriptors should be tightly condensed and clearly differentiated to provide quick and immediate impressions of particular NQF levels. They expressed a need for a more simplified and shorthand version of the Descriptor document. They acknowledged that while abstract learning may not be easily quantifiable, at the same time qualitative statements should be simplified. The challenge was seen as being to convert the Level Descriptor statements to more practical, tangible, simpler statements that both “advanced and ordinary” users could use. Suggestions included that the simplification process should result in more direct sentences and specific verbs or adjectives that did not overlap between descriptors – to be used by qualification developers, evaluators, and other users, so that they are “lost in wordiness”.

In addition, at present, some words like “articulation”, were not widely understood – such as in countries outside South Africa; it was noted that the South African Level Descriptors needed to be understandable internationally as well as nationally – such as in the Southern African Development Community (SADC) context. It was suggested that the Descriptor document could include a section that explained the differences in terminology for various regions.

*SAQA respondent challenges in distinguishing between the NQF Level Descriptors*

Fifteen respondents (n=33) felt that the differences between NQF levels were not clear, and that some levels tended to overlap. The distinctions that respondents struggled to make included those between NQF Levels 2 and 3 on one hand, and Levels 7 and 8 on the other. It was found to be difficult to determine the cognitive demands expected of

learners at these levels. Another problematic case that was frequently pointed out by respondents, was that between Levels 5 and 6, where the difference between 'informed understanding' and 'detailed knowledge', respectively, was not easy to grasp/apply. Distinctions that were found to be easier included those between Levels 1 and 2; Levels 3 and 4; Levels 4 and 5; and Levels 9 and 10. Five SAQA respondents (n=33) felt that the categories of applied competency were duplicated: while having 10 NQF levels was not signalled as a challenge, these duplications were. It was suggested that to address this difficulty, some categories of Descriptor criteria, which caused the overlaps, could be grouped, for example those of "scope of knowledge" (Criterion 1) and "knowledge literacy" (Criterion 2). Also the criteria of "ethics and professional practice" (Criterion 5) and "accountability" (Criterion 10). And the criteria "producing and communicating information" (Criterion 7) and "accessing, processing and managing information" (Criterion 6). Further, it was suggested that possibly "method and procedure" (Criterion 3) and "context and systems" (Criterion 8) could be integrated – resulting in five, rather than 10, Descriptor criteria. The suggestion was also made, that not all of the criteria may apply at all NQF levels.

#### *SAQA respondents noting the need for advocacy and training regarding the Level Descriptors*

Seven respondents (n=33) raised the need for public awareness and training regarding the NQF Level Descriptors. The technical nature of the Descriptors was said to add to the difficulties associated with using them. It was thought that the Descriptors were useful for qualification developers; education, training and development practitioners; employers and learners – as well as for the NQF partner organisations. It was noted that therefore, more awareness needed to be developed around the Descriptors as descriptions of learning outcomes – through roadshows and other forms of public engagement.

#### *SAQA respondent observations that the NQF Level Descriptors were not always used*

A further seven SAQA respondents (n=33) noted challenges in that the Descriptor document was viewed as being "descriptive" rather than "prescriptive". While using the Level Descriptors to shape qualifications and their levels, is mandatory – as specified in SAQA's policy for registering qualifications – at times, qualifications were submitted to SAQA for registration on the NQF, which did not reflect use of the Descriptors, or reflected partial alignment to the Descriptor criteria. Respondents reported that some providers had copied the words from the Descriptor document, into the submitted qualification documentation, rather than engaging deeply with the Descriptor document, to shape the content of the qualification. Further, sometimes when a submitted qualification was returned by SAQA to the Quality Councils on the basis that it did not adhere to the Descriptors, the providers had criticised the evaluators for "failing to understand" the curriculum specifics. At other times, inconsistencies were found, between the Exit Level Outcomes, the assessment criteria, and the rules of combination in qualifications. In further instances, there was no consistency between similar qualifications at the same NQF Levels, which shared the same title and credits.

### *SAQA respondent observations regarding the incorrect pegging of qualifications*

The SAQA respondents reported the inappropriate pegging of qualifications on the NQF, at times, by providers<sup>58</sup>. For example, the qualification may be placed at NQF Level 8, but its Exit Level Outcomes are at NQF Levels 6 or 7. In addition, providers, especially in the HEQSF context, offer short courses and have allocated NQF levels to these offerings – although NQF levels can correctly only be allocated the qualifications registered on the NQF, in one of the NQF Sub-Frameworks. Respondents noted the need to develop contextualised criteria for the Descriptors, for use in the NQF Sub-Framework contexts.

### *SAQA respondent observations regarding the need for occupational or workplace-related criteria in the NQF Level Descriptors*

Two SAQA respondents (n=33) commented on the need for occupational or workplace-related areas to be included in the Level Descriptor criteria. These respondents noted that the Descriptors focused mostly on learning, and were biased in favour of academic criteria, to the exclusion of a range of competences needed in workplaces.

### **Quality Council challenges reported**

Two Quality Council respondents (n=4) interviewed also noted difficulties in distinguishing some of the Descriptor criteria, for example, in the “scope of knowledge” for NQF Levels 5 and 6, which were very similar. It was further noted that there should be no room to say that an NQF Level 1 qualification could also be NQF Level 2 or 3 qualifications.

A further two Quality Council respondents (n=4) mentioned that the Descriptors should include criteria relevant in the occupational context; there was especially a need to elaborate on the practical aspects. One Quality Council respondent (n=4) said that SAQA should consider encouraging Level Descriptors elaborations for the NQF Sub-Framework contexts.

### **Department of Basic Education (DBE), and Higher Education and Training (DHET) challenges reported**

Two DHET and DBE respondents mentioned the lack of public awareness of the NQF Level Descriptors, and the need for training in this regard (n=7). A further two respondents (n=7) mentioned the broad nature of the Level Descriptors, which were said to be “too broad to be meaningful”, especially given that the learning outcomes were difficult to explain. It was suggested that the Descriptors be contextualised for the Sub-Framework contexts. The departmental respondents expressed the need for workshops for stakeholders, to deepen the understandings and application of the NQF Level Descriptors,

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<sup>58</sup> Providers do not submit qualifications directly to SAQA for registration; this is done by the Quality Councils. If a qualification is rejected by SAQA, the decision goes to the relevant Quality Council, which then communicates with the provider concerned. The provider then responds to the relevant Quality Council and the Quality Council sends this information to SAQA.

which were not universally being used as intended. While the document “is structured and critical”, one respondent (n=7) explained that the document should be made more “illustrative and diagrammatic”, to help people to understand the flow of the levels. In addition, people need to accept the Level Descriptors as providing sound parameters and guidelines, and that they do not restrict learning. The Level Descriptors need to be understood as enablers of horizontal, vertical, and diagonal articulation.

### **Qualification developer challenges reported**

Over half of the qualification developer respondents (n=22) cited problems related to the theoretical nature of the Descriptors; under a third mentioned the lack of public knowledge as to how to apply the Descriptors, and that there were missing components in the Descriptors; and some also made reference to the overlapping nature of the levels as well as to the descriptive and broad nature of the document.

#### *Qualification developer observations that the NQF Level Descriptors are too academic in nature*

Thirteen respondents (n=22) mentioned the academic and wordy nature of the Descriptors as a problem. They stated that the Descriptors are academically focused, and that the language used is dense, technical and not easy to read – although every word might have been decisively chosen. For the qualification developers, the problem was either due to the phrasing itself, or the way that the Descriptor statements were categorised. Respondents suggested that SAQA should consider illustrating the descriptors in a chart (similar to the NQF diagram), and/or provide a summary that shows all the NQF Level Descriptors at once. This chart should clearly outline the differences between NQF Levels. Without a chart, it became difficult to compare Level 3 and 4 qualifications, for instance, because one has to page through the document like a book. Qualification developer respondents noted that the Descriptor document needed to become an easier tool to use for day-to-day decisions and practice.

#### *Qualification developer observations of the need for advocacy and training regarding the NQF Level Descriptors*

Five qualification developer respondents (n=22) discussed the need for training and public awareness around the Descriptors. Some noticed that while providers tend to use the Descriptors more, professional bodies and employers need to understand the value of the NQF levels. The qualification developers suggested that the Descriptors should be workshopped with stakeholders; discussion around the Descriptors was needed, given that consultants struggle to use the document.

#### *Qualification developer observations of the need for occupational or workplace-related criteria in the NQF Level Descriptors*

A further five qualification developer respondents (n=22) flagged the lack of focus upon occupational qualifications in the Descriptors. From the perspective of those working in the

OQSF context, the Descriptors failed to capture correctly, work-related aspects such as accountability in the workplace and the responsibilities of workers in this regard. It was noted that the learning happening outside formal academic contexts, was not considered in the Descriptors – including aspects such as “social/soft skills” or “emotional intelligence”, where people have to exercise personal judgment and communicate with colleagues, for instance, which were part of the world of work. It was noted that Work-Based Learning (WBL) required different competences to those associated with learning in academic settings. In addition, it was mentioned that the Descriptors should consider different contextual elements, embrace the complexities associated with vocational learning and be elaborated in a way that could be used across the Sub-Framework contexts. The point was raised that the Descriptors need to enable the linking of knowledge, skills and practical components in the curriculum; the consultants observed that these aspects were not adequately linked.

#### *Qualification developer observations that the distinctions between NQF levels are not clear*

Four qualification developer respondents (n=22) stated that differences between NQF Levels were not clear, that the levels were not easy to distinguish. It often took concentrated study to decipher the distinguishing elements, and a positive outcome (the distinction) was not always guaranteed. It was noted in particular, that NQF Levels 6 and 7 were confusing and not easily distinguishable. It was also mentioned that the Descriptor document tended to be repetitive, for instance, many of the higher levels mentioned disciplinary knowledge, which contributed to making distinctions difficult.

#### *Qualification developer observations that the NQF Level Descriptors are not prescriptive*

Two qualification developer respondents (n=22) discussed the need for the Descriptor document to be more prescriptive. Qualification developers were not using it with SAQA’s policy for registering qualifications, leading to an array of interpretations. Consultants noted that with expert practitioners or training providers who designed qualifications, there was a tendency to assign higher levels to the qualifications than those suggested by the content. It was re-iterated that if the document used more accessible language, and was more clearly prescriptive in nature, it would assist the industry. Consultants also observed that few learning and development practitioners knew about the Descriptor document, and that the Descriptors were not influencing practice to the extent that they could. Two further respondents (n=22) mentioned the broad nature of the Descriptor document, rendering it vague and open to interpretation, while other respondents in this category commended the lack of specificity, as it enabled a degree of flexibility for the design of qualifications.

### **Public Higher Education Institution (HEI) and College challenges reported**

When asked whether the Descriptors should be strengthened, 11 (n=25) public institutions agreed, and 14 (n=25) disagreed. From the qualitative responses, two respondents (n=25) said the document needs to be simplified, one (n=25) mentioned the need for public awareness; another said some levels overlap; and the point of occupational relevance and specificity was also noted by two respondents.



On the aspect of simplicity, respondents said that examples should be given regarding the application of the Descriptors; there should be a summary that shows how knowledge changes from NQF Levels 1 to 10. It was also noted that there is no general understanding of how the Descriptors work, and how to integrate Critical-Cross-Field Outcomes – “people tend to draw on Bloom’s taxonomy to develop level outcomes”. Therefore, it was said, the Descriptors should be extensively workshopped.

On the point of overlap, the respondents explained that the differentiation between each level must be more explicit. Respondents felt that the Descriptors should accommodate the qualities needed in occupational qualifications, more. Some mentioned that the Descriptors are defined in a neutral and generic way, and as such, it is important to consider elaboration to enable a deeper engagement in the Sub-Framework contexts.

### **Private Higher Education Institution (HEI) and College challenges reported**

Regarding the challenges experienced with using the Level Descriptors, five private institutions (n=39) mentioned the broad nature of the Descriptors; three respondents (n=39) highlighted that the Descriptors need to be made more understandable, three (n=39) stated that there needs to be training around the Descriptors; and two (n=39) indicated that there is duplication of categories in the Descriptor statements; there are overlapping levels, and there is a lack of focus on emerging trends.

#### *Private Higher Education Institution (HEI) and College observations that the NQF Level Descriptors are generic and broad*

On the aspect of broadness, the five private entity respondents (n=39) mentioned that the Descriptors were too generic to make sense, or to translate into practical situations; difficulties were experienced in linking the Descriptors to assessments and to pitching qualifications at the right levels. Respondents were challenged in contextualising the Descriptors for specific fields and levels, which involved aligning the Descriptor criteria with different disciplines. The examples of Art and Design were given, where the valued skills, like innovation, were not necessarily academic in nature. It was noted that while the Descriptors were meant to foster common understanding amongst “curriculumators”, the “curriculumators” found implementing the Descriptors, including contextualising the Descriptor criteria, difficult. The Descriptors were not always understood and applied by staff.

#### *Private Higher Education Institution (HEI) and College observations that the NQF Level Descriptors are academic in nature*

Three private entity respondents (n=39) noted that the Descriptor document had very academic language, and that readers were required to demonstrate understanding of its contents. It was noted that some of the verbs, adjectives and terms were found to be too vague; the example given was the term “understand”. It was felt that the content in the Descriptors should be explained to institutions; respondents expressed that SAQA should encourage institutions to acquire the document, and not assume that it is already known or being implemented. They also suggested that the use of Bloom’s taxonomy might be

helpful, and that examples should be provided from different disciplines, such as Engineering or the discipline of Fashion Design, and the scope of knowledge and other applied competences, which a learner needs to achieve before they exit a qualification, are explained. These respondents were asking for practical, and not theoretical, Descriptors.

#### *Private Higher Education Institution (HEI) and College observations of the need for advocacy and training regarding the NQF Level Descriptors*

Private entity respondents explained that it should not be taken for granted that people understand what the various Descriptor statements and adjectives mean. It was noted that there was currently confusion around ABET for example, where learners completed ABET Levels 1 to 3, only to discover that ABET Level 4 was at NQF Level 1. Respondents noted that since qualification developers and other practical users of the Descriptors need to contextualise them for various subjects, fields and disciplines, people should be able to deconstruct the Descriptor statements and clearly identify what learners should know and be able to do – and that this was currently not the case. Respondents suggested that workshops should be held to enhance awareness around the Descriptors and their practical application.

#### *Private Higher Education Institution (HEI) and College observations regarding the duplication and overlap in the NQF Level Descriptors*

Two private entity respondents (n=39) mentioned that they felt the Descriptor statements contained duplications in the categories of applied competence. Although the Descriptors were acknowledged as helping with qualification design, the respondents expressed that it took a lot of time to explain the Descriptor criteria to academic staff, as there were many criteria, and that the document was not easily understood as a guideline for academic qualification development. Respondents also noted that the Descriptor criteria were not equally applicable at the to lower NQF Levels, as some of the criteria were not relevant at certain levels. These respondents noted an overlap between the criteria for NQF Levels 8 and 9, which were viewed as being too similar; “research” was the main factor distinguishing these levels. It was further noted that the differentiating factors at each NQF level were sometimes subtle, resulting in an apparent or actual overlap between the levels. One respondent (n=39) however said that there should be a “flow of learning” where the learning at one level formed the foundations for related learning at the next level. One respondent (n=39) noted that the Level Descriptor document failed to consider emerging trends and graduate attributes that should be in programmes.

#### **Sector Education and Training Authority (SETA) and Skills Development Provider (SDP) challenges reported**

Of the four SETA responses, two indicated that the Descriptors should be strengthened, and a further two disagreed. The qualitative responses showed that two respondents (n=4) felt that the Descriptors should be simplified. The Descriptors, it was felt, should be made more practical for users and should be more concise and succinct, and it was also

suggested that they should be presented in a tabular form to facilitate usage. It was also pointed out that public awareness and training regarding the Descriptors, was needed. SETAs and SDPs pointed out that employers and those in the skills development sector were confused about where to pitch qualifications at particular NQF levels, on the Organising Framework for Occupations (OFO); the Descriptors and the OFO were seen as different frameworks – while a qualification could be pitched at OFO Level 4, it could be at NQF Level 2 or 3. It was noted that the usefulness of the Descriptors would depend on how Qualification Development Facilitators (QDFs) were able to explain them to the community of expert practitioners in the OQSF context.

### **Professional body challenges reported**

Twenty-nine professional body respondents (n=65) thought that the Level Descriptors needed strengthening; 34 said that they did not need strengthening.

#### *Professional body observations on the need for advocacy and training regarding the NQF Level Descriptors*

Twelve professional body respondents (n=65) felt that stakeholders did not understand the Descriptors, and that there was a need for public awareness-raising workshops in this regard; ten felt that the Descriptors were difficult to understand and should be simplified; six felt that the Descriptors needed to consider emerging trends, articulation, the workplace, and professional designations; three felt that the differences between the levels were not clear; and one felt that some categories of applied competence were duplicated and that the Descriptors were not sufficiently specific.

Professional body respondents highlighted that SAQA should provide information on the NQF Level Descriptors, that the professional bodies could use to send to their stakeholders, via their newsletters or other regular communication channels. More documents and information were needed on how to apply the Descriptors. Further, more assistance should be provided to professional bodies to design levels for their designations in line with the Level Descriptors. While Professional Bodies found using the Descriptors challenging, they noted that there was a general need to enhance public awareness about the usefulness and relevance of the Descriptors, for qualification development and delivery, professional designations and occupations – and to build the institutional capacity to apply the Descriptors. It was noted that using the Descriptors could support parity of esteem. It was noted that while the Descriptors were recognised as being important, more work was needed to ensure that people and institutions recognised this.

#### *Professional body observations that the NQF Level Descriptors are academic in nature*

Twelve professional bodies (n=65) noted that the Descriptors were academic and cumbersome to use; they felt the Descriptors were difficult to read and apply, and that SAQA could expand further in the form of a narrative or “flesh out” each Descriptor. These respondents thought that providing this clarity would strengthen the Descriptors, and that Bloom’s taxonomy could be used to help “ordinary individuals” to grasp the Descriptors.

Some called for a table summarising the levels, with descriptions of each NQF level, and examples.

### *Professional body observations on the need to address articulation challenges*

Amongst the 12 professional bodies (n=65), several articulation-related points were made regarding strengthening the Level Descriptors. Firstly, the issue of emerging trends was raised, and the need for the Level Descriptors to be future-focused. Secondly, it was noted that the Descriptors should address the articulation challenges between qualifications and professional designations, and between Degrees and Diplomas on one hand, and occupational qualifications on the other. Third, they mentioned that Descriptor criteria should include aspects relevant for the knowledge and skills needed in workplaces, including for Trades, which would make qualifications and professional designations more relevant. Fourth, they noted that the Descriptors would be strengthened by including criteria for professional designations. Fifth, they emphasised that the Descriptors did not indicate incremental differences between levels, clearly. They pointed to the current use of verbs, adjectives, and other terminology, to achieve this differentiation, and called instead for further clarification including through visual means, and elaboration of the different terms such as “basic”, “fundamental” and “operational” knowledge. They noted that currently the differences between the terms were subtle, and felt that only educational experts would be able to understand them fully. There were duplicated categories of applied competence. Lastly, some thought that the Descriptors should provide a scaffold from which more specific descriptors could be developed for different sectors in discipline-based, occupation-based, or profession-based, ways.

## ***NQF Level Descriptors under the SAQA and NQF Acts***

This sub-section discusses the Level Descriptors under the SAQA and NQF Acts respectively, based on the responses of staff from SAQA, the Quality Councils, DHET and DBE, qualification developers, public and private HEIs and Colleges, SETAs and SDPs.

### **SAQA staff responses**

Seven of the SAQA respondents (n=33) provided views on the NQF Level Descriptors under the SAQA and NQF Acts respectively. Under the NQF Act, a 10-level framework replaced its eight-level counterpart under the SAQA Act. Under the NQF Act, what had been Level 6 under the SAQA Act, became Level 7. Under the SAQA Act, masters and Doctoral Degrees were on the same level; under the NQF Act they were positioned on Levels 9 and 10 respectively. Six respondents (n=33) noted that under the SAQA Act, Descriptors had only been published for Levels 1-4, while general understanding around Levels 5-8 was assumed. The lack of the Level 5-8 Descriptors was said to result from a lack of confidence on the part of the Higher Education sector, in the NQF system with its Outcomes-Based Education approach, and the fact that Descriptors were not used as much as they were currently. In the Higher Education sector, the notion of “graduate

attributes<sup>59</sup> was embraced, and the focus was more on curriculum issues and finding ways of describing and distinguishing Higher Education qualification types, rather than on applying the Level Descriptors to Higher Education qualifications. Under the NQF Act, one of the priorities of the CHE in the establishment of the HEQSF, was to describe Higher Education qualification types and their NQF levels.

While the accessibility of the Level Descriptors under the SAQA Act was noted (they are remembered as being less academically-oriented and rigorous, with qualitative statements which were easier to grasp), three respondents (n=33) highlighted the inconsistent application of the old descriptors, and the improvement in the consistency of application, with the formalisation of the current Descriptors. From the promulgation of the SAQA Act, between 1995 and 2002, there were no Level Descriptors. One respondent (n=33) described qualification developers and moderators as “flying blind” at the time, or as working after having developed “a feel” (for the level of a qualification). It was noted that during this time, SAQA had oversight of qualification development, and was hands-on in terms of supervising consultants, Standards Generating Bodies (SGBs) and National Standards Bodies (NSBs), who were responsible for the generation and recommendation of qualifications and standards<sup>60</sup> respectively. When the Level Descriptors were published in 2003, they were used by SAQA staff but there was generally no uniform approach to qualifications development. SAQA staff underwent training to use the old descriptors, but it was the consultants from outside of SAQA who were at the forefront of writing up the actual qualifications.

The SAQA respondents noted that in the early years under the SAQA Act, the NQF levels to which qualifications were linked, were often not clear; the Unit Standards compounded this issue because they “compartmentalised” learning, and the rules for their packaging were not clear. Qualifications designed for the higher NQF levels (Levels 5-8) were developed using generic conceptual descriptors such as “manage”, “supervise”, “assess” and “analyse”; and for the lower levels, “under supervision” and “apply”. It was noted that without a full guiding framework, qualification developers often started out by deliberating what Unit Standards could be used to make up a qualification. Although SAQA staff were involved in the generation of qualifications, one respondent (n=33) mentioned that the term “Descriptors” was hardly spoken of; although the issue of the NQF levels existed, there was no universal common currency around “Descriptors” and qualification development.

The SAQA respondents noted that under the NQF Act, the ten NQF Level Descriptors were developed and published (SAQA, 2012a). The new Level Descriptors incorporated the old Descriptors, restructuring them. While the old Descriptors focused on two categories of competences (“applied competence” and “autonomy of learning”), the new Descriptors focused on 10. The old Descriptors were not associated with “Exit Level Outcomes” and “Assessment Criteria”; the new ones were. Respondents also noted that the old

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<sup>59</sup> The concept of “graduate attributes” provided for the competences, skills and knowledge, which students developed during their academic studies at HEIs, and were also outcomes-focused.

<sup>60</sup> The SGBs and NSBs were responsible for developing Unit Standards and skills programmes. Under the NQF Act, the SGBs and NSBs were disbanded and the responsibility for standard setting and quality assurance moved to the Quality Councils.

Descriptors were arguably not as widely known and applied, as were their current counterparts.

### **Quality Council staff responses**

One of the Quality Council respondents (n=4) commented on the existence of NQF Levels 1 to 4 under the SAQA Act. All of the Quality Council respondents highlighted the differences between the old and the current Descriptors, and the user-friendly nature of both sets of Descriptors. It was noted that under the SAQA Act, qualification development often started “from the bottom-up” and the old Descriptors were not used a lot, while the current Descriptors were guiding qualification development.

The Quality Council respondents noted that the old Descriptors were comparable to Critical Cross-Field Outcomes which focused on areas such as “communication”, “technology”, “ethics”, and “professionalism”, pointing out that the new Descriptors had absorbed these categories of competence. The old Descriptors were said to be simpler to use, and were noted for being more specific, while the new Descriptors were described as being multi-faceted, and as being applicable across implementing environments. Under the NQF Act, it was noted that efforts had been made to speak in the Descriptors, to the realities in all three NQF Sub-Framework contexts.

### **Department of Basic Education (DBE), and Higher Education and Training (DHET) responses**

There was one response from the departmental people interviewed regarding the Level Descriptors under the SAQA and NQF Acts respectively. One respondent (n=7) commented on the state of the Descriptors under the SAQA Act, indicating that there was a formal document for NQF Levels 1 to 4 at the time; the current Level Descriptors (SAQA, 2012a), were the first holistic and formalised of their kind. In addition, it was mentioned that the Higher Education sector did not agree on the Descriptors for Levels 5-8.

### **Qualification developer responses**

Over a third (eight) of the interviewed qualification developers (n=22) raised the existence of the NQF Level 1-4 Descriptors under the SAQA Act, and their user-friendliness, noting also the transition to the current 10-level framework, and the lack of buy-in of the Higher Education sector, for the old Level 5-8 Descriptors. Respondents recalled that the old Descriptors were used mostly between 2003 and 2008 where the document was called “Criteria and Guidelines”. A working group had been set up in 2005 to develop Descriptors for NQF Levels 5-8, but they were never finalised or agreed upon. When the Joint Policy Statement was issued, the NQF was increased to 10 Levels and the Descriptors were subsequently expanded<sup>61</sup>. The perception amongst qualification developers at the time was noted, that the biggest need in terms of Descriptors, was for NQF Levels 1-4, as the Higher Education sector had long since had levels, and relied on its rules and conventions for designing and delivering qualifications. One qualification developer respondent (n=22)

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<sup>61</sup> This statement was issued by the ministers of Education and Labour in September 2007.

put it that “it was difficult to inject something that did not fit into the Universities thinking of Level Descriptors”. This respondent noted that there were institutional-procedural clashes where the HEQC decided to be involved in a separate process to develop NQF Levels 5-8, whereas SAQA was mandated to manage the process. At the time, the respondent noted, the Level Descriptors for all eight levels under the SAQA Act, were not generally available for use by qualification developers.

Three qualification developer respondents (n=22) mentioned the user-friendly nature of both the old and new Descriptors. The current Descriptors were recognised as differing from the old Descriptors because of their detailed categorisation which made them relatively easy to understand, although problems were sometimes experienced. One respondent stated that the old levels were not sophisticated enough, although they were sometimes easier to use because they had fewer criteria. One qualification developer stated that a substantial change from the old to new Descriptors was not very evident.

### **Sector Education and Training Authority (SETA) and Skills Development Provider (SDP) responses**

One respondent (n=6) commented on the nature of the Descriptors under the SAQA Act, noting that individuals within the Higher Education sector had advanced a view of their sector as separate and apart; they wanted to retain their own independent way of looking at things. As such, the value of a common document like the Level Descriptors was criticised.

## ***Summary overview of the understandings, uses, and impact of the South African NQF Level Descriptors***

### **NQF Level Descriptors**

It is clear from the responses, that the NQF Level Descriptors developed under the NQF Act – from elaborating two areas of competences across four levels under the SAQA Act, to the current 10-level framework, with ten areas of competence for each of the 10 levels. There have also been developments with respect to the buy-in of stakeholders: while the Higher Education sector opposed the Level Descriptors under the SAQA Act; all NQF stakeholders are using the Level Descriptors (SAQA, 2012a) under the NQF Act. While some user-challenges have been reported, the Descriptors were widely described as a framework that describes learner competences and informs articulation between qualifications, the professional designations of professional bodies, and workplaces. Respondents most commonly mentioned using the Level Descriptors for the development, delivery, comparison, and evaluation, of qualifications. The Descriptors were also reported as being used in workplaces, industry, and professional contexts, to peg competences and occupational/professional practices to NQF levels, and for NQF-appropriate practices such as RPL, CAT, and articulation.

## **Valuing the NQF Level Descriptors**

Respondents were clear about the Level Descriptors under the NQF Act providing a strong and objective structure for qualifications, professional designations, and the NQF practices of RPL, CAT, and articulation. A large degree of agreement was found, regarding the benefits of the Level Descriptors, for pegging qualifications and the modules, content, teaching and learning, assessment, and outcomes of qualifications. Benefits were also noted regarding the relative uniformity of qualifications at the same levels; for pegging professional designations and job descriptions; for linking qualifications to professional designations, and work; evaluating local and foreign qualifications, and describing learner competences.

While the existence of the NQF Level Descriptors was generally appreciated in the interview and survey responses, a number of challenges in their usage also emerged. Because the Descriptors are generally framed, there is space for interpretation in their implementation. Different qualification developers were shown to use the Descriptors differently, with some qualifications taking longer to register due to their initial non-alignment or partial alignment with the Descriptors – although a SAQA analysis of the rates of return-for-additional-development of qualifications submitted by the Quality Councils for registration on the NQF, are lessening over time. Challenges cutting across the responses received, related to (a) difficulties relating to the wordiness and academic/technical nature of the Descriptors; (b) difficulties in distinguishing some of the Descriptors due to the use of common terms across their criteria; and (c) the lack in the Descriptors, of work-related criteria, and future-looking aspects. There were calls across sectors, to elaborate the Descriptors for use in the different NQF Sub-Framework contexts, as well as for use in relation to the professional designations of professional bodies.

## **Simplifying, elaborating, and advocating the NQF Level Descriptors**

While the NQF Level Descriptors were found to be widely used across the range of NQF stakeholder entities, they were not fully embedded in all organisational practice. The implementation challenges have been noted. Clear suggestions were provided by the respondents. Firstly, the Descriptors need to be simplified and clarified – in their wording, as well as in visual form, such as charts or tables. While it was said that the old (SAQA-Act) Descriptors were more user-friendly, it is clear that they did not provide for qualifications in a consistent way across all NQF levels; stakeholders feel that the sophisticated nature of the NQF Act-based Descriptors could be reduced without compromising the substance of each level. Simplification could include rephrasing qualitative statements to be more accessible and less theoretical; reducing and regrouping the number of categories of applied competence and making categories more distinctive.

Secondly, efforts need to be made, to use descriptions that are clearly different between NQF levels – and between Descriptor criteria: while there was universal agreement around the use of the 10-level framework, suggestions were made for grouping some of the Descriptor criteria that already seemed similar (difficult to distinguish). In addition, the Descriptor criteria need to include more workplace-related competences.



Third, the Descriptors could be elaborated for use in the three different NQF Sub-Framework contexts, and also for use in relation to professional designations.

Lastly, respondents across the board, called for information towards understanding and applying the Descriptors, to be made widely available through stakeholder workshops. The Descriptors document needs to be unpacked in accessible ways, for different groups of stakeholders, including but not limited to, the Quality Councils, qualification developers, professional bodies, and employers. A more robust understanding of the Descriptors is required; for instance, stakeholders need to understand that Descriptors relate to learning outcomes as well as NQF levels. The fact that using the Level Descriptors is mandatory, needs to be made more widely known; adherence to the standards embedded in the Descriptors is linked to awareness and understanding of the document itself, and is also tied to its simplification and accessibility.

#### **8.4 RECOMMENDATION: SUB-PROJECT 4**

One recommendation emerged from Sub-Project 4, which focused on the stakeholder experiences and impact of the NQF Level Descriptors.

##### **Recommendation 6: Simplify, clarify, and workshop the NQF Level Descriptors**

It is recommended that SAQA refines the NQF Level Descriptors, taking into account the stakeholder uses and challenges reported, and hosts public consultation workshops as part of this process and to share information on the finalised Descriptors.

# 9. Sub-Project 5: Impact of Council on Higher Education (CHE) Initiatives to Integrate Public and Private Higher Education

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The Council on Higher Education (CHE), in collaboration with the South African Qualifications Authority (SAQA), addressed the following two questions regarding the impact of CHE initiatives to integrate public and private Higher Education.

## **CHE Question 1:**

What are the mechanisms that the CHE has developed and implemented since 2008, under the National Qualifications Framework (NQF) Act, to promote integration and articulation between public and private Higher Education Institutions (HEIs) – and what impact have these initiatives had, on integration/articulation in the Higher Education Qualifications Sub-Framework (HEQSF) context?

This question was divided into the following sub-questions:

- What policies, frameworks and good practice guides have the CHE developed and implemented with a view towards promoting integration and articulation between public and private Higher Education?
- What has the CHE done to advocate these policies, frameworks, and guides to HEIs?
- What qualification standards and other regulatory tools and procedures has the CHE developed and implemented with a view towards promoting integration and articulation between public and private Higher Education?
- How do these mechanisms seek to promote integration and articulation between public and private Higher Education?
- What were the responses of the HEIs, to these initiatives (policies, frameworks, guides, and regulatory tools and standards)?

## **CHE Question 2:**

How much student movement has occurred between public and private HEIs since 2008, and how does this differ from student movements before 2008? (Student movement patterns before 2008 provided the baseline for comparison).

This question was divided into the following types of sub-questions (This list comprises an example only; similar sets of questions were addressed for student movement patterns in the fields of [a] Business, Commerce, and Management Sciences, and [b] Information Technology [IT]):

Of all the students achieving a Bachelor's Degree as a first qualification in the selected fields in the HEQSF context between 2003-2008 (inclusive) and 2010-2015 (inclusive), how many students:

- achieving a Bachelor's Degree in a public HEI – went on to obtain a second qualification in the HEQSF context, in a public HEI?
- achieving a Bachelor's Degree in a public HEI – went on to obtain a second qualification in the HEQSF context, only in private HEI?
- achieving a Bachelor's Degree in a public HEI – went on to obtain a third or more qualifications in the HEQSF context, in a mix of public and private HEIs?
- achieving a Bachelor's Degree in a private HEI – went on to obtain a second qualification in the HEQSF context, only in private HEI?
- achieving a Bachelor's Degree in a private HEI – went on to obtain a second qualification in the HEQSF context, only in public HEI?
- achieving a Bachelor's Degree in a private HEI – went on to obtain a third or more qualifications in the HEQSF context, in a mix of public and private HEIs?

## 9.1 METHOD AND SAMPLING IN SUB-PROJECT 5

As part of the 2017 NQF Impact Study, the CHE investigated the progress of its initiatives towards integrating the public and the private Higher Education sub-sectors and promoting articulation between these two sub-sectors. In order to achieve this, information was obtained from multiple sources, including the review of documents, followed by interviews with Directors of core business directorates within the CHE in order to acquire deep understanding of the issues investigated.

### ***Comparative analysis and triangulation in Sub-Project 5***

A comparative analysis was undertaken between the contents of the policy documents, frameworks and good practice guides developed and released after the promulgation of the NQF Act in 2008, with those developed and published before 2008. The intention was to assess if there was a change of focus or emphasis in the key messages conveyed in these documents before *versus* after the promulgation of the NQF Act.

Additional information, which assisted in shedding more light on particular mechanisms, was obtained from annual reports and Communiqués.

Context analysis of documents was performed which involved selecting and making sense of the lines, phrases and paragraphs of text contained in the documents (Bowen, 2009) relevant to the questions under investigation. Context analysis allowed the researchers to make sense of and highlight the important texts contained in the reviewed documents. The facts and opinions provided by respondents selected for the interviews were interpreted and used for triangulation.

Subsequently, second-generation Cultural Historical Activity Theory (CHAT) (Engeström, 2001) was used for further analysis of the information obtained from the documentary

review and director interviews. CHAT was adopted as an evaluation theory for carrying out an assessment of the changes that might have possibly been induced by the initiatives developed and implemented by the CHE under the NQF Act. The rationale for the use of this theory is that policy development and implementation does not only begin and end with the policy-makers, but rather involves multiple role players. As advocated by Engeström (2001) and Koszalka & Wu (2004), the CHAT analysis is an approach useful for analysing human interactions and relationships within particular social contexts. Engeström *et al* (1999) used an activity triangle to organise different elements (i.e. subject, object or objective, mediating tools, rules, community and division of roles) of the activity system to portray a nexus of the social and material relationship (see Section 3.2 above). For this part of the study, CHAT helped in organising the different elements of the problem statement. For example, the activity triangle provided a scaffold to show how the CHE (subject) is connected with the development and implementation of its mechanisms (object), for promoting integration and articulation (outcome) within the HEIs (community) depending on the availability of tools and division of roles and how the initiatives may be limited by rules.

## ***Sampling in Sub-Project 5***

### **The documents reviewed**

The review of documents relevant to the questions under investigation was conducted between June and December 2017. The relevant policy documents, frameworks and good practice guides developed and released by the CHE, as shown in Table 33 below, were analysed.

**Table 33: Documents analysed for CHE’s Research Question 1**

<b>CHE Framework and policy documents</b>		
<b>Title of Document</b>	<b>Date Published</b>	<b>Source</b>
Criteria for Programme Accreditation	2004	CHE
Towards a Framework for the Monitoring and Evaluation of South African Higher Education	2004	CHE
Towards a Framework for Quality Promotion and Capacity Development in South African Higher Education	2005	CHE
Higher Education Qualification Framework	2007	Government Gazette
Revised Criteria for Programme Accreditation	2012	CHE
Revised Framework for National Review	2015	CHE
Higher Education Qualifications Sub-Framework	2013	CHE
Framework for Qualifications Standards	2013	CHE
Framework for Institutional Quality Enhancement in the Second Period of Quality Assurance	2014	CHE
Policy on the Recognition of Prior-Learning Policy for Credit Accumulation and Transfer (CAT) & Policy on Assessments	2016	CHE
Work-Integrated Learning: Good Practice Guide	2011	CHE

<b>CHE Framework and policy documents</b>		
Distance Higher Education in a Digital Era: Good Practice Guide	2014	CHE
Good Practice Guide for Management of Short Courses offered outside the Higher Education Qualification Sub-Framework	2016	CHE
<b>Other documents</b>		
Annual reports	2008/9, 2009/10, 2010/11, 2011/12, 2012/13, 2013/14, 2014/15, 2015/16	CHE

Further insights into the documents were sought by interviewing the directors of core functions within the CHE. These individuals were selected based on their experience with the development and implementation of the policies, frameworks and good practice guides. A total of four directors were interviewed.

### **Sampling to assess student movements between public and private HEIs**

The achievements of learners and the institutions where these achievements were obtained, were extracted from the National Learners' Records Database (NLRD)<sup>62</sup>. The focus was specifically on qualifications in the CHE-selected fields of (a) Business, Commerce, and Management Sciences, and (b) IT, achieved between 2003 to 2008 (inclusive); and 2009 to 2015 (inclusive) respectively, as this enabled the comparison of trends before and after the implementation of the NQF Act in 2009<sup>63</sup>. The number of steps taken by learners (which is also the number of qualifications) were determined from the data and used to depict the movements between the different institutional types achieved.

## **9.2 FINDINGS AND ANALYSES FOR THE FIRST PART OF SUB-PROJECT 5: COUNCIL ON HIGHER EDUCATION INITIATIVES TO INTEGRATE PUBLIC AND PRIVATE HIGHER EDUCATION**

This section presents the mechanisms developed and implemented by the CHE post-2009 implementation of the NQF Act, and in the context of CHE initiatives since its inception. This background is juxtaposed with figures showing the analysis of actual data on the student movements between public and private Higher Education. The student movement data were drawn from the NLRD, and are presented as a proxy for the integration of public

<sup>62</sup> The data source for this section of the study was extracted from the NLRD. The NLRD is the electronic Management Information System (MIS) of the South African NQF. With more than 18 million people currently recorded in the system, the NLRD is used for providing policy-makers and decision makers with comprehensive information on education and training, and on labour market supply, as well as for tracking the paths of individual learners, providing them and their employers with proof of qualifications obtained.

<sup>63</sup> These fields were selected because of their high student numbers and the fact that they are commonly offered in both public and private HEIs.

and private Higher Education. In this instance, it was not possible to link *directly*, the CHE initiatives towards integration, and the student movements. However, it is argued that the student movements are associated with the CHE initiatives in the time periods selected.

### ***Mechanisms developed and implemented by the Council on Higher Education***

The findings from the document review and analysis indicate that as part of fulfilling its extended mandate derived from the NQF Act, which complements the initial mandate derived from the Higher Education Act 101 of 1997, the CHE has developed uniform Quality Assurance mechanisms for both public and private Higher Education including: (a) criteria-based Programme Accreditation (CHE, 2012b); (b) criteria-based programme review (CHE, 2015b); (c) criteria-based institutional audits<sup>64</sup> (CHE, 2004b); (d) a sector-wide quality enhancement initiative (CHE, 2014c); (e) national qualification standard-setting (CHE, 2013b); (f) HEQSF level and Qualification Descriptors (CHE, 2013c); (g) quality promotion and capacity development (CHE, 2005); and (h) research, monitoring and evaluation (CHE, 2004b).

In order to advance the above-mentioned mechanisms, frameworks and policies including (a) the Higher Education Qualifications Sub-Framework (HEQSF) (CHE, 2013c), (b) the Framework for Qualification Standards (CHE, 2013b), (c) the Framework for Institutional Quality Enhancement in the Second Period of Quality Assurance (CHE, 2014c), (d) the Framework for National Review of Programmes in Higher Education (CHE, 2015c), (e) Policy on the Recognition of Prior Learning (RPL) (CHE, 2016c), (f) Policy on Credit Accumulation and Transfer (CAT) (CHE, 2016c), and (g) Policy on Assessment (CHE, 2016c) were developed and are being implemented. In addition, good practice guides<sup>65</sup> in key areas of concern have been produced. Such areas include guidelines for the offering of short courses; the delivery of educational programmes by distance mode; and Work Integrated Learning (WIL).

#### **Programme Accreditation**

Prior to the establishment of the CHE, new study programmes developed by HEIs did not necessarily go through rigorous accreditation processes in the sense that providers were only required to provide a mere statement of internal Quality Assurance mechanisms to an Education and Training Quality Authority (ETQA) as a basis for the latter to grant accreditation to the programmes (SAQA, 2001). Private providers were allowed to have their qualifications registered on the NQF without providing evidence that the qualifications

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<sup>64</sup>Institutional Audits serve as one of the mechanisms that the CHE utilises to promote Quality Assurance in the Higher Education sector. Institutional Audits were carried out by the Higher Education Quality Committee (HEQC) of the CHE in the pre-NQF Act where the CHE operated as an EQTA. As such, all the tasks performed in this area are acknowledged in this study.

<sup>65</sup> The CHE produces good practice guides for ensuring uniformity of practices across the HE system. As mentioned above work in this area is dated before the passing of the NQF during which the CHE functioned as an EQTA. Good practice guides such as the *Good Practice Guide for the Quality Management of Research Projects* are acknowledged.

were of acceptable quality (CHE, 2008). In other words, providers just submitted generic institutional policy documents that did not contain enough details about what systems and procedures would be established to ensure that quality requirements would be met. Hence, the system attracted unscrupulous providers that raised public suspicion regarding the quality of the programmes offered, especially by private providers. This signalled the need for a more integrated Programme Accreditation system which would require all programmes to meet minimum acceptable criteria before they could be offered to students.

In 2004, the HEQC<sup>66</sup> of the CHE completed the development and started the implementation of the criteria for Programme Accreditation to inform the CHE's evaluation process for programmes offered across the sector, with the intention of protecting the public from the unscrupulous providers. Programme Accreditation is a peer-review process, with the actual evaluation being conducted by experts sourced from across the Higher Education system.

The pre-2008 HEQC of the CHE functioned as an ETQA for Higher Education in terms of the ETQA regulations, promulgated under the provisions of the SAQA Act, (CHE, 2004b). Following the enactment of the NQF Act in 2009 and the designation of the CHE as the Quality Council for Higher Education, the CHE commissioned an independent review of its Programme Accreditation processes and procedures and the entire Quality Assurance approach. One of the intentions of the review was to assess the extent to which the Quality Assurance approach and the accreditation processes and procedures, in particular, were aligned to the objectives of the NQF, and complied with the NQF Act in terms of the functions of the Quality Councils. The findings of the review led to the revision of its frameworks, processes and procedures, to ensure alignment to the requirements of the NQF Act. Programme Accreditation was among the activities that were revised to align with the NQF Act (CHE, 2012b).

The criteria for Programme Accreditation set out measures for accrediting all programmes offered by both public and private providers. The purpose of the criteria is to enable both public and private providers to reflect on their quality management arrangements and to guide the generation of self-evaluation reports (CHE, 2012b). These criteria were developed as points of reference for institutions in the process of compiling Self-Evaluation Reports (SERs). The HEQC uses the SERs along with other supporting documents to evaluate the institutions' programmes for accreditation purposes. The criteria are applied uniformly across the two components (private and public), and it is believed that doing so has helped with bridging the divide between the quality of programmes in private and public institutions. Thus, the consistent application of the criteria for Programme Accreditation has contributed towards the realisation of the NQF's long-term goal of integrating the two sub-sectors of Higher Education and promoting articulation between them.

As it was initially intended, the Programme Accreditation process has, to some extent, served as a mechanism for safeguarding the public from unscrupulous providers because

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<sup>66</sup> The HEQC is a permanent committee of the CHE, established under the provisions of the Higher Education Act of 1997, to oversee Quality Assurance processes.

the programmes that are accredited by the CHE meet the minimum quality requirements and, by law, only programmes accredited by the CHE may be offered by institutions in the Higher Education space. This has also compelled both public and private providers to be mindful of the quality of their offerings given that accreditation serves as a permit for them to offer programmes legally (CHE, 2008). It is believed that the process also has had the impact of increasing the credibility of the Higher Education system as a whole in the eyes of the public. Moreover, it has also contributed towards improving the internal quality management arrangements within the private and public HEIs.

## **National Reviews**

National Reviews are a process of re-accrediting existing programmes offered by all public and private HEIs in particular disciplines and at particular qualification levels (CHE, 2015b). National Reviews are conducted only when there is a need for a programme to be re-accredited. The CHE deems this approach as being cost effective, given the large number of programmes in the system that require re-accreditation. The process is undertaken by academic peers, who make reference to national and international good practices and, where necessary, to the requirements of Professional Bodies (CHE, 2008).

The initial framework for the National Reviews was approved and published in 2012. However, soon afterwards, it was realised that it required some revisions, among other reasons, to align the process of National Reviews to the requirements of the NQF Act (CHE, 2015a; CHE, 2015b). The main aim is to ensure that the programmes being reviewed meet the minimum set quality standards, therefore protecting students from programmes that are not of the desired quality (CHE, 2014). The National Reviews also serve to enhance the public confidence in the Higher Education system (CHE, 2015c).

Since the review of the 2012 framework, two programmes (i.e. Bachelor of Social Work and Bachelor of Laws [LLB]) were reviewed in all institutions offering them. Of those reviewed, some institutions lost their accreditation for both the Bachelor of Social Science and Bachelor of Laws programmes (CHE, 2017a). Programmes offered by both private and public providers are reviewed and evaluated against a uniform set of criteria. It follows that, as a result, this contributes towards the integration of public and private components of the Higher Education sector. The outcomes of National Reviews are publicised extensively and they give the general public an understanding that, whether they are from the public or private HEIs, programmes that are re-accredited through this process are of good quality (CHE, 2015c). With respect to the Master of Business Administration (MBA), for instance, such understanding made re-accredited MBA programmes in private business schools equally attractive to students across the board. It thus promoted articulation between the two components of the Higher Education sector.

## **Quality Enhancement**

One of the immediate needs in South Africa's new democracy is increasing students' access to the Higher Education system, already expressed in the SAQA and NQF Acts (Republic of South Africa [RSA], 1995 and 2008 respectively) and the 2001 National Plan



for Higher Education (NPHE). The importance of increasing student access is also underscored in the White Paper for Post School Education and Training (PSET) (DHET, 2013c). However, regardless of governmental initiatives such as teaching development incentives (Boughey, 2013), the HEIs remain burdened with poor achievement rates (CHE, 2014a; van Zyl, 2017). Furthermore, the poor success rates in the country are disturbing. The findings of the institutional audits conducted by the CHE between 2004 and 2011 attested to the fact that the Higher Education system in the country had low efficiency levels, resulting in poor student completion and success rates. The fragmented initiatives for teaching and learning development, such as social support and teacher development (Higher Education South Africa [HESA], 2011)<sup>67</sup>, have not worked to address the challenges.

In an effort to alleviate the challenges referred to above, the HEQC sanctioned the development and implementation of the Framework for Institutional Quality Enhancement in the Second Period of Quality Assurance in 2014. This framework informs the quality enhancement process. The process is centred on the quality enhancement of teaching and learning as well as community engagement. The framework was operationalised through the implementation of the Quality Enhancement Project (QEP), which succeeded the institutional audits in 2014 (CHE, 2014a).

The QEP project was initiated based on feedback from an external panel which advised the CHE to seek alternative methods of promoting quality. The purpose of the QEP is to assist in reshaping and advancing teaching and learning practices in the Higher Education system in order to improve student success (CHE, 2015a; 2015c). The long-term goal of the QEP is to develop a quality enhancement mind-set among HEIs in which continuous improvement is embedded in institutions' strategic thinking and institutional planning, and institutions routinely collaborate to bring about systematic and systemic improvements to Higher Education (CHE, 2014a). The anticipated outcomes of the QEP included benchmarks and codes of good practice for improving the quality of undergraduate educational provision that would raise the bar of what could be expected of institutions in future (CHE, 2014c).

Both public and private providers were engaged in the QEP, and good practices that are likely to promote student success are drawn from institutions within the two sectors. Through the QEP, therefore, the CHE contributed towards coordinating and integrating the two components of the Higher Education sector. The interaction of institutions within the QEP context also assisted with the promotion of articulation between traditional Universities and Universities of Technology (UoTs), and also between public and private HEIs, in general.

### **National Standards Development**

Prior to the establishment of the CHE, the responsibility for setting standards used to lie with several Standard Generating Bodies (SGBs) (SAQA, 2000). However, SGBs were fragmented across the Higher Education landscape, particularly between the private and

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<sup>67</sup> HESA has since been renamed and is currently known as Universities South Africa (USAf).

the public sector. This resulted in differences between similar qualifications offered by public and private providers, which, in turn, raised public suspicions regarding quality of the qualifications (CHE, 2013b). This condition triggered the need to develop cohesive national qualification standards in order to address the shortcomings while providing both compliance and developmental guidelines for qualifications offered across the Higher Education system. The CHE developed a national Framework for Qualification Standards for Higher Education in 2013 to guide its standard-setting activity. The agreed approach to the standard-setting process is experts-driven (CHE, 2015c).

The intention of setting national qualification standards was to improve public perception regarding the consistency between similar qualifications offered in different institutions across the HE system, including those between the private and public sectors (CHE 2013b). Standards specify what a programme leading to a qualification aims to achieve and how it can be verified that the standards have been achieved. Furthermore, a qualification standard provides a benchmark for qualifications from which institutions (both private and public) can refer to when designing their qualifications and curricula. The HEQC also uses the minimum set standards for Programme Accreditation purposes (CHE, 2013b).

The development and application of uniform qualification standards across both components of the Higher Education sector, has enabled the CHE to contribute towards the NQF's long term-objective of integrating the two components. The CHE expects public and private HEIs to apply the qualification standards uniformly. Among other things, this is expected to facilitate the movement and transfer of students between the two components, given that the standards of admission should be more or less the same across the system as a whole.

### **HEQSF Level and Qualification Descriptors**

Prior to 1994, the Higher Education system was characterised by disparate and/or parallel structures of qualifications that prevented the articulation of programmes and the transfer of students between programmes and institutions. The Education White Paper 3 (DoE, 1997b) emphasised the need for a single integrated Higher Education system. In response to this need, the Higher Education Qualifications Framework (HEQF) was promulgated and its implementation followed a phased approach starting from 2009 to 2012. The intention of developing the HEQF was to integrate the fragmented structures of qualifications in order to promote progression and articulation across the sector while creating a consistent reference point for all qualifications in the sector. Upon instituting the HEQF, all new programmes in the sector were subjected to an alignment process and the existing programmes had to be re-aligned.

The HEQF consisted of Level and Qualification Descriptors which formed the most inner and explicit layer of the broader NQF level and Qualification Descriptors. The HEQF Level Descriptors provided generic threshold standards for qualifications in the HEQF in line with the NQF. They outlined specific prerequisite skills, departure levels, and minimum and

maximum credits per HEQF qualification type at each Level respectively. Within the context of the ten levels of the NQF, the HEQF ranged from Level 5 to 10 (CHE, 2013b).

The HEQF was succeeded by the Higher Education Qualifications Sub-Framework (HEQSF) in 2013. The HEQSF was developed with the intention to address some shortcomings of its forerunner, the HEQF. These shortcomings included the lack of clarity around qualification pathways; the purpose and ‘fit’ of Level 5 and 6 qualifications; and the potential overlaps between vocational qualifications regarding the fitness of, for example, articulation pathways between undergraduate and postgraduate levels, and the duration necessary for a Level 8 qualification on the HEQF (CHE, 2011c; CHE, 2013b; CHE, 2013c).

Some changes occurred along with the revision of the HEQF namely, the recognition of three broad qualifications routes<sup>68</sup>, clarification of the interpretation of qualification types and the introduction of greater flexibility to deal with the expectations of the labour market and confirm the principles for CAT in Higher Education. By and large, the HEQSF is similar to the HEQF, and it also serves as a policy that intends to bring all qualifications and programmes offered by all HEIs under one umbrella and therefore do away with the isolated qualification structures that existed during the *apartheid* era. It does so by setting up common parameters and criteria for qualification design and facilitating the comparability of qualifications across the system (CHE, 2013c). It also comprises Level Descriptors, qualification specification routes, core qualification types, and their descriptors for designated variants and qualifiers for qualification specialisations (*Ibid.*).

Since the implementation of the HEQSF began in 2013, the CHE initiated an alignment project which began in 2013 and ended in 2015. The purpose of the alignment project was to ensure that qualifications offered by all HEIs meet the requirements of the HEQSF. To date, over 10 000 programmes have been logged into the HEQSF-online system as part of the alignment process. Lately, all programmes provided by both public and private providers are aligned to HEQSF; hence, it can be said that the goal of a single coordinated Higher Education system has been achieved. In addition, the alignment project has been productive, since it has allowed HEIs to streamline their offerings, including discarding outdated and withdrawn programmes from their archives (CHE, 2015b).

The HEQSF alignment process, implemented by the CHE, brought both public and private provisioning under a uniform regulatory framework for the first time and therefore contributed towards the long-term objective of integrating the Higher Education system. The HEQSF succeeded in building homogeneity and unity in the design and naming of qualifications across the public and private HEIs. This, in turn, impacted on the overall quality and relevance of programmes offered across the two components.

Unlike its predecessor, the HEQSF is simplified and reader-friendly. Involving academic staff from different parts of the system during the re-alignment process to review their qualifications and curriculum has strengthened capacity in programme design for multiple providers. Overall, it is clear that the implementation of the HEQSF has enhanced the

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<sup>68</sup> The three broad qualifications routes are: (a) vocational, (b) professional, and (c) general academic.

credibility of, and public confidence in Higher Education qualifications across the two components – private and public.

### **Quality Promotion and Capacity Development (QPCD)**

The pre-CHE Higher Education system<sup>69</sup> was characterised by the absence of a single recognised external Quality Assurance system and the lack of understanding of, and measures to give effect to, and partake in, evidence-based and peer-driven quality assurance (CHE, 2008). Consequently, Quality Assurance was practised differently across different institutions in the Higher Education landscape (CHE, 2001).

In an effort to address such uneven Quality Assurance practices across the system, the CHE developed the Quality Promotion and Capacity Development (QPCD) programme (CHE, 2001). One of the key purposes of the QPCD was to prepare the entire Higher Education system for the full implementation of the Quality Assurance dispensation in line with post-1994 national transformation objectives. The promotion of quality and the development of capacity in the system to meet the technical and conceptual challenges posed by the new Quality Assurance system was been a necessary and urgent task. This was in line with the Education White Paper 3 (DoE, 1997b) which stressed that a successful Higher Education system needed more commitment to transformation, which was critically dependent on building and enhancing capacity in all spheres. A key dimension of this work has been, for example, quality teaching and learning in the context of an expanded and diverse system.

A second aspect of the QPCD is linked to the institutional improvement of quality. While Programme Accreditation and institutional audits focus primarily on the evaluation of quality, the QPCD activities direct attention to fostering institutional quality improvement. Quality-related strengths (good practices) and weakness at the institutional and sector levels are identified in the Programme Accreditation, national review and institutional audit reports. This information has been and continues to be used by the QPCD to facilitate quality improvements across the sector (CHE, 2005).

The QPCD has undertaken the following different approaches. For example, in the case of teaching and learning development, platforms such as colloquia, workshops, training and quality fora are organised by the CHE for the private and the public HEIs to discuss pertinent issues including curriculum design, assessment practices and Work-Based Learning (WBL). Effort has been made to engage students with the intention of familiarising them with the Quality Assurance procedures as well as building awareness of the responsibilities relating to accreditation and the related roles of SAQA, the HEQC and the Department of Higher Education and Training (DHET). In addition, the National Excellence in Teaching and Learning Award platform was initiated by the CHE in conjunction with Higher Education Learning and Teaching Association of Southern Africa (HELTASA) in 2009. This initiative was aimed at supporting excellence in teaching and learning, developing leadership and inspiration-driven academics within the field of teaching in HEIs.

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<sup>69</sup> The Higher Education system prior to the establishment of the CHE.

The research and development component of the QPCD is engaged in benchmarking research leading to the production of good practice guides. As indicated earlier in this section of the report, a number of good practice guides have been developed and released to both public as well as private HEIs for implementation (CHE, 2011c; CHE, 2014b; CHE, 2016b). The QPCD supports the institutions in the implementation of these good practice guides through workshops, information sharing sessions, and online and telephone support. The good practice guides assist in standardising practices across public and private HEIs with respect to particular issues such as, for example, short courses, WIL, and the delivery of Higher Education via distance modes. In this way, it is expected that all institutions, whether private or public, will end up doing things in a consistent manner, thus contributing to the integration of the system.

### **Council on Higher Education Policy on the Recognition of Prior Learning (RPL)**

The *apartheid* period was characterised by unequal provision of education and training in the sense that programmes and qualifications were not necessarily linked to learning pathways (SAQA, 2017a). Barriers to learner access and success characterised the Higher Education system, most intensely experienced by individuals with no formal requirements for admission to Higher Education studies (CHE, 2016a).

In order to overcome such barriers and promote access for these people, and in line with the requirements of the NQF Act and related policies, the CHE's RPL policy was developed as a means to compel HEIs to facilitate learning pathways in their respective institutions (CHE, 2016c). The purpose of the CHE's RPL policy is to facilitate the implementation of RPL across all Higher Education providers in the country. It is underpinned by principles of equal access to education and training for all.

The CHE developed its RPL policy using SAQA's (2013/2016) and the Minister for Higher Education and Training (MHET's) (DHET, 2016) RPL policies as points of reference for customisation to the Higher Education context. Contained in the CHE's (2016c) RPL policy, are a set of principles applicable uniformly to both public and private HEIs, for institutions to use in crafting and implementing their individual institutional RPL policies. The CHE's RPL policy also contains a set of guidelines applicable to both public and private HEIs (CHE, 2016c). RPL in the Higher Education context, in line with SAQA's (2016) RPL policy, provides for the recognition, mediation and assessment of learning obtained informally and non-formally, and opens doors for individuals who were previously marginalised in the education system. Both public and private providers are mandated to include RPL considerations in their programme design.

### **Council on Higher Education Policy on Credit Accumulation and Transfer (CAT)**

The CHE's (2016c) CAT policy forms part of the mechanisms developed by the CHE to overcome the *apartheid*-related barriers that students experienced. The policy provides for formal CAT to enable students to move within and across HEIs. In other words, credits acquired by a student from a certain institution or programmes for the same or different qualification can be recognised in another institution or programme (*Ibid.*). CAT also

provides for articulation across the Sub-Frameworks of the NQF in order to facilitate lifelong learning and access to the workplace (SAQA, 2014b). The CHE's CAT policy provides a legal framework for compelling both private and public HEIs to include CAT in their programme design within the context of the HEQSF. CAT facilitates the articulation of students within and across institutions in order to promote lifelong learning as well as the mobility of students for improving their chances of completing their studies.

The CHE developed its 2016 CAT policy by interpreting the SAQA's (2014b) CAT policy and customising it for application in the Higher Education sector (CHE, 2016c). Contained in the policy are a set of uniform codes and guidelines applicable to both public and private HEIs (*Ibid.*).

The HEQSF, through its Level and Programme Descriptors, offers a credit grid that facilitates CAT. Thus, CAT is informed by the HEQSF which sets uniform parameters and criteria which in turn guide the design of programmes offered by both private and public HEIs. This allows credits accumulated within and/or between the two types of institutions to be comparable to an extent where they are transferable across the system. The ability of both private and public Higher Education components to have comparable credits accumulated for qualifications can facilitate alternative access routes and simplify the transition between the two components, which in turn can promote articulation and integration. The CHE's CAT policy serves to entrench the already existing practice of transferring credits within and across HEI, and also serves to transform these practices from ad hoc to systematic and consistent ones.

### **Council on Higher Education policy on assessment**

Under *apartheid* Higher Education was characterised by discriminatory assessment methods that were not necessarily transparent to students or conducted uniformly across the system. In an effort to address these problems and promote transparency in the system, the CHE developed its national assessment policy and criteria to be used consistently across the Higher Education system. These set minimum standards for unbiased, transparent, fair, just and valid assessment practices aligned with the specifications of the HEQSF, and SAQA's (2014a) *Policy and Criteria for Designing and Implementing Assessment for Qualifications, Part-Qualifications and Professional Designations in the NQF*. The CHE's (2016c) assessment policy contains common principles and guidelines that aim to direct assessment systems and practices in Higher Education. The fact that the CHE advocates the use of uniform principles on assessments for both public and private providers contributes towards the integration and articulation of the two components (*Ibid.*).

### ***Council on Higher Education advocacy of its policies, frameworks, and guides***

The CHE serves and liaises with a variety of stakeholders, including government bodies, HEIs, students, sponsors, employers, and society at large. The CHE therefore frequently communicates with and disseminates information to these stakeholders. Since the CHE

became the Quality Council for Higher Education, it has advocated its policy and framework developments to the Higher Education community through multiple communication media and platforms, including the printing and distribution of policy documents, brochures and booklets. The CHE has also stimulated public engagement through training workshops, colloquia, forums, site visits to HEIs and institutional engagement, as well as the Excellence in Teaching and Learning Award events. Lately, it has added the electronic newsletter to its stakeholder communication and engagement platforms.

### ***Qualification standards and other regulatory tools and procedures developed and implemented by the Council on Higher Education***

In addition to the initiatives already discussed, part of the responsibilities of the CHE as a Quality Council include the development and implementation of the HEQSF itself, as well as policies and criteria for the development, registration and publication of qualifications (i.e. Standard Setting) (CHE, 2013b; 2013c). The standard-setting work previously overseen by SAQA was transferred to the CHE in 2009 (CHE, 2012b). The implementation of the newly added mandate initially progressed at a slow pace due to delayed allocation of funds and the suspended establishment of a relevant directorate because of an organisational review (CHE, 2010a). Work only began in 2011 following the establishment of the Standards Development Directorate. Nevertheless, the development of standards constitutes a vital component for implementing the HEQSF, which in turn forms an integral part of the NQF. Standards afford HEIs with benchmarks for qualifications useful for internal Quality Assurance as well as external comparison.

Following the implementation of the CHE's Framework for Qualification Standards in Higher Education in 2013, the HEQC embarked on a journey to develop standards for selected academic fields and disciplines (CHE, 2013b). The process of developing standards is a long-winded one because it involves extensive consultation with stakeholders. The Director responsible, in an interview, described the standards development process as follows.

#### **CHE Director's description of CHE standards development processes**

The process of developing standards is a long and [winding] one, requiring multiple levels of consultations with a wide array of stakeholders. It also requires time to pilot the standards before finalising them. So, the nature of the process means that developing standards for any particular qualification will take not less than three years.

Given the limited human capacity within the CHE, it is only practical to work on the development of standards for a few qualifications at a time. This, together with the fact that it takes three years to develop and finalise standards for any particular qualification, mean that the process is generally slow[er] than one would have wished.

The following qualification standards were approved by the HEQC in 2015, and are now available for use:

- a) Master of Business Administration (MBA)
- b) Bachelor of Laws (LLB)
- c) Diploma in Engineering
- d) Bachelor of Engineering (BEng)
- e) Bachelor of Social Work

The following draft qualification standards were at various phases of development, and it was projected that they would be finalised during the course of 2017/18.

- a) Advanced Diploma in Engineering
- b) Bachelor of Engineering Technology
- c) Bachelor of Commerce
- d) Bachelor of Sports Coaching

### ***How the Council on Higher Education mechanisms seek to promote integration and articulation between the public and private Higher Education Institutions***

The CHE seeks to promote integration and articulation between the public and private HEIs by developing and applying the same set of frameworks, policies, guides and standards evenly across the private and public HEIs (CHE, 2008 and thereafter). The implementation of the HEQSF, the 2013 successor to the HEQF, has provided for the establishment of a single integrated qualifications framework for Higher Education, which includes the offerings of both public and private providers.

Since the implementation of the HEQSF all programmes submitted to the HEQC for accreditation were obliged to have been aligned to the HEQSF; otherwise they would not be accredited. Moreover, the criteria used to accredit programmes are the same across the two components – public and private. In addition, one of the conditions for a programme to be accredited is to meet the requirements listed in Criterion 1 which, among other things, requires that the programme's design offers students learning and career pathways with opportunities for articulation with other programmes within and across institutions, where possible, therefore facilitating articulation between the two components.

### ***The responses of Higher Education Institutions to the Council on Higher Education's integration mechanisms (policies, frameworks, guides, and regulatory tools and standards)***

In an interview (CHE, 2017b), the CHE Director responsible for stakeholder engagement and liaison with institutions, described the CHE's experience with HEIs regarding the development and implementation of integration-related policies. The description is presented in the box immediately below.



### **CHE Director's description of the development and implementation of integration-related policies in the HEQSF context (CHE, 2017b)**

The institutions were consulted extensively in the process of developing the frameworks and policies. Their comments and other inputs were incorporated in the final frameworks and policies. Any concerns the institutions would have had were also addressed before finalising them [the policies and frameworks]. By the time the frameworks and policies were released for implementation, the institutions had already known about them and accepted them.

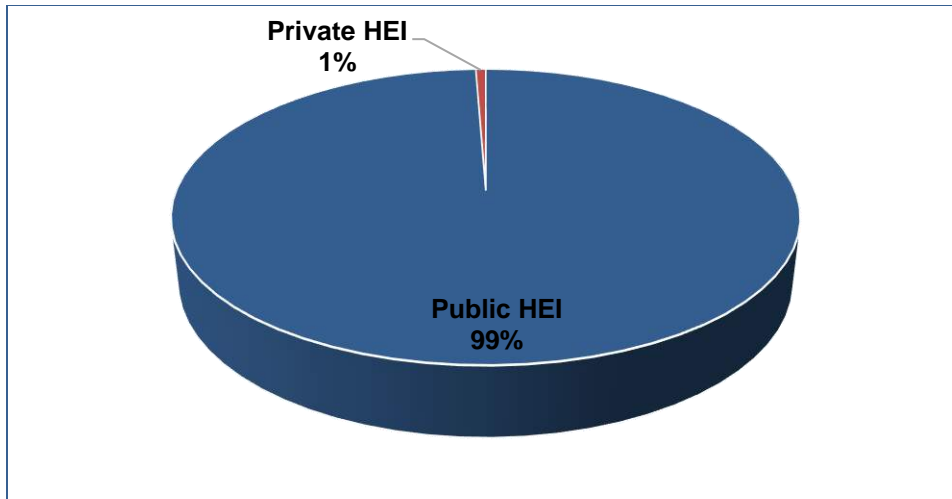
Regarding implementation, the institutions responded to the frameworks and policies differently, depending on [the] availability of capacity on the ground. Institutions that had adequate and relevant capacity implemented these with relative ease, whereas those that did not have relevant and/or adequate capacity struggled to implement the policies and frameworks. A number of the latter institutions have had to use consultants to ensure that the frameworks and policies are properly implemented. However, capacity in Quality Assurance remains a constraint to a number of institutions particularly those that are relatively new. Such institutions continue to struggle to get their programmes accredited or reaccredited. Similarly, they struggle to prepare for national reviews or institutional audits, and most of them do not get positive reports from national reviews and institutional audits.

## **9.3 FINDINGS AND ANALYSES FOR THE SECOND PART OF SUB-PROJECT 5: STUDENT MOVEMENTS BETWEEN PUBLIC AND PRIVATE HIGHER EDUCATION INSTITUTIONS BEFORE AND AFTER 2008**

This section provides an overview of the student movements between the private and public Higher Education before and after 2008 respectively, in the fields of (1) Business, Commerce, and Management Sciences, and (2) Information Technology (IT). The findings are presented separately for each of the CHE sub-questions identified (See Section 4.2 above).

### ***Percentages of students achieving Bachelor's Degrees in public HEI versus private HEI 2003-2008 and 2010-2015 respectively***

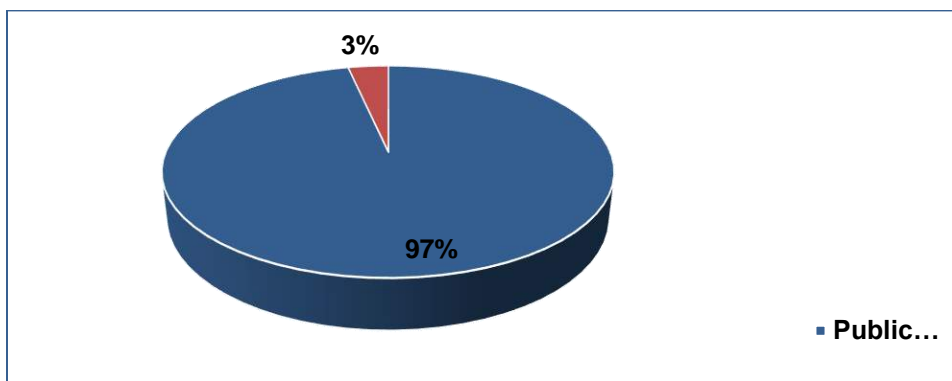
In the period 2003-2008 (inclusive), a total of 295 856 students achieved Bachelor's Degrees in public HEIs and private HEIs. Of these, 294 039 (representing 99%) achieved a qualification in a public HEI whilst the remaining 1 817 (representing 1%) achieved in a private HEI, as shown in Figure 13.



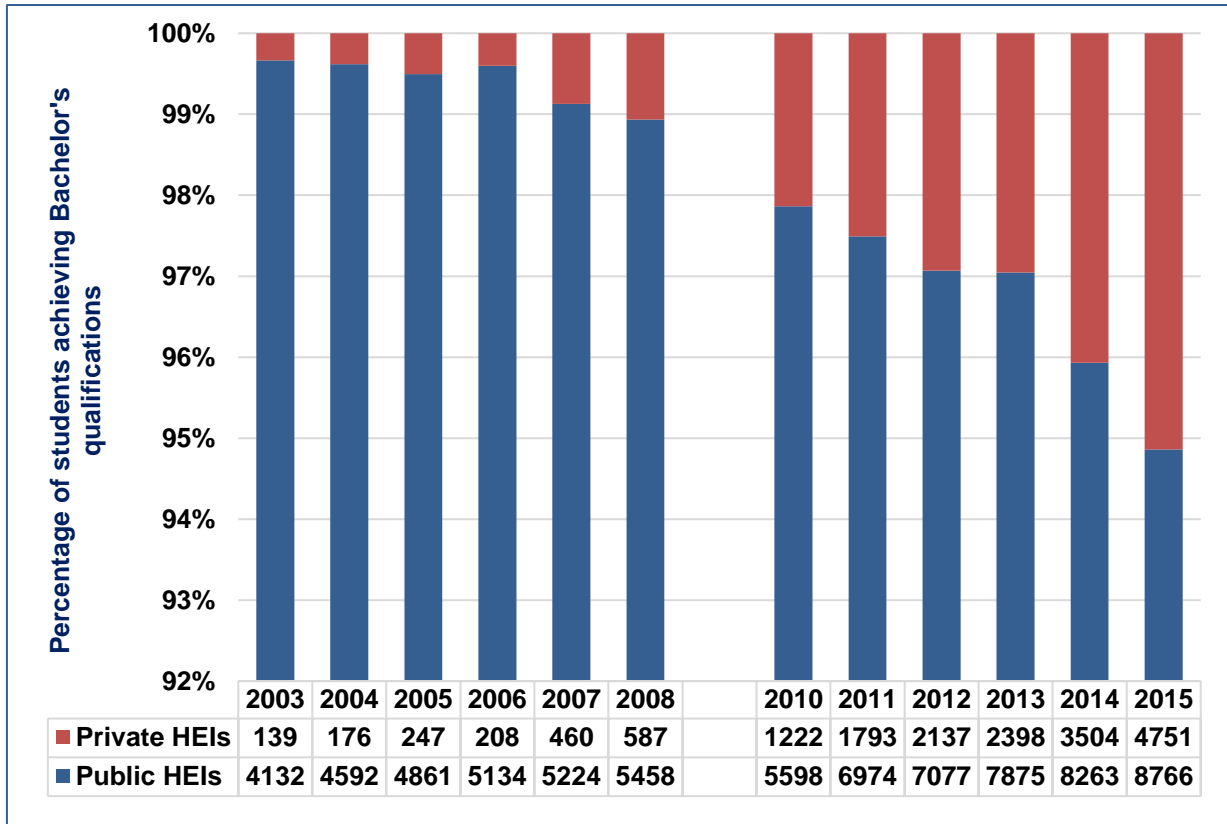
**Figure 13: Percentages of students achieving Bachelor's Degrees, 2003 to 2008 (n=295 856)**

In the period 2010-2015 (inclusive), a total of 461 357 students achieved Bachelor's Degrees in public HEIs and private HEIs. Of these, 445 552 (representing 97%) achieved a qualification from a public HEI whilst the remaining 15 805 (representing 3%) achieved in a private HEI as shown in Figure 14. In addition, there has been steady growth in the numbers of students achieving Bachelor's Degrees from private HEIs as a percentage of the total number of such achievements per year across both periods under study (see Figure 15).

The contribution of the private sector in terms of the numbers students achieving Bachelor's Degrees as a percentage of the total grew from 0.34 % in 2003 to 1.08% in 2008 except for a dip of 0.4% in 2006. This trend increased in the period 2010-2015, where the contribution of private HEIs in terms of the percentage of students achieving Bachelor's qualifications grew from 2% in 2010 to 3.4% in 2015 as shown in Figure 16.

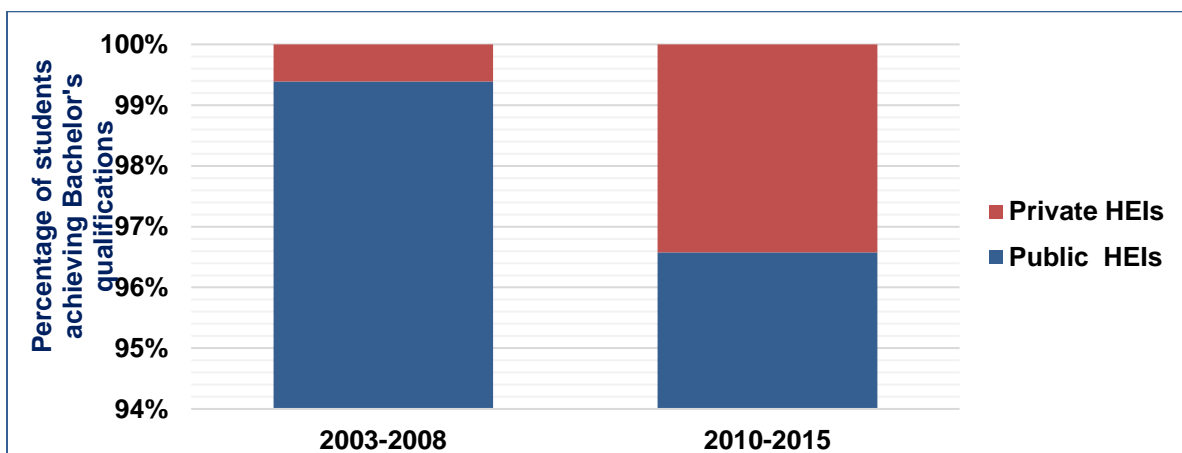


**Figure 14: Percentages of students achieving Bachelor's Degrees, 2010 to 2015 (n=461 357)**



**Figure 15: Numbers of students achieving Bachelor's Degrees: Private HEIs versus Public HEIs by year, 2003-2008 and 2010-2015**

The average annual growth over the period 2010-2015 was 3.4% compared to just 0.6% per annum over the period 2003-2008 as shown in Figure 16.



**Figure 16: Average annual growth in numbers of students achieving Bachelor's Degrees from private/public HEIs as percentages of totals in 2003-8 and 2010-15**

***Public-private HEI location of students' qualification achievements after achievement of a Bachelor's Degree as a first qualification in the selected fields in the Higher Education context 2003-2008***

Tables 34 and 35 below show the public-private HEI location of students' qualification achievements after achievement of a Bachelor's Degree as a first qualification in the selected fields of Business, Commerce and Management [NQF Field 3] and Physical, Mathematical, Computer and Life Sciences (Sub-Field: Information Technology (IT) and Computer Sciences)<sup>70</sup> [Field 10] in the Higher Education context, in the period 2003-2008.

**Table 34: Public-private HEI locations of students' qualification achievements after achieving their Bachelor's Degree as a first qualification in the selected field of Business, Commerce and Management [NQF Field 3] 2003 – 2008<sup>71</sup>**

No. of qualifications	Student movements between public and private HEI	No. of students	Percentage of students <sup>72</sup>
2	Public-Public	18 356	91.5%
3	Public-Public-Public	1 554	7.7%
3	Public-Public-Private	7	0.0%
3	Public-Private-Public	12	0.1%
4	Public>Public>Public>Public	53	0.3%
4	Public>Public>Public>Private	1	0.0%
4	Public>Public>Private>Public	3	0.0%
4	Public>Public>Private>Private	1	0.0%
4	Public-Private-Public-Private	1	0.0%
4	Public>Private>Public>Public	3	0.0%
5	Public>Public>Private>Public>Private	1	0.0%
2	Public-Private	62	0.3%
2	Private-Private	4	0.0%
2	Private-Public	7	0.0%
	<b>Total</b>	<b>20 065</b>	<b>100%</b>

<sup>70</sup> The whole of Field 10 contained too many records to be analysed in the time period allocated for the study.

<sup>71</sup> Field 03: Numbers of students who achieved a single qualification in this field in 2003-2008)-Private=404; Public= 66 345.

<sup>72</sup> Percentages less than 0.1% appear as 0.0% for display purposes only.

**Table 35: Public-private HEI locations of students' qualification achievements after achieving their Bachelor's Degree as a first qualification in the selected field of Physical, Mathematical, Computer and Life Sciences (Sub-Field: Information Technology and Computer Sciences) [NQF Field 10] 2003-2008<sup>73</sup>**

No. of Qualifications	Student movements between public and private HEI	No. of students	Percentage of students
2	Private>Private	1	0.3%
2	Public>Private	2	0.6%
2	Public>Public	314	94.3%
3	Public>Public>Public	16	4.8%
	<b>Total</b>	<b>333</b>	<b>100%</b>

**Achievements of a first Bachelor's Degree and a second qualification in public HEI only 2003-2008**

Table 34 indicates that 18 356 students, representing 91.5% of the total achieving a Bachelor's Degree in Business, Commerce and Management Studies in a public HEI, went on to obtain a second qualification in the Higher Education context in a public HEI between 2003 and 2008 inclusive. A further 1 554 (7.7%) and 53 (0.3%) students respectively went on to achieve a third or fourth qualification only in public HEIs.

Table 35 shows that 314 students, representing 94.3% of the total achieving a Bachelor's Degree in IT and Computer Sciences in a public HEI, went on to obtain a second qualification in the Higher Education context in a public HEI. A further 16 (4.8%) of the students went on to achieve a third qualification only in public HEIs.

**Achievements of first Bachelor's Degree in a public HEI and second qualification in a private HEI only 2003-2008**

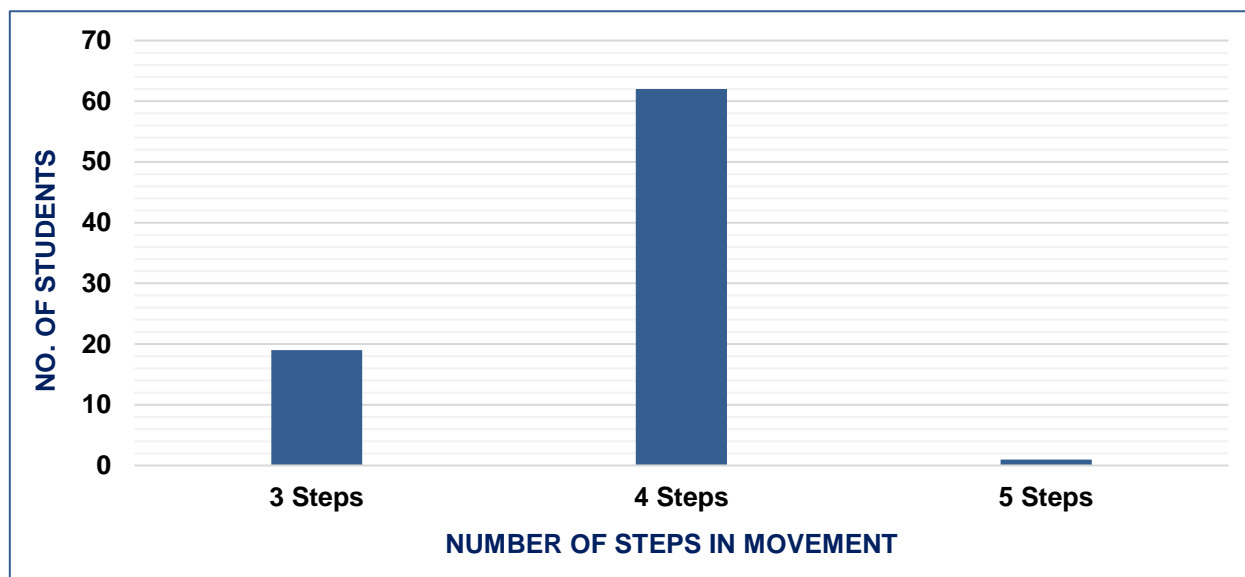
The number of 62 students, representing 0.3% of the total achieving a Bachelor's Degree in Business, Commerce and Management Studies in a public HEI, went on to obtain a second qualification in the Higher Education context only a private HEI as reflected in Table 34.

Two students, representing 0.6% of the total, achieved a Bachelor's Degree in IT and Computer Sciences in a public HEI and went on to obtain a second qualification in the Higher Education context in a private HEI as reflected in Table 35.

<sup>73</sup> Field 10: Number of students who had a single qualification (2003 to 2008)-Private=49; Public= 1 563.

### **Achievements of first Bachelor's Degree in a public HEI and second, third or further qualifications in a mix of private and public HEIs 2003-2008**

A total of 91 students (0.5%) who achieved a Bachelor's Degree in Business, Commerce and Management Studies from a public HEI went on to obtain a second, third, or further qualification in the Higher Education context in a mix of public and private HEIs as shown in Tables 34 and 36 and Figure 17, which also shows the number of steps (qualifications) in the learning pathway.



**Figure 17: Number of steps involved in movements of students who achieved a Bachelor's Degree from a public HEI and went on to achieve a third or more qualifications from a mix of public and private HEIs for 2003-2008**

### **Achievements of first Bachelor's Degree and second qualification in private HEI only 2003-2008**

Four students achieved a Bachelor's Degree in Business, Commerce and Management Studies in a private HEI and went on to obtain a second qualification in the Higher Education context only in private HEI in 2003-2008.

Only one student who achieved a Bachelor's Degree in IT and Computer Sciences in a private HEI went on to obtain a second qualification in the Higher Education context only in private HEI in this period.

### **Achievements of first Bachelor's Degree in a private HEI and second qualification in a public HEI only 2003-2008**

Seven students achieved a Bachelor's Degree in Business, Commerce and Management

Studies in a private HEI and went on to obtain a second qualification in the Higher Education context only in public HEI in 2003-2008.

No students who achieved Bachelor's Degree in IT and Computer Sciences in a private HEI went on to obtain a second qualification in the Higher Education context only in public HEI over this period.

**Achievements of first Bachelor's Degree in a private HEI and second, third or further qualifications in a mix of private and public HEI 2003-2008**

None of the students who obtained a Bachelor's qualification in Business, Commerce and Management Sciences from a private HEI in the period 2003-2008, went on to achieve a third or more qualifications.

***Public-private HEI location of students' qualification achievements after achievement of a Bachelor's Degree as a first qualification in the selected fields in the HEQSF context 2010-2015***

Tables 36 and 37 below show the public-private HEI location of students' qualification achievements after achievement of a Bachelor's Degree as a first qualification in the selected fields of Business, Commerce and Management [NQF Field 3] and Physical, Mathematical, Computer and Life Sciences (Sub-Field: IT and Computer Sciences)<sup>74</sup> [Field 10] in the HEQSF context, in the period 2010-2015.

**Table 36: Public-private HEI locations of students' qualification achievements after achieving their Bachelor's Degree as a first qualification in the selected field of Business, Commerce and Management [NQF Field 3] 2010 – 2015<sup>75</sup>**

No. of qualifications	Student movements between public and private HEI	No. of students	Percentage of students <sup>76</sup>
2	Public>Public	28 046	88%
3	Public>Public>Public	2 649	8%
4	Public>Public>Public>Public	61	0%
5	Public>Public>Public>Public>Public	4	0%
2	Public>Private	765	2%
3	Public>Private>Private	30	0%
3	Public>Private>Public	51	0%
3	Public>Public>Private	105	0%
4	Public>Private>Private>Private	1	0%
4	Public>Private>Public>Private	1	0%
4	Public>Private>Public>Public	2	0%

<sup>74</sup> The whole of Field 10 contained too many records to be analysed in the time period allocated for the study.

<sup>75</sup> Field 03: Number of students who had a single qualification (2010 to 2015)-Private=5 133; Public= 84 105.

<sup>76</sup> Percentages less than 0.1% appear as 0.0% for display purposes only.

4	Public>Public>Private>Public	5	0%
4	Public>Public>Public>Private	1	0%
5	Public>Public>Private>Private>Public	1	0%
5	Public>Public>Public>Private>Public	1	0%
2	Private>Private	150	0%
3	Private>Private>Private	11	0%
4	Private>Private>Private>Private	1	0%
2	Private>Public	76	0%
3	Private>Private>Public	1	0%
3	Private>Public>Private	1	0%
3	Private>Public>Public	5	0%
4	Private>Private>Public>Public	1	0%
	<b>Total</b>	<b>31 969</b>	<b>100%</b>

**Table 37: Public-private HEI locations of students' qualification achievements after achieving their Bachelor's Degree as a first qualification in the selected field of Physical, Mathematical, Computer and Life Sciences (Sub-Field: Information Technology and Computer Sciences) [NQF Field 10] 2010-2015<sup>77</sup>**

No. of qualifications	Student movements between public and private HEI	No. of students	Percentage of students <sup>78</sup>
2	Private>Private	2	0%
2	Private>Public	6	1%
2	Public>Private	12	2%
2	Public>Public	484	88%
3	Private>Private>Public	1	0%
3	Private>Public>Public	1	0%
3	Public>Private>Private	1	0%
3	Public>Public>Public	44	8%
4	Public>Public>Public>Private	1	0%
	<b>Total</b>	<b>552</b>	<b>100%</b>

### **Achievements of first Bachelor's Degree and second qualification in public HEI only 2010-2015**

Some 28 046 students (representing 88%) of the total achieving a Bachelor's Degree in Business, Commerce and Management Sciences in a public HEI went on to obtain a second qualification in the HEQSF context in a public HEI between 2010 and 2015 (inclusive). Another 2 649 (8% of) students went on to achieve a third qualification only in

<sup>77</sup> Field 10: Number of students who had a single qualification (2010 to 2015)-Private=481; Public= 2 966.

<sup>78</sup> Percentages less than 0.1% appear as 0.0% for display purposes only.



public HEIs. 61 (0.2%) and four students respectively went on to achieve fourth and fifth qualifications, respectively, from public HEIs only, as indicated in Table 36.

Some 484 students (representing 88% of the total) of the total achieving a Bachelor's Degree in IT and Computer Sciences in a public HEI went on to obtain a second qualification in the HEQSF context in a public HEI. A further 44 (8%) students went on to achieve a third qualification only in public HEIs in the period 2010-2015. as shown in Table 37.

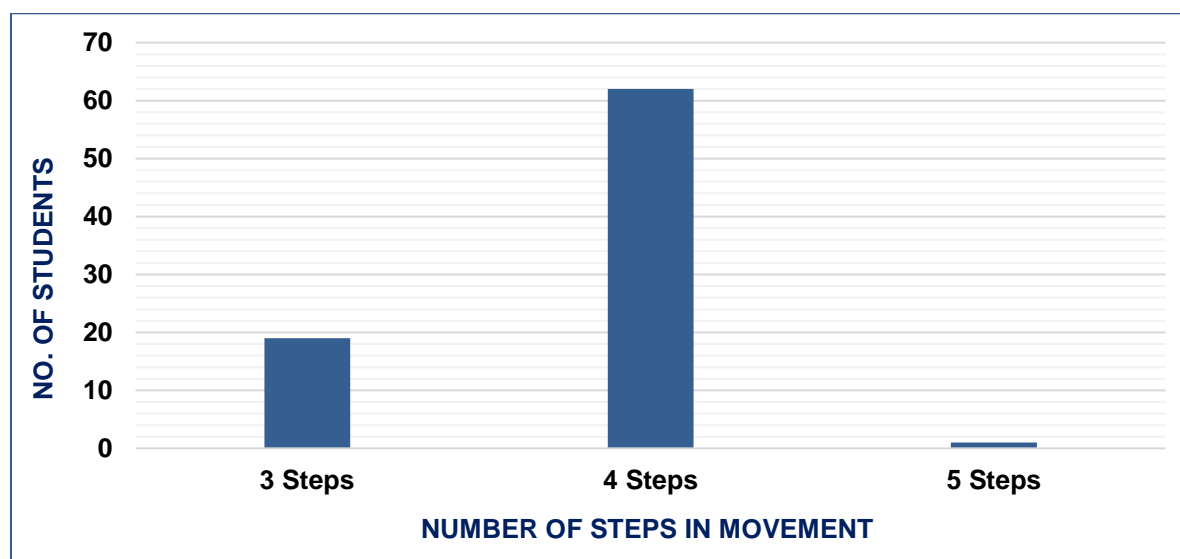
### **Achievements of first Bachelor's Degree in a public HEI and second qualification in a private HEI only 2010-2015**

Some 765 students, representing 2% of the total, achieved a Bachelor's Degree in Business, Commerce and Management Sciences in a public HEI and went on to obtain a second qualification in the HEQSF context only in a private HEI in the period 2010-2015.

A number of 12 students achieved a Bachelor's Degree in IT and Computer Sciences in a public HEI and went on to obtain a second qualification in the HEQSF context in a private HEI in this period.

### **Achievements of first Bachelor's Degree in a public HEI and second, third or more qualifications in a mix of private and public HEI 2010-2015**

A number of 298 (0.9%) students who achieved a Bachelor's Degree in Business, Commerce and Management Sciences from a public HEI went on to obtain a third or more qualifications in the HEQSF context in a mix of public and private HEIs, as shown in Figure 18, which also shows the number of steps in the pathways for the period 2010-2015.



**Figure 18: Number of steps involved in movements of students who achieved a Bachelor's Degree from a public HEI and went on to achieve a third or more qualifications from a mix of public and private HEIs for 2010-2015**

### **Achievements of first Bachelor's Degree and second qualification in private HEI only 2010-2015**

Table 36 indicates that 150 (0.4%) students achieved a Bachelor's Degree in Business, Commerce and Management Sciences in a private HEI and went on to obtain a second qualification in the HEQSF context only in private HEI in the period 2010-2015 inclusive. A further 11 and one student, respectively, went on to obtain three or four qualifications in the context of the HEQSF only in private HEIs.

Meanwhile, Table 37 indicates that two students who achieved a Bachelor's Degree in IT and Computer Sciences in a private HEI went on to obtain a second qualification in the HEQSF context only in a private HEI in the same period.

### **Achievements of first Bachelor's Degree in a private HEI and second qualification in public HEI only 2010-2015**

Some 76 (2%) students achieved a Bachelor's Degree in Business, Commerce and Management Sciences in a private HEI and went on to obtain a second qualification in the HEQSF context in a public HEI in 2010-2015. An additional five students achieved a Bachelor's Degree in Business, Commerce and Management Sciences only in a private HEI and went on to obtain a third qualification in a public HEI in the same period as shown in Table 36.

No students who achieved Bachelor's Degree in IT and Computer Sciences in a private HEI went on to obtain a second qualification in the HEQSF context in a public HEI in this period, as reflected in Table 37.

### ***Overall learner movement trends between public and private HEI, between NQF Levels 5 and above for 2003-2008***

Table 38 indicates the movement of students between the public and private sector in their achievement of Higher Education qualifications at NQF Levels 5 and above, for the periods 2003-2008, using the whole sample.

**Table 38: Student movements between public and private HEIs in their achievement of Higher Education qualifications at NQF Levels 5 and above, for the periods 2003-2008, using the whole sample**

No. of qualifications	Student movements between public and private HEI	2003 to 2008
1	Private	1 569
	Public	215 903
2	Private>Private	158
	Private>Public	66

No. of qualifications	Student movements between public and private HEI	2003 to 2008
	Public>Private	166
	Public>Public	68 026
3	Private>Private>Private	4
	Private>Private>Public	8
	Private>Public>Private	2
	Private>Public>Public	22
	Public>Private>Private	3
	Public>Private>Public	17
	Public>Public>Private	19
	Public>Public>Public	6 321
4	Private>Private>Private>Private	1
	Private>Private>Public>Public	1
	Private>Public>Private>Public	1
	Private>Public>Public>Private	1
	Private>Public>Public>Public	3
	Public>Private>Private>Private	0
	Public>Private>Private>Public	1
	Public>Private>Public>Public	3
	Public>Public>Private>Private	3
	Public>Public>Private>Public	2
	Public>Public>Public>Private	1
	Public>Public>Public>Public	226
5	Private>Private>Public>Public>Public	0
	Public>Public>Private>Private>Private	0
	Public>Public>Private>Private>Public	0
	Public>Public>Private>Public>Private	1
	Public>Public>Private>Public>Public	0
	Public>Public>Public>Public>Private	0
	Public>Public>Public>Public>Public	9

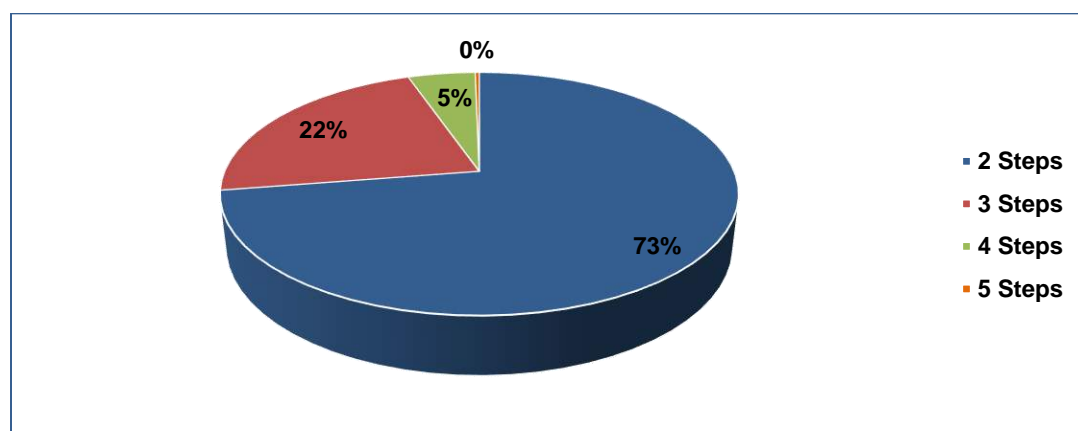
From Table 38 above a number of observations can be made regarding the trends in student movements between public and private HEI for those who achieved Bachelor's Degrees between 2003 and 2008 (inclusive).

First, the majority of students who achieved their Bachelor's Degrees in this period did not progress to achieve another Higher Education qualification, but remained with a single Higher Education qualification. Of these students, majority 141 105 (65%) remained in the public sector while 1302 (83%) remained in the private sector. Meanwhile, of 1 569

students who attained a Bachelor’s Degree in Fields 3 and 10 from a private HEI between 2003 and 2008 inclusive, 267 (representing 17%) progressed to achieve a further Higher Education qualification in either the public or private sectors and most went back to the private sector. Similarly, of the 215 903 students who attained a Bachelor’s Degree in Field 3 and 10 from a public HEI, 74 798 (35%) progressed to achieve a further Higher Education qualification in either the private or public sectors, and most went back to the public sector.

Second, the majority of students who did move on to achieve further Higher Education qualifications after having attained Bachelor’s Degrees in 2003-2008, tended to remain within the sector of their first Bachelor’s Degree: most of those who began in private HEI tended to remain in the private HEI sector, and those who began in public HEI tended to remain in the public sector for the further Higher Education qualifications they obtained.

Third, of those who moved across the public-private divide (private-public or public-private) in this period, 73% achieved two steps (two qualifications); 22% achieved three steps (three qualifications), and 5% achieved four steps (four qualifications), as shown in Figure 19. Only one student who moved across public-private institutions achieved five steps.



**Figure 19: Proportions of students who moved across public and private HEIs by numbers of steps (Higher Education qualifications) in 2003-2008**

***Overall learner movement trends between public and private HEI, between NQF Levels 5 and above 2010-2015***

Table 39 indicates the movement of students between the public and private sector in their achievement of Higher Education qualifications at NQF Levels 5 and above, for the period 2010-2015, using the whole sample.

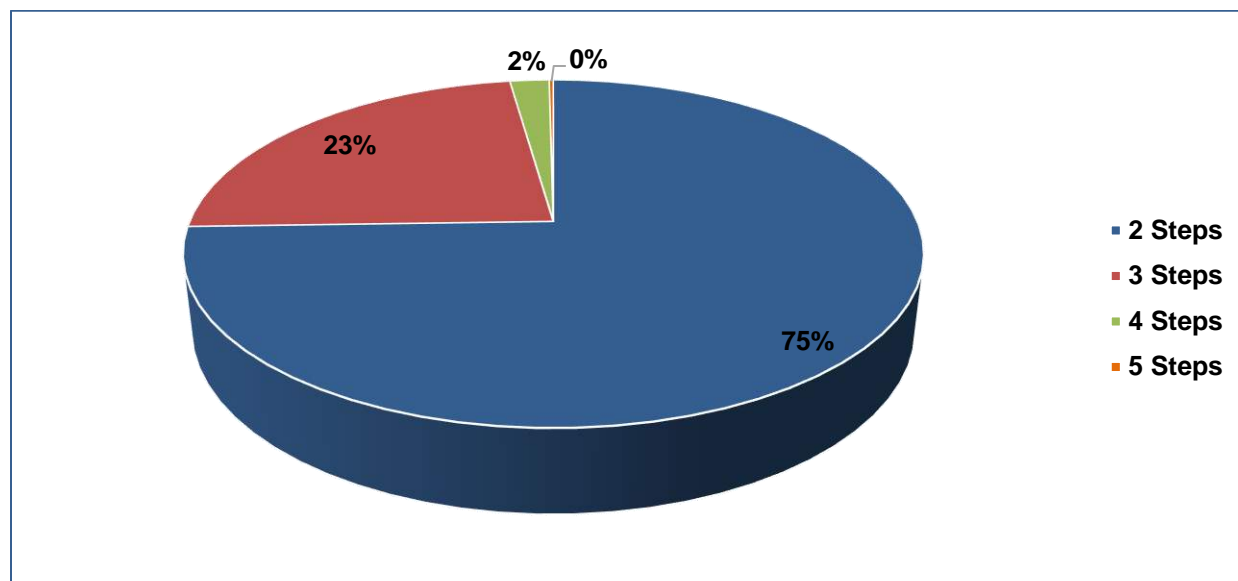
**Table 39: Student movements between public and private HEIs in their achievement of Higher Education qualifications at NQF Levels 5 and above, for the periods 2010-2015, using the whole sample**

No. of qualifications	Student movements between public and private HEI	2010 to 2015
1	Private	13 363
	Public	313 437
2	Private>Private	1 782
	Private>Public	669
	Public>Private	1 405
	Public>Public	112 656
3	Private>Private>Private	127
	Private>Private>Public	27
	Private>Public>Private	8
	Private>Public>Public	129
	Public>Private>Private	83
	Public>Private>Public	118
	Public>Public>Private	281
Public>Public>Public	11 905	
4	Private>Private>Private>Private	3
	Private>Private>Public>Public	2
	Private>Public>Private>Public	2
	Private>Public>Public>Private	2
	Private>Public>Public>Public	2
	Public>Private>Private>Private	4
	Public>Private>Private>Public	1
	Public>Private>Public>Public	4
	Public>Public>Private>Private	19
	Public>Public>Private>Public	10
	Public>Public>Public>Private	11
Public>Public>Public>Public	379	
5	Private>Private>Public>Public>Public	1
	Public>Public>Private>Private>Private	1
	Public>Public>Private>Private>Public	1
	Public>Public>Private>Public>Private	0
	Public>Public>Private>Public>Public	1
	Public>Public>Public>Public>Private	2
	Public>Public>Public>Public>Public	9

Between 2010 and 2015, the majority of students who achieved their Bachelor's Degrees (inclusive) in Fields 3 and 10 did not move on to achieve further HEQSF qualifications, but remained with a single qualification as indicated in Table 40.

Of the students who went on to achieve additional Higher Education qualifications, 186 547 (representing 60%) of 313 437 remained in the public sector while 10 609 (representing 79%) of 13 363, remained in the private sector. Meanwhile, students who attained a Bachelor's Degree from a private HEI (inclusive) in this period, numbering 2 754 (21%) went on to achieve further HEQSF qualifications in either the public or private sectors and most went back to private HEI. Similarly, of the 313 437 students who attained a Bachelor's Degree in Fields 3 and 10 from a public HEI, numbering 126 890 (40%) achieved additional Higher Education qualifications in either the private or public sectors, and most went back to public HEI.

Of the students who achieved Bachelor's Degrees between 2010 and 2015 (inclusive), and went on to attain a second or more HEQSF qualifications across the public-private HEI divide, 2074 (75%) did so in two steps (achieving two qualifications), 646 (23%) did so in three steps (three qualifications) and 57 (2%) did so in four steps (four qualifications) as shown in Figure 20. Six students in this group achieved five qualifications.



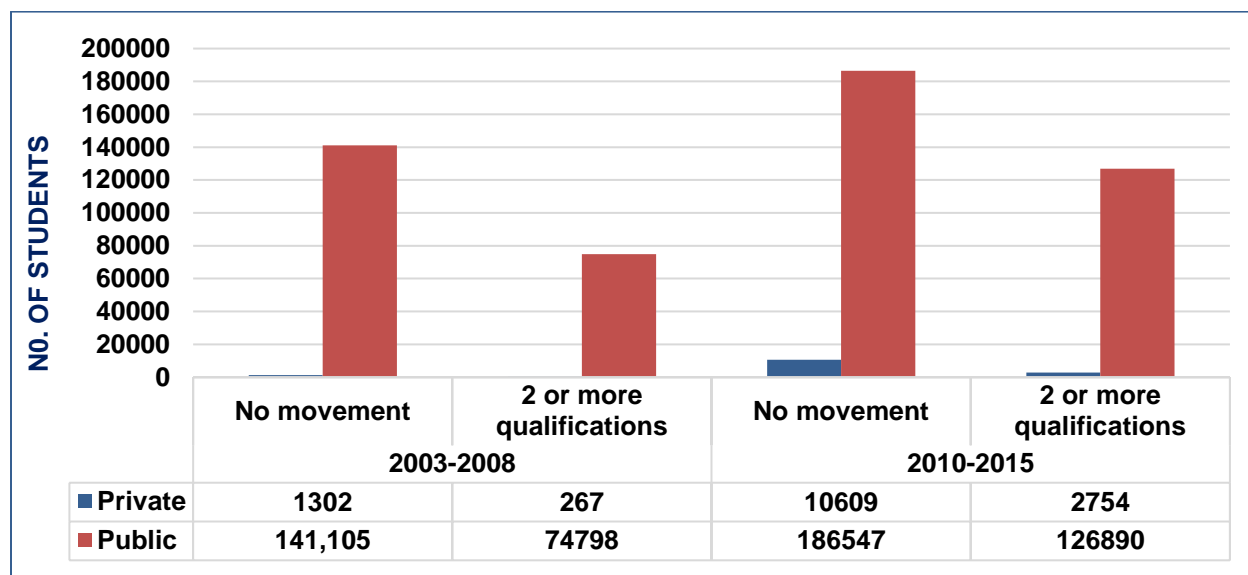
**Figure 20: Proportions of students who moved across public and private HEIs by numbers of steps (HEQSF qualifications) in 2010-2015**

### ***Comparing student achievement numbers in public and private HEI across the two periods 2003-2008 and 2010-2015***

The trends in student movements between private and public HEI *across the periods* 2003-2008 and 2010-2015 were also analysed, using the *whole sample*.

Using the whole sample, it is clear that whilst the majority of students who attained Bachelor's Degrees in the two periods under consideration did not cross the public-private HEI divide as they did not go on to attain more than one Higher Education qualification. An increase in the number of students who achieved a second or more Higher Education qualification(s) was observed across both institutional types in the 2010-2015 period, relative to the years 2003-2008 – as shown in Figure 21.

In the case of private HEIs, there was an increase in this regard from 18% in 2003-2008 to 21% in 2010-2015. For public HEIs, there was an increase from 35% in 2003-2008 to 40.5% in 2010-2015.



**Figure 21: Movements of students who achieved Bachelor's Degrees in private and public HEIs in 2003-2008 compared to 2010-2015<sup>79</sup>**

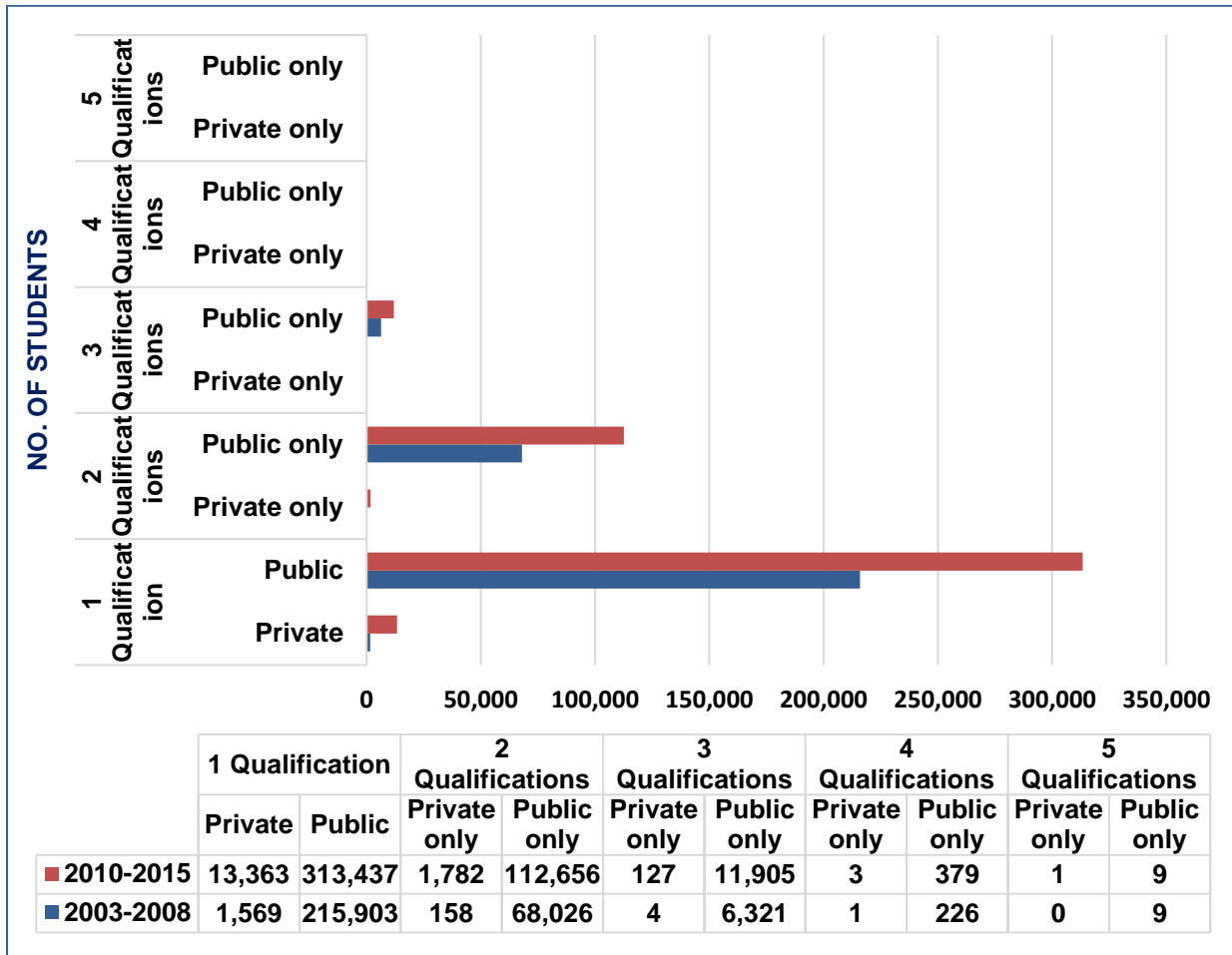
Based on the whole sample, Figure 21 shows the increases in numbers of students achieving two or more Higher Education qualifications per private/public HEI, for the two periods 2003-2008 and 2010-2015, respectively.

Of the students who did follow a pathway within the HEQSF context, the majority tended to remain either entirely within public HEIs or within private HEIs for all their qualifications as shown in Figure 22.

However, as shown in Figure 22, an increase can be observed in the numbers of students who followed pathways within the HEQSF context across both institutional types, as well as in the numbers of qualifications achieved in 2010-2015 compared to the numbers achieved in the period 2003-2008 – with the exception of the achievement of five qualifications in public HEIs, where the number remained unchanged. The observed

<sup>79</sup> 'No movement' indicates a student's achievement of only one Higher Education qualification in this period.

growth was more marked in the numbers of students who attained three qualifications from private HEIs, from four students in the 2003-2008 period, to 127 in the years 2010-2015 (representing a 31.75% increase). This can be compared to the 85.1% increase in the numbers of students who attained a Bachelor’s Degree in a private HEI over the two periods.



**Figure 22: Numbers of students who achieved two or more qualifications within only private or only public HEIs in the periods 2003-2008 and 2010-2015 respectively**

Figure 22 shows a comparison using the whole sample, of the numbers of students who, having achieved a Bachelor’s Degree in a private or public HEI, went on to attain a second or more qualification(s) in the same or different sector.





**Figure 23: Numbers of students achieving additional Higher Education qualifications across public and private HEIs in the periods 2003-2008 and 2010-2015 respectively**

As indicated in Figure 23, there is a marked increase in the numbers of students who achieved their Bachelor’s Degrees in the 2010-2015 period, compared to those who graduated in 2003-2008, for all lengths of learning pathways (i.e. pathways including two, three, four, or five steps). The majority of the students who achieved additional qualifications in both periods, followed two-step pathways.

***Reflections on the Council on Higher Education part of the study:  
Enhancing Integration and Articulation between Public and Private HEI***

As part of the 2017 NQF Impact Study, the CHE undertook to assess the extent to which its activities as mandated by the NQF Act are facilitating integration between the public and private components of the Higher Education sector. The movement of students between the public and private HEIs, analysed on the basis of NLRD data, was used as an indicator of integration and articulation.

The CHE has developed and implemented policies, frameworks and good practice guides as the main mechanisms of facilitating integration and articulation between the public and private components of the Higher Education system in the country. These have been complemented by sector-wide quality enhancement initiatives and national qualifications standard setting.

Bearing in mind the assumptions on which the analysis of the NLRD data was based, the results reported in Section 5.5 confirm that not only has the CHE developed and

implemented the integrating instruments as reported, but that this intentional application across the public and private components of the sector is contributing to integration and articulation in the system. The results and analysis in Section 5.5 revealed two key trends.

### Trends in student movements across public and private HEIs

First, there has been a pronounced increase in the numbers of students achieving Bachelor's Degrees in both public and private HEIs. Along with this trend, there has also been a marked increase in the contribution of Private Higher Education Institutions (PHEIs) to the total number of students achieving Bachelor's Degrees annually. In the period 2003-2008 (inclusive), private HEIs accounted for just 1% of the total number of students who achieved Bachelor's Degrees. This number grew to 3% in the period 2010-2015 inclusive. Whilst the number of Bachelor's graduates from private HEIs grew at an average annual rate of 0.6% in 2003-2010 period, the average annual growth rate rose to 3.4% during 2010-2015 period. This finding suggests that levels of public confidence in the quality of programmes offered by private HEIs is increasing, and that the education obtained from private HEIs may no longer be perceived as being inferior to that offered by Public Universities. These developments could also be attributed to the fact the public is more aware than was previously the case, that programmes offered by the private HEIs are subjected to the same level of scrutiny by the CHE as are those for public HEIs.

Second, there has been some growth in the number of students who, having achieved a Bachelor's Degree, go on to achieve a second or third Higher Education qualification on the NQF. Most interesting for the purpose of this study is the finding that the numbers of students who achieve a second or third qualification in public HEI after having obtained their first degree from private HEIs, and *vice versa*, are increasing. This trend is illustrated by the analysis of student movements across public and private HEI for second, third and fourth qualifications in Business, Commerce and Management Sciences (Field 03) as well as Physical, Mathematical, Computer and Life Sciences (Field 10, Sub-Field: IT and Computer Sciences) summarised in Table 40.

**Table 40: Private-public movement of students for second, third and other qualifications in Fields 03 and 10**

No. of qualifications	Private-Public movement	Field 03		Field 10	
		2003-2008	2010-2015	2003-2008	2010-2015
		No. of students	No. of students	No. of students	No. of students
2	Public-Public	18 356	28 046	314	484
2	Public-Private	62	765	2	12
2	Private-Private	4	150	1	2
2	Private-Public	7	76	0	6
3	Public-Public-Public	1 554	2 649	0	44
3	Public-Public-Private	7	105	0	0
3	Public-Private-Public	12	51	0	1
3	Public>Private>Private	0	30	0	0
3	Private>Private>Private	0	11	0	0

No. of qualifications	Private-Public movement	Field 03		Field 10	
		2003-2008	2010-2015	2003-2008	2010-2015
		No. of students	No. of students	No. of students	No. of students
3	Private>Private>Public	0	1	0	1
3	Private>Public>Private	0	1	0	0
3	Private>Public>Public	0	5	0	0
4	Public>Public>Public>Public	53	61	0	0
4	Public>Public>Public>Private	1	1	0	1
4	Public>Public>Private>Public	3	0	0	0
4	Public>Public>Private>Private	1	5	0	0
4	Public-Private-Public-Private	1	0	0	0
4	Public>Private>Public>Private	0	1	0	0
4	Public>Private>Public>Public	3	2	0	0
4	Public>Private>Private>Private	0	1	0	0
4	Private>Private>Private>Private	0	1	0	0
4	Private>Private>Public>Public	0	1	0	0
5	Public>Public>Public>Public>Public	0	4	0	0
5	Public>Public>Private>Public>Private	1		0	0
5	Public>Public>Private>Private>Public	0	1	0	0
5	Public>Public>Public>Private>Public	0	1	0	0
	<b>Total</b>	<b>20 065</b>	<b>31 969</b>	<b>333</b>	<b>552</b>

Table 40 shows an increase in the mix of institutions and steps involved as students move between components of the Higher Education sector in pursuit of qualifications in the NQF. Whilst some of the student numbers are small, the results still show that there is increasing integration and articulation in the sector.

The trends discussed suggest that after obtaining a first Higher Education qualification, students appear to be increasingly flexible in terms of selecting whether to pursue their next qualification in public or private HEIs. This pattern suggests that there may be a perception of greater parity of esteem between the qualifications offered by public and private HEIs. A decade ago and earlier, it was known that private HEIs were perceived as being inferior to public HEI in terms of the quality of provision, the methods of teaching and learning, and the overall status of the institutions (Fehnel, 2002; Mabizela, 2002; Kruss, 2004).

### **Towards further enhancing integration and articulation in Higher Education**

While the results show a steady positive trajectory in terms of student movements across public and private HEIs, it is important to note that these patterns seem to be at early stages and a lot still needs to be done by the CHE, SAQA and the DHET to ensure that there is full parity of esteem between the institutions, programmes and qualifications of private HEIs, *vis-à-vis* those in public HEIs. The 2016 amendment to the Higher Education Act makes provision for private HEIs to use the institutional title of 'University', and this is a welcome development that will go a long way to increasing the parity of esteem of programmes and qualifications of private HEIs in relation to those of Public Universities. It

is recommended that the DHET expedites the process of developing the regulations that will spell out the conditions to be satisfied, and processes to be followed to allow eligible private HEIs to assume the title of 'Private University'.

### *Role for the CHE*

The CHE, on its part, has to continue with developing and implementing its policies, frameworks and good practice guides uniformly across public and private HEIs. However, it needs to invest more, and increase its initiatives in the area of quality promotion and capacity development, because it is through quality promotion and capacity development that all institutions become more quality conscious and entrench a quality culture. When a quality culture is entrenched throughout the system, the question of which institution one obtained his or her qualification from, becomes largely irrelevant.

Fuller integration and articulation between the two components of the Higher Education sector may also become difficult to realise if the private HEIs continue to focus on Business/Commerce, Theology and Information and Communications Technology (ICT) studies, while neglecting other fields of study such as Engineering, Health Sciences and Natural Sciences. These latter fields are, in fact, those in which graduates are in relatively higher demand within the economy and other sectors of society. Private HEIs are likely to enhance their public profiles and improve their reputations by venturing into offering programmes in these fields.

### *Role for Professional Bodies*

Professional Bodies need to be involved in this aspect of articulation work. Currently, a number of Professional Bodies recognise qualifications from public HEIs, but not similar qualifications from private HEIs. Some professional body statutes include that the bodies will register as professionals, the graduates from Universities. It is generally known however, that the administrators involved translate this into 'graduates from public Universities' and may not register for practice the graduates from private HEIs, even though these graduates may have similar qualifications.

### *Role for Employers*

Employers need to be conscientised to desist from the practice of attaching more value to the institution where a potential employee obtained her or his qualification, and focus more on qualification type and its level on the NQF. A change of this type could go a long way towards dismantling the perception that graduates from Public Universities should be preferred over those from private HEIs, in employment opportunities.

## ***Reflections on Sub-Project 5***

In conclusion, the study has shown that the work that the CHE is doing to integrate public and private HE and promote articulation between the two components is yielding some positive results. However, as alluded to above, other role players have also to do their part

to assist the process. These include the DHET, the private HEIs themselves, Professional Bodies, and employers. The CHE also has to upscale its quality promotion and capacity development work in the sector.

#### **9.4 RECOMMENDATION: SUB-PROJECT 5**

One recommendation emerged from Sub-Project 5 on the integration of public and private Higher Education.

##### **Recommendation 7: Deepen articulation between public and private Higher Education**

To enhance access to, and progression in and beyond, Higher Education, it is recommended that the CHE (a) continues to develop and implement its policies, frameworks and good practice guides across public and private Higher Education, while increasing its quality promotion and capacity development activities; and (b) reports articulation successes widely.

To make possible the recognition of a wider range of qualifications from private HEI via (a) private HEI offering a wider range of Higher Education qualifications, and (b) professional body registration of individuals with qualifications from both types of institutions, SAQA could work with the South African Private Higher Education (SAPHE) body, DHET, and others, towards (1) the review and repealing of the restrictive legislation [that also that contradicts Section 29 of the Constitution, and Section 53(1) of Higher Education Act], and (2) expediting the DHET process of developing criteria for private HEIs to become fully-fledged universities as envisaged in the 2016 amendment of the Higher Education Act.

# 10. Sub-Project 6: Experiences and impact of the new Quality Council for Trades and Occupations (QCTO) model for Occupational Qualifications

This section of the report presents the sub-project led by the Quality Council for Trades and Occupations (QCTO), which focused on the stakeholder experiences and impact of the QCTO's new model for occupational qualifications. This model is an example of a 'tool' (Engeström, 1987) used to achieve the National Qualifications Framework (NQF) objectives of access, quality, transparency and progression. The historical background for occupational qualifications was sketched in Section 2 of this report. Section 10 opens with a description of the QCTO model for qualifications. It presents the research questions addressed; the method and samples used; findings and analyses, and recommendations.

The QCTO-led part of the 2017 NQF Impact Study addressed one main question and three sub-questions, as follows.

## **QCTO Research Question:**

How has the QCTO model for occupational qualifications in the integrated education and training system under the NQF Act impacted on the development of occupational qualifications and the provision of Occupational Training?

This question was divided into:

**Part A:** What are the changes between the pre- and post-2008 models for occupational qualifications?

**Part B:** What is the impact of the post-2008 model?

These questions were divided into **sub-questions** as follows.

- What are the significant differences between the QCTO model for qualifications under the NQF Act, and the Unit Standards-based model under the SAQA Act, with respect to (a) qualification design, (b) the provisioning of occupational training, and (c) the administration processes of both?
- What is the stage of progress regarding implementing the new model for the selected set of qualifications, and has it served to simplify the OQSF?
- How have the differences between the pre and post-2010 models impacted on the stakeholders linked to the selected set of qualifications? What do the stakeholders say about the efficiency and effectiveness of the new system in this regard? And what do the stakeholders say about the simplicity of the new system, and the extent to which there is articulation between the selected

## 10.1 QUALITY COUNCIL FOR TRADES AND OCCUPATIONS (QCTO) MANDATE AND MODEL FOR OCCUPATIONAL QUALIFICATIONS

Under the South African Qualifications Authority (SAQA) Act, Sector Education and Training Authority (SETAs) were established through the Skills Development Act (RSA, 1998). Their Education and Training Quality Authorities (ETQAs) were accredited by SAQA for periods of three years. Their responsibilities included, in their economic sectors:

- accrediting providers to offer training for specific NQF-registered qualifications and Unit Standards;
- monitoring the provision of these qualifications and Unit Standards, including the associated assessment and moderation;
- registering assessors for assessment in the specified qualifications and Unit Standards, in line with the criteria established for this purpose;
- certification of the successful learners involved;
- recommending new qualifications and Unit Standards, or modifications to existing ones, to the National Standards Bodies (NSBs) for consideration;
- maintaining a database, and reporting, in line with SAQA requirements, and carrying out any other functions that were assigned to them by SAQA.

The NQF Act (RSA, 2008) and the Skills Development Amendment Act (RSA, 2008b) mandate the QCTO *inter alia* to:

- oversee the development and maintenance of the Occupational Qualifications Sub-Framework (OQSF);
- establish and maintain occupational standards and qualifications;
- quality assure occupational standards and qualifications;
- design and develop occupational standards and qualifications; and
- ensure the quality of occupational standards and qualifications.

While the mandate of the QCTO had been stated in the Skills Development Amendment Act (RSA, 2008b), the strategic thinking and implementation of activities had a slow start. The extent of change at the time, in the legislative and regulatory environment of the NQF and Department of Higher Education and Training (DHET), compounded the issue. Developmental areas included the following.

- Replacing sector-specific qualifications with cross-sectoral occupational qualifications and doing away with Memoranda of Understanding between SETAs<sup>80</sup>.

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<sup>80</sup> Each provider was accredited by a 'parent' SETA, to offer qualifications for which that SETA was the approved ETQA. If a provider wanted to provide a qualification that lay within the ambit of another SETA, a MoA between the parent and additional SETA was needed.

- Doing away with the multiple quality-assuring structures (ETQAs) and establishing the QCTO to oversee the OQSF.
- Addressing the existing inconsistency of approaches to learning and assessment across economic sectors and providers.
- Doing away with the proliferation of Unit Standards, and structuring qualifications into three components namely Knowledge Standards, Practical Standards, and Workplace Experience Standards.
- Avoiding over-emphasis on accreditation as the key to Quality Assurance.

Notwithstanding the assistance of SAQA, the QCTO was faced with the task of setting up and establishing itself as an organisation, while simultaneously assuming its responsibilities.

### ***Quality assurance model for OQSF qualifications***

The transition from the SAQA Act to the NQF Act was preceded by the publication of the Joint Policy Statement by the ministers of Education and Labour in 2007, which led to the formation of a Project Steering Committee. This Committee was established by the Director-General of Labour and consisted of officials from the Department of Labour (DoL), and individuals and resources from Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) (then called GTZ)<sup>81</sup>.

This Committee developed a draft OQSF and models for the development and Quality Assurance of the qualifications in this Sub-Framework. The QCTO further developed these models, which emphasised three aspects, namely:

- qualification design as the basis for Quality Assurance;
- the importance of the monitoring of providers; and
- the centrality of Quality Assurance of External Integrated Summative Assessment (EISA).

From the start, Quality Assurance was central in the work of the QCTO, and a Chief Directorate for Occupational Quality Assurance was established within the organisation.

### **Delegation of powers**

The QCTO adopted its delegation policy as a model for successfully fulfilling its obligations. The QCTO, in an effort to minimise further systemic disruption, delegated the Quality Assurance part of its mandate for registered qualifications to the SETAs, as from October 2012, in terms of the ETQA Regulations put in place by SAQA (1998). Since that time, the quality assurance system for occupational qualifications has included the establishment of Development Quality Partners (DQPs) and Assessment Quality Partners (AQPs)<sup>82</sup>. DQPs

<sup>81</sup> The – previously GTZ – is a German cooperation that supports skills development. It has sponsored skills development in the occupational sector in South Africa, using German resources, since the 1990s.

<sup>82</sup> Typical DQPs and AQPs include SETAs, Professional Bodies, legislated bodies, examination bodies, moderation bodies, and occupational associations.



are responsible for the development of occupational qualifications; AQPs for assessment relating to these qualifications.

The delegation of these Quality Assurance functions to the former ETQAs proved to be successful while the QCTO built its capacity. The delegation model was also contested however, for delaying the further development of the Trades and Occupations (TO) landscape. After 2013 the SETAs had new roles to play which do not include the Quality Assurance of qualifications for the TO sector<sup>83</sup>.

### *Development Quality Partners (DQPs)*

The QCTO approves DQPs to coordinate the design, development, and revision of specified occupational standards and qualifications. It uses its Policy on Delegation to DQPs and AQPs (QCTO, 2011b; 2014b) to manage this approval process. This policy outlines the criteria for approval of DQPs, the functions of DQPs, and the QCTO's obligations with respect to DQPs.

The process for selecting DQPs is stakeholder-driven. Industry stakeholders must agree on a body that will assume the role of DQP for specific qualifications, and key stakeholders must be represented in the decision-making meeting that leads to the identification and selection of the DQP.

The identified body – the potential DQP – must then meet the criteria stipulated in the Policy on Delegation (*Op.Cit.*) before the QCTO enters into a Service Level Agreement (SLA) that effects the delegation. The DQP must appoint a QCTO-registered Qualifications Development Facilitator (QDF) to facilitate the qualification development process<sup>84</sup>. The facilitation process followed by the QDF is standardised (QCTO, 2014a). The outcome of the development process must be verified with a community of experts. The DQP must ensure that appropriate members from the community of experts are involved throughout the qualification development process. The aim of all these requirements is to ensure that an appropriate community of experts is responsible for the development of each occupational qualification, and that quality is built into each step of the process.

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<sup>83</sup> Research showed that the SETAs had too many objectives and that this overload was linked to difficulties in their strategic planning (DHET, 2013:66). As a result, SETAs have not affected the links needed between education and work. SETA reporting is uneven, making the monitoring of SETAs by the DHET difficult (*Ibid.*). The new streamlined foci for SETAs are (1) focusing on obtaining accurate data on workplace skills needs, and (2) supporting training providers in their delivery of learning programmes. Their work includes facilitating cooperation between education and training institutions, and workplaces, and worker development in enterprises (DHET, 2013:67-68). The White Paper for PSET (*Ibid.*) also provides direction for the strengthening of planning and reporting in SETAs, and notes impending changes towards strengthening SETA governance (*Ibid.*).

<sup>84</sup> A QDF is a person registered by the QCTO as having met the requirements to facilitate the development of new QCTO qualifications. The QDF environment is managed by the QCTO utilising its Policy on Qualifications Development for Facilitators (QCTO, 2014a). This policy outlines the roles of QDFs, and the criteria for their registration amongst other aspects.

### *Assessment Quality Partners (AQPs)*

An AQP is a body delegated by the QCTO to develop assessment instruments and manage the final EISA of specific occupational qualifications. The AQP also recommends the certification of learners to the QCTO.

AQPs work within the requirements of QCTO policy (QCTO, 2011a; 2011b; 2014a; 2014b) which are designed to build in Quality Assurance at each stage of the assessment processes. How this strengthening of the processes is achieved can be seen by considering the functions of AQPs, which include:

- coordinating and managing external assessment processes;
- recommending external assessment specifications documents to the QCTO for approval;
- developing and maintaining a national data-bank of instruments for external assessments;
- developing guidelines for the accreditation of Assessment Centres or the approval of assessment sites for external assessments, and recommending accreditation or withdrawal of accreditation for these centres as appropriate, to the QCTO;
- recommending the withdrawal of the accreditation of Skills Development Providers (SDPs) for the Knowledge and/or Practical Skills components of qualifications, where necessary;
- ensuring that there are reliable and secure electronic databases to record learner registration in formats required by the QCTO;
- moderating at least 10% of learners' external assessments;
- recommending the certification of learners to the QCTO;
- implementing an appeals policy in line with QCTO Assessment Policy (QCTO 2014a);
- conducting tracer studies such as employer satisfaction surveys to ascertain the occupational competence levels of qualifying learners;
- promoting the continuous professional development of AQP-associated practitioners;
- providing a mechanism for Recognition of Prior Learning (RPL); and
- reporting to the QCTO, in the form and manner required by the QCTO.

### *Criteria for appointing Assessment Quality Partners (AQPs)*

The criteria for successful AQPs are stringent as imperatives for quality. A body seeking to perform the functions of an AQP must, for example:

- be recommended to the QCTO by the relevant DQP, after completing an occupational profile compiled by a community of expert practitioners that has good standing in the relevant occupation;

- have access to subject matter experts and the other human resources necessary for performing AQP functions, and all the individuals involved need to have good standing in the occupational field concerned;
- have research capacity;
- have the financial resources necessary to establish the AQP functions required, and to implement effective, efficient and transparent financial management and internal control systems, verified by means of a written commitment by its relevant authority;
- have a proposed fee structure and funding model to maintain the delivery of its functions;
- have a reliable Management Information System (MIS) in the format required by the QCTO;
- have a system in place to detect and address irregularities;
- be willing to sign the QCTO Code of Conduct if approved; and
- be a juristic entity.

### **Qualification development and selection of Development Quality Partners and Assessment Quality Partners**

In the QCTO's policy for developing qualifications it stipulates the following mandatory processes for DQPs and AQPs (QCTO, 2011b; 2014a; 2014b), as follows.

- Conducting pre-scoping meeting(s) during which the scope of a qualification and/or part-qualification is determined. This meeting includes the identification of possible DQPs and AQPs.
- The appointment of DQPs during QCTO-facilitated scoping sessions.
- Occupational profile development and identification of the proposed AQP.
- Development process managed by the DQP and facilitation delegated to the QDF or learner QDF.
- Verification management of the occupational profile by the respective DQP with the consultation of the identified AQP.
- Appointment of the AQP by the QCTO based on substantiated recommendation by the DQP. At this point, the assessment functions are delegated to the AQP.
- The relevant DQP maintains module specification development with the QDF and/or learner QDF responsible for facilitation.
- The QDF and/or learner QDF guides the process of External Assessment Specification development which is delegated to the AQP for content management and sign-off.
- Verification management regarding curriculum and assessment specifications remain with the DQP for overseeing and management.

### **Assessment Quality Partners and enhancing quality**

The QCTO focuses its Quality Assurance of assessment on the Final EISA which is developed and managed by AQPs. The intention is that this model responds to labour

market skills needs through the involvement of respected industry experts, and by separating provision from assessment. Checks and balances at every stage are designed to maximise quality and the extent to which the skills development system responds to market needs.

The EISA determines whether or not learners have developed the required occupational competences to be awarded the respective qualifications. The setting of standards for specific EISAs by AQPs has potential to ensure that successful candidates are fully qualified to do the work stated on their Occupational Certificates.

All AQPs are members of the QCTO's AQP Forum, which meets at least three times a year. The purpose of this Forum is to create a platform to guide the implementation of AQP functions and to share successes.

The QCTO also monitors examination and marking sessions as well as Trade Testing towards enhancing quality. AQPs must report annually to the QCTO on:

- learner enrolments and achievements;
- the moderation and management of external assessments;
- the utilisation of assessment instruments, and an analysis of their performance;
- the performance of accredited Assessment Centres and sites;
- the performance of accredited SDPs;
- recommendations regarding learner certification;
- the management practices of assessment practitioners;
- tracer studies of learner performance in the workplace; and
- employer satisfaction surveys.

## **10.2 PROGRESS AFTER 2010**

Setting up the QCTO was challenging for its staff, but is viewed by them as being successful.

### ***Progress regarding the Delegation of Powers***

The QCTO achieved approval for its policies and procedures for delegation to DQPs and AQPs in 2011 (QCTO, 2011b; 2014a; 2014b). Initially there was a challenge with the small numbers of registered QDFs on the QCTO's register, and with the equity representation of those registered. An intervention was instituted to train Learner QDFs with the aim of expanding the pool of registered QDFs. The QDF Training Project was approved by the National Skills Fund (NSF) in 2012, and implemented for the first time in the 2013/14 financial year. The purposes of this initiative were to standardise and enhance the quality of QDF training, increase the numbers of registered QDFs, and improve the equity representation of registered QDFs.

To date, 28 DQPs, 28 AQPs, and 25 QDFs have been appointed for the newly registered qualifications or those submitted for registration under the QCTO.

## ***Progress regarding stability and sustainability in the QCTO context***

By December 2012, the SETA Grant Regulations (DHET, 2012b) were promulgated, requiring SETAs to set aside funding for the Quality Assurance activities of the QCTO. In order to have access to the funds the QCTO is required, on an annual basis, to present to the DHET a proposal describing how the funds will be used.

Two of the three NQF Sub-Frameworks – the General and Further Education and Training Qualifications Sub-Framework (GFETQSF) and the Higher Education Qualifications Sub-Framework (HEQSF) – were determined in 2013; by 2014, the OQSF followed suit. For the first time, in 2014, the whole structuring of the differentiated NQF in South Africa was clear to all. Finalisation of the determination of the three NQF Sub-Frameworks represented the point from which cross-cutting integrating work – such as the development of articulated learning pathways and Credit Accumulation and Transfer (CAT) – could become a national focus.

Ministerial determination (DHET, 2012a) specified that the qualifications on the OQSF would be named ‘Occupational Certificates’. The determination further stipulated that these qualifications would be located on NQF Levels 1-6. A subsequent determination (DHET, 2013c) specified that qualifications on the OQSF would span NQF Levels 1-8<sup>85</sup>. The OQSF development and approval process that followed, ensured that the necessary consultation processes were achieved. It is generally thought that this developmental process had minimal effects on providers and learners in the occupational qualification system, as most providers and learners at the time were part of the SETA ETQA system to which the QCTO had delegated authority.

In January 2013, the White Paper for Post-School Education and Training (PSET) (DHET, 2013c) was released. This Paper defined priorities for the PSET sector, which included strengthening and expanding the Technical and Vocational Education and Training (TVET) Colleges. This focus influenced the work of the QCTO significantly.

### **10.3 THE OCCUPATIONAL QUALIFICATIONS SUB-FRAMEWORK (OQSF)**

While occupational qualifications can be located on NQF Levels 1-8, the present focus of the QCTO is on qualifications at NQF Levels 1-6. The QCTO issues Occupational Certificates for qualifications registered at these levels on the OQSF. Each occupational qualification reflects the exact occupational title provided in the Organising Framework for

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<sup>85</sup> This development was largely a result of representations from stakeholders, and especially from the Banking sector. The OQSF has commenced with qualifications at Levels 1-6, and will progress to developing qualifications at Levels 7 and 8 over time.

Occupations (OFO)<sup>86</sup>. Table 41 shows the NQF levels and OFO Major Groups against which the QCTO issues certificates.

**Table 41: NQF levels and OFO Major Groups against which the QCTO issues certificates**

NSDS <sup>87</sup>	NQF Level	Skill Level <sup>88</sup>	OFO Major Groups				
High	7-10	4	2 Professionals			1 Managers	
			3 Technicians and Associate Professionals				
Intermediate	6	3	3 Technicians and Associate Professionals				
	5		2	4 Clerical Support Workers	5 Services and Sales Workers	6 Skilled Agricultural, Forestry, Fisheries, Craft, and Related Trades Workers	7 Plant and Machine Operators and Assemblers
	4						
Entry	3	1	8 Elementary Occupations				
	2		8 Elementary Occupations				
	1		8 Elementary Occupations				

The OQSF is designed to:

- facilitate post-school learning for individuals, and their contributions to social, cultural and economic development in South Africa;
- provide occupational qualifications that can be credibly benchmarked against similar international occupational qualifications;
- facilitate as appropriate, articulation between occupational qualifications within this Sub-Framework and qualifications in the GFETQSF and HEQSF; and
- be straight-forward, easy to understand and user-friendly in order to enable pathways in learning and work.

### ***The structure of occupational qualifications***

An occupational qualification is a qualification developed to address occupational skills needs for either an occupation or a specialisation within an occupation. A Trade is an occupation that is listed in the National List of Artisan Trades published by the Minister of Higher Education and Training (MHET). All occupations are listed on the OFO.

<sup>86</sup> The OFO was published in 2013 (DHET, 2013b). The diagram of the OFO shows four skill levels, each of which can be mapped against the NQF. The OFO levels are distinguished by types of skills (each level contains a fixed range of types of skills) combined with levels in the authority hierarchy in workplaces.

<sup>87</sup> National Skills Development Strategy (NSDS) III 2011-2016 categorisation of skills (DHET, 2010)

<sup>88</sup> OFO skill level.

Occupational qualifications are structured to include three components of learning namely:

- (1) knowledge;
- (2) practical skills; and
- (3) Workplace Based Learning (WBL).

These components are formalised as Knowledge Standards, Practical Skills Standards; and Work Experience Standards (QCTO, 2011b; 2014a; 2014b). The new occupational qualifications seek to integrate the knowledge, practical and workplace components to ensure that qualifying candidates have the necessary competencies required for the workplace.

OQSF policy (DHET, 2013b) regulates and specifies the characteristics of qualifications that are part of the OQSF. It outlines for the public –SDPs, learners, and others – the different Occupational Qualification options available as part of the PSET system, and criteria for accreditation to offer these qualifications.

Vocational qualifications are similar to the sector qualifications developed by SAQA prior to 2008. Vocational qualifications – such as the National Certificate: Vocational (NCV) – cover several occupations and serve to introduce learners to the world of work. Unlike occupational qualifications, vocational qualifications do not qualify successful learners for a specific occupation or Trade.

### ***Qualifications maintained by the QCTO***

The different types of qualifications for which the QCTO executes its mandate include the following.

- **New occupational qualifications** – the QCTO quality assures the occupational qualifications registered on the NQF after 2012, which includes Trades.
- **Trades listed on the NQF** – the QCTO approved the National Artisan Moderation Body (NAMB) as an AQP for the Trades. The Quality Assurance processes for the Trades are in place and functional, including the certification system.
- **Legacy qualifications** – inherited by the QCTO, from the NQF under the SAQA Act, these were quality assured by the ETQAs under delegation from the QCTO<sup>89</sup>; the QCTO took over the delegated functions in 2015.

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<sup>89</sup> These ETQAs include SETAs, professional bodies, legislated bodies, examination bodies, moderation bodies, and occupational associations.

- **National Technical Education (NATED) N4 to N6 part-qualifications, and the associated National (N) Diplomas<sup>90</sup>**, in which the content is mainly theoretical; there are few practical instructional offerings available. Certificates are issued by the DHET at Levels N4, N5, and N6<sup>91</sup>. Completion of the N6 certificate and the required workplace experience results in the award of the National (N) Diploma, also by the DHET. These qualifications were in high demand prior to development of the new system, although many students did not obtain the N Diploma due to the difficulty of finding suitable workplace experience to fulfil the requirements of the qualification. These qualifications were found in the National Articulation Baseline Study (SAQA-DUT, 2018) to be playing an important role in learning pathways between TVET and Higher Education.

### ***QCTO management of inherited occupational qualifications since 2009***

Upon establishment of the QCTO in 2010, 2336 occupational qualifications already registered on the NQF were allocated to the OQSF by SAQA. These qualifications are quality assured by the QCTO directly or through its Quality Assurance Partners (QAPs), which include SETAs and Professional Bodies<sup>92</sup>. Most of these qualifications were unit-standard-based, and many have since expired.

### ***Certification for occupational qualifications***

#### **Certification for occupational qualifications**

The QCTO as part of its master systems plan in developing a Management Information System (MIS) allows for the certification of occupational qualifications registered on the OQSF, and includes (1) the recording of learner information from its SDPs; (2) tracking of the accreditation of SDPs and Assessment Centres, and (3) managing the assessment information that leads to the issuing of a certificate for a learner who has successfully completed an Occupational Qualification (including Trades). Until such time that the SETA occupational qualifications have been re-aligned to the new model for occupational qualifications, the certification of the SETA qualifications as well as the uploading of learner information to the NLRD will remain with the SETAs. This will allow for the continued uploading of learner achievement information to the NLRD as required.

#### **Certification for Trades**

Section 26 (D)(4) of the Skills Development Act (RSA, 1998) mandates the QCTO to issue any person who has successfully completed a Trade Test, with a Trade Certificate in the prescribed form. The certificate is issued for a Trade listed in the register as published by

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<sup>90</sup> The N4–N6 programmes were first described in Report 190/191, and were originally offered at the Technical Colleges rationalised to form the Further Education and Training (FET) Colleges in the mid-2000s, renamed TVET Colleges in 2013.

<sup>91</sup> National (N) Diplomas involved 'matric' plus three years of post-school education and training.

<sup>92</sup> Vocational qualifications are quality assured and certified by the DHET.



the Minister in 2012, and states that the holder of the certificate is qualified to perform the Trade specified in the certificate. When the QCTO took over the certification function from the DHET on 1 April 2013, there were three different processes through which a person received a Trade Certificate.

- First, artisan learners who had successfully completed apprentice training and Trade Testing under the auspices of a SETA (in terms of powers transferred to them in line with the Manpower Training Act [RSA, 1981]) received a SETA certificate with a SETA logo, signed by the Chief Executive Officer (CEO) of the SETA and endorsed by the Registrar of Manpower or the Registrar in the DHET as appointed by the Minister of Higher Education and Training (MHET). Between 2009 and November 2013, these certificates were issued in terms of either Section 13 or Section 28 of the Manpower Training Act (Ibid.). The DHET endorsed the SETA-issued certificates based on hard copies of Trade Test reports, contracts where applicable, and a recommendation from the SETA. Electronic copies of these transactions were located with the SETAs involved; there were no central electronic records of these certificates.
- Second, artisan learners who successfully underwent Learnership training and sometimes central trade testing under the auspices of SETA-accredited trade test centres, received certificates with the relevant SETA logos only, signed by the CEO of the SETA concerned, and the ETQA manager only. These certificates were issued between 2000 and 2009 – not in terms of the Manpower Training Act, but in accordance with the standards set by the SETA involved.
- Third, artisan learners who underwent Trade Testing at INDLELA without any linkages to a SETA, received a certificate in terms of Section 28 of the Manpower Training Act, with a red seal embossed with the Government Coat of Arms. These certificates included both the QCTO and the DHET logos, and were issued between April 2012 and October 2013, and signed by the Registrar in the DHET and the Registrar at the QCTO.

A number of challenges arose as a result of these different learning routes and types of certification. There had been general public confusion regarding the routes to artisan training and certification, sometimes blocking the employment of individuals.

In some sectors, certificates issued in terms of Section 28 of the Manpower Training Act (MTA) (RSA, 1981) are not recognised; only those issued under Section 13 of this Act are seen as being acceptable in the industry. There is a general perception that artisans following the Section 28 route (acquiring skills over time, in the course of learning and work) have inferior skills compared to those following the Section 13 route (formalised training through an apprenticeship contract), even although all artisan learners in a sector undergo exactly the same Trade Tests. RPL initiatives have addressed this problem in many but not all cases. It should also be noted that learners following a formal training route (Section 13) and successfully completing the Trade Test outside the contractual period also received Trade Certificates issued under Section 28.

A further challenge was that hard copies of records (trade tests conducted by the Central Organisation for Trade Testing [COTT]), contracts and other information if available, were neither organised nor located centrally. INDLELA, for instance, did not have access to the contracts stored at the DHET, and older COTT records had been captured on the EMAGIC system, but without verification of when the record was captured, and in many instances, the information was not sufficient to issue a replacement certificate based only on the electronic record.

The QCTO inherited these databases when it assumed the certification function in 2013 and has since introduced a new certification system with migrated records from the EMAGIC system. In November 2013 the QCTO took full responsibility for the issuing of Trade Certificates, still using the certificate format with the DHET and QCTO logos. In April 2016 the QCTO introduced its own certificate format with enhanced security features. A large-scale digitisation project is currently underway at the QCTO to scan the contracts and records in hard copy form, and index and capture these records in a comprehensive relational database for certification.

The Skills Development Act requires a central national office that manages Trade Tests in a standardised, easily accessible way. The NAMB established in terms of this Act is responsible for this centralisation and for recommending all trade certification to the QCTO. The QCTO maintains a national database of all Trade Certificates issued and informs NAMB of the issuing of such certificates.

The intention is that the QCTO's certification approach will assist in engagement with QAPs for the first issuing of certificates, and directly with candidates in instances where Trade Certificates were issued and are now lost, and where replacement certificates are required. The issuing of replacement Trade Certificates issued prior to November 2013 is, however, dependent on the digitisation of records being completed.

From November 2013 when the QCTO began to issue single Trade Certificates (first issues) in line with the Skills Development Act, OFO, and OQSF, these certificates were for artisan learners who had successfully completed their Trade Tests at INDLELA, Olifantsfontein<sup>93</sup> and in SETA accredited Trade Test centres<sup>94</sup>. The new certificates clearly indicate the relevant Trade, Trade specialisation, and OFO Code, and are not differentiated on the basis of routes to the Trade Tests. The certificates were issued with two logos, that of the DHET on the left, and that of the QCTO on the right. The red seal, which is and has been affixed to some Trade Certificates for many years, is present and embossed with the Government Coat of Arms. Trade Certificates issued by the QCTO were initially signed by delegated QCTO officials who were appointed as Registrars under the MTA for the period November 2012 to May 2013; the only official signature since has been that of the CEO of the QCTO, in electronic form. Since April 2017 Trade Certificates have been issued without the DHET logo on the QCTO-approved certificate format which includes the National Coat of arms and the QCTO logo only. These certificates have enhanced security features.

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<sup>93</sup> Olifantsfontein is where INDLELA (previously the Central Organisation for Trade Testing [COTT]) is located. Olifantsfontein has long been a Trade Testing Centre.

<sup>94</sup> The SETA accreditation of trade test centres is also quality assured by the QCTO.

Attempts were made to design this certification system in a way that minimises complexity. System input data are informed by the electronic submission of learner information for certification received from NAMB and imported to the QCTO system, as well as well as verification by QCTO staff, through a sample of supporting documents.

All requests for the issuing of Trade Certificates, and requests for replacement certificates received since November 2013, have been processed. Initially the QCTO experienced a challenge regarding the legality of issuing replacement certificates, which delayed the issuing of these certificates in 2014; the matter was also resolved in 2014. A further challenge emerged regarding the issuing of replacement certificates previously issued by a SETA, in that information is not available electronically at a central point: each SETA has its own database, and the older records from the Training Boards are available in hard copy only. The QCTO issued its Directive for Certification in 2015 which guides SETAs and NAMB with regard to the request for the issuing of Trade Certificates. This directive requires hard copies of original documents for certificates previously issued by a SETA or Training Board, to allow the QCTO to ensure that a credible process is followed in the issuing of replacement Trade Certificates.

The QCTO takes full control and accountability for the certification of all artisan learner achievements: this legislative requirement is not delegated.

#### **10.4 OQSF QUALIFICATIONS UNDER THE NEW QCTO MODEL, REGISTERED ON THE NQF**

The development of occupational qualifications for registration on the NQF using the new QCTO model, and actual registration, commenced in 2012, and continued as shown in Table 42 below. The table and detailed analysis of the processing of occupational qualifications shows that over time, a lower proportion of qualifications submitted by the QCTO to SAQA for registration, are returned to the QCTO for further development. It is clear that over time, the understanding of the NQF Level Descriptors and the principles and criteria in SAQA’s policy for registering qualifications and part-qualifications on the NQF, by Qualification Developers, has deepened.

**Table 42: Occupational qualifications submitted, revised and registered on the NQF, 2012-2017 (Sources: SAQA’s Qualifications and Standards Committee Meeting Minutes, and SAQA Board Meeting Minutes)**

<b>Status of the OQSF qualifications</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
<b>OQSF qualifications submitted to SAQA for registration on the NQF</b>	2	25	48	48	69	29
<b>OQSF qualifications registered on the NQF</b>	2	15	24	40	59	27
<b>OQSF qualifications returned by SAQA to the QCTO for further development</b>	0	10	24	8	10	2

The stakeholder interviews and questionnaires in the study attempted to establish what the various role-players have experienced in terms of the efficiency and effectiveness of the new model. The research team also attempted to establish stakeholder views around the extent to which there is articulation between the selected occupational qualifications and learning pathways in the OQSF/across the other two NQF Sub-Frameworks/into workplaces.

## 10.5 RESEARCH QUESTIONS, METHOD, SAMPLING

### ***Method and sample for the first part of Sub-Project 6: Highlighting differences in the models for Trade and Occupational Qualifications under the SAQA and NQF Acts, respectively***

This research aimed to assess the differences between on one hand, the QCTO model for qualifications under the NQF Act, and on the other hand, the Unit Standards-based model under the SAQA Act, with respect to (a) qualification design, (b) the provisioning of occupational training, and (c) the administration processes of both. The method comprised documentary analysis of the related legislation and policies, supplemented with telephonic interviews with the policy conceptualisers where necessary. The documents were compared between the periods 1994-2009 on one hand, and post-2010 on the other. The methods of analysis used were (1) thematic analysis, and (2) analysis of voicing in the responses. The documents analysed are shown in Table 43 below.

**Table 43: Documents analysed**

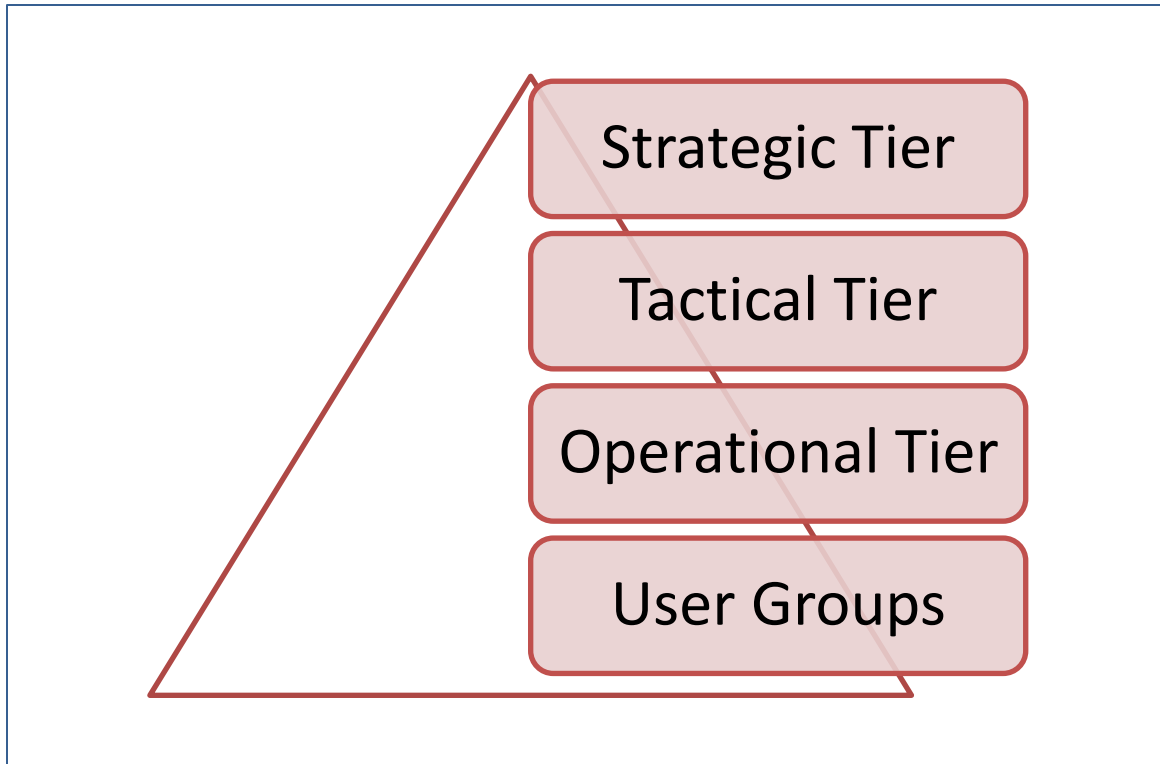
<b>Document type</b>	<b>Document title/focus</b>	<b>Source/author</b>
GIZ Analysis of QCTO Model (Report)	Report entitled: Analysis and Application of the QCTO Model, Recommendations and Vision for Qualifications	Bauer, Marock and Durango, 2015
Policy for Delegation to AQPs and DQPs	Policy on Delegation to Development Quality Partners (DQPs) and Assessment Quality Partners (AQPs)	QCTO, 2011b; 2014b
Criteria and Guidelines for AQPs	Assessment Quality Partners (AQPs): Criteria and Guidelines	QCTO, 2016c
Policy for Assessment in the OQSF context	Assessment Policy for Qualifications and Part-Qualifications on the Occupational Qualifications Sub-Framework (OQSF)	QCTO, 2011a; 2014b; 2016b
Policy for the Approval of Results in the OQSF context	Policy for the Approval of Results	QCTO, 2016g
Policy for E-Assessment in the OQSF context	General Principles and Minimum Requirements on the E-Assessment of Qualifications and Part-Qualifications on the Occupational Qualifications Sub-Framework (OQSF)	QCTO, 2016f
Policy for RPL in the OQSF context	Policy for the implementation of Recognition of Prior Learning (RPL)	QCTO, 2014c; 2016d

Document type	Document title/focus	Source/author
Policy for Assessment Centre Accreditation in the OQSF context	Policy on the Accreditation of Assessment Centres	QCTO, 2016a
Guidelines for RPL in the OQSF context	Recognition of Prior Learning (RPL) Implementation Guidelines	QCTO, 2016h
QCTO Status Report	QCTO Status Report (on the Numbers of AQPs, Qualifications Registered, AQPs with Registered Qualifications, Qualifications with Providers, and External Integrated Summative Assessments Conducted)	QCTO, 2017b
Research report	Analysis of Issues Raised in SAQA's Qualifications and Standards (Q&S) Committee Meetings Regarding QCTO-submitted Qualifications 2012-2017	SAQA, 2017c
Research report	Articulation between TVET Colleges and HEI: National Articulation Baseline Study Report	SAQA, 2018
Paper in peer reviewed book on RPL	Lifelong Learning at the Centre: the National Recognition of Prior Learning (RPL) System in South Africa	Bolton, Samuels, Mofokeng, Akindolani, and Shapiro, 2017
Policy for qualification development in the OQSF context	Policy on Qualification Development Facilitators	QCTO, 2014a
Policy for Accreditation of Skills Development Providers (SDPs)	QCTO Policy on Accreditation of Skills Development Providers	QCTO, 2015

### ***Method and sample for the second part of Sub-Project 6: Understanding progress in implementing the QCTO model***

In order to understand the stage of progress regarding implementing the new QCTO model for qualifications, the research team (1) evaluated the various stages of the guidelines for developing qualifications in the OQSF context, and (a) analysed the issues raised in SAQA's Qualifications and Standards Committee (Q&S) meetings between 2012 and 2017<sup>95</sup>. The task of this Committee includes evaluating qualifications submitted by the Quality Councils for registration on the NQF, and either recommending the qualifications to the SAQA Board for registration, or recommending specific further development to be overseen by the Quality Councils. The documentary and issue analyses were supplemented with stakeholder views obtained via surveys. Stakeholders were identified from the following positions in the system:

<sup>95</sup> This period was defined by collecting the data from when the QCTO first submitted qualifications for registration in 2012, to the end of 2017, with 2017 being the year in which the data for the 2017 NQF Impact Study were collected.



**Figure 24: Stakeholder groups identified by the QCTO**

- Categories of stakeholders invited to respond in the *Strategic Tier*:
  - DHET NQF Directorate and Skills Branch; and
  - key SAQA management personnel.
- Categories of stakeholders invited to respond in the *Tactical Tier*:
  - the QCTO's DQPs;
  - the QCTO's AQPs; and
  - Sector Education Training Authorities (SETAs) who had functioned with both the pre- and post-2010 occupational qualifications models.
- Categories of stakeholders invited to respond in the *Operational Tier*:
  - public and private education institutions; and
  - industries providing workplace experience.
- Categories of *user groups* invited to respond:
  - employers; and
  - a sample of the current cohort of learners studying towards the selected qualifications.

The starting point for the selection of the sample for QCTO Question B was 'qualifications which have gone through the whole cycle from development to registration on the NQF, provider take-up, learner registration, and learner registration for/completion of the EISA

linked to that qualification – some with large uptake of over 300 students, some with small uptake of under 300 students’. The QCTO supplied the researchers with a list of all the students who met these criteria for the qualifications selected, for a six-month period leading up to March 2017. The researchers then attempted to contact these students, and ‘worked backwards’ from the qualifications, to identify the DQPs, Qualification Development Partners (QDPs) and Quality Development Facilitators (QDFs, SDPs) and AQPs involved. The numbers of respondents surveyed for QCTO Question B are shown in Table 44. The respondents were sought in the different Communities of Practice (Engeström, 1987) ‘using’ the QCTO model.

**Table 44: Numbers of respondents surveyed**

Respondent category	Contacts attempted <sup>96</sup>	Surveys sent out	Responses to surveys	Percentage of response
DQPs <sup>97</sup>	9	5	3	60%
SDPs <sup>98</sup>	200+	114	43	38%
QDPs, QDFs <sup>99</sup>	15	15	7	47%
AQPs <sup>100</sup>	20	20	9	45%
QCTO Learners <sup>101</sup>	300+	213	24	11%
Employers <sup>102</sup>	24	0	0	0%

### ***Method and sample for the third part of Sub-Project 6: Understanding the impact of the pre- and post-2010 models for occupational qualifications***

This part of the study sought to understand how the pre- and post-2010 models for occupational qualifications have impacted on the design, development, provisioning, assessment and certification of the qualifications, as well as on the overall simplicity of the system in the OQSF context. Interviews and surveys were conducted with the purposively selected respondents shown in Table 45.

<sup>96</sup> These numbers refer to the potential number of contacts linked to the selected qualifications.

<sup>97</sup> The researchers contacted all nine potential DQPs and were able to reach five people.

<sup>98</sup> The researchers contacted over 200 SDPs and were able to reach 114 entities.

<sup>99</sup> The researchers were able to reach all 15 potential QDPs/QDFs.

<sup>100</sup> The researchers were able to reach all 20 AQPs.

<sup>101</sup> The researchers attempted to contact over 300 potential learners and met with exceptional challenges, as many of the learners provided had Gmail or Yahoo addresses which bounced and had originally given the cell-phone numbers of family/friends, which were no longer working. There were significant non-response rates. The researchers were able to reach 213 learners.

<sup>102</sup> It was only possible to contact the employers of the learners once the 24 learners had responded and made the employer details available. However, in some instances, learners had moved employers; in other instances, the employers were large companies and could not remember the learners. Timing in the current study did not allow for further investigation in this regard.

**Table 45: Numbers of respondents interviewed/surveyed<sup>103</sup>**

Respondent category	Type of/data collection method	Number of actual interview participants
SAQA officials	Individual interviews	3
DHET officials	Individual interviews	1
SETAs	Individual interviews	4
DQPs/QDFs	Individual interviews	3
AQPs	Individual interviews	9
Learners	Individual interviews	24
Public and private institutions of learning/SDPs	Survey	21 (complete) 19 (partially complete)
Employers	N/A	0

Telephonic interviews were conducted, and then digital surveys were distributed with follow ups and reminders submitted to increase the response rate to the survey.

There are currently 38 approved AQPs, 29 of which are the AQPs for 156 registered qualifications, and one part-qualification (the Foundational Learning Certificate [FLC]). This study focused on the qualifications currently being overseen by the QCTO Quality Assurance functions and processes. In order to manage to research in the time available, it was necessary to select qualifications in relation to which responses would be sought. In an attempt to obtain a range of responses, qualifications with large take-up (300 and over) and qualifications with small take-up (under 300) were included.

- *Selected qualifications with large take-up comprised<sup>104</sup>:*  
Healthcare Promotion Officer (Community Health Worker) (NQF Level 3) and Tax Professional (NQF Level 8).
- *Selected qualifications with small take-up comprised<sup>105</sup>:*  
Compliance Officer (Enterprise Risk Management) (NQF Level 6);  
Electrical Line Mechanic: Overhead Lines (NQF Level 4);  
Financial Markets Practitioner (NQF Level 7);  
Professional Principal Executive Officer (Bus./Comm./Man.) (NQF Level 5);  
Tax Practitioner (NQF Level 6); and  
Toolmaker (NQF Level 5).

Table 46 shows the response rates per qualification.

<sup>103</sup> These respondents were purposively selected from the groups identified in Table 45.

<sup>104</sup> Large take-up is defined as 300 or more learners.

<sup>105</sup> Small take-up is defined as under 300 learners.



**Table 46: Response rate per respondent category**

Respondent category	Actual no. of respondents <sup>106</sup>	All respondents contacted <sup>107</sup>	Initial potential respondents <sup>108</sup>
<b>Qualifications with large uptake</b>			
Healthcare Promotion Officer	24	87	243
Tax Professional	1	17	40
<b>Qualifications with small uptake</b>			
Compliance Officer	0	15	15
Electrical Line Mechanic (Overhead Lines Mechanic)	13	23	27
Financial Markets Practitioner	1	4	4
Professional Principal Executive Officer	2	8	23
Tax Practitioner	0	16	16
Toolmaker	4	30	30

SDPs (n=42) were asked to select relevant areas for feedback dependent on their relevant experiences; their responses are presented in Table 47 below.

**Table 47: Areas selected by Skills Development Providers for feedback**

Areas selected for feedback	No. of respondents who elaborated on this item	Proportion of this item in relation to <u>all</u> comments made by SDPs
Programme and curriculum design	10	56%
The quality and efficiency of occupational training provision	6	33%
The quality and efficiency of process management and administration	8	44%
Differences in credit allocation and course structures	4	22%
Articulation between qualifications (vertical, horizontal, diagonal)	6	33%
Learner movement from a study-environment to a work-environment	9	50%
Programme duration: Learnership vs. QCTO qualification	6	33%
Recognition of Work Integrated Learning (WIL)	3	17%

<sup>106</sup> Respondents from whom information was collected.

<sup>107</sup> The researchers were able to reach these respondents.

<sup>108</sup> The starting point for the selection of the sample was 'qualifications which have gone through the whole cycle from development to registration on the NQF, provider take-up, learner registration, and learner registration for/completion of, the EISA linked to that qualification – some with large (300+), and some with small uptake (under 300 students)'. The QCTO supplied the researchers with a list of all the students who met these criteria for the qualifications selected, for a six-month period leading up to March 2017. These students formed the 'initial potential respondents'. In attempting to contact these respondents, there were challenges in that some of their Gmail or Yahoo addresses bounced, and some had given the cell-phone numbers of family/friends, which were no longer working. There were significant non-response rates.

Areas selected for feedback	No. of respondents who elaborated on this item	Proportion of this item in relation to <u>all</u> comments made by SDPs
Adopting and implementing the concept of Notional Hours in the QCTO-model	4	22%
Expense and relative Return on Investment (ROI) relating to qualification development	5	28%
Logistical challenges in a multi-partner qualification delivery model	7	39%

## Triangulation

Findings from the analysis of issues identified by SAQA's Qualifications and Standards Committee (Q&S) when evaluating qualifications submitted by the QCTO between 2012 and 2017<sup>109</sup> were used to triangulate findings from the analyses of stakeholder responses. The interviews with SAQA and DHET also allowed for voicing of perceived and/or anticipated challenges experienced during the transition from the pre- and post-2010 models.

## 10.6 FINDINGS AND ANALYSES: UNDERSTANDINGS DIFFERENCES, PROGRESS, AND IMPACT OF THE QCTO MODEL FOR OCCUPATIONAL QUALIFICATIONS

This sub-section of the report presents a range of understandings and views regarding the QCTO model for occupational qualifications, and stakeholder experiences of this new model.

### *Understandings of the new and old models for occupational qualifications 'from the top'*

Interviews with key personnel representing the regulators implicated in this study – the DHET, SAQA and the QCTO – revealed a coherent and shared understanding of the core differences between the previous and current models for occupational qualifications; the following points were made.

- a) It was agreed that the QCTO model for qualification design and programme delivery distinguishes between three components, namely classroom-based theory; practical demonstration; and workplace exposure. The Unit Standard-based model did not involve defining components in relation to the modalities of delivery. Unit

<sup>109</sup> The Quality Councils submit qualifications to SAQA for registration on the NQF. These qualifications are assessed by SAQA's Q&S Committee – a Sub-Committee of the SAQA Board – and submitted by the Q&S Committee to the SAQA Board for consideration for registration on the NQF. The Q&S returns qualifications to the Quality Councils for further development if the qualifications do not meet the criteria for registration. The data period was defined by the year in which the QCTO started submitting its new-model qualifications for registration (2012), and by the year in which the data for the present study were collected (2017).

Standards are classified as ‘fundamental’ (comprising generic base learning common to a wide variety of study areas); ‘core’ (directly related to the subject-matter specific to a programme); or ‘elective’ (related to specialisation areas in a programme).

- b) It was noted that while the old and new models employ overtly different approaches to qualification design and programme delivery, both draw on the NQF Level Descriptors in similar ways.
- c) It was also noted that while both models relate in varying degrees to the Organising Framework for Occupations (OFO), the QCTO model for qualifications is the more suitable of the two models, for addressing the goals of the OFO, because of its stronger and more structured relations with industry.

## ***Occupational Qualifications Sub-Framework successes: QCTO view***

### **Structures, systems, policies and processes**

The QCTO is still relatively new. Between 2010 and the first comprehensive NQF impact study under the NQF Act in 2014, most of the development in the OQSF context related to “setting up the ‘architecture’ of the OQSF”, and the structures and systems to support it. Between 2012 and 2017, the focus was also on developing and implementing the Sub-Framework policies and processes needed. In this period the necessary committees were established, and the QCTO model for qualifications was rolled out.

It was noted that additional capacity building and an ongoing increase in the numbers of staff members were achieved as required to deliver on the QCTO’s mandate and reduce the number of its delegated functions. The standardisation of operational processes and procedures for the core business areas took place. Governance and corporate structures were created and are seen to have been able to meet the exacting requirements of the Treasury and Auditor General<sup>110</sup>. Implementation of a system to manage legacy (Unit Standards-based) qualifications occurred, resulting in minimal disruption to the system while qualifications development and revision take place.

### **Enhanced capacity for qualification development, registration and assessment**

The QCTO had increased its capacity for the development of qualifications by training Learner Qualification Development Facilitators (LQDFs). During 2016/2017, 40 LQDFs were trained. The LQDF training contributed to expanding the pool of candidates to be considered for registration as QDFs. The QCTO also set up a functioning Quality Assurance system with approved DQPs, QDFs, AQPs, Assessment Centres and SDPs – and the monitoring of these entities commenced. As the QCTO processes are strengthening, there is a need to expand the organisational structure of the QCTO. The

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<sup>110</sup> The QCTO had the relevant governance structures and procedures in place, adhered to these, and its audits have been clean.

implementation of the comprehensive and credible Quality Assurance system remains a top priority.

In addition to registering occupational qualifications and part-qualifications, the QCTO accredited SDPs. Despite initial difficulties, the accreditation system is operational. By the end of the 2016/17 financial year, 221 SDPs had been accredited, and 20 occupational qualifications had learner uptake. The average turnaround time of 90 days to accredit SDPs had been achieved – but could be a challenge in future if verifiers are not available or appointed in time.

### **Occupational qualifications**

By the end of the 2016/2017 financial year, the QCTO in collaboration with SAQA had registered 154 occupational qualifications in the new model format on the OQSF<sup>111</sup>. A total of 78 historically registered qualifications were identified and submitted to SAQA for deregistration or deactivation in that year, bringing the number of historical qualifications submitted for deregistration/deactivation, to 221. There are 743 historical that still need to be realigned or replaced by occupational qualifications developed using the new model.

### **Quality Assurance**

The QCTO was able to apply fully its Quality Assurance model for the new occupational qualifications in the 2016/2017 financial year. Altogether 14 final EISA were administered for qualifications linked to the Tax Practitioner, Compliance Officer, Financial Market Practitioner and Electrical Line Mechanic professions. The QCTO was also able to evaluate the effectiveness of its Quality Assurance policies and procedures, and was convinced that its policies, procedures and systems are effective and functional. The challenge noted in going forward would be to take the implementation of the EISA to scale for all new qualifications developed.

At the end of the 2016/17 financial year the QCTO had approved 37 AQPs to develop assessments for registered occupational qualifications. These AQPs included the NAMB, SETAs, and Professional Bodies. As at the end of the reporting period, the QCTO had registered 247 Assessment Centres for Trade and Occupational Qualifications. It was noted that the AQP Forum was fully functional and had played a role in shaping the AQP policies and processes.

In the period under investigation the QCTO Trade Certification system was re-developed and was functional and able to upload learner information electronically, in contrast to the pre-QCTO manual capturing of this information. Between 2012 and 2017 this system had been improved and its security enhanced.

The development of a fully-fledged certification system for all qualifications on the OQSF is currently being prioritised within the broader Occupational Qualification MIS development project. Much of the backlog in the issuing of Trade Certificates as well as

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<sup>111</sup> This number excludes the historically registered qualifications in the OQSF.

the outstanding applications for replacement certificates had been resolved. It was noted that the turnaround time for *producing* certificates is now well within the 21-day period specified in the policy. In addition, the QCTO's the Certification Unit also conducts the *verification* of certificates within a five-working day turnaround time. At the time of this study, the QCTO had entered into Service Level Agreements (SLAs) with 90 verification clients.

In the 2016/17 financial year, the QCTO's Certification Unit processed 100% (19 625 records) of the certification recommendations received from NAMB for Trade Certificates, within a 21-working day turnaround time. In this period, the QCTO issued 183 Occupational Certificates for four occupational qualifications, 78 (43%) of which were achieved through RPL processes for access to the EISA.

The QCTO's Monitoring and Evaluation (M&E) Unit continued its monitoring visits to its QAPs, which included the 21 SETAs and nine Professional Bodies. In the 2016/17 year there was a special focus on the monitoring of SETA-accredited SDPs, to check compliance with SETA accreditation policies and procedures. This work included determining the veracity of the SETA accreditation procedures and processes, and QCTO monitoring of the moderation and verification of assessments conducted by the QAPs.

### **Recognition of Prior Learning (RPL) and Credit Accumulation and Transfer (CAT)**

RPL in the OQSF context is viewed as a redress tool to address some of the ills of the *apartheid* past. It is used to allow adults to obtain credible certification for the jobs they have been doing, often for many years, without any formal recognition. SAQA's RPL and CAT policies were said by QCTO managers to have had a clear impact on the development and content of the QCTO's RPL and CAT policies. The QCTO's RPL systems and processes were being reviewed in light of various lessons learned through the following initiatives.

1. The South African Institute of Tax Practitioners (SAIT) project 'INTELLA', which involved 150 candidates who were given the opportunity to obtain the 'Tax Professional' qualification.
2. The South African Revenue Service (SARS) and SAIT initiative currently underway, which involves RPL for 85 candidates nationwide, for the 'Tax Technician' qualification. This project commenced in June 2017 with the first 40 candidates, and is scheduled to run for two years. It targets employees with years of experience but no formal qualifications.
3. The Insurance Sector Education and Training Authority (INSETA) and Batseta (Council for Retirement Funds for South Africa) computer-based RPL assessments for the 'Insurance Underwriter' and 'Professional Principal Executive Officer' qualifications respectively. Candidates can take these assessments in their work environments.

4. The RPL assessments conducted and quality assured via the QCTO, NAMB, and Electricity Supply Commission (Eskom), for a group of candidates for the 'Electrical Line Mechanic' qualification at NQF Level 4. These candidates were part of the first group to receive the new QCTO Occupational Certificate.

The QCTO's CAT Policy was approved by its highest decision-making structure, the Council, in 2017. Other policies and guideline documents that enable development of occupational qualifications were reviewed and are now packaged into the Occupational Qualifications Management Strategic Document (OQMSD). The OQMSD contains the objectives, activities, job descriptions, adopted OFO Code Document and all the policies needed by role-players in the OQSF space.

### **Advocacy and communication**

To enhance advocacy and communication with stakeholders in the OQSF context around the NQF and OQSF policies and processes, the QCTO established a Marketing and Communications unit, including appointing a Deputy Director: Marketing and Communications, in 2014. Vigorous roll-out of an intense marketing drive commenced in the 2015/16 financial year, and has continued to be a strong focus of the QCTO.

In 2014, a revised website was launched where information was updated regularly to keep stakeholders informed of new developments. This information included the listing of registered qualifications, accredited providers, qualifications in development, and related information. In the 2015/16 financial year, a need was identified to enhance the website to ensure that it was more user-friendly with an improved layout. As a result, Phase 2 of the website process was subsequently initiated. By the end of the 2016/17 year, the Phase 2 processes were 80% complete. The existence of a more vibrant website and the engagement of the Deputy Director of Marketing and Communication have begun to address the QCTO's ability to handle internal and external communications more effectively.

Between 2015 and 2017 the QCTO engaged various key stakeholders such as the South African Airways (SAA), Eskom, Transnet, the Sport Development Institute on Physical Training Education (SDIPE), the Department of Agriculture, Fisheries and Forestry (DAFF) and other key large government entities, as part of its information sharing on qualifications, accreditation and Quality Assurance.

### **Performance**

During the 2016/2017 financial year, the QCTO achieved 89% of its Key Performance Indicators (KPIs). This achievement was a considerable improvement on that in previous years, where at one stage the organisation's achievement on KPIs was as low as 39%. The KPIs are based on the two strategic goals that direct the QCTO's activities, namely (a) establishing an organisation that has a sound foundation which enables its long-term sustainability, and (b) ensuring that people in South Africa have access to credible skills training that supports both industrial and social development.

With staff establishment having stabilised, performance planning and aligning management to strategy have taken centre stage. This work is enabled through rigorous operational planning and implementation at unit level. Performance planning and management continue to assist the QCTO in its effort to focus on its mandate while the implementation of plans and policies related to staff development continue to enable all staff to deliver in line with the QCTO's strategy. The QCTO has also been working with staff to embed risk management and fraud prevention, the latter strengthened by the services of the QCTO's Internal Auditors.

During October 2016 the QCTO hosted the Portfolio Committee on Higher Education and Training. Presentations made to the Portfolio Committee and the Select Committee on Education and Recreation and Research were well received. The Committee engaged with the QCTO representatives and commended the hard work and accomplishments of the QCTO.

### ***Challenges in the Occupational Qualifications Sub-Framework context: QCTO view***

#### **Managing legacy and new qualifications**

According to the QCTO staff members interviewed, one of the biggest challenges for the QCTO has been to manage the historically registered (legacy) qualifications for TO. There were too many of these qualifications; the QCTO had to commence establishing the uptake and relevance of these qualifications as well as designing the new qualifications needed, at the same time. The purpose of all of this work was to move towards ensuring a minimum number of qualifications of high quality in the OQSF context. Progress in this regard has been reported but there remains work to be done.

#### **Managing legacy qualifications and learning pathways**

Ensuring the continued operation of the development, delivery, Quality Assurance, and certification of quality qualifications for the Trades and Occupations (TO) sector – without disruptions – remains a top priority for the QCTO. The organisation will continue its work with SETAs and SAQA to ensure up-to-date and reliable information pertaining to qualifications, to this end. There is a need for great care with respect to the historically registered qualifications, which could easily be described as a labyrinth with the Unit Standards of one qualification being linked to one or many other qualifications that are used differently in many different training purposes. The redesign or deregistration of a historical qualification can have an impact that extends well beyond the qualification itself.

#### **Master System Plan (MSP)**

The QCTO developed an MSP for the development of its IT infrastructure, although this area was said to remain one which needs attention.

## Financial challenges

To address the financial challenges experienced by the QCTO, the QCTO developed and presented a business case to the DHET. The business case advocates for increased funding over the next five years, with immediate effect. The additional funding is required to capacitate the QCTO to fulfil fully the role assigned to it in legislation, and to respond adequately to changes and demands in a transitioning education, training, development and work environment.

## ***Skills Development Provider perspective***

Interviews and correspondence with the 43 selected SDP representatives<sup>112</sup> yielded the following views.

- a) **Regarding terminology:** The SDPs indicated that the identification of and referencing in the QCTO qualifications were not aligned to conventions used by Umalusi and the CHE.
- b) **Regarding the relevance of curriculum/programme content in the old and new qualification models:** In terms of qualification content, SDPs perceived the Unit Standards-based model as being outdated and, in some instances, completely obsolete, whereas the new QCTO qualifications were expressed as being closely aligned to the current state of the related work. The SDP group praised the QCTO qualifications being offered, for being suitably occupationally-specific in terms of curriculum content, and producing more occupationally orientated, or specialist, graduates than was previously the case. The view was that under the Unit Standards-based model, while learners might have had wider 'base-knowledge of their subject areas', they did not have enough in-depth knowledge for their occupational specialisations. Regarding programme and curriculum design, the SDP group was largely confident that the QCTO model was generally better-positioned to address learner mastery of the theoretical content and practical skills needed for specific occupations. The content of QCTO qualification curricula, with its strong emphasis on current and authentic workplace experience, was said by the SDPs to sensitise learners to the work environment more effectively than the Unit Standards-based qualifications did, thereby lessening the 'culture-shock' that learners typically experience when entering places of work.
- c) **Regarding the nature, delivery and Quality Assurance aspects of the current QCTO model:** The increased focus on workplace learning in the current QCTO model was widely welcomed by the SDP group due to the perceived link between this focus and the ability to produce work-ready learners. A concern was expressed however, that this approach takes a large component of the teaching and learning out of the hands of qualified educators and trainers and makes it the responsibility of people with little or no pedagogical training in the hosting workplaces. This

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<sup>112</sup> The researchers contacted over 200 SDPs, and were able to reach 114 entities: 43 responded to the call to participate in the research (See Table 44).



concern was coupled with the perception that the QCTO's sub-contracting of its Quality Assurance roles to the various SETAs could compromise the quality of programme delivery under the QCTO model. What underlay this concern was the idea that the educational and training rigour and Quality Assurance may not necessarily be managed effectively when the responsibilities for teaching and learning, and assessment were shared between several separate parties, and the Quality Assurance thereof between two regulating bodies. The distrust in this approach did not reside in the separation of responsibilities between the parties, but rather the absence of a centrally governed curriculum administration and Quality Assurance regime. While views around assessment design were also contested due to the multi-party involvement, several respondents praised the quality of assessment and its ability to validate authentic workplace-ready skills. However, across the user groups interviewed – but most highlighted by SDPs, learners, and employers – a perception exists that the assessment strategy of the QCTO-model is logistically cumbersome and expensive to implement and access. Logistics (i.e. the movement between the different parties delivering the different components of a qualification) together with the perceived limited availability of workplace positions and AQPs were cited as key barriers to increased learner through-put. Some felt that the model would benefit the more privileged learners with access to resources such as transport and financial assistance.

The most worrying response from this group of interviewees related to the perceived absence of the QCTO in the day-to-day operations of their respective learning facilities. Comments such as “we do not deal with the QCTO,” or, “we work with the SETA, we do not communicate with the QCTO”, or even “we do not know the QCTO” were expressed. Further, some of the SDP representatives who did report dealings with the QCTO described their interactions as “frustrating”, saying that the QCTO's communications were unclear and conveyed a sense of uncertainty, regarding policies and procedures, on the part of the QCTO. Some respondents in this group thought that the QCTO did not project confidence in its understanding of the division of roles and responsibilities between the QCTO and the SETA. However, there was more of this kind of experience “in the early days” with “a marked improvement” in service of late. There remained a sense that the navigation of QCTO processes could be more clearly defined and communicated.

There was also a view in this group, that there is lack of change-management in the SETA context, in that the SETAs are struggling to manage the shift from the Unit Standards-based qualifications to occupational qualifications. It was noted that there seems to be a lack of suitably qualified verifiers in the SETAs, especially for the higher-level academic Quality Assurance required for the theoretical components of the occupational qualifications, which are seen to be more academically rigorous than the Unit Standards. A need was expressed for Quality Assurance personnel with the aptitude to guide new providers through processes in a “nurturing” rather than a “policing” way.

Finally, regarding the model, points were raised around learner movement from study to work, and the unavailability of sufficient suitable work placements due to a declining economic climate, and the perceived unwillingness of business to accommodate learners for fear of exposing their intellectual property. Solutions put forward included establishing formal partnerships between providers and host companies; strong financial incentives for host companies; and providers developing companies to host their learners – with careful control of assessment. The uneven quality of the workplace experience was also raised, as coaches and mentors were believed sometimes to lack the knowledge and skills needed, and perhaps also the willingness to perform their roles adequately.

- d) **Regarding inclusivity and access:** In the SDP group several representatives criticised “the QCTO’s ability to provide an education and training solution for the masses”.
- e) The following **related points** were also raised amongst the SDPs.
- The SDPs claimed that the QCTO model, in its efforts to raise the quality of occupational education and training, had inadvertently created further barriers to access. Learners who, for example, struggled to pass National Senior Certificate (NSC)-level Mathematics and Science later struggled to access study for occupational qualifications. The model was perceived to be “aiming too high” and “skewed in its focus” as it did not address adequately the gaps in these learners’ secondary schooling.
  - The available QCTO qualifications were viewed as being at cognitive levels higher than those which the greatest part of the target market could reach. This comment was related to a perception that secondary education did not prepare learners sufficiently for study at this level, and also that the curricula and courseware of the qualifications were not necessarily aligned to the associated NQF Level Descriptors. For example, where a qualification was registered at NQF Level 5, the interviewees perceived the coursework as more suitable for NQF Level 6. This observation raised the issue of the interpretation of the NQF Level Descriptors at DQP level, and by implication, the suitability of the criteria applied when appointing these DQPs.
  - Within the South African education and training system with its literacy and numeracy challenges, the SDP respondents thought that the QCTO model for qualifications should have retained more of the fundamental literacy components of the Unit Standards-based model. They also said that the QCTO model could de-emphasise theoretical knowledge acquisition in favour of increased practical learning. In its current form, the model was seen to lack alignment to the developmental objectives of the country. A suggestion made here was to include “stepping stones” (articulation) to enable learners to achieve basic skills and literacies before moving into more cognitively demanding/complex areas, and to enhance access.

- f) The SDP group was generally positive in its estimation that the QCTO model's increased emphasis on experiential learning would ultimately lead to greater employee retention and greater workplace productivity. However, it was also noted that the occupationally-specific training/curricula of the current QCTO **model possibly did not include sufficient teaching and learning to enable learner flexibility in work and learning to cope** in a climate of job losses and the changing nature of jobs. The SDP group thought that entrepreneurship, as well as non-traditional or emerging Trades, were sufficiently emphasised in the QCTO training model. It was pointed out that, ironically, the Unit Standards-based model was better equipped to produce entrepreneurs as it developed generic fundamental competencies in addition to core vocationally-orientated competences. This mixture enabled individuals to work both inside and outside their primary vocations.
- g) The respondents raised a concern that the QCTO model, with its emphasis on training for full qualifications, would **disallow the SDPs to offer short targeted skills programmes or part-qualifications**, as they were able to do with the Unit Standards-based model. SDPs noted that this could cause an unsustainable drop in revenue, especially for those which had built their business strategies around offering short programmes. These views pointed to a need for increased QCTO advocacy around the need for part-qualifications to be part of full qualifications, and for full qualifications to be located in learning pathways, for enhanced articulation and learner progression in the system.
- h) The definition of the **concept of 'notional hours'**<sup>113</sup> **and its subsequent application by SDPs and enforcement by regulators** were said by the respondents to be a long-standing point of contention. These views point to a clear need for the QCTO to develop clearer criteria and rules for the standardisation and dissemination of formulas to be used to calculate and apply the idea of notional hours across stakeholders in the OQSF context. Respondents also noted overly stringent enforcement of the 70:30 workplace-classroom ratio on behalf of the regulators, which, in the opinion of this group, showed evidence of a lack of in- depth understanding of the rationale of this guiding notion.
- i) The SDP group shared the sentiments of the regulators in that the **DQP-model is experienced as being expensive**. In the case of the SDPs, the concern related to "opportunity-cost", and "productivity-cost lost" when individuals involved in the development of programmes had to be absent from work for prolonged periods.
- j) The SDP group expressed a **need for more standard-setting over and above the qualification structure and curricula**. The setting of standards for programme delivery – which includes aspects such as learning materials and teaching and learning methodologies – "should involve SDPs" as they are at the forefront of

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<sup>113</sup> Notional hours are defined as the total amount of time it would take the average learner to meet the outcomes defined in a learning experience. Notional hours include amongst others, contact time, time spent in structured learning in the workplace, time for completing assignments and research, and time for assessments (SAQA, 2014a).

programme delivery. A need was expressed for tighter control and **standardisation in the recording of learner participation in Learnerships** and of evidence generated through WBL. Respondents in this group believed that the matter could be remedied through the development of standardised log-books or templates to record evidence. It was emphasised, however, that both providers and industry need to be able to provide inputs into the development of these documents.

- k) The **efficiency** with which the QCTO, or the SETAs to which it delegates part of its role, manage programme management and administration remains strongly criticised by all respondents. As echoed by others, the SDP group pointed to a lack of system standardisation; qualified, knowledgeable and empathetic personnel; and the inefficient communication of clearly defined, and invariable, operational protocols, as the main contributors to a poor experience of QCTO administration. Poor experiences in this area were thought to be underscored by a sense that the QCTO, through its representatives, is overly bureaucratic in its approach and does not have compassion for the stakeholders it is meant to serve.
- l) Regarding the **length of QCTO qualifications**, in comparison with the Unit-Standard equivalents offered through the Learnership delivery model, the group seemed satisfied that the QCTO programmes were not unduly long in duration. In one instance, however, an interviewee claimed that the replacement programme for a 'Machine Operator' in his industry is five times as long as the programme it replaced. This type of situation was untenable and where it existed, it needed to be addressed as individuals would not be given these lengths of time off work for study, and the qualifications would not be taken up.

### ***Qualification Development Facilitator perspective***

Interviews and correspondence with the seven selected QDF representatives<sup>114</sup> yielded the following views regarding (a) the perceived differences between the current QCTO model and its old Unit Standards-based counterpart, and (b) the impact of the new model on their work. The respondents noted that apart from these views, further impact was difficult to assess as there were few accredited providers in the market and in some instances Trade Tests and summative assessments had not yet been developed against registered qualifications.

- a) While the DQF respondents felt that it was too early to assess the full impact of the new QCTO model, the following **positive insights and suggestions for improvement** were contributed.
  - The model can be applied to new and emerging occupations.
  - The model will serve to bolster existing occupations by building associated scholarly disciplines to support them.

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<sup>114</sup> The researchers were able to reach all 15 potential QDPs/QDFs; seven responded to the call to participate in the research (See Table 44).

- The model has improved 'labour market identity' by using nomenclature that references the occupation in the qualification title.
- At face value, the model is clearer in the guidance it provides to providers regarding programme delivery. The Unit Standard model, in the opinion of respondents, left too much room for interpretation. Once the QCTO model was fully understood by interviewees in the group, they felt that it would be more practical in its application than the Unit-standards model.
- The group welcomed the fact that the QCTO seemed to draw on the expertise of experienced artisans and Trades people in the development of curricula. This was seen to add greatly to the sense of generational continuity needed in the transference of more traditional (i.e. well-established) Trades and occupations.
- Respondents pointed out that under the SAQA Act, with the exception of Trades and the relevant Trade Tests, assessments in the OQSF context were the responsibility of providers – there were no external assessments for occupational qualifications. In the current model, the EISA potentially increase the credibility of assessment in the OQSF space.
- Overall, the group perceived the model, and its qualification design and delivery methodology particularly, as more closely aligned to the needs of industry. In general, the group has received the model with great enthusiasm as it promises to address the issue of work-readiness in a structured and practicable way. This notion is based on the level of interest received from industry stakeholders who want to participate in the qualification development process that QDFs have initiated.

b) The following points were raised as **areas for improvement**.

- As with other user groups, negativity was expressed regarding prolonged periods associated with the registration of newly developed occupational qualifications. Some QDFs have claimed that while their qualification development process is concluded within six months, it can take more than two years for these qualifications to be registered on the NQF. From here, providers still need to seek accreditation approval, develop courseware, pursue funding via SETAs, and register Learnerships. The duration of the process, from end to end, is believed to not only negatively impact industry development goals but also affects the contemporariness of the curricula.
- Confusion and delays have been experienced due to limited application and approval windows instituted by the QCTO.
- Content transference issues have been experienced where DQPs attempted transpose Unit Standard-based curricula onto the curricula of the new

occupational qualifications. It was, however, noted that if original curricula, from the Unit Standard era, were soundly constructed and were kept current, providers had little difficulty aligning their courses and courseware to the new requirements.

- c) The **perceived state of efficiency of QCTO-operations** – including the management of logistics, administration and quality – produced the following responses in the QDF group.
- The replacement of extensive Portfolios of Evidence (PoE) with statements of results has simplified administrative requirements and reduced learner support issues.
  - Quality Assurance processes are experienced as being unnecessarily cumbersome. The introduction Qualification Assessment Specifications (QAS), and subsequent addendum, by the QCTO, has also been criticised by certain respondents for burdening industry and AQPs financially.
  - A lack of communication between the QCTO and provincial QDFs has resulted in some of the respondents developing programmes against old models. Feedback on moderation and the general conveying of information has also been experienced as confusing. A request was made to include regional QDFs in national QDF Forum meetings.
  - DQPs have noted that providers seem to have trouble when attempting to align assessments to assessment criteria and designing integrated learning programmes. This highlights issues about the academic capacity of providers and AQPs alike. Here, AQP capacity-building seems to pose challenges which inevitably hampers the programme delivery.
- d) Among the respondents in this group, the observation was made that while the model seems **simple in principle, it is the application thereof that detracts** from what could be a very user-friendly model. The following aspects contributed to this difficulty.
- Distrust of the integrity of providers to manage the quality of programme delivery coupled with a centralised certification process.
  - The duration of qualification implementation, as noted, also detracts from the potential effects of the system.
  - While the need for very stringent EISA is justifiable, the practical implications thereof complicate the delivery of the model.
  - Lack of a centralised MIS which all stakeholders could interface when managing learner administration. The current usage of obsolete data-management tools,

such as spreadsheets, is highlighted as greatly compromising the model's potential efficiency.

- Delayed and insufficiently informative communication from the QCTO and SETAs.
- e) The following opinions were raised among respondents in the QDF group regarding the **OQSF's ability to support articulation**.
- While some standardisation in the qualification design of occupational qualifications, together with the promise of higher levels of Quality Assurance and an increased focus on academic rigour should enhance perceptions of quality, public and private HEIs have not yet embraced articulation /progression across the Sub-Frameworks. The progression of learners with OQSF qualifications into Higher Education is still 'fought' on a case-by-case basis, where the acceptance of these learners is still largely dependent on the institution they apply to, and their credentials.
  - The limited number of occupational programmes currently registered on the NQF limits articulation possibilities within this Sub-Framework, and between it and the other Sub-Frameworks.
  - Some respondents noted that 'articulation' is an academic concept and cannot be applied to learning that is heavily focused on workplace-based learning. In this view, articulation between the NQF Sub-Frameworks is only theoretically possible if providers on both sides of the divide being navigated realise that learners with highly developed practical skills are not necessarily suitably prepared to make the transition unaided, into a theoretically-laden academic milieu. This view points to a need for deepened understandings around articulation, the navigation of barriers to progression, and the mediation of and support for, such navigation.

### ***Triangulation through inspection of QCTO delivery aspects***

Tables 48-50 summarise QCTO delivery against key performance indicator deliverables relating to the QCTO's new model for occupational qualifications in the four years leading up to and including the year in which data were collected for the current study. These data contribute towards triangulating the respondent data. The tables show that regarding (a) recommending prioritised occupational qualifications for registration, (b) monitoring enrolments for these qualifications, (c) issuing accreditation letters, (d) enrolling LQDFs, and (e) reporting on the reconstruction of NATED part-qualifications – the QCTO was fully on target only by the 2016/2017 year. Regarding key performance indicators related to Assessment Centre accreditation and AQP delegation approvals, it was on target a year earlier. However, the QCTO is still struggling to meet its targets for certification, learner data uploads, and verification functions.

**Table 48: QCTO progress between 2013/14-2016/17 regarding (a) recommending prioritised Occupational Qualifications for registration, (b) monitoring enrolments for these qualifications, (c) issuing accreditation letters, (d) enrolling learner QDFs, and (e) reporting on the reconstruction of NATED part-qualifications**

Indicator	2013/2014	2014/2015	2015/2016	2016/2017
Number of Prioritised occupational qualifications recommended to SAQA for registration on the OQSF	Not achieved	Not achieved	Target exceeded	Target achieved
Percentage of prioritised registered occupational qualifications (new model) with enrolment monitored	N/A	N/A	Target Achieved	Target Achieved
Average turnaround time from date of receipt of duly completed accreditation application to date of issuance of accreditation letter to SDPs offering newly registered occupational qualifications (in working days)	N/A	N/A	N/A	Target Achieved
Average turnaround time from date of receipt of duly completed accreditation application to date of issuance of accreditation letter to SDPs offering NATED Report 190/1 part-qualifications (in working days)	N/A	N/A	N/A	Achieved
Number of Learner QDFs enrolled on training programme to facilitate the development of occupational qualifications	N/A	N/A	Not Achieved	Achieved
Number of reports on reconstruction of N4 -N6 part-qualifications submitted for consideration to the QCTO Qualifications Committee	N/A	N/A	Not Achieved	Achieved

**Table 49: Progress regarding Key Performance Indicators related to Assessment Centre accreditation and AQP Delegation approvals**

Indicator	2013/2014	2014/2015	2015/2016	2016/2017
% of Assessment Centre accreditations processed within the turnaround time (30 working days)	N/A	Achieved	Achieved	Achieved
% of AQP delegation approvals processed within turnaround times	N/A	N/A	Achieved	Achieved
% of assessments quality assured against QCTO standards	N/A	N/A	Achieved	Achieved



**Table 50: Progress regarding Key Performance Indicators related to the QCTO Certification, Learner Uploads and Verification functions**

Indicator	2013/2014	2014/2015	2015/2016	2016/2017
% of certificates issued within the turnaround time (21 working days)	N/A	Achieved	Not achieved	Achieved
% of learner achievement data submitted to the NLRD in line with NLRD specifications	N/A <sup>115</sup>	N/A	Not achieved	Not achieved
% of verification requests for certificates issued by the QCTO addressed within turnaround time (five working days)	N/A	N/A	N/A	Achieved

### ***Cross-cutting regulatory issues raised***

Interviews with stakeholders across the board particularly those not dealing directly with the QCTO raised the following concerns regarding the efficiency and effectiveness of the QCTO's new model for occupational qualifications.

- a) With the model's reliance on genuine workplace experience as an integral component, it was said by several respondents that given the limited job opportunities in the country, 'workplace scarcity' may result. In this scenario, learner through-put may be affected. Given the economic context, **an inflexible commitment to a workplace component in its current form – as opposed to industry-reviewed simulation interventions – may prove counterproductive** for the goals of the QCTO.
- b) **Some of the processes linked to the model are slow.** The process for appointing DQPs was noted as being too slow to keep pace with the skills needs of the country. This was said to have led to too few DQPs being operational – which in turns hampers the development of qualifications. There was a perception in some quarters that the existing DQPs are monopolising the field in a financial sense, and acting as 'gatekeepers' for access to learning programmes. The "DQP-model" was said to be "expensive" as the costs associated with programme development, as charged by the available DQPs, seemed excessive when compared to the costs relating to curriculum and courseware development under the Unit Standards model.

Experiences had been that accreditation application processes had in many instances exceeded the 18-month mark, and in some cases the two-year mark. If this timeline is added to the time it takes to locate and appoint a suitable DQP, and then to develop and obtain approval for a qualification, and register the first

<sup>115</sup> SAQA indicated key performance metrics for providing the QCTO information. Meetings were concluded between SAQA and the QCTO to ensure alternative arrangements where the QCTO was not yet in a position to meet the requirements of the NQF Act.

learners, three years could be exceeded. The view was thus expressed that by the time the first learner was exposed to the curriculum content of a new qualification, it would be outdated and possibly obsolete – especially if a qualification was heavily laden with content of a technological nature. The suggestion was put forward that to avoid this situation, there could be less dependence on strictly defined curricula and a stronger movement toward the registering of broad outcomes. Having broader outcomes would allow providers to respond to changes in context while still adhering to the development of core competencies. The adoption of this approach would bring the QCTO model into closer alignment with that of the Higher Education model, which ensures that learning content remains relevant and authentic to the provider.

- c) With all three NQF Sub-Frameworks reliant on the SAQA-published NQF Level Descriptors to guide the cognitive levels of qualifications, respondents noted that the application of the concept of **‘notional hours’ and ‘credit allocation’** in the QCTO model is not aligned to the model used in the HEQSF context. When compared to a typical 120 credit qualification in the HEQSF for example, learning commitments in terms of notional hours are far lower in the HEQSF context than those with similar credit values in the OQSF context.

The QCTO model was seen to define, and subsequently apply, the concept of ‘notional hours’, or the time a learner needs to commit to achieving the outcomes of a qualification, in a manner disparate to those of the other Quality Councils. This disparity creates confusion for many stakeholders when attempts are made to assess the ‘workload’ or ‘time-commitment’ associated with an occupational qualification.

- d) The **QCTO’s continued reliance on SETAs** to fulfil its Quality Assurance functions was strongly criticised across all stakeholder groups. The essence of this criticism lay in the perception that all ‘user groups’ – parties that use the system and are subjected to the policies and operational procedures promulgated by the QCTO – are exposed to at least two administrative, managerial, and logistical systems, those of the QCTO and the SETA. The user’s navigation of the QCTO system, from qualification development to qualification conferral, is guided by various, and often contradictory ‘regulatory voices’. It is widely thought that the shared Quality Assurance efforts of the QCTO and the 21 SETAs under its control, is counterproductive in terms of a simplified Quality Assurance system – and is central in the confusion and frustration experienced by users. This perception is bolstered by claims of inefficiencies in the SETA administrative processes, and stark inconsistencies in standard operating procedures from one SETA to the next. The user is “exposed to twenty-two ways of doing things”. Examples of areas with inconsistent approaches and processes include Learnership management; the application and recognition of e-learning, RPL, amongst others. There is a great need for the centralisation and standardisation and of processes. The absence

of a dedicated QCTO MIS has been cited as a key contributor to frustrations experienced by the various user groups.

- e) The **QCTO's insistence on curriculum registration** is cited as a further problematic and outmoded component of the new model. Respondents pointed out that qualifications with a registered or "fixed curriculum", cannot respond in a dynamic way to changes in the context of qualification delivery – such as changes in technology, developments in subject knowledge, the changing needs of industry, and others. While a nationally standardised curriculum is recognised as being beneficial in the pursuit of consistent quality across providers, the delays in the associated processes are believed to overshadow this benefit.

### ***The learners' perspective***

A group of learners who had recently completed new occupational qualifications were asked to rate their overall learning experiences on a scale of five (see Table 51), and their rating of extent to which the qualification concerned provided them with "workplace-ready skills"<sup>116</sup>. With an average rating of 4.57, almost a third of the learners indicated that they had had "an excellent experience" overall, while roughly a third claimed that they had "a good experience" while elaborating on certain areas that they thought could be improved. All the learners said that the qualifications had provided them with "workplace-ready skills", and that their training had been aligned to workplace needs.

**Table 51: Learner ratings of their overall experiences of occupational qualifications in terms of providing 'workplace ready' skills (n=21)**

<b>Response category provided</b>	<b>Response count</b>
<b>Very poor experience</b> (Score=1)	0
<b>Generally poor experience, but some good parts</b> (Score=2)	0
<b>I don't know</b> (Score=3)	1
<b>Good experience, but parts could be better</b> (Score=4)	7
<b>Excellent experience</b> (Score=5)	13

The learners were also asked to rate (out of 5) and provide feedback on the following ten (10) elements in their learning experiences.

1. Variety of available qualifications to suit their relevant training needs
2. Availability of training providers and/or assessment providers
3. Recognition of Prior Learning (RPL processes)
4. Gap-fill training after RPL
5. Learning support received
6. Dealing with the people

<sup>116</sup> A total of 214 students were selected who had recently completed assessments. The assumption was that the students' contact details would be up to date, however, through dissemination of the research instrument, it was clear that 36% of email addresses were inactive, and a further 34% of the respondents had declined participation through numerous follow up telephone calls. In all, the remaining database of contactable learners comprised 90 of which 24 (26.6%) learners were successfully approached via telephone or email; 21 (23.3%) gave full responses.

7. Administrative processes
8. Teaching (including courseware, mode of delivery, and training facilities)
9. Assessment practices.
10. Relevance of the training.

The learner ratings of these aspects are provided in Table 52.

**Table 52: Learner ratings of particular aspects of their training experiences in the QCTO qualification context (n=21)**

Aspect rated	Very bad (Score=1)	Not great but parts good (Score=2)	Don't know (Score=3)	Good but parts could improve (Score=4)	Excellent experience (Score=5)	Total response count
Variety of available qualifications	2	3	1	8	7	21
Availability of providers	4	3	1	6	7	21
RPL processes	3	3	1	8	6	21
Gap-fill after RPL	4	4	2	6	5	21
Learning support	2	2	1	11	5	21
Dealing with the people	2	3	0	10	6	21
Administration	2	5	1	8	5	21
Teaching	2	2	0	10	7	21
Assessment	2	2	0	11	6	21
Relevance of the training	2	1	0	7	11	21

### Elaborated comments from the learners

The learners affirmed the benefits of the new system as follows.

- Most of the learners sampled gave an **overall 'good' or 'excellent'** rating to their learning experiences under the new model for occupational qualifications, although only a **third to half rated all the aspects of their training highly**.
- Most learners also indicated that their occupational qualifications were highly **relevant** to their respective occupations and stated that they were likely to continue their studies in the near future.
- The improvement of **learning materials** was highlighted in this study, and learners praised the **theoretical components** of their course as being very closely aligned with their respective occupations.

- **WBL was deemed to be effective** by the learners, who praised the relevance of their experiential learning and the willingness of employers to go above and beyond the basic requirements to provide the learners with adequate exposure to the multiple facets of their chosen occupations.

The learners also noted the following challenges.

- Learners raised concerns around the **costs** of the multi-provider model because for certain occupations the fees related to obtaining the relevant qualification, and additional fees related to assessment and testing could be prohibitive, especially for people outside a work environment.
- **Administrative processes** were identified as an area for improvement with some learners indicating a lack of procedural understanding and lack of user-friendly resources for the end-user regarding what would be expected during the overall learning experience.
- **Student support** also received marginal ratings which could indicate a gap in the delegation process which affected the overall learning experience. Learners indicated a lack of ownership or lack of a centralised point of call during the overall training experience.
- Regarding **RPL**, learners reported challenges in areas of RPL application which could indicate a misalignment of the RPL Guidelines provided by the QCTO. Learners also noted a lack of SDPs and training centres that could provide the required gap-fill training after the RPL processes had been concluded. Even although lists of accredited providers are available on the QCTO website, the QCTO research team concluded that there were low levels of awareness of the relevant databases.

## 10.7 REFLECTIONS ON THE STAKEHOLDER EXPERIENCES OF THE QCTO MODEL FOR QUALIFICATIONS

- It was useful to triangulate the QCTO narrative of its own developmental initiatives, successes, and challenges, with the responses of its various stakeholders – this approach has led to a **three-dimensional picture** regarding the implementation of the new QCTO model. In several instances – such as with the foci on accelerating turnaround times in its processes, on enhancing advocacy and communication, and on strengthening its MIS – the QCTO is clearly addressing aspects described by stakeholders as presenting challenges.
- The analyses of the responses from SDPs, AQPs, DQPs, QDFs, learners and other strategic stakeholders in the implementation of the post-2010 QCTO model for qualifications shows a **general acceptance** of the new model – and that the model is clearly in its early years. Stakeholders across the board

expressed appreciation for the relevance of the model, that it sensitises learners to work environments, and that it gives learners the much-needed in-depth occupational knowledge. The QDF respondents noted further, that the new model can be applied to new and existing occupations, that it enhances labour market identity, that it provides clear guidelines for the delivery of qualifications, and that it promotes drawing on specialist expertise in the development of qualifications. Learners noted the quality of the learning materials and their workplace experiences.

- Several indications emerged, that **the standards of the new occupational qualifications are high**. SDP respondents noted that these qualifications “are at a high level” and that it is difficult for learners to “articulate into” them. QDF respondents similarly noted the “stringent” EISAs. This feedback points to the need for **‘stepping stones’ to enable learner progression** into the qualifications. Further, **learner support** is also needed once learners are in the system, especially but not only, in the navigation of boundaries regarding assessment and progression.
- While many respondents commented favourably on links between the new qualifications and the workplace, attention needs to be paid to enabling **articulation between the new occupational qualifications into HEQSF programmes where appropriate**. The way in which credits and notional hours are conceptualised in the OQSF context impacts on articulation between qualifications in the OQSF contexts, and qualifications in the other NQF Sub-Framework contexts.
- There were several **calls for greater standardisation** over and above the standardisation of qualification structure and curriculum – including for more standardisation in the management of Learnerships, and in RPL processes, across contexts. These calls were made in the context of the public confusion caused, and the unevenness experienced, in the absence of standardisation. At the **same time there were calls for flexibility in other aspects** – such as in the windows for approval in qualification development processes, and in the context of “workplace opportunity shortfalls”, the possibility of providing alternative authentic work experience such as work simulations.
- Respondents in the different stakeholder groups commented on a lack of **communication and clarity**, to the extent that some qualifications had been developed using an outdated model; the QCTO inputs already show increased efforts this regard. It appears from the research that the more closely entities work with the QCTO, the clearer information is perceived to be. This reality points to the need for extensive communication throughout the OQSF system. It was also clear to the QCTO research team – and is borne out by OQSF-related RPL data in the NLRD – that the RPL mechanisms are proving to be highly successful in the OQSF context. There are still indications of lack of understanding and implementation of the required processes as per the

relevant RPL Implementation Guidelines, in some quarters. Awareness and procedural understanding are lacking on the part of the learner (end-user), for example, and could be addressed through increased communication.

- Some SDP respondents raised the issue of the “loss of short courses” and the associated income. This point of view also points to the need for advocacy: the country is focused on enhancing **delivery through partnerships, to enhance learning pathways, articulation and progression** in education, training, development and work. In this approach, part-qualifications must be part of full qualifications, and full qualifications must lead to further learning and/or work. There can be no dead ends. Uncertainty about the role of part-qualifications/Unit Standards needs to be addressed as a matter of urgency.
- Some respondents raised the issue of the **mismatch between curriculum content, and the NQF level of the qualification** supported by the curriculum. This experience is a valid one: analysis of the qualifications submitted between 2012 and 2017 for registration on the NQF, shows that several were returned for further development for this reason. However, analysis also shows that this trend **decreased markedly between 2012 and 2017**.
- In almost all the stakeholder groups, extensive comments were made around **difficulties relating to the multi-partner Quality Assurance system**, which causes time lags, lack of clarity and simplification, confusion, and additional expenses. As the model is still in its developmental and expansion phase, **strong action plans and performance monitoring are needed to ensure that the model contributes to the simplification of the system, and is efficient**.
- Capacity building continues to be a strong focus in the OQSF context and should increase the efficiency of the OQSF system. **Performance enhancements** and additional human resources are also proving to increase the effectiveness and increase the scope and ability of the QCTO to fulfil its functions. The stabilisation and expansion of the QCTO, its work on advocacy and communication, Monitoring and Evaluation (M&E), and the development of its information management systems are well-placed.

## 10.8 RECOMMENDATIONS: SUB-PROJECT 6

A cluster of related recommendations emerged from Sub-Project 6, which considered the experiences and impact of the new QCTO model for occupational qualifications, on the work of stakeholders in the OQSF context.

## **Recommendation 8: Strengthen consistency, articulation, information sharing in the OQSF context**

It is recommended that the QCTO:

- makes efforts to ensure (a) articulation into occupational qualifications, (b) learner support to navigate barriers when studying occupational qualifications, and (c) the compatibility of credits to ensure articulation into continued learning and work pathways once the qualifications have been achieved;
- continues its capacity-building and performance-enhancing work, to increase its ability to coordinate the components of the OQSF system;
- grows standardised RPL and learnership practices within sub-sectors, as a single approach does not necessarily work across contexts and a measure of standardisation is needed;
- explores expanded opportunities for authentic work experience; and
- runs regular information-sharing and training sessions for stakeholders, and uses its communication initiatives to advocate and expand the OQSF as widely as possible.



# 11. Summary of findings, reflections, conclusions and recommendations

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This section of the report provides an overview of the 2017 National Qualifications Framework (NQF) Impact Study, including its main findings and recommendations, limitations, and reflections on the approach; foci and conceptual framework selected. Section 11 also points to the way forward.

## 11.1 THE FOCUS OF THE 2017 NQF IMPACT STUDY

Potentially, the general question addressed in the 2017 NQF Impact Study, was 'What is the emerging impact of NQF implementation, on the systemic integration and articulation, access and redress, and quality and transparency in education, training, development and work?' Given the timeframe of the study, and the historical stage of development of the system (Engeström, 1987), however, it was not possible to address each of these aspects fully. It would have been premature for South African Qualifications Authority (SAQA) and the Quality Councils to conduct a *full* NQF impact study in 2017, as the Quality Councils were still in the process of finalising and advocating their Sub-Framework policies for Recognition of Prior Learning (RPL), CAT, assessment and articulation in line with SAQA's related overarching policies, the Ministerial Policy for the Coordination and Funding of RPL (DHET, 2016) and Articulation Policy (DHET, 2017). SAQA and the Quality Councils thus selected particular questions, in relation to the foci of their work in the eight years since the promulgation of the NQF Act.

## 11.2 CONCEPTUAL FRAMEWORK

The conceptual framework of the 2017 NQF Impact Study comprised understanding the NQF as a 'relational system' (Bolton and Keevy, 2011), and SAQA-Quality Council work as being characterised as Engeström's (1987; 2001) 'interacting systems' within a Cultural Historical Activity Theory (CHAT) perspective. A realist approach to impact evaluation (Pawson and Tilley, 2004) was used. CHAT informed the understanding of the NQF, and shaped the research questions, methods, and samples for the study. The concept of 'relational agency' (Edwards, 2010; 2014) was encouraged – both in planning and conducting the research by SAQA and the Quality Councils, and in the extensive engagements with stakeholders through the surveys and interviews throughout the study.

## 11.3 RESEARCH QUESTIONS, DESIGN, METHOD

The 2017 NQF Impact Study sought to ascertain the effects and emerging impact of NQF implementation on the systemic integration and articulation, access and redress, and quality and transparency, in education, training, development and work. The stage of NQF policy development at the start of the study meant that the research focus needed to be on key aspects, rather than on the whole system. Efforts were made to build relational agency through the study. Stakeholder experiences were captured; triangulation was done. The research team sought to conduct the study in line with the foci in Sustainable Development Goal 4, which are 'inclusive and equitable quality education' and promoting

lifelong learning, which equip learners to acquire the knowledge and skills needed to promote sustainable development, sustainable lifestyles, human rights, gender equality, the promotion of a culture of peace and non-violence, and global citizenship (UNESCO, 2015). The articulation agenda in South Africa was also central in the research. While SAQA and the Quality Councils worked collaboratively on all the research questions addressed, each of these entities originally developed research questions relevant for their contexts.

There were six focal areas in the study, each with one or two main research questions, and several sub-questions. Essentially the over-arching research design of the study comprised six sub-projects. The first two sub-projects used mixed methods, comprising documentary analyses, followed by in-depth interviews with purposively selected respondents; Sub-Project 2 also included some surveys. Sub-Project 3 had a survey design. Sub-Project 4 had a qualitative design, comprising extensive in-depth interviews with a purposively selected and snowballed sample. Sub-Projects 5 and 6 had mixed method designs; Sub-Project 5 comprised a documentary analysis, and a quantitative trends analysis. Sub-Project 6 commenced with a documentary analysis, followed by a survey and then in-depth interviews.

## **11.4 FINDINGS AND RECOMMENDATIONS**

For ease of reading, the findings from each of the Sub-Projects 1-6, are presented with the recommendations stemming from that particular project.

### ***General note regarding the recommendations***

The recommendations from the 2017 NQF Impact Study need to be seen in light of the implementation of the NQF Act, and the achievement of the NQF objectives to date. The recommendations may be adjusted in relation to the decision made in Parliament, on the NQF Amendment Bill.

On the basis of the NQF aspects investigated, the overarching findings are that:

- RPL, CAT, NQF transparency tools, NQF Level Descriptors, integrating public and private Higher Education, and the new QCTO qualifications model, are deeply embedded within the work of the NQF partners and stakeholders;
- extensive relational work for, and the implementation of, these aspects have taken place; and
- further alignment and deepened implementation is needed and could be achieved through addressing (i) stakeholder-reported barriers, (ii) inconsistencies and gaps in the system, and (iii) ensuring regular communication with stakeholders.

Recommendations were initially developed by the researchers on the basis of sub-project findings. Inputs from SAQA's Research Committee and Board, and SAQA-Quality Council engagements have been incorporated.

## ***Sub-Project 1: Alignment of NQF policies for RPL, CAT, assessment***

### **Purpose and methods**

This sub-project investigated the extent to which the RPL, CAT and assessment policies in the NQF Sub-Framework contexts are aligned to the over-arching DHET and SAQA policies. Independent documentary analyses were conducted by the SAQA and Umalusi researchers. Findings were then integrated.

### **Findings**

The analyses showed that although the three Quality Councils' policies for RPL, CAT and assessment were *generally* aligned to those of SAQA and the DHET, there are anomalies which need to be addressed, including:

- (iv) variations in the conceptualisation of RPL within individual policy documents,
- (v) restrictions for RPL cohorts/the proportions of qualification for which RPL can be utilised, and
- (vi) silence or lack of elaboration on (a) objectives; (b) implementing RPL; (c) RPL capacity development; (d) addressing barriers to RPL; (e) the development and use of RPL toolkits; (f) avoiding distinctions between RPL and traditional learner achievements; (g) managing RPL data; (h) RPL research; (i) dealing with RPL complaints; (j) the elaboration of RPL roles and responsibilities; (k) advocacy and information sharing regarding RPL, and (l) reporting on RPL.

The CAT policies of the Quality Councils are broadly aligned to SAQA and DHET articulation policies, but provide insufficient guidance for (a) CAT concepts and processes; (b) entity roles and responsibilities in the Sub-Framework contexts; (c) CAT for articulation *across* the NQF Sub-Frameworks; and (d) reporting on articulation.

Umalusi has revised its assessment policy since the 2017 analyses for the study; the DBE is currently in the process of revising its assessment policy. At the time of the analysis, the assessment policies of the three Quality Councils and the DBE, did not elaborate on: (a) the different types of assessment and feedback needed in the respective contexts; (b) relationships between assessment and articulation/ RPL/ CAT; (c) the development and maintenance of data systems compatible with the NLRD; (d) accessible language in assessments; and (e) stakeholder roles and responsibilities, amongst others.

SAQA's 2014 policies for implementing RPL and CAT were found to be fairly strongly aligned to the DHET policies for RPL and articulation, with small differences.

### **Recommendations**

#### **Recommendation 1: Align RPL, CAT, and assessment policies**

To address the non-aligned aspects of SAQA, DBE, and Quality Council policies, it is

recommended that:

- the DBE, SAQA, and the Quality Councils consider revisions of the affected policies; and
- SAQA sets up dialogue mechanisms to address any contested aspects and develop criteria for exceptions.

### **Recommendation 2: Develop an 'Implementation Plan for RPL and CAT'**

To ensure the aligned, system-wide implementation of RPL and CAT, it is recommended that:

- SAQA facilitates information-sharing events with NQF stakeholders to deepen understandings and agree on an 'Implementation Programme for RPL, CAT, and Articulation', and
- the NQF Implementation Framework and System of Collaboration be updated to include (a) RPL, CAT and assessment policy alignment, (b) implementation of the aligned policies, and (c) RPL and articulation data and reporting.

## ***Sub-Project 2: Impact of NQF policies for RPL, CAT, assessment***

### **Purpose and methods**

This sub-project focused on how the SAQA policies for RPL, CAT, and assessment were observed/ reported to have impacted on the related work of the Quality Councils. The extent of policy alignment was taken as an indication of the impact of SAQA's policies. Umalusi researchers conducted a separate impact analysis, interviewing seven key GFETQSF assessment body stakeholders. SAQA researchers analysed the extent of alignment in the Statutes and other documents of the 26 public Higher Education Institutions (HEI), and surveyed a 10% random sample of the 576 private HEI/Colleges, 100 Skills Development Providers (SDPs), and the 61 employers linked to Business Unity South Africa (BUSA) and the Black Business Council (BBC).

### **Findings**

Umalusi found that its assessment policy had impacted on the work of the sampled assessment bodies, in that the policy was reported to be shaping and controlling their work. Interviewed stakeholders were found to understand the policy, view it as being comprehensive, and utilise it fully. However, they seldom referred to CAT and RPL.

SAQA's analysis of the public HEI documents revealed that while RPL and articulation are being implemented across HEI, this implementation is uneven (see Tables 53 and 54). Of the hundreds of Handbooks/ Yearbooks/ Rulebooks found, careful reading of three randomly selected Handbooks showed that even in a single department, the RPL and articulation requirements for the different qualifications offered, could differ widely. While a University Statute may promote RPL and articulation, documents closer to the 'user interface' could work against these.

**Table 53: Items that could promote articulation in public HEI (n=26)**

Item	No. of HEIs with this item
Statutes published on HEIs website	16
General rules on HEIs website	21
Handbooks, Yearbooks, Rulebooks, Prospectus, Calendars	Handbooks (6), Yearbooks (3), Rulebooks (1), Handbooks + Yearbooks (3), Prospectus (12), Calendars (7), Prospectus + Calendar (6)
Policies for RPL/ CAT/ articulation on HEI website	16 had none of these 10 had policies, or guidelines, or both 20 had <i>information</i> on RPL/ alternative access (with/without policy)
HEI website items which could support articulation	22 (eg funding, contacts for career advice, student support items)
HEI Ombud Office	4

**Table 54: Private College/HEI respondent awareness and impact of SAQA policies for RPL, CAT, assessment (Respondents n=37 of a possible 57)**

Item	No. of responding private HEIs/Colleges (with comments)
Aware of SAQA policies for RPL, CAT, assessment	37
Aware of CHE policies for RPL, CAT, assessment	31
Reporting 'assessment has <i>not</i> changed' under NQF Act	17
Reporting 'assessment <i>has</i> changed' under NQF Act	16 (example comments: 'NQF levels are key tools in CAT assessments' 'NQF levels guide assessment' 'assessment ... is more rigorous')

Private HEIs reported that (a) it was burdensome to implement RPL and CAT, and (b) there were no guidelines to translate achieved learning into credits. The CAT challenges raised included differences in the knowledge and skills taught across different institutions, and that similarly named modules often have different learning outcomes.

All five of the responding Skills Development Providers (SDPs) were aware of the QCTO policies. They raised concerns regarding financial restrictions, the moratorium on organisational structures, and the appointment of personnel. They noted that the Quality Councils do not embrace RPL equally, and generally do not recognise occupational qualifications for exemption purposes.

Half of the 16 employers who responded were aware of SAQA's policies. They noted that RPL is under-utilised due to resource constraints, and the lack of incentives to do so.

### Recommendations

Some recommendations from this sub-project are addressed in Recommendations 1 and 2 above.

### **Recommendation 3: Address GFETQSF stakeholder difficulties**

To address GFETQSF stakeholder difficulties, it is recommended that Umalusi (in collaboration with SAQA):

- adds criteria and guidelines for implementation to its assessment and CAT policies;
- clarifies the terms 'Credit Exemption', 'Credit Recognition', and the operationalisation of these terms;
- conducts information-sharing sessions with GFETQSF stakeholders, to enhance awareness and implementation of RPL and CAT; and
- addresses articulation pathways for adults – eg through implementing the National Senior Certificate for Adults (NASCA), or offering the National Senior Certificate (NSC) in different ways (part-time/ extended time/ etc.). SAQA should arrange a dialogue with the relevant stakeholders, to this end.

### **Recommendation 4: Review Umalusi quality assurance of public provision**

Review and revise how Umalusi quality assures public provision so as to improve its effectiveness.

#### ***Sub-Project 3: Impact of selected aspects of the transparency apparatus of the NQF***

##### **Purpose and methods**

This sub-project sought to ascertain (1) where stakeholders obtain information on qualifications and related aspects, (2) what stakeholders know about SAQA's searchable databases; (3) the extent to which stakeholder use these databases and find them useful; (4) stakeholder awareness of the National Learners' Records Database (NLRD) Trends Reports, how these are used, and their impact, and (5) stakeholder experiences of SAQA's Record of Learning Service, and its impact.

A survey instrument focusing on these aspects was developed on 'esurv' and the link emailed to all public HEI and Colleges; a 10% randomly selected sample of private HEI/Colleges; SDPs; national, provincial and local government departments; the Quality Councils; the parastatal Statutory Bodies, the 106 recognised Professional Bodies, the Sector Education and Training Authorities (SETAs), and employers registered with BUSA and BBC – a total of 589 organisations; 199 responses were received (34% response rate). To assess the impact of SAQA's Record of Learning (RoL) Service, a sample of 1 000 individuals was randomly selected from the 35 807 clients who had used the service between 2015-2017 (inclusive), and surveyed via Short Messaging Service (SMS).

## Findings

The majority of stakeholders who responded to the survey were aware of, and use, SAQA's searchable databases. The majority were not aware of the NLRD Trends Reports. Tables 55 and 56 provide more detail.

**Table 55: Reasons for using SAQA's searchable databases, and benefits**

<b>Use of NLRD databases</b>	<b>No. of responding organisations (n=199)</b>
For obtaining information on <b>qualifications</b> that are registered on the NQF, from "SAQA and/or the NLRD"	130
For getting information on <b>part-qualifications</b> that are registered on the NQF, from "SAQA"	120
For getting information on <b>Professional Bodies</b> that are listed on the NQF, from "SAQA and/ or the NLRD"	114
For obtaining information on <b>Professional Designations</b> that are listed on the NQF, from "SAQA and/or the NLRD"	104
For obtaining information on the <b>verification of qualifications</b> in South Africa, from "SAQA and NLRD and Verifications"	117
'NLRD is part of the information sources used'	28
'For qualification development'	90
<b>Benefits of NLRD databases</b>	<b>No. of responding organisations (n=182)</b>
The NLRD databases 'have positive benefits'	130
'Useful for verifying information'	32
'Accessibility of information'	31
'Confirmation of qualifications'	24

**Table 56: Awareness and impact of NLRD Trends Reports (n=193)**

<b>Awareness of NLRD Trends Reports</b>	<b>No. of responding organisations (n=193)</b>
Had not seen any NLRD Trends Reports	127
Had seen some of the NLRD Trends Reports	66
Had seen Trends Report 4 (2017)	55
Had seen Trends Report 3 (2013)	45
Had seen Trends Report 2 (2006)	34
Had seen Trends Report 1 (2004)	22
<b>Impact of NLRD Trends Reports</b>	<b>No. of responding organisations</b>
'had <b>not</b> impacted'	89 (n=193)
' <b>had</b> impacted'	54 (n=193)
NLRD Trends Report impact question 'not applicable'	45 (n=193)
'had influenced strategic discussions/ planning/ decision-	28 (of 54 reporting

making'	impact)
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The total number of individuals receiving the RoL survey was 520; 82 (16%) responded, 45 reported finding the service 'very useful'; 18, 'useful'; 34 rated it as having had 'a strong impact' on their lives, and 19 as it having had 'some impact'.

#### **Recommendation 5: Enhance information-sharing regarding NQF transparency tools**

It is recommended that SAQA continues and enhances information-sharing to advocate use of the searchable databases of the NLRD, and RoL and Verification Services. Clarify what is meant by 'prospective employee'.

### ***Sub-Project 4: Experiences and impact of the NQF Level Descriptors***

#### **Purpose and methods**

This sub-project investigated how the NQF Level Descriptors are understood and used, what they have enabled for stakeholders, challenges experienced, and suggestions for improvement. The questions were addressed through questionnaires emailed to 503 entities: all public HEIs and Colleges; Development and Assessment Quality Partners (DQPs, AQPs), SDPs; organised employers; recognised professional bodies, and a 10% random sample of private HEIs/Colleges. Further, 74 in-depth interviews were conducted with SAQA staff (33); senior Quality Council officials (11); senior DHET and DBE officials (seven); and snowballed DQPs, Quality Development Facilitators (QDFs), SETAs (18), and private HEIs (five).

#### **Findings**

Interviewed stakeholders understood the definitions of the Level Descriptor categories in SAQA's policy document. The main reported uses of the Descriptors were to:

- (a) pitch the types and levels of learner competences in qualification development and evaluation;
- (b) cater for access, progression and articulation; and
- (c) describe the levels of competences required for professional designations.

Level Descriptors were found to be used by those who design, accredit, evaluate, compare and critique local and foreign qualifications, either for the purposes of registration on the NQF or for the recognition of foreign credentials. To a lesser extent, respondents mentioned using the Descriptors in training; conceptualising jobs; articulation, and professional designations. Reasons given for the usefulness of the Descriptors included their roles in developing uniformity, enhancing articulation, enabling comparison, defining competency levels, and supporting the registration of professional bodies. The most-mentioned benefit was the role of the Descriptors in the qualification development process. Of the 65 responding professional bodies, 58 reported finding the Descriptors 'useful/very useful/essential'; seven reported 'limited use'. The SAQA and Quality Council interviewees reported relying on the Descriptors for their work.



The main challenges reported regarding the Descriptors were (1) their academic and wordy nature; (2) their 'broad and overlapping' character, which makes them difficult to distinguish, (3) lack of guidance for their use, (4) lack of elaboration of the competences in the Descriptors, for occupational/workplace contexts, and for professional designations, and (5) lack of public awareness. Some respondents found the 'old Level Descriptors' (under the SAQA Act) more user-friendly than the present Descriptors; the process of qualification development was however reported to be more consistent under the NQF Act.

### **Recommendation 6: Simplify, clarify, and workshop the NQF Level Descriptors**

It is recommended that SAQA refines the NQF Level Descriptors, taking into account the stakeholder uses and challenges reported, and hosts public consultation workshops as part of this process and to share information on the finalised Descriptors.

### ***Sub-Project 5: Impact of CHE initiatives to integrate public and private Higher Education***

#### **Purpose and methods**

Sub-Project 5 sought to describe the CHE mechanisms implemented since 2008, to promote integration and articulation between public and private Higher Education sectors, and the impact of these initiatives. The project included NLRD data analyses of student movements between the sectors – before and after 2008 – as a proxy for the relative integration and articulation of the sectors.

#### **Findings**

The numbers of students achieving Bachelor's degrees in both public and private Higher Education, were found to have increased under the NQF Act, relative to the numbers of achievements under the SAQA Act. A marked increase was also found, in the contribution of private HEIs to the total number of students achieving Bachelor's degrees annually. There was some growth in the numbers of students who, having achieved a Bachelor's degree, went on to achieve a second or third HEQSF qualification. The numbers of students achieving second or third qualifications in public HEIs after obtaining first degrees from private HEIs, and *vice versa*, showed a small increase across the two periods. The data suggest that after obtaining a first Higher Education qualification, students appeared to be increasingly flexible in terms of selecting whether to pursue subsequent qualifications in public or private HEIs. The trend found was in the direction desired, but for enhanced access and progression, needs to be deepened.

### **Recommendation 7: Deepen articulation between public and private Higher Education**

To enhance access to, and progression in and beyond, Higher Education, it is recommended that the CHE (a) continues to develop and implement its policies, frameworks and good practice guides

across public and private Higher Education, while increasing its quality promotion and capacity development activities; and (b) reports articulation successes widely.

To make possible the recognition of a wider range of qualifications from private HEI via (a) private HEI offering a wider range of Higher Education qualifications, and (b) professional body registration of individuals with qualifications from both types of institutions, SAQA could work with the South African Private Higher Education (SAPHE) body, DHET, and others, towards (1) the review and repealing of the restrictive legislation [that also that contradicts Section 29 of the Constitution, and Section 53(1) of Higher Education Act], and (2) expediting the DHET process of developing criteria for private HEIs to become fully-fledged universities as envisaged in the 2016 amendment of the Higher Education Act.

## ***Sub-Project 6: Impact of the new QCTO model for occupational qualifications***

### **Purpose and methods**

Sub-Project 6 sought (a) to describe the pre- and post NQF Act models for occupational qualifications; (b) assess progress in implementing the new model for a selected set of qualifications; and (c) understand its impact. Occupational qualification documentation pre and post-2010, was analysed. Individuals linked to two qualifications with large uptake, and six with small uptake, were surveyed and interviewed by the QCTO researchers. Interviews were conducted with representatives from the DHET and SAQA (four); SETAs (four); DQPs, QDFs and AQPs (12); public and private SDPs (40) and 24 learners – linked to the selected qualifications. The SAQA researchers analysed the minutes of SAQA's Qualifications and Standards (Q&S) Committee meetings of 2012-2017, to identify issues raised in relation to qualifications submitted by the QCTO.

### **Findings**

Stakeholders implementing the post-2010 QCTO model for occupational qualifications reported general acceptance of the model. Capacity building emerged as a focus: performance enhancements and additional human resources were noted by respondents to be improving the effectiveness and efficiency of the QCTO. Several challenges were reported. Firstly, the standards of the new occupational qualifications were said to be high, so that 'it is difficult for learners to articulate into' them. Secondly, the lack of standardisation in the way credits and notional hours; RPL; and learnerships are managed in the OQSF context, were said to impact on articulation. Thirdly, there were calls for flexibility in aspects such as 'the windows for approval' in qualification development processes, and in alternative opportunities for authentic work experience. Fourth, many stakeholders commented on a lack of communication and clarity from the QCTO, and a need for regular updates. Fifth, difficulties were noted regarding the QCTO's multi-partner quality assurance system, which was said to cause time lags, confusion, and additional expenses.

## **Recommendation 8: Strengthen consistency, articulation, information sharing in the OQSF context**

It is recommended that the QCTO:

- makes efforts to ensure (a) articulation into occupational qualifications, (b) learner support to navigate barriers when studying occupational qualifications, and (c) the compatibility of credits to ensure articulation into continued learning and work pathways once the qualifications have been achieved;
- continues its capacity-building and performance-enhancing work, to increase its ability to coordinate the components of the OQSF system;
- grows standardised RPL and learnership practices within sub-sectors, as a single approach does not necessarily work across contexts and a measure of standardisation is needed;
- explores expanded opportunities for authentic work experience; and
- runs regular information-sharing and training sessions for stakeholders, and uses its communication initiatives to advocate and expand the OQSF as widely as possible.

### **11.5 ON BUILDING RELATIONAL AGENCY**

A deliberate attempt was made when conducting the 2017 NQF Impact Study, to use the research as an opportunity to develop the 'relational agency' (Edwards, 2010; 2014), and 'solidarity' (Von Kotze and Walters, 2017) needed within and between NQF stakeholder organisations for implementing the NQF. Deliberate attempts were made to avoid what Soudien (2012) describes as 'othering'.

In practice, this approach meant that while SAQA provided the leadership for the study, its conceptualisation; the determination of the research questions, design and instruments; the research itself, and the analyses and reporting, were done collaboratively. This collaboration meant setting up meetings and other opportunities to allow for discussion and collaboration towards building mutual understanding and allowing for deep engagement with the motives, issues, needs, and traditions of all four organisations. These efforts also helped to build the shared (common) knowledge on which the study is based. SAQA and the Quality Councils collaborated towards sharpening the research questions and instruments, providing information for valid research samples, gathering extensive data, clarifying analyses, and meeting reporting requirements.

In the 2017 NQF Impact Study, allowing for the different foci, and the variations in the research methods used in the four contexts of SAQA and the Quality Councils, may have lessened the standardisation of aspects in the study. However, it arguably enriched the study, the findings of which can be used in the implementation and further development of the NQF. It also arguably enhanced the relationships between the research teams located in the four organisations, and there are signs that the collaborative spirit has spread beyond this research project.

## **11.6 LIMITATIONS OF THE STUDY**

Efforts were made in SAQA's 2017 NQF Impact Study, to address the limitations in SAQA's 2014 NQF Impact Study, in addition to the new foci addressed. The main criticism of the 2014 study, was the lack of triangulation and lack of reporting on stakeholder experiences. The 2017 study addressed these issues through a combination of documentary reviews, and extensive surveys and interviews of the range of NQF stakeholders. In addition, different researchers from the larger SAQA-Quality Council research team worked together on the six sub-projects in different ways, at different times, and critiqued each other's work. These steps were taken in an attempt to eliminate bias. The efforts towards triangulation are clearly visible in all six sub-projects. In a small number of instances, the limited response rates for some of the surveys may be a limitation.

The variation in the research questions across the sub-projects may seem to some, a second limitation. While the over-arching research question sought to ascertain the impact of the implementation of the NQF policy suite, SAQA and each Quality Council chose foci for the specific research questions, which had been central efforts for their organisations in the eight years since the promulgation of the NQF. The researcher collaboration points towards the possibility of a more streamlined research question for SAQA's 2021 NQF Impact Study.

A third limitation, always, is the impossibility of determining direct cause and effect in a complex system made up of interacting sub-systems – each of those with further interacting sub-systems (Engeström, 1987; 2001). It is argued however, that the way that activities, outputs, outcomes and emerging impact have been linked in the 2017 NQF Impact Study report, go some way towards showing the links in the data and trends.

## **11.7 USEFULNESS OF THE CONCEPTUAL FRAMEWORK**

The conceptual framework selected, proved enabling, extending the categories of items that would otherwise have been considered. Using the realist approach (Pawson and Tilley, 2004) led to attempting to establish *post-hoc*, the links between initiatives, and the patterns found. It also encouraged the researchers to look for the heterogeneity of responses within and between respondent groups, and different responses across time periods. The use of CHAT (Engeström, 1987; 2001) helped to visualise the NQF system, and to select appropriate methods to investigate it. The CHAT categories were used to guide the sampling categories of respondents, in that the researchers sought to include respondents from all of the Communities of Practice in the NQF system; respondents at different levels of the authority hierarchies in these Communities of Practice; and respondents 'close to the centres' of these communities, as well as those on the peripheries. CHAT led the researchers to look deliberately for a variety of 'NQF tools and rules' such as those of and in, initiatives, policies, advocacy, and so on. The building of relational agency has been described. It is suggested that this conceptual frame be used again in future NQF impact studies.

## **11.8 CLOSING COMMENTS**

The 2017 NQF Impact Study identified a conceptual framework that proved useful, and could be used again. The ways of using it could be refined. The study addressed six sets of research questions, which possibly lent it complexity, but proved useful for the organisations involved. SAQA-Quality Council collaboration helped to strengthen the research. The interviews conducted, and the project as a whole, used, and arguably built, relational agency in the system. In some instances, the responses to the surveys were at very high rates; in other instances, these rates were too low. The researchers think however, that overall, a balanced picture has emerged. The foci of the study were in line with the foci in Sustainable Development Goal 4, of 'inclusive and equitable quality education' and promoting lifelong learning which equip learners to acquire the knowledge and skills needed to promote sustainable development, sustainable lifestyles, human rights, gender equality, promotion of a culture of peace and non-violence, and global citizenship (UNESCO, 2015). The research also supports the articulation agenda in South Africa. The researchers urge NQF policy-makers and implementers to address the recommendations for the benefit of all NQF beneficiaries in the country.

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# Appendices

The appendices are attached below, in the following sequence.

- **Appendix 1:** Interview with the QCTO on RPL, CAT, and Assessment policies (SAQA data collection tool)
- **Appendix 2:** Interview with Umalusi on the development of the RPL, CAT, and Assessment policies (SAQA data collection tool)
- **Appendix 3:** Interview with Umalusi on the impact of Umalusi's policies for RPL, CAT, and Assessment (SAQA data collection tool)
- **Appendix 4:** Interview with the CHE on the development of the RPL, CAT, and Assessment policy (SAQA data collection tool)
- **Appendix 5:** Interview with the CHE on the impact of CHE's policy for RPL, CAT, and Assessment (SAQA data collection tool)
- **Appendix 6:** Questionnaire for employers regarding national policies for RPL, CAT, and Assessment and the NQF Level Descriptors (SAQA data collection tool)
- **Appendix 7:** Questionnaire for Skills Development Providers regarding national policies for RPL, CAT, and Assessment, and the NQF Level Descriptors (SAQA data collection tool)
- **Appendix 8:** Questionnaire for Umalusi accredited providers regarding national policies for RPL, CAT, and Assessment and the NQF Level Descriptors (SAQA data collection tool)
- **Appendix 9:** Stakeholder survey on the searchable databases of the NLRD and the NLRD Trends Reports (SAQA data collection tool)
- **Appendix 10:** Record of Learning Survey (SAQA data collection tool)
- **Appendix 11:** Interview with staff from SAQA on the NQF Level Descriptors (SAQA data collection tool)
- **Appendix 12:** Survey for NQF stakeholders on the NQF Level Descriptors (SAQA data collection tool)
- **Appendix 13:** Survey and interview questionnaire for OQSF Stakeholders on experiences and impact of the new QCTO model for occupational qualifications - DHET NQF Directorate and Skills Branch and SAQA (QCTO data collection tool)
- **Appendix 14:** Survey and interview questionnaire for OQSF Stakeholders on experiences and impact of the new QCTO model for occupational qualifications - DQPs and AQPs (QCTO data collection tool)
- **Appendix 15:** Survey and interview questionnaire for OQSF Stakeholders on experiences and impact of the new QCTO model for occupational qualifications - Public and Private Providers and Industry (QCTO instrument)

- **Appendix 16:** Survey and interview questionnaire for QQSF Stakeholders on experiences and impact of the new QCTO Model for Occupational Qualifications – Employers (QCTO data collection tool)
- **Appendix 17:** Survey and interview questionnaire for QQSF Stakeholders on experiences and impact of the new QCTO model for occupational qualifications – Learners (QCTO data collection tool)
- **Appendix 18:** Interview with Umalusi policy-makers on the development of Umalusi’s RPL, CAT and Assessment policies (Umalusi data collection tool)
- **Appendix 19:** Interview with Umalusi stakeholders on the development of Umalusi’s RPL, CAT and assessment policies (Umalusi data collection tool)



## APPENDIX 1:

### Interview with the QCTO on RPL, CAT and assessment policies (SAQA data collection tool)



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#### 2017 NQF IMPACT STUDY

#### INTERVIEW 1: WITH THE QCTO, ON RPL, CAT AND ASSESSMENT POLICIES

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The National Qualifications Framework (NQF) Act of 2008 (Section 13[k(i)-(ii)]) mandates the South African Qualifications Authority (SAQA) to: "Conduct or commission investigations on issues of importance to the development and implementation of the NQF, including periodic studies of the impact of the NQF on South African education, training and employment" and "publish findings of the investigations".

SAQA conducts an NQF Impact Study every three years.

The purpose of this interview is for the 2017 NQF Impact Study researchers to understand the QCTO's developmental process and content in the QCTO's policies for RPL, CAT and Assessment as well as how the QCTO's policies for RPL, CAT and Assessment have impacted on the QCTO's work.

We will capture this discussion and give you our notes, for your inputs.

Names and positions of respondents	
Date of interview	

- 1) Please could you tell us about the QCTO's policy development process, including its timelines?
- 2) Please could you say a bit more about how the following were used/ shaped/ impacted on the QCTO's policies/ processes:
  - a) Articulation Policy for the Post-School Education and Training System in South Africa (DHET, 2017);
  - b) Recognition of Prior Learning (RPL) Coordination Policy (DHET, 2016);
  - c) Policy for the Implementation of RPL (SAQA, 2013 reprinted 2016);
  - d) Policy for Credit Accumulation and Transfer (CAT) (SAQA, 2014), and
  - e) Policy and Criteria for Designing and Implementing Assessment for NQF Qualifications

and Part- Qualifications, and Professional Designations in South Africa (SAQA, 2014).

- 3) In the development of the QCTO's policies, were there any contradictions or issues to be addressed, and if so, please could you sketch these for us?
- 4) When did the QCTO publish its policies for RPL, CAT and Assessment? And how did the QCTO make known to its stakeholders, the publication of the QCTO's policies for RPL, CAT and Assessment?
- 5) How have the QCTO's policies for RPL, CAT and Assessment affected/ impacted on the work of the QCTO? Please expand.
- 6) What have been some of the changes experienced as a result of the QCTO's policies for RPL, CAT and Assessment (a) within the QCTO, and (b) in the system for education, training, development and work?
- 7) Is there anything else you would like to mention?

**THANK YOU !**

## APPENDIX 2:

### Interview with Umalusi on the development of the RPL, CAT and assessment policies (SAQA data collection tool)



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#### 2017 NQF IMPACT STUDY INTERVIEW 2: WITH UMALUSI, ON THE DEVELOPMENT OF THE RPL, CAT AND ASSESSMENT POLICIES

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The National Qualifications Framework (NQF) Act of 2008 (Section 13[k(i)-(ii)]) mandates the South African Qualifications Authority (SAQA) to: "Conduct or commission investigations on issues of importance to the development and implementation of the NQF, including periodic studies of the impact of the NQF on South African education, training and employment" and "publish findings of the investigations".

SAQA conducts an NQF Impact Study every three years.

The purpose of this interview is for the 2017 NQF Impact Study researchers to understand Umalusi's developmental process and content in Umalusi's policies for RPL, CAT and Assessment.

We will capture this discussion and give you our notes, for your input.

Names and positions of respondents	
Date of interview	

- 1) Please could you tell us about Umalusi's policy development process, including its timelines?
- 2) Please could you say a bit more about how following were used/ shaped/ impacted on Umalusi's policies/ processes:
  - a) Articulation Policy for the Post-School Education and Training System in South Africa (DHET, 2017);
  - b) Recognition of Prior Learning (RPL) Coordination Policy (DHET, 2016);
  - c) Policy for the Implementation of RPL (SAQA, 2013 reprinted 2016);
  - d) Policy for Credit Accumulation and Transfer (CAT) (SAQA, 2014), and
  - e) Policy and Criteria for Designing and Implementing Assessment for NQF Qualifications and Part- Qualifications, and Professional Designations in South Africa (SAQA, 2014).

- 3) What were the key challenges that the policies on Assessment, RPL, and CAT sought to address, and to what extent do you think they were successful?
- 4) During the policy development and revision process, what (if any) obstacles or challenges did you encounter in formulating the policies?
- 5) In the development of Umalusi's policies, were there any contradictions to be addressed, and if so, please could you sketch these for us?
- 6) Is there anything else you would like to mention?

**THANK YOU !**

## APPENDIX 3:

### Interview with Umalusi on the impact of Umalusi's policies for RPL, CAT and assessment (SAQA data collection tool)



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#### 2017 NQF IMPACT STUDY

#### INTERVIEW 3: WITH UMALUSI, ON THE IMPACT OF UMALUSI'S POLICIES FOR RPL, CAT AND ASSESSMENT

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The National Qualifications Framework (NQF) Act of 2008 (Section 13[k(i)-(ii)]) mandates the South African Qualifications Authority (SAQA) to: "Conduct or commission investigations on issues of importance to the development and implementation of the NQF, including periodic studies of the impact of the NQF on South African education, training and employment" and "publish findings of the investigations".

SAQA conducts an NQF Impact Study every three years.

The purpose of this interview is to understand how Umalusi's policies for RPL, CAT and Assessment have impacted on Umalusi's work.

We will capture this discussion and give you our notes, for your input.

Names and positions of respondents	
Date of interview	

- 1) When did Umalusi publish its policies for RPL, CAT and Assessment? And how did Umalusi make known to its stakeholders, the publication of Umalusi's policies for RPL, CAT and Assessment?
- 2) How have Umalusi's policies for RPL, CAT and Assessment affected/ impacted on the work of Umalusi? Please expand.
- 3) What have been some of the changes experienced as a result of Umalusi's policies for RPL, CAT and Assessment (a) within Umalusi, and (b) in the system for education, training, development and work?
- 4) Is there anything else you would like to mention?

**THANK YOU !**

## APPENDIX 4:

### Interview with the CHE on the development of the RPL, CAT and assessment policy (SAQA data collection tool)



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#### 2017 NQF IMPACT STUDY

#### INTERVIEW 4: WITH THE CHE, ON THE DEVELOPMENT OF THE RPL, CAT AND ASSESSMENT POLICY

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The National Qualifications Framework (NQF) Act of 2008 (Section 13[k(i)-(ii)]) mandates the South African Qualifications Authority (SAQA) to: "Conduct or commission investigations on issues of importance to the development and implementation of the NQF, including periodic studies of the impact of the NQF on South African education, training and employment" and "publish findings of the investigations".

SAQA conducts an NQF Impact Study every three years.

The purpose of this interview is for the 2017 NQF Impact Study researchers to understand the CHE's developmental process and content in the CHE's policy for RPL, CAT and Assessment.

We will capture this discussion and give you our notes, for your input.

Name and position of respondent	
Date of interview	

- 1) Please could you tell us about the CHE policy development process, including its timelines?
- 2) Please could you say a bit more about how the following were used/ shaped/ impacted on the CHE policy/ process:
  - a) Articulation Policy for the Post-School Education and Training System in South Africa (DHET, 2017);
  - b) Recognition of Prior Learning (RPL) Coordination Policy (DHET, 2016);
  - c) Policy for the Implementation of RPL (SAQA, 2013 reprinted 2016);
  - d) Policy for Credit Accumulation and Transfer (CAT) (SAQA, 2014), and
  - e) Policy and Criteria for Designing and Implementing Assessment for NQF Qualifications and Part- Qualifications, and Professional Designations in South Africa (SAQA, 2014).

- 3) In the development of the CHE policy, were there any contradictions or issues to be addressed, and if so, please could you sketch these for us?
- 4) Is there anything else you would like to mention?

**THANK YOU !**

## APPENDIX 5:

### Interview with the CHE on the impact of CHE's policy for RPL, CAT and assessment (SAQA data collection tool)



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#### 2017 NQF IMPACT STUDY

#### INTERVIEW 5: WITH THE CHE, ON THE IMPACT OF CHE'S POLICY FOR RPL, CAT AND ASSESSMENT

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The National Qualifications Framework (NQF) Act of 2008 (Section 13[k(i)-(ii)]) mandates the South African Qualifications Authority (SAQA) to: "Conduct or commission investigations on issues of importance to the development and implementation of the NQF, including periodic studies of the impact of the NQF on South African education, training and employment" and "publish findings of the investigations".

SAQA conducts an NQF Impact Study every three years.

The purpose of this interview is to understand how the CHE's policy for RPL, CAT and Assessment have impacted on the CHE's work.

We will capture this discussion and give you our notes, for your input.

Name and position of respondent	
Date of interview	

- 1) When did the CHE publish its policy for RPL, CAT and Assessment? And how did the CHE make known to its stakeholders, the publication of the CHE's policy for RPL, CAT and Assessment?
- 2) How have the CHE's policy for RPL, CAT and Assessment affected/ impacted on the work of the CHE? Please expand.
- 3) What have been some of the changes experienced as a result of the CHE's policy for RPL, CAT and Assessment (a) within the CHE, and (b) in the system for education, training, development and work?
- 4) Is there anything else you would like to mention?

**THANK YOU !**



## APPENDIX 6:

### Questionnaire for employers regarding national policies for RPL, CAT and assessment and the NQF Level Descriptors (SAQA data collection tool)



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#### 2017 NQF IMPACT STUDY

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#### QUESTIONNAIRE RQ1, RQ2, RQ3 FOR EMPLOYERS

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The National Qualifications Framework (NQF) Act of 2008 (Section 13[k(i)-(ii)]) mandates the South African Qualifications Authority (SAQA) to: "Conduct or commission investigations on issues of importance for the development and implementation of the NQF, including periodic studies of the impact of the NQF on South African education, training and employment" and "publish findings of the investigations". SAQA conducts an NQF Impact Study every three years. The purpose of this questionnaire is to understand your company's experiences of national policies for Recognition of Prior Learning (RPL), Credit Accumulation and Transfer (CAT) and assessment – and of the NQF Level Descriptors. Please note that your responses will be strictly confidential and used for research purposes only. We ask kindly that you type straight into this document please.

#### Regarding national policies for RPL, CAT and Assessment

- 1) Are you aware of SAQA's policies for RPL, CAT, and assessment?

YES	NO

- 2) If your answer to Question (1) above was "yes", please could you describe briefly, when and how you became aware of these policies?

- 3) Are you aware of the policies for RPL/CAT/Assessment developed by any of the Quality Councils? [Umalusi/ Council on Higher Education (CHE)/ Quality Council for Trades and Occupations (QCTO)]

YES	NO

- 4) If your answer to Question (3) above was "yes", please could you describe briefly, when and how you became aware of these policies?

5) Please could you elaborate for us, on how any of these policies have impacted on the work of your company?

**Regarding the NQF Level Descriptors**

6) Regarding the NQF Level Descriptors – please could you tell us:

(a) what they mean for your company, if anything...

(b) how they are used in your company, if they are used...

(c) what impact they have had, on the work of your company, if any...

(d) what challenges your institution has experienced in relation to the NQF Level Descriptors...

**Other**

7) Please feel free to comment on any particular challenges your institution has experienced in relation to these and any other NQF policies...

**OPTIONAL SECTION: PLEASE ADD CONTACT DETAILS (OPTIONAL)**

*These details are optional and are for the purposes of the research only, for follow-up where necessary, and will be treated with strict confidentiality.*

<b>Name of company</b>	
<b>Name of respondent</b>	
<b>Position of respondent</b>	
<b>Telephone/Cell phone number</b>	
<b>Email address</b>	

**THANK YOU VERY MUCH FOR COMPLETING THIS QUESTIONNAIRE –  
you have helped to strengthen the system for  
education, training, development and work in South Africa!**

## APPENDIX 7:

### Questionnaire for Skills Development Providers regarding national policies for RPL, CAT and assessment and the NQF Level Descriptors (SAQA data collection tool)



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#### 2017 NQF IMPACT STUDY

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#### QUESTIONNAIRE RQ1, RQ2, RQ3 FOR SKILLS DEVELOPMENT PROVIDERS

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The National Qualifications Framework (NQF) Act of 2008 (Section 13[k(i)-(ii)]) mandates the South African Qualifications Authority (SAQA) to: "Conduct or commission investigations on issues of importance to the development and implementation of the NQF, including periodic studies of the impact of the NQF on South African education, training and employment" and "publish findings of the investigations". SAQA conducts an NQF Impact Study every three years. The purpose of this questionnaire is to understand (1) how the Recognition of Prior Learning (RPL), Credit Accumulation and Transfer (CAT) and assessment policies of SAQA and the QCTO have impacted on the work of your institution, and (2) how your institution has experienced the NQF Level Descriptors. Please note that your responses will be strictly confidential and used for research purposes only. We ask kindly that you type straight into this document please.

#### Regarding national policies for RPL, CAT and Assessment

1) Are you aware of SAQA's policies for RPL, CAT, and Assessment?

YES	NO

2) If your answer to Question (1) above was "yes", please could you describe briefly, when and how you became aware of these policies?

3) Are you aware of the QCTO's policies for RPL and Assessment?

YES	NO

4) If your answer to Question (3) above was "yes", please could you describe briefly, when and how you became aware of these policies?

- 5) Please could you elaborate for us, on how these RPL policies have impacted on the work of your institution, and how RPL is accommodated in your institution – are there differences before and after 2010? Please feel free to give us as much detail as possible, including RPL candidate numbers where possible...
- 6) Please could you elaborate for us, if assessment at your institution changed after 2010, and if so, how. Please feel free to expand on this important question...

**Regarding the NQF Level Descriptors**

- 7) Regarding the NQF Level Descriptors – please could you tell us:
  - (e) what they mean for your institution...
  - (f) how they are used in your institution...
  - (g) what impact they have had, on the work of your institution...
  - (h) what challenges your institution has experienced in relation to the NQF Level Descriptors...

**Other**

- 8) Please feel free to comment on any particular challenges your institution has experienced in relation to RPL, Assessment, and the NQF Level Descriptors....

**OPTIONAL SECTION: PLEASE ADD CONTACT DETAILS (OPTIONAL)**

*These details are optional and are for the purposes of the research only, for follow-up where necessary, and will be treated with strict confidentiality.*

<b>Name of Institution</b>	
<b>Name of respondent</b>	
<b>Position of respondent</b>	
<b>Telephone/Cell phone number</b>	
<b>Email address</b>	

**THANK YOU VERY MUCH FOR COMPLETING THIS QUESTIONNAIRE !**

## APPENDIX 8:

### Questionnaire for Umalusi accredited providers regarding national policies for RPL, CAT and assessment and the NQF Level Descriptors (SAQA data collection tool)



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#### 2017 NQF IMPACT STUDY

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#### QUESTIONNAIRE RQ1, RQ2, RQ3 FOR UMALUSI ACCREDITED PROVIDERS

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The National Qualifications Framework (NQF) Act of 2008 (Section 13[k(i)-(ii)]) mandates the South African Qualifications Authority (SAQA) to: "Conduct or commission investigations on issues of importance to the development and implementation of the NQF, including periodic studies of the impact of the NQF on South African education, training and employment" and "publish findings of the investigations". SAQA conducts an NQF Impact Study every three years. The purpose of this questionnaire is to understand (1) how the Recognition of Prior Learning (RPL), Credit Accumulation and Transfer (CAT) and assessment policies of SAQA and Umalusi have impacted on the work of your institution, and (2) how your institution has experienced the NQF Level Descriptors. Please note that your responses will be strictly confidential and used for the purposes of research only. We ask kindly that you type straight into this document please.

#### Regarding national policies for RPL, CAT and Assessment

1) Are you aware of SAQA's policies for RPL, CAT, and Assessment?

YES	NO

2) If your answer to Question (1) above was "yes", please could you describe briefly, when and how you became aware of these policies?

3) Are you aware of Umalusi's policies for RPL, CAT, and Assessment?

YES	NO

4) If your answer to Question (3) above was "yes", please could you describe briefly, when and how you became aware of these policies?

5) Please could you elaborate for us, if and how the following are conducted and reported in your institution:

(a) RPL...

(b) CAT...

- 6) Please could you elaborate for us, if assessment at your institution changed after 2009 or 2010, and if so, how. Please feel free to expand on this important question...
- 7) Please could you elaborate on the main challenges that your institution has experienced in relation to RPL, CAT, and assessment?

**Regarding the NQF Level Descriptors**

- 8) Regarding the NQF Level Descriptors – please could you tell us:
  - (i) what they mean for your institution...
  - (j) how they are used in your institution...
  - (k) what impact they have had, on the work of your institution...
  - (l) what challenges your institution has experienced in relation to the NQF Level Descriptors...

**Other**

- 9) Please feel free to add additional comments on any matters relating to the NQF...

**OPTIONAL SECTION: PLEASE ADD CONTACT DETAILS (OPTIONAL)**

*These details are optional and are for the purposes of the research only, for follow-up where necessary, and will be treated with strict confidentiality.*

<b>Name of Institution</b>	
<b>Name of respondent</b>	
<b>Position of respondent</b>	
<b>Telephone/Cell phone number</b>	
<b>Email address</b>	

**THANK YOU VERY MUCH FOR COMPLETING THIS QUESTIONNAIRE !**

## APPENDIX 9:

### Stakeholder survey on the searchable databases of the National Learners' Records Database (NLRD), and the NLRD Trends Reports (SAQA data collection tool)



#### 2017 NQF IMPACT STUDY

#### STAKEHOLDER SURVEY: ON SAQA'S SEARCHABLE DATABASES AND TRENDS REPORTS

The National Qualifications Framework (NQF) Act of 2008 (Section 13[k(i)-(ii)]) mandates the South African Qualifications Authority (SAQA) to: "Conduct or commission investigations on issues of importance to the development and implementation of the NQF, including periodic studies of the impact of the NQF on South African education, training and employment" and "publish findings of the investigations".

SAQA conducts an NQF Impact Study every three years. This survey is part of the 2017 NQF Impact Study.

The purpose of this 10-question survey is for SAQA to understand the impact of its searchable databases and Trends Reports.

We ask kindly that you please complete the survey and submit it by **2 October 2017**.

Kindly note that all responses received will be kept **strictly confidential**; they are for research purposes only.

### SECTION A:

#### 1. Please indicate where your organisation gets information on:

a) Qualifications that are registered on the NQF	
b) Part-qualifications that are registered on the NQF	
c) Professional bodies that are listed on the NQF	
d) Professional designations that are listed on the NQF	
e) Providers that are accredited in South Africa	
f) Providers of RPL in South Africa	
g) Learner achievements in South Africa	
h) Verification of qualifications in South Africa	

#### 2. Do you know about SAQA's searchable databases?

Yes	No	

3. If you use SAQA's information/searchable databases, please tell us which databases you use?

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4. For what purpose, and how, do you use the databases?

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5. How useful are the databases?

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6. What would you say, are the benefits of the information provided by the National Learners' Records Database (NLRD) for your organisation?

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7. Have you seen any of the NLRD Trends Reports?

Yes	No

8. If yes, please tick the Trends Reports that you have seen.

Report 1: Trends in Public Higher Education 1992 - 2001	
Report 2: Trends in Public Higher Education 1995 - 2004	
Report 3: Work-Related Qualifications and Part Qualifications Registered on the NQF: Trends 2002 to 2011	
Report 4: Pathway Trends: Qualifications Awarded and Learners' Movement across the South African Education and Training System, 1995 to 2014	

9. How were the Trends Reports useful to your organisation?

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10. Would you say that the Trends Reports have had any kind of impact on your organisation?

Yes	No



11. Could you briefly describe the impact?

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**SECTION B: PLEASE ADD CONTACT DETAILS (OPTIONAL)**

*These details are optional and are for the purposes of the research only, for follow-up where necessary, and will be treated with strict confidentiality. Please note that it is optional to provide your contact details.*

<b>Name of organisation</b>	
<b>Name of respondent</b>	
<b>Position of respondent</b>	
<b>Telephone/Cell phone number</b>	
<b>Email address</b>	

**THANK YOU FOR YOUR KIND PARTICIPATION IN THIS SAQA SURVEY!**

## APPENDIX 10:

### Record of Learning Survey (SAQA data collection tool)



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#### 2017 NQF IMPACT STUDY

#### RECORD OF LEARNING SURVEY

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**YOU ARE INVITED TO GIVE US FEEDBACK TO HELP IMPROVE THIS SERVICE!**

1. How useful is SAQA's Record of Learning Service?

5 Very useful	4 Useful	3 Not sure	2 Slightly useful	1 Not useful

2. Has SAQA's Record of Learning Service impacted on your life and work?

5 Strong impact	4 Some impact	3 Not sure	2 Slight impact	1 No impact/ Bad impact

3. Add comment if you like

**THANK YOU FOR PARTICIPATING IN THIS SAQA SURVEY!**

## APPENDIX 11:

### Interview with staff from SAQA on the NQF Level Descriptors (SAQA data collection tool)



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#### 2017 NQF IMPACT STUDY

#### INTERVIEW: WITH STAFF FROM SAQA, ON THE NQF LEVEL DESCRIPTORS

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The National Qualifications Framework (NQF) Act of 2008 (Section 13[k(i)-(ii)]) mandates the South African Qualifications Authority (SAQA) to: "Conduct or commission investigations on issues of importance to the development and implementation of the NQF, including periodic studies of the impact of the NQF on South African education, training and employment" and "publish findings of the investigations".

SAQA conducts an NQF Impact Study every three years. This interview is part of the 2017 NQF Impact Study.

The purpose of this interview is for the 2017 NQF Impact Study researchers to understand how the NQF Level Descriptors are used in SAQA.

Kindly note that all responses received will be kept **strictly confidential**; they are for research purposes only.

- 1) Please could you tell me how long you have been working in the NQF context? And what have your role(s) been?
- 2) What would you say are the NQF Level Descriptors? What are they for you?
- 3) Can you tell us
  - (a) how you are supposed to use the NQF Level Descriptors?
  - (b) how you actually use them? and
  - (c) practical reasons for the differences, if any?
- 4) What would you say, are some of the main issues or problems with the NQF Level Descriptors? Do you think these issues should be addressed, and if so, how?
- 5) Do you know how the NQF Level Descriptors differed under the SAQA Act? Please tell us.
- 6) Do you know of anyone who used the Level Descriptors under the SAQA Act, who we could interview?

## APPENDIX 12:

### Survey for NQF stakeholders on the NQF Level Descriptors (SAQA data collection tool)



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#### 2017 NQF IMPACT STUDY

#### SURVEY FOR NQF STAKEHOLDERS

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The National Qualifications Framework (NQF) Act of 2008 (Section 13[k(i)-(ii)]) mandates the South African Qualifications Authority (SAQA) to: "Conduct or commission investigations on issues of importance to the development and implementation of the NQF, including periodic studies of the impact of the NQF on South African education, training and employment" and "publish findings of the investigations".

SAQA conducts an NQF Impact Study every three years.

This survey is part of SAQA's 2017 NQF Impact Study. The purpose of this **four-question survey** is for SAQA to understand how the NQF Level Descriptors have been experienced and used. We ask kindly that you please complete the survey and email it to **Ms Renay Pillay** ([rpillay@sqa.co.za](mailto:rpillay@sqa.co.za)) and **Dr Heidi Bolton** ([hbolton@sqa.co.za](mailto:hbolton@sqa.co.za)) by **13 October 2017**.

Kindly note that all responses will be kept **strictly confidential**; they are for research purposes only.

### **SECTION A: PLEASE TYPE INTO THIS SURVEY**

[1] Please could you tell us about how the NQF Level Descriptors have been used in the work of your organisation?

[2] How have the NQF Level Descriptors impacted on your work/the work of your organisation?

[3] On a scale of 1-4, please could you rate the overall usefulness of the NQF Level Descriptors, for the work of your organisation? Please motivate briefly for your rating.

4	3	2	1
<b>Very useful/essential</b>	<b>Useful</b>	<b>Of some limited use</b>	<b>Not of much use</b>

[4] Please elaborate on challenges experienced when using the NQF Level Descriptors.

[5] Do you think that the NQF Level Descriptors should be strengthened?

Yes	No

[6] If you think the NQF Level Descriptors need to be strengthened, please could you provide suggestions? Your ideas would really assist SAQA.

**SECTION B: PLEASE ADD CONTACT DETAILS (OPTIONAL)**

*These details are optional and are for the purposes of the research only, for follow-up where necessary, and will be treated with strict confidentiality. Please note that it is optional to provide your contact details.*

<b>Name of institution</b>	
<b>Name of respondent</b>	
<b>Position of respondent</b>	
<b>Telephone/Cell phone number</b>	
<b>Email address</b>	

**THANK YOU FOR YOUR KIND PARTICIPATION IN THIS SAQA SURVEY!**

## APPENDIX 13:

### Survey and interview questionnaire for QQSF Stakeholders on experiences and impact of the new QCTO model for occupational qualifications – DHET NQF Directorate and Skills Branch, and SAQA (QCTO data collection tool)

## DHET NQF Directorate and Skills Branch, and SAQA

Interviewees:

- DHET NQF Directorate and Skills Branch
- Key SAQA qualifications registration directorate

1) In your view, what significant differences exist between the unit-standard based qualification model and the QCTO-model? Structure your answer around the following discussion points:

- a. Qualification
- b. Programme and Curriculum Design
- c. The quality and efficiency of occupational training provision
- d. The quality and efficiency of process management and administration

2) Further to the previous discussion, could you also articulate your views on the following issues relating to the migration from the Unit-Standard model to the QCTO-model:

- a. Differences in credit allocation and course structures
- b. Articulation between qualifications (vertical and horizontal)
- c. Learner movement from a study-environment to a work-environment
- d. Programme duration: Learnership vs. QCTO Qualification
- e. Recognition of Work Integrated Learning (WIL)
- f. Adopting and implementing the concept of Notional Hours in the QCTO-model
- g. Expense and relative return on investment (ROI) relating to qualification development
- h. Logistical challenges in a multi-partner qualification delivery model

3. To conclude, from the perspective of the stakeholder-group you represent, what do you believe is the general consensus within your component of the facilitation of the QCTO-model on the following:

- a. The perceived impact on various stakeholder groups as a result of changes brought about by the implementation of the QCTO model.
- b. The perceived efficiency and effectiveness of all functions related to programme delivery – administrative, logistical, academic, quality, etc. – as experienced in the

operation of the QCTO-model.

- c. User-friendliness and simplicity of the QCTO-model
- d. The related Occupational Qualifications Sub-Framework's (OQSF) ability to facilitate inter-qualification articulation.

## **APPENDIX 14:**

### **Survey and interview questionnaire for QQSF stakeholders on experiences and impact of the new QCTO model for occupational qualifications – Development Quality Partners (DQPs) and Assessment Quality Partners (AQPs) (QCTO data collection tool)**

## **DQPs and AQPs**

Interviewees:

- Development Quality Partners (DQPs)
  - Assessment Quality Partners (AQPs)
  - Sector Education Training Authorities (SETAs) who have functioned in both the pre- and post-2010 models.
- 1) In your opinion, and from the perspective of the stakeholder-group you represent, what do you believe is the general consensus within your component of the facilitation of the QCTO-model on the following:
    - a. The perceived impact on various stakeholder groups as a result of changes brought about by the implementation of the QCTO model.
    - b. The perceived efficiency and effectiveness of all functions related to programme delivery – administrative, logistical, academic, quality, etc. – as experienced in the operation of the QCTO-model.
    - c. User-friendliness and simplicity of the QCTO-model
    - d. The related occupational qualifications Framework's (OQF) ability to facilitate inter-qualification articulation.
  - 2) [Optional / time-time permitting] From the perspective of the stakeholder you represent, could you provide a comparison of the two models (Pre-QCTO vs. Post-QCTO) while referring to the following:
    - a. Qualification development process
    - b. Programme and Curriculum Design
    - c. The quality and efficiency of occupational training provision
    - d. The quality and efficiency of process management and administration



## APPENDIX 15:

**Survey and interview questionnaire for QCSF stakeholders on experiences and impact of the new QCSO model for occupational qualifications – public and private providers in the Occupational Qualifications Sub-Framework (OCSF) context, and industry (QCSO data collection tool)**

### Public and Private Providers and Industry

Interviewees:

- Public and Private education institutions
- Industries providing workplace experience

- 1) From the perspective of the stakeholder you represent, could you provide a comparison of the two models (Pre-QCSO vs. Post-QCSO) while referring to the following:

*Please note: Depending on the nature and role of the interviewee, not all the questions below might be applicable. Interviewer discretion required.*

- a. Programme and Curriculum Design
- b. The quality and efficiency of occupational training provision
- c. The quality and efficiency of process management and administration
- d. Differences in credit allocation and course structures
- e. Articulation between qualifications (vertical and horizontal)
- f. Learner movement from a study-environment to a work-environment
- g. Programme duration: Learnership vs. QCSO Qualification
- h. Recognition of Work Integrated Learning (WIL)
- i. Adopting and implementing the concept of Notional Hours in the QCSO-model
- j. Expense and relative return on investment (ROI) relating to qualification development
- k. Logistical challenges in a multi-partner qualification delivery model

## **APPENDIX 16:**

### **Survey and interview questionnaire for QQSF stakeholders on experiences and impact of the new QCTO model for occupational qualifications – employers (QCTO data collection tool)**

## **Employers**

Interviewees:

- Employers

- 1) In your experience, as an employer placing learners in your company that has been trained through the QCTO-model, as opposed to the Unit-standard model, could you comment on the following:
  - a. Any impact that training of employees via the QCTO-model has had on your business and/or the larger industry you represent? You may want to structure your comment around the following points:
    - Integration of the employee into the workplace
    - Skills level and competence
    - Frequency of employee intake / period for completion of a qualification
    - Variety of available qualification to promote employee development in your sector
    - The perceived efficiency and effectiveness of all functions related to programme delivery – administrative, logistical, academic, quality, etc. – as experienced in the operation of the QCTO-model.

## APPENDIX 17:

### Survey and interview questionnaire for QQSF stakeholders on experiences and impact of the new QCTO model for occupational qualifications – learners (QCTO data collection tool)

## Learners

Interviewees:

- Learners

- 1) As a learner accessing training utilising the QCTO-model, it is foreseeable that you will not be able to compare the training you are currently receiving, or have recently completed, to that of training offered in the Unit-standard based model. Could you, however, rate your current experience of the following components of training delivery (where applicable to you) and provide a comment if possible?

Please Note, the rating scale is as follows:

(1)– Very Poor Experience

(2)– Poor, but with redeeming qualities

(3)– Indifferent / Undecided / Not applicable

(4)– Good, with definite areas for improvement

(5)– Excellent

- a. If you've completed your qualification and subsequently managed to find employment, how would you rate your ability to integrate into your new workplace?
- b. Rate your perceived experience of the quality of training you received in the following areas:
  - Tuition (courseware, mode of delivery, facilities, etc.)
  - Assessment (structure, relevance, etc.)
  - Programme content and relevance
  - Administration (enrolment, accessing assessment scores, etc.)
  - Dealing with multiple parties all contributing a component to your training
  - Variety of available qualifications to address your training need
  - Availability of training and / assessment providers

## **APPENDIX 18:**

### **Interview with Umalusi policy-makers on the development of Umalusi's RPL, CAT and assessment policies (Umalusi data collection tool)**

The National Qualifications Framework (NQF) Act of 2008 (Section 13[k(i)-(ii)]) mandates the South African Qualifications Authority (SAQA) to: "Conduct or commission investigations on issues of importance to the development and implementation of the NQF, including periodic studies of the impact of the NQF on South African education, training and employment" and "publish findings of the investigations".

SAQA conducts an NQF Impact Study every three years.

The purpose of this interview is for the 2017 NQF Impact Study researchers to understand Umalusi's developmental process and content in Umalusi's policies for RPL, CAT and Assessment.

We will capture this discussion and give you our notes, for your input.

- 1) Please could you tell us about Umalusi's policy development process, including its timelines?
- 2) Please could you say a bit more about how following were used/ shaped/ impacted on Umalusi's policies/ processes:
  - a) Articulation Policy for the Post-School Education and Training System in South Africa (DHET, 2017);
  - b) Recognition of Prior Learning (RPL) Coordination Policy (DHET, 2016);
  - c) Policy for the Implementation of RPL (SAQA, 2013 reprinted 2016);
  - d) Policy for Credit Accumulation and Transfer (CAT) (SAQA, 2014), and
  - e) Policy and Criteria for Designing and Implementing Assessment for NQF Qualifications and Part- Qualifications, and Professional Designations in South Africa (SAQA, 2014).
- 3) What were the key challenges that the policies on Assessment, RPL, and CAT sought to address, and to what extent do you think they were successful?
- 4) During the policy development and revision process, what (if any) obstacles or challenges did you encounter in formulating the policies?
- 5) In the development of Umalusi's policies, were there any contradictions to be addressed, and if so, please could you sketch these for us?
- 6) Is there anything else you would like to mention?

**THANK YOU !**

## **APPENDIX 19:**

### **Interview with Umalusi stakeholders on the development of Umalusi's RPL, CAT and assessment policies (Umalusi data collection tool)**

The National Qualifications Framework (NQF) Act of 2008 (Section 13[k(i)-(ii)]) mandates the South African Qualifications Authority (SAQA) to: "Conduct or commission investigations on issues of importance to the development and implementation of the NQF, including periodic studies of the impact of the NQF on South African education, training and employment" and "publish findings of the investigations".

SAQA conducts an NQF Impact Study every three years.

The purpose of this interview is for the 2017 NQF Impact Study researchers to understand Umalusi's developmental process and content in Umalusi's policies for RPL, CAT and Assessment.

We will capture this discussion and give you our notes, for your input.

- 1) Please could you tell us about your experience of the implementation of Umalusi's RPL, CAT and Assessment policies?
- 2) Please could you say a bit about how following are used or impact on your organisation's operations:
  - a) Articulation Policy for the Post-School Education and Training System in South Africa (DHET, 2017);
  - b) Recognition of Prior Learning (RPL) Coordination Policy (DHET, 2016);
  - c) Policy for the Implementation of RPL (SAQA, 2013 reprinted 2016);
  - d) Policy for Credit Accumulation and Transfer (CAT) (SAQA, 2014), and
  - e) Policy and Criteria for Designing and Implementing Assessment for NQF Qualifications and Part- Qualifications, and Professional Designations in South Africa (SAQA, 2014).
- 3) What were the key challenges that the policies on Assessment, RPL, and CAT seemed to address, and to what extent do you think they were successful?
- 4) During the policy implementation process, what (if any) obstacles or challenges did you encounter in implementing the policies?
- 5) In the implementation of Umalusi's policies, were there any contradictions that needed to be addressed, and if so, please could you sketch these for us?
- 6) Is there anything else you would like to mention?

**THANK YOU !**