An Interdependent
NATIONAL QUALIFICATIONS FRAMEWORK
System

Consultative Document

Pretoria
July 2003

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Department of Education • Department of Labour

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FOREWORD

It is with great pleasure that we are able to publish an initial joint response from the Departments of Education and Labour to the *Report of the Study Team on the Implementation of the National Qualifications Framework* (Pretoria, April 2002).

We appreciate that this work has taken far longer than expected and that a number of people and processes have been inconvenienced by the delay. So much is at stake and so many people will be affected by the outcome that considerable care had to be exercised in its preparation.

Given that some important proposals in this inter-departmental document are substantially different from those in the Study Team's report it is only fair to give interested parties an opportunity to comment on them before final decisions are made.
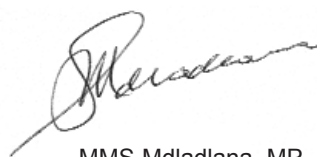
We commend the ideas in this consultative document to you for careful scrutiny. Our National Qualifications Framework must serve the needs of our citizens even better in future than in its first eventful years. To that end we will welcome your comments and suggestions on our departments' analysis and proposals. Written submissions should be sent by 31 October 2003 to the address indicated at the back of the report. Once comments have been digested and revisions made a policy document will be submitted to Cabinet in 2004 along with a new National Qualifications Framework Bill. The public will have ample opportunity to engage with the Bill during the ensuing Parliamentary process.

Meanwhile we request stakeholders to continue to work flexibly within the existing arrangements. There will be no sudden break with the past. After thorough consultation with all the interested parties transitional arrangements will ensure a smooth passage to the new NQF system once it is approved and legislated next year.

We compliment the board members, management and staff of the South African Qualifications Authority who have continued to work professionally throughout this review period. The unwavering dedication of all involved in the NQF process has afforded our departments the space they needed to understand the problems more thoroughly and together formulate an implementation strategy that builds on the strengths of the NQF experience and brings the achievement of the NQF objectives within closer reach.

Professor Kader Asmal, MP
Minister of Education

MMS Mdladlana, MP
Minister of Labour

CONTENTS

REFERENCES CITED IN THE REPORT 45

ANNEXURES

TABLE AND DIAGRAMS

1. INTRODUCTION

The National Qualifications Framework

The establishment and implementation of the NQF was a key accomplishment of the first democratic government, working closely with its social partners in organised labour and organised business, the community of education and training providers and stakeholders in the education and training system.

The Reconstruction and Development Programme envisaged the NQF as the vehicle for a new, non-discriminatory human resource development strategy that would contribute to national economic, social and cultural development. The underlying rationale of the NQF is that it would open up learning and career pathways for all South Africans, whatever their previous formal education, training or work experience.

The South African Qualifications Authority (SAQA) Act, 1995 established SAQA with a mandate to oversee the development and implementation of an integrated national framework of quality assured learning achievement that would

- Facilitate access, mobility and progression within education, training and employment
- Enhance the quality of education and training
- Accelerate redress of educational and job opportunities, and
- Advance personal, social and economic development.

The Minister of Education in consultation with the Minister of Labour administers the SAQA Act.

The present state of development of the NQF reflects the work of thousands of South Africans over many years, led by SAQA. The NQF concept and its objectives continue to command widespread support. Despite the difficulties of implementing changes of such magnitude the idea of an integrated framework of quality assured qualifications is a reference point for all new developments in our national learning system.

The work is far from being completed and in some respects it is barely past its teething stage. The development of an NQF is essentially an open-ended process, constantly evolving in response to social, cultural and economic needs and technological change.

Intense debate, considerable tension and some resistance have accompanied many aspects of NQF implementation. In response to widespread anxiety and dissatisfaction among public bodies and stakeholders and in the Departments of Education and Labour, the Ministers were advised early in 2001 that the time was ripe for an independent examination of NQF implementation.

The Study Team

In July 2001 the Ministers appointed a Study Team led by Dr Jairam Reddy to investigate how the implementation of the National Qualifications Framework could be streamlined and accelerated. The team comprised seven South Africans and three international specialists, supported by a research team of three. The Study Team completed its work in April 2002 and their report was published on 5 May 2002. [1] The report included an account of the progress made in developing and implementing the NQF, a summary of public submissions made to the Study Team on its terms of reference, an analysis of relevant international developments, a set of operational principles and detailed proposals for improving NQF implementation.

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[1] Department of Education/Department of Labour, *Report of the Study Team on the Implementation of the National Qualifications Framework* (Pretoria: April 2002).

The Ministers invited all interested parties to respond in writing to the report and by August 2002 a substantial volume of responses had been contributed.

In their respective submissions to the Study Team the Departments of Education and Labour provided very different perspectives on the NQF and its implementation. Labour's point of departure was the labour market while Education's was the system of education and training provision. The Study Team felt that it needed the active participation of the two departments in order to find the points of intersection between the two perspectives, and proposed to the Ministers that their two departments should provide leadership in this matter. Instead the Study Team was advised that its own report would provide the basis for a *rapprochement*. Accordingly the Study Team's report took note of the different points of departure of the two sponsoring departments. It reiterated the view, expressed by SAQA and many other bodies, that the DoE and DoL needed to construct a single national perspective in order to advance NQF implementation. The Study Team's own recommendations navigated around the two departments' positions rather than attempting to reconcile them.

The DoE/DoL task team

The Ministers directed that neither department should make a public comment on the report until both departments had agreed on a joint position in the light of the Study Team's report and the public response. An inter-departmental task team of senior officials was appointed to prepare a draft joint statement on behalf of the Departments of Education and Labour.

The task team began work in May 2002 and met frequently. It gave serious attention to the Study Team's report and the public's responses and took advice from the departments' principals along the way. The task team worked from the following starting points:

- The objectives of the NQF envisaged in the SAQA Act, 1995 command overwhelming public support and must be upheld.
- The Ministries of Education and Labour have joint responsibility for the NQF. Collaborative leadership of the NQF by the two departments is an essential condition for successful implementation.
- The tensions and difficulties that have emerged signal underlying problems with the early conceptualisation or subsequent implementation of the NQF and such areas must be targeted in the review process.
- Implementing structures and processes must enable every major learning constituency to advance their individual and collective interests while contributing to the transformational objectives of the NQF.
- Communities of trust are the foundation on which NQF implementation must be built. Existing and emerging communities of trust that advance the objectives of the NQF must be respected and supported. Resident expertise and experience must be conserved.
- Changes to NQF structures or processes must respond to genuine needs and build on existing strengths and new opportunities.
- The transition to new structures and processes must be managed in full consultation with affected parties and over a reasonable time period.

Translating these standpoints into agreed proposals proved difficult and time-consuming, which indicates the inherent complexity of the task.

The task team agreed that the Study Team had correctly identified where problems existed in NQF implementation. The Study Team's recommendations commanded respect but were regarded as suggestive rather than definitive. More work was needed to gain a fuller understanding of the underlying reasons for the differences that had emerged.

On the advice of its principals the task team recognised that its first obligation would be for the sponsoring departments of the NQF to reach a common understanding of how best to advance the NQF objectives while respecting the core interests of their constituencies and their own mutual interests. This approach would lay the basis for trust between them. This took time but it was time well spent. Having achieved a significant level of mutual understanding and trust, it was necessary to agree on proposals to change the NQF system that would attend to the most widely acknowledged problems and command the confidence of the major learning constituencies. In some measure this meant revisiting the earliest (1994-96) inter-departmental conversations on the NQF. However, the task team recognised that the legislative and institutional environment had radically changed in the past eight years and that many of the problems of implementation were inherent in that environment. Moreover, the NQF was a going concern, whatever its flaws. There was no clean slate.

The consultative document

The inter-departmental task team delivered their unanimous report in May 2003. Their analysis supports many of the Study Team's recommendations, but taken as a whole their report embodies a new perspective on the NQF and proposes significant changes in the structures responsible for its implementation. In the circumstances the Ministers of Education and Labour jointly decided that interested parties should have an opportunity to comment before new policy and legislative proposals are laid before Cabinet for approval. The ideas and proposals in this consultative document are commended to the public for careful scrutiny and debate.

2. THE INTERFACE BETWEEN LEARNING AND WORKING

Introduction

In 2001 the Ministers of Education and Labour published the government's Human R*esource Development [HRD] Strategy for South Africa*. [2] The organising principle underpinning the strategy is the concept of work, not understood in a narrow sense but meaning:

"the full range of activities that underpin human dignity by achieving self-sufficiency, freedom from hunger and poverty, self-expression and full citizenship."

The *HRD Strategy* addresses the vast challenges of ending poverty and promoting economic growth in the economy by seeking to deliver an improvement in several of the indices that contribute to South Africa's very low ranking on the UN Development Programme's Human Development Index. The *Strategy* document observes that the capabilities of people remain a limiting factor in the attainment of socio-economic development.

"At the heart of the proposed HRD strategy is the belief that enhancing the general and specific abilities of all citizens is a necessary response to our current situation. To realise their potential citizens need knowledge, skills and democratic values, and they also need opportunities in which to apply them."

Accordingly, the strategy depends on the effective co-ordination of these objectives:

- "A solid basic foundation, consisting of early childhood development, general education at school and adult education and training;
- "Securing a supply of skills, especially scarce skills, within the Further and Higher Education and Training bands of the National Qualifications Framework (NQF), which anticipate and respond to specific skill needs in society, through state and private sector participation in lifelong learning;
- "An articulated demand for skills, generated by the needs of the public and private sectors, including those required for social development opportunities, and the development of small business; and
- "A vibrant research and innovation sector which supports industrial and employment growth policies."

The strategy is designed to secure the necessary linkages among its component parts. It does not seek to intervene in respective departmental line function responsibilities except by linking them within the strategic HRD framework and providing an institutional basis for their mutual co-operation with other government departments, employers and workers. [3]

The Departments of Education and Labour have distinct responsibilities for the development and management of the government's policies toward education and training on the one hand and skills development on the other. Yet the *HRD Strategy* makes clear the close correspondence of these responsibilities and their mutual relationship to the dignity and life chances of South Africa's people. The strategy transcends the line function responsibilities of the two departments with a clear set of national priorities for which they are jointly responsible.

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[2] Department of Education/Department of Labour, *A Nation at Work for a Better Life for All: Human Resource Development Strategy for South Africa* (Pretoria, 2001).
[3] *HRD Strategy*, pp. 5, 11.

Moreover, the two departments are equally challenged by the exponential increase in knowledge and knowledge flows, communications capacity and advanced technology, the frequent changes in business and work organisation, the premium now placed on productivity, adaptability and international competitiveness in a global economy, and the progressive shift from primary production to value-added production, knowledge-based industries and services. South Africa's learners and workers have to be increasingly well equipped to engage effectively with such changes in their learning and working lives as well as in their personal, social and civic lives. This means enabling them to continually upgrade their knowledge and skills, develop the cognitive capacity to understand their world and the values to guide their conduct, and adapt constructively to rapid change.

"The demands of the future and the situation of South Africa as a developing country require that programmes, while necessarily diverse, should be educationally transformative. Thus they should be planned, coherent and integrated; they should be value-adding, building contextually on learners' existing frames of reference; they should be learner-based, experiential and outcomes-oriented; they should develop attitudes of critical enquiry and powers of analysis; and they should prepare [learners] for continued learning in a world of technological and cultural change." [4]

Such an approach to programme design (and qualifications) applies equally to all learning programmes, whether in the workplace or in learning institutions at whatever level, and it is fully consistent with the objectives and principles of the NQF.

A successful HRD strategy in the 21st century thus requires the delivery of both sophisticated occupational skills development and highly effective general, further and higher education across the full range of human capability. South Africans have the added responsibility of designing opportunities for fellow-citizens to redress the unjust denial of education and skill that remain a crippling legacy of decades of racial oppression.

Since 1994 South African efforts to transform education and skills development in the era of democracy have attempted to address these global and local challenges. The conceptualisation and development of the NQF, which is a key element in the transformation agendas of both the Departments of Education and Labour, has been undertaken in direct response to the phenomena of globalisation and democratisation. The next stage of NQF implementation must also achieve a balanced and effective response to both imperatives.

At the heart of the construction of the NQF has been the desire to take an integrated approach to education and training in formal learning institutions and in the workplace. This is embodied in the first objective of the NQF, "to create an integrated national framework for learning achievements". [5]

In South Africa, as elsewhere, the two worlds of discipline-based learning (mainly in institutions) and skills development (mainly in the workplace, including professional practice), have co-existed uneasily within the common qualifications framework. There is an implicit tension between the two perspectives. Educators recognise the importance of career preparation but stress that preparation for work must be embedded in programmes of much broader educational value for individual and social development. This is particularly important in the context of increased demands being placed on workers by rapid changes in the economy. Workplace learning practitioners elevate the importance of work for sustaining and enhancing life and society,

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[4] *National Commission on Higher Education Report: A Framework for Transformation* (Pretoria, 1996) quoted in SAQA, *Development of Level Descriptors for the National Qualifications Framework: Document for Public Comment* (Pretoria, December 2001), p. 12.
[5] SAQA Act, 1995 (Act No. 58 of 1995), section 2(a).

recognise the value of fundamental education, but argue that work-readiness and work competence are best acquired through learning that is embedded in real work experience.

Regrettably, the tension between these positions has seemed at times to polarise viewpoints and exasperate relations between the protagonists. But each perspective, schematically presented here, has merit. They are not in fact opposites but equally essential facets of the same national learning system. The National Qualifications Framework is a vital mechanism for holding the tension between them and bringing out the complementary and mutually reinforcing attributes of institutional and workplace learning. It is necessary to stand above simplistic dichotomies and attempt to understand more holistically the interface between the two worlds, especially since both are undergoing rapid change in the eras of globalisation and South African democracy. The further development of the NQF can be approached in such a manner that respects the different modes of learning and encourages collaboration and inter-dependence among the various structures, without compromising the unique value each learning perspective brings to the whole.

Institution- and workplace-based learning in the NQF

Strained relationships between the constituencies representing workplace-based and institution-based learning may have arisen in part because their respective roles in the NQF are not clearly enough defined and acknowledged. The first objective of the NQF is to link the full spectrum of qualifications in an integrated framework, but the regulations that establish the framework make no explicit distinction between the two modes of institution-based and workplace-based learning. [6]

The organising fields of the NQF deliberately blur the distinction by cutting across learning contexts. SAQA's policy documents apply to all learning contexts, thus emphasising the integrative purpose of the framework. They acknowledge the diversity of learning contexts, but start from the premise that the NQF's learner-centred outcomes-based paradigm is applicable to all. National standards (including qualifications) are described in terms of "knowledge about 'quality practice' or competence [including assessment criteria]". National standards are meant to make explicit the knowledge of good practice that is implicit in, for example, the shop floor lathe operator, the professional physician or the academic historian. [7] In deciding whether a qualification should be registered on the NQF, SAQA advises evaluators to ask:

- whether its effect will be transformative
- whether it will facilitate entry to a career path and lifelong learning as well as preparing learners for a particular job; and
- "the overarching question": whether the qualification will contribute to the learner's full personal development and to national social and economic development. [8]

Such questions, important as they are for the learning system as a whole, may have different degrees of relevance for different qualification types and learning contexts.

Even the band structure of the NQF resonates differently in the education community and workplace learning contexts. The nomenclature "General Education and Training," "Further Education and Training," and "Higher Education" reflects a combination of policy, statutory and constitutional provisions and international conventions that determine how formal education is organised at national and provincial levels, and there is a close functional relationship between the band structure and the hierarchy of educational

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[6] National Standards Bodies Regulations, 1998 (No. R452 of 28 March 1998).

[7] SBA Isaacs, *The National Qualifications Framework and the Standards Setting* (Pretoria: SAQA, July 2000), pp. 14-18.

[8] SAQA, *Criteria for the Generation and Evaluation of Qualifications and Standards within the National Qualifications Framework. Policy Document, Revision 3* (Pretoria, 5 December 2001), p. 4.

qualifications. Although nomenclature varies across countries the South African classification is consistent with much worldwide practice. Not surprisingly the NQF bands do not resonate so clearly in the nation's workplaces where learning is organised quite differently. The NQF bands serve little or no functional purpose in workplace learning, but the NQF levels are in principle highly functional for pegging standards and qualifications for the workplace and providing the framework for progression along learning pathways. Internationally, the organisation and classification of workplace learning has not mirrored that of the education system, and the situation in South Africa is no different.

The first phase of NQF development and implementation achieved a fundamental change across all institution-based as well as workplace-based learning by shifting the focus of learning from inputs to outcomes. Across the board nowadays the objectives of learning programmes are being specified in terms of learning outcomes. The intention underlying NQF design was that the outcomes based approach would embrace the differences between various forms of learning within a single qualifications framework. The definition of a qualification was expressed in terms that were meant to be precise enough to achieve coherence in the learning system but broad enough to permit maximum flexibility in the design of programmes depending on learning context:

"A qualification shall…represent a planned combination of learning outcomes which has a defined purpose and which is intended to provide qualifying learners with applied competence and a basis for further learning…." [9]

But because the distinct purposes of the constituencies responsible for institutional and workplace learning, including professional practice, were not sufficiently acknowledged, SAQA's regulations and policy documents do not make the differences explicit. [10] NSBs and SGBs developed qualifications and standards without the benefit of conceptual guidance on how the two forms of learning might find distinct expression within a single framework. Facing pressure to transform the system of education and training delivery on the one hand and to provide access to nationally registered workplace learning on the other, the different bodies involved in qualifications development tended to operate in isolation with only the principle of integration as a guideline.

SAQA's regulations and policies assume that the integrated framework will have one set of level descriptors and one set of qualification types. The prolonged delay in the development and approval of level descriptors has seriously handicapped qualifications design, and there is considerable debate about the draft descriptors published in December 2002. [11] But the blurring of the distinction between learning achieved in the occupational context and learning achieved through institutional programmes has proved to be equally serious. The debate about "whole qualifications" and "unit standards-based qualifications" stood as a proxy for these issues, because the only tools hitherto available to deal with them were the credit totals and rules of combination laid out in SAQA's regulations and policy documents.

The Study Team acknowledged the distinction between the two modes of learning and used it as the basis of its own pragmatic proposals for standards generation:

[9] NSB Regulations, 1998, reg. 8(1); SAQA, *The National Qualifications Framework: An Overview* (Pretoria, [n.d.]).
[10] Members of the academic community have reservations about the appropriateness of this definition for formative disciplinary knowledge and fundamental research. Members of the workplace learning community consider that the skills implied in "applied competence" derive value in relation to specific occupational contexts, which this definition omits (although NSB Regulation 1 defines the component of core learning in a qualification as "that compulsory learning required in situations contextually relevant to the particular qualification").
[11] SAQA, Draft *Level Descriptors*.

"In practice, a broad demarcation is emerging between academically and vocationally oriented qualifications, with the former mainly comprising whole qualifications and the latter being based on unit standards. This demarcation has the potential to enable the various sectors of education and training to develop usable qualifications in ways that suit their distinctive needs and purposes. It represents a pragmatic way forward that the Study Team supports." [12]

But a pragmatic solution may simply buy time without tackling the underlying problem that has created tension between the education and workplace communities. The unit standards/whole qualifications debate, which we return to below, masks a deeper structural fault line in SAQA's current architecture.

There are clear indications that the SAQA architecture is not holding. The intensity of the unit standards/whole qualifications debate is symptomatic of a deeper division. The mobility of learners through the articulation of qualifications and progression through the NQF levels has been considered separately within the band and sector structures respectively. With some notable exceptions little progress has been made in enabling learners to transfer their learning credits from one context to the other. The concepts of learning and career pathways, and the relationship between the two, have not been sufficiently clarified, which has led to much confusion and uncertainty. The education and workplace communities have taken independent actions on qualifications design:

- The Ministry of Education found it necessary to make its own qualifications design arrangements for the schools and FET colleges.
- The organised higher education community likewise created an alternative standards generation process, starting with the development of generic qualifications for the five most populous of its degrees.
- Some Sector Education and Training Authorities (SETAs) and professional bodies decided that their sectoral interests were best met by establishing SGBs in their own images. Some, supported by the Department of Labour, clustered together to map and design qualifications in ways that more adequately met their needs, especially for the development of learnerships and associated qualifications. [13] Some professional bodies and SETAs co-operated on standards design in order to enable learners to progress in their chosen career paths.
- Some sector-aligned SGBs, in attempting to facilitate career progression, designed qualifications at levels 5, 6 or above in terms of the NSB Regulations, 1998. To the extent that such actions did not involve the organised higher education community or take account of the Minister of Education's academic policy the Department of Education considers them to be inconsistent with the principle of a single, co-ordinated higher education system envisaged in the Higher Education Act, 1997.

Effectively the organised education community has abandoned the NSB structure, leaving NSB-aligned SGBs to the workplace learning community, predominantly SETAs and professional bodies, which are increasingly remodelling it to suit their purposes.

Whereas standards generation under the NSBs has been nominally integrated but increasingly separate in practice, by contrast the quality assurance structures have been separate from the outset but marked by extreme uncertainty over jurisdictional boundaries and rules of engagement. Two different organising principles emerged for quality assurance during 1997/98, when the Ministries of Education and Labour

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[12] *Report of the Study Team,* p. 81.
[13] "Learnerships combine structured learning and work experience and culminate in nationally recognised qualifications which signify job readiness." Department of Labour, *Skills Development Strategy for Economic and Employment Growth in South Africa: Green Paper* (Pretoria, March 1997).

formulated major policies and legislation. The Ministry of Education incorporated in Education policy and legislation the idea of "band ETQAs", or quality promotion and assurance bodies established by the Minister for different NQF bands of the education and training system. The Minister of Labour established 25 "economic sector ETQAs" in terms of the flagship Labour legislation that created Sector Education and Training Authorities (SETAs) to drive skills development in the workplace. [14]

SAQA's ETQA Regulations, 1998 took account of these developments by recognising three categories of ETQAs: for NQF bands (or "education and training sub-systems"), economic sectors and social sectors respectively. [15] Several professional bodies have been accredited by SAQA as economic sector ETQAs. They straddle the worlds of education and work, operate in terms of their own statutes (many of which pre-date the NQF) and are accountable to their respective Ministers.

One unfortunate result of this plethora of band, SETA and professional body ETQAs is that tension has developed (especially between the band and SETA ETQAs, but also among some SETA ETQAs) over the delimitation of their respective scope of responsibility. As a consequence SAQA and the ETQAs have directed much effort to manage the tensions and establish workable rules of engagement based on the negotiation of memoranda of understanding (MOUs). [16] Some have been successful, but since MOUs must be agreed on a case-by-case basis they tend to be unwieldy and time-consuming to construct and operate. A clearer quality assurance framework would remove the need for such cumbersome processes.

The next phase of NQF implementation must build on the strengths of the first phase (especially the universality of the framework and the focus on outcomes based learning) but fully accommodate the differences between the typical learning purposes associated with institutions and the workplace.

Defining typical learning modes

The world of learning embraces a wide spectrum of practices that serve different educational and career purposes. It is notoriously difficult to find a language to describe accurately the differences among them. The main learning modes are often expressed as contrasting pairs or dualities, but dualities about learning are quick to break down.

One duality contrasts general education, organised in subjects and disciplines, with preparation for a career. This distinction is important but not conclusive. Many general education programmes prepare learners for entry to the labour market with attributes employers welcome: developed cognitive, communication and learning skills and adaptability to changing circumstances. Many career specific programmes pride themselves on their strong disciplinary and cultural content.

A related duality contrasts institution-based learning with workplace-based learning. Internationally in recent years workplace learning has become highly interesting to policy-makers, researchers and education theorists, given the profound alterations that are occurring in the structure of national economies and in the organisation of work. [17] Traditional forms of workplace learning, such as trade apprenticeship and professional internship, are receiving substantial support while undergoing modernisation in the light of

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[14] Higher Education Act, 1997 (Act No. 101 of 1997); Department of Education, *Preparing for the Twenty-First Century through Education, Training and Work: A Programme for the Transformation of Further Education and Training. Education White Paper 4* (Pretoria, August 1998); Skills Development Act, 1998 (Act No. 97 of 1998).

[15] ETQA Regulations, 1998, reg. 2(3). No social sector ETQA has yet been accredited by SAQA.

[16] See for example CHE, Higher Education Quality Committee*, Quality Assurance in Higher Education: The Role and Approach of Professional Bodies and SETAs to Quality Assurance. A Report Commissioned by the Higher Education Quality Committee* (Pretoria, November 2000).

contemporary findings on the complex role of the workplace as a site of learning in modern conditions. Research supports the idea that knowledge, skills and expertise required for competent practice of occupations and professions is best acquired by active engagement with fellow workers in the work situation under expert guidance. Not only is workplace learning within enterprises under intense scrutiny in its own right, but efforts are being made in many countries to create co-operative programmes that link schools, vocational education institutions and universities to structured learning and advanced study in the workplace.

Imprecise though such contrasting dualities may be, they reflect underlying realities that tend to emerge organically if they are ignored. For convenience the terms "discipline-based" and "occupational context-based" will be used in this document to describe the different poles of learning that the NQF must acknowledge and embrace. [18] The terms are related to one another and are frequently co-dependent. In fact they might be likened to lenses at either end of the learning telescope.

Discipline-based learning typically occurs at institutional sites such as schools and universities. Communities of specialists are employed to induct new entrants into the learning areas, subjects or disciplines and (at the highest levels) advance the boundaries of knowledge. In most such programmes workplace experience is not required, either as an embedded element or acquired end-on to the formal learning programme or qualification.

Occupational context-based learning, by contrast, is typically associated with learning and achieving recognised competence or expertise at work or (less commonly) at an accredited simulated workplace. [19] Such learning may follow or depend on the achievement of a particular standard or qualification undertaken in an education and training institution. Workplace learners must attain competence under the tutelage of one or more qualified practitioners who induct the newcomer in the application of skills in specific occupational contexts and the solving of problems under real time pressures and constraints and in the face of real world complexities. Learners are assessed by competent practitioners against registered national, industry or professional competency standards or qualifications unique to the workplace.

These two modes stand at each end of the learning spectrum. But a third mode habitually emerges between them. It looks both ways, to the discipline-based and the practice-based forms of learning, but it is not reducible to either. It has been variously described as "career-focused" or "general vocational" but neither term is fully satisfactory.

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[17] For reviews see Sandra Kerka, "Constructivism, Workplace Learning, and Vocational Education," *ERIC Digest No. 181,* http://www.Ericfacility.net/; Tavistock Institute, *Workplace Learning, Culture and Performance* (London: Institute of Personnel and Development, 1998); David Ashton and Johnny Sung, *Supporting Workplace Learning for High Performance Working* (Geneva: International Labour Office/Centre for Labour Market Studies, University of Leicester, 2001); Clive Chappell , Geof Hawke and Kaye Schofield, *An Industry-led System: Issues for Policy, Practice and Practitioners.* Working Paper 02-11 (Sydney: University of Technology, Sydney Research Centre for Vocational Education and Training, 2002).

[18] This is similar to the distinction between the learning of "espoused", "formal" or "declarative" knowledge and the learning of "knowledge-in-use" or "practice-based learning and activities". See Stan Lester, "The Construction of Qualification Levels and Frameworks: Issues from three UK Projects," *Higher Education Quarterly, 55,* 4 (2001), pp. 396-415.

[19] This usage is consistent with the Australian definition of "competency standard": "an industry-determined specification of performance which sets out the skills, knowledge and attitudes required to operate effectively in employment." Australian National Training Agency (ANTA), http://www.anta.gov.au/gloAtoE.asp. Compare the definition of "skills" in the Department of Labour's 1997 *Green Paper:* "… the development of the necessary competences which can be expertly applied in a particular context for a defined purpose. Skills development should result in skilled performance such as is traditionally associated with the work of "skilled craft workers", "skilled managers" and "skilled professionals"."

"Career-focused" was most recently used in the Council on Higher Education's draft *New Academic Policy (NAP)* document to describe a track or pathway (distinguishable from the "General" pathway) with qualifications based on "vocational, career-based or professional definitions of learning, giving them a more applied, practical and market-oriented focus". [20] A number of qualifications offered by education and training institutions have professional competency standards embedded within the qualification by mutual agreement between the institutions and the relevant professional body. Others require a period of experiential learning in an approved workplace but this does not in itself confer professional recognition. The technikons' primary mission is closely associated with the latter kind of programme, but the *NAP* document points out that both universities and technikons offer career-focused qualifications. The forthcoming establishment of two National Institutes of Higher Education and the development of several comprehensive higher education institutions will underline the point that neither the General nor Career-focused learning pathway is exclusively identified with a particular type of institution.

The term "General Vocational" has been revived by the Further Education and Training community. It describes a wide range of programmes that offer learners a broad-based orientation to employment skills, some specialised skills training and sufficient academic education to prepare them for admission to higher education if they so choose. It often takes the form of the underpinning theory required for a skills application, but not the application competence itself. In fact General Vocational programmes are not designed to equip learners with occupational competence, since that requires supervised practice in the work situation and assessment by qualified practitioners against recognised occupational standards. At higher levels, General Vocational education might involve understanding, designing and developing application technologies and associated systems, services, products and procedures using available knowledge and experience. This third form of learning is the most difficult to describe uniquely. It has tended to be under-developed and under-recognised in South Africa, but it has a vital role to play in the development of the society and the economy.

This analysis produces a National Qualifications Framework with three inter-related but distinguishable learning modes or typical pathways: discipline-based, career-focused/general vocational and occupational context-based. [21]

Progression: bands, levels and pathways

Most of the first phase of development of the National Qualifications Framework was not supported by agreed level descriptors. Level descriptors are meant to aid learners' progression through the learning system, since they are designed to provide a recognised currency for learning achievements and thus enable standards and qualifications across all the "domains, disciplines, fields and learning pathways" to be pegged at levels that are appropriate and mutually consistent. [22] SAQA may have experienced difficulty in developing

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[20] Council on Higher Education, *A New Academic Policy for Programmes and Qualifications in Higher Education: Discussion Document* (Pretoria, December 2001). The university sector regards the two pathways approach to Higher Education qualifications as unfortunate especially if it is used to promote an artificial divide between "academic" and "vocational" qualifications. SAUVCA, *Report of the Study Team on the Implementation of the National Qualifications Framework (April 2002). Consolidated University Sector Response* (Pretoria: 15 August 2002), p. 6. After the inter-departmental task team had completed its work the Committee of Technikon Principals (CTP) submitted additional views on the draft *NAP* to the Department of Education. The CTP considers that "it is not useful to place degrees in discrete categories when the majority of degrees fall somewhere along the continuum of purely general, discipline-focused to narrowly career-focused". CTP, "New Academic Policy: CTP Proposals to Enable Implementation" (Pretoria: 11 June 2003). The Minister of Education has not yet pronounced policy on the draft *NAP*.

[21] The three connected elements of the innovation cycle provide an interesting parallel. They are described as basic strategic research, application/design/development and production/sales/marketing. Department of Science and Technology, *South Africa's Research and Development Strategy* (Pretoria, 2002), ch. 4.

[22] SAQA, Draft *Level Descriptors*, p. 17.

level descriptors in part because it was attempting to use a single conceptual vocabulary for all modes of learning and for all learners whether children or adult. Even the current draft level descriptors are considered by some to be too academic and by others to be too vocational. When they are approved, SAQA's level descriptors are intended only as a tool to guide the writing of context-specific learning outcomes, since they are meant to indicate "a broadly acceptable level of learning, skills and learner autonomy for a particular level of the NQF". [23]

This document does not attempt to improve on the present draft level descriptors, but notes the inherent difficulty of formulating descriptors for the entire learning spectrum that are sufficiently precise to apply with discrimination to actual learning achievements and sufficiently broad to encompass modes of learning with very different purposes. In particular, it would be exceptionally difficult to envisage level descriptors whose common vocabulary would fit both workplace-based qualifications and discipline-based qualifications. Instead of attempting to bridge the conceptual divide with level descriptor statements of broader and broader generality, it may well be necessary to consider fit for purpose level descriptors for each learning mode that are nevertheless sufficiently compatible with one another, level by level, that they assist the articulation of qualifications within and between pathways.

A view of the relationship between learning pathways across the three bands of the learning system is proposed as the conceptual scheme on which the new organisation of the NQF could be built.

The idea of a learning or career pathway may convey the notion of a linear progression through the education or job hierarchy respectively. Quite rightly, from the outset the design of the South African NQF has been based on a non-linear progression model that reflects the varied nature of individual learning and career choices, especially in the current era of rapid knowledge growth and occupational change. The concepts of articulation and mobility have been built in to the NQF progression model because learners and workers need to be able to exercise their options to move vertically, horizontally or diagonally between learning or career pathways as the case may be, with due credit for learning achieved. The idea of a pathway as embodying an organised sequence of connection or switching points is more appropriate to our circumstances. A recent Australian report expresses the concept in this way:

"The transitional journeys for many young people are diverse, dynamic and uncertain. For most, the essential ingredient for progress will be the knowledge and skills, and the associated qualifications that will allow them to move to the next stage of the transition process. Pathways, therefore, are *a series of learning platforms*. This is a definition that is better suited to the concept of lifelong learning." [24]

Moreover, a special obligation rests on the system of public provision of education and training to ensure that the generality of learners have access to learning that serves their personal growth and the goals of our democratic society. The learning pathways available in the system of public education and training must therefore always offer a broadly-based range of knowledge and vocational preparation. Public provision of education and training cannot attempt to substitute for the specific trade, occupational and professional training that is uniquely possible in the workplace. Nor can it attempt successfully to compete with the private or corporate providers that specialise in training for specific, rapidly changing technologies and niche markets. Rather, the national system of public provision has a duty to make available the highest quality of

[23] SAQA, Draft *Level Descriptors*, p. 52. See also draft *NAP*, p. 57.
[24] Victoria State Government, Department of Education, Employment and Training, *Ministerial Review of Post Compulsory Education and Training Pathways in Victoria* (Chair: Mr Peter Kirby) (Melbourne, 2000). Italics in original.

general education as possible to the largest number of citizens, and lay the basis of vocational and professional preparation that will be advanced and perfected by formal and informal learning and practice in the workplace. Public providers have a unique responsibility to educate for citizenship in a democratic South Africa, to prepare citizens as effectively as possible for life and work in their own communities and in an increasingly interdependent global society, and to enable them to acquire the essential tools required to navigate in a knowledge-rich economy.

Learning pathways cannot be sealed off from one another, as though a learner is fated to stay on one route once a choice has been made. The principle of flexibility must ensure that links are available for learners to move from one pathway to another, to be credited appropriately with learning achievements that are relevant to the new pathway and be afforded the opportunity to acquire additional learning that would enable the learner to make an efficient transition.

General education and training as the basis

The general education learning phase which must be provided to all learners as a fundamental right is the basis of all three pathways described above, giving learners the foundation they need to equip them for a range of further learning options and make reasonably informed choices about them. This is evident from the National Curriculum Statement (NCS) that has been designed for the compulsory school grades:

"The curriculum aims to develop the full potential of each learner as a citizen of a democratic South Africa. It seeks to create a lifelong learner who is confident and independent, literate, numerate and multi-skilled, compassionate, with a respect for the environment and the ability to participate in society as a critical and active citizen."

Learners will be prepared for the new General Education and Training Certificate (GETC) which will be awarded for the first time in 2008. [25] Appropriately, the GETC will be pegged at level 1 of the NQF.

The curriculum and learning outcomes of Adult Basic Education and Training (ABET) are described differently for each of the three ABET levels, since by definition the clientele are experienced adults, not children and adolescents undergoing their developmental phases in the 5-15 age group.

Making choices in further education and training

Young learners, graduating from the compulsory school phase at NQF level 1, have choices to make. One choice is to leave school and join the labour force, but the employment opportunities for 15-16 year old school leavers are negligible, although workplace-based Learnership opportunities are beginning to open up. A very high proportion of learners will progress into senior secondary schools, some into specialised technical schools and others (expected to be an increasing number) into FET colleges.

Stricter control of the age of enrolment at schools means that most learners in further education and training will be between 16 and 18 years old. Many may have a limited understanding of the implications of their choice of learning programme and may need to switch pathways when they are better informed. FET will also serve adult workers and unemployed citizens who are seeking to enter or progress in or change a career pathway, or equip themselves for admission to higher education, or both.

At the end of its report the NQF Study Team referred to:

[25] Department of Education, *Revised National Curriculum Statement Grades R-9 (Schools)* (Pretoria, 2002).

"the total insufficiency of provision for diversified skills development in the FET band…and also at the interface between further and higher education and training."

The Study Team regarded FET diversification as vital to the success of the government's HRD strategy and the broad objectives of the NQF. [26] The two departments agree, and take note of the range of actions undertaken by the Ministry of Education to fill the FET curriculum and qualifications policy gap and the Ministry of Labour's actions on Learnership development. [27]

A special obligation rests on the Ministry of Education to make further education "progressively available and accessible" as required by the Constitution. [28] Achieving a Further Education and Training Certificate (FETC) must equip learners for further learning either at work or in higher education. For this reason the proposed new FET qualifications framework is based on three pathways, General, General Vocational, and Trade, Occupational and Professional (TOP).

General pathway. The General pathway leading to the Further Education and Training Certificate (FETC) will be the basic programme in senior secondary schools but will also be available in FET colleges, both to learners transferring from schools as well as unemployed adults and workers. It will be structured into fundamental, core and elective components in accordance with the NSB Regulations, 1998. Learners will choose from a limited number of subjects in the learning fields of the school curriculum. [29] The qualification will be based on band exit level outcomes, but the design of the qualification and the development of subject statements take cognisance of existing unit standards. Portability of learning credits will be possible to permit articulation with other learning pathways.

Whereas the FETC (General) will be a band exit level outcomes-based qualification at level 4, all learners will receive transcripts or report cards of their learning achievements by subject at grade 10/level 2 and grade 11/level 3 respectively.

General Vocational pathway. This pathway will be relevant for 16-18 year olds who have yet to make a career choice, who wish to progress to higher education in a career-focused pathway or who have not been able to secure access to a workplace for trade, occupational and professional skills training. Unemployed adults may have similar reasons for taking this route.

The FETC in the General Vocational pathway will also be structured into fundamental, core and elective components, with a concentration on the vocational fields. The General Vocational pathway will be the basic curriculum of FET colleges at levels 2-4 and will also be available in specialised technical senior secondary schools. It has not yet been clarified how the FET schools programme will articulate with that of the colleges. The General Vocational FETC will not prepare learners for occupational competence but will offer them a broad-based orientation to employment skills and sufficient academic education to prepare them for admission to higher education if they so choose.

The design of the qualification and the development of subject statements are taking cognisance of existing

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[26] *Report of the Study Team*, p. 132.
[27] Department of Education, *Phasing in OBE into the FET Band: Implementation Strategies (2003-2006)* (Pretoria, 2003). The Learnership programme, which was announced in the Department of Labour's *Green Paper* in 1997 and provided for in the Skills Development Act, 1998, was launched jointly by the Minister of Labour and Minister of Education on 26 June 2001.
[28] The Constitution of the Republic of South Africa, 1996, section 29(1)(b).
[29] Department of Education, *Introducing Outcomes-based Education in Grades 10-12 (Schools)* (Pretoria, 2003).

unit standards. Portability of learning credits will be possible to permit articulation with other learning pathways.

The FETC (General Vocational) will also be a band exit level outcomes-based qualification at level 4, but all learners will receive transcripts or report cards of their learning achievements by subject at level 2 and level 3 respectively

Trade, Occupational and Professional (TOP) pathway. Learners in this pathway, both young people and adults, will make the most specific and least flexible choices. It will be open to those who have been able to secure access either to a workplace learning site or a simulated workplace learning site (an accredited college workshop for example) where they can learn and practise their skills and attain SETA determined competency standards or expertise recognised by a professional body.

Traditional trade skills and new skill sets based on new industry clusters or new forms of work and technology will be available. Programmes will therefore tend to be associated with an occupational title or industry cluster and training will provide a clear access route to employment or self-employment. The qualification in this pathway will focus on occupational competence and convey trade, occupational or professional recognition. It will be based on an approved combination of standards, and learners' trade, occupational or professional competence will be assessed by registered assessors. The fundamental, core and elective pattern may need to be modified to fit the specific workplace context and the needs of working learners. The approach to fundamental learning will be different in this pathway since it will focus on underpinning and supporting learning within a specific context rather than anticipating a wide array of contexts.

Specialised pathways in higher education and training

Stimulated by the draft *NAP* document, the Study Team report argued for a relaxation of the eight-level NQF structure to accommodate the need for more levels within the Higher Education band of the NQF. [30] The Study Team's proposal of a ten-level NQF has been widely approved and the Departments of Education and Labour agree with it. A ten-level NQF provides scope not only for the proper pegging of postgraduate qualifications in levels 8-10 but for due recognition to be given to the vitally important levels 5 and 6 which will house intermediate certificates and diplomas.

The choice of learning pathway beyond level 4 of the NQF will be between a General or Career-focused programme in a higher education institution (or possibly an approved FET college by arrangement with a technikon, in the case of level 5 and 6 certificates and diplomas) or entry to a TOP programme in the workplace. The latter will lead to occupational recognition as a skilled worker, para-professional or professional, depending on the level, or the achievement of a qualification unique to the workplace.

The *NAP* document discussed the first two pathways but not the third. The TOP pathway would accommodate competency standards for trades, occupations and professions and TOP qualifications unique to the workplace earned predominantly or wholly through structured practice in the work environment. Such qualifications are very familiar and have equivalents in all parts of the world. The TOP pathway opens the possibility of a progression or sequence of qualifications linking the trade, occupational or artisan level to the professional level. This would in principle permit workers to achieve a level 4 qualification and proceed beyond that current glass ceiling to level 5 and subsequent qualifications without leaving the workplace. For

[30] *Report of the Study Team*, p. 82.

workers in mid-career with family responsibilities as well as for their employers this would be highly advantageous. As the Manufacturing Working Group has commented:

"…the lack of a coherent set of qualifications beyond artisan level in the working context…has always been the source of argument, debate and frustration." [31]

Qualification types in a revised National Qualifications Framework

What emerges from the above analysis is a National Qualifications Framework that comprises a three by three grid, with the three NQF bands on the vertical axis and the General, General Vocational/Career focused and TOP pathways on the horizontal axis (Table 1).

Table 1. Proposed revised National Qualifications Framework

NQF band	General pathway	Articulation column	General vocational/Career -focused pathway	Articulation column	Trade, occupational and professional pathway
Higher education and training	Discipline-based qualifications	Articulation credits	Career-focused qualifications	Articulation credits	Occupational recognition or context-based qualifications unique to the workplace
Further education and training	Discipline-based qualifications	Articulation credits	General vocational qualifications	Articulation credit	
General education	General education qualifications (with ABET defined separately)				

To ensure that each pathway is not walled off from the next an articulation column is created between them to enable vertical, horizontal and diagonal articulation between qualifications. For the grid to be fleshed out a set of clearly understood qualification types is required within each pathway and level (and possibly modified level descriptors appropriate to each pathway).

Work towards this outcome has commenced with the CHE's draft *New Academic Policy (NAP)* document and the *Contextual Qualifications* document prepared by a cluster of manufacturing industry SETAs, each of which is discussed below.

The nested qualifications model

The CHE's *New Academic Policy (NAP)* discussion document is a highly-regarded and innovative contribution to the development of the NQF and qualifications design. Moreover it emanates from a major statutory body exercising its autonomous advisory responsibility in collaboration with SAQA. It has proposed a set of qualification types that are linked to levels of learning on the NQF.

At SAQA's invitation a joint working group drafted new NQF level descriptors as part of the *NAP* process. These were published more or less simultaneously by SAQA for public comment.

Taken together both documents help fill major gaps in the conceptual development of the NQF. They have been available for public comment since December 2001 and final approval for revised versions has been delayed pending the government's formal response to the Study Team's report. The *NAP* discussion
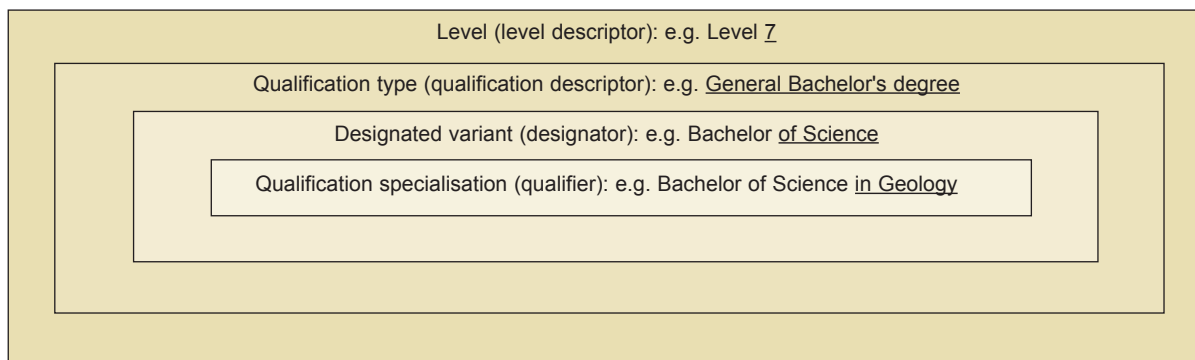
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[31] Christoph Vorwerk, *Contextual Qualifications Model: A new approach to designing NQF qualifications,* South African - German Development Co-operation Skills Development Research Series Book 1, Commissioned by German Technical Co-operation in partnership with CHIETA, FoodBev SETA and MERSETA (Pretoria: GTZ, 2002), p. 26.

document has been a particularly fruitful source of ideas and marks a major contribution by the higher education community to the development of the NQF as a whole.

As previously discussed, the *NAP* discussion document proposes a higher education qualifications framework based on two distinctive but articulated learning pathways, "General" and "Career-focused", linked by an "Articulation Column" as a vehicle for purpose-designed credits which would enable learners to move efficiently between pathways. Both the *NAP* and *Level Descriptors* documents incorporate a new "nested approach" to the specification of qualifications.

A grid of qualifications is proposed within each pathway, putting them into a logical sequential relationship. The nested approach is used to classify qualifications by level, type and sub-type.

Diagram 1. Nested qualifications model

Level (level descriptor): e.g. Level 7

Qualification type (qualification descriptor): e.g. General Bachelor's degree

Designated variant (designator): e.g. Bachelor of Science

Qualification specialisation (qualifier): e.g. Bachelor of Science in Geology

The first order classification is NQF level, for example level 7. The second is qualification type, such as "General Bachelor's Degree". ("General" indicates the pathway in which the qualification type is situated.) The next is the designated variant or designator, such as "Bachelor of Science". (Designators apply only to degree qualifications.) The last classification is the qualifier, such as "Bachelor of Science in Geology". Diagram 1, taken from the draft *NAP*, illustrates this qualification in the General pathway in higher education. [32]

Such a system makes the design of specialised and/or provider-specific qualifications relatively straightforward, whilst at the same time ensuring articulation possibilities between qualifications that are framed or nested within the same generic or umbrella qualification.

Career-focused qualifications in higher education (like General Vocational qualifications in FET) have some of the attributes of both the General pathway and the TOP pathway. The draft NAP states that the designators in the Career-focused pathway "signify the professional or vocational focus, e.g. *of Engineering, of Technology, of Education, of Social Work, of Nursing, of Agriculture,*" and the number of possible designators is open-ended to accommodate innovation and market trends. As in the General pathway, Career-focused qualifications may be further specified by means of a specialisation or qualifier. [33]

The nested approach to qualifications design has won wide acceptance in the higher education provider sector for which it was designed. It is in principle applicable, with appropriate modifications and additions, to General and General Vocational qualifications in Further Education and Training (FET). Moreover it is also applicable with modifications to TOP qualifications.

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[32] *Draft NAP,* pp. 45, 68-69.
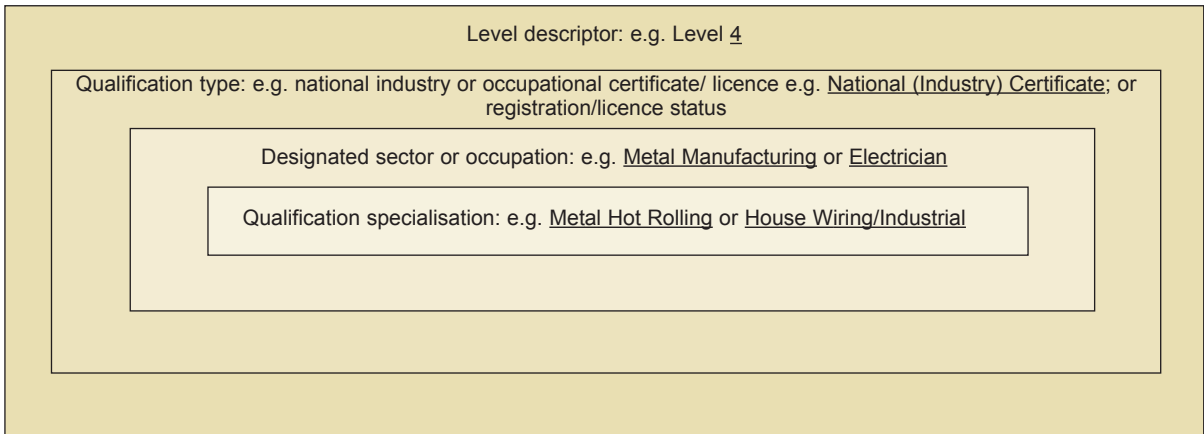[33] Draft *NAP*, pp. 68-69.

The Manufacturing Working Group addressed the design of generic qualification types appropriate to context-specific workplace learning at any level, and their methodology lends itself well to translation into the nested model of qualifications design. The Contextual Qualifications Model was developed collaboratively between three SETAs in the manufacturing sector (CHIETA, FoodBev SETA and MERSETA) on the initiative of the Department of Labour's Institute for the National Development of Learnerships, Employment Skills and Labour Assessments (INDLELA) and the Learnership/ETQA Forum, with the support of German Technical Co-operation (GTZ). The initiative was prompted by the absence of "a coherent, structured model for developing a qualification for multiple [workplace] contexts". The approach to a new generic qualifications model, which in principle is applicable to all industry sectors, is based on the insight that:

- Skills reflect the integration of information gathering, knowledge, values and physical and cognitive responses
- Skills are generic but have to be acquired and developed in a specific context; and
- Identifying and classifying the skills required yields a coherent and systematic approach to developing qualifications. [34]

For present purposes it is unnecessary to elaborate further on the working group's method and conclusions, except to give a condensed account of the design structure, which bears a striking resemblance to the *NAP*'s structure although arrived at by a different route. The working group's approach gives primary focus to the industry context within which learning takes place. The context tends to determine the range of systems with which a learner must learn to interface, such as the technology or service functions they must perform, the work organisation within which they must work and the business or social environment of customers and suppliers.

The qualification classification system proposed in this model follows a contextual or occupational logic as opposed to a discipline-based logic. Like the *NAP* model it too starts with NQF level, but then moves to context, sub-context and specialisation. An example is: *National Certificate in Manufacturing (Metal Hot Rolling)*. Alternatively it moves from NQF level to occupation and specialisation, for example, *Registered professional engineer (electrical)* or *Registered technologist (mechanical)*. Although the working group did not express their model in nested form, it is easily translated (see Diagram 2):

Diagram 2. Nested contextual qualifications model

Level descriptor: e.g. Level 4

Qualification type: e.g. national industry or occupational certificate/ licence e.g. National (Industry) Certificate; or registration/licence status

Designated sector or occupation: e.g. Metal Manufacturing or Electrician

Qualification specialisation: e.g. Metal Hot Rolling or House Wiring/Industrial

There are clear similarities and differences between the *NAP* nested model and the contextual nested model. Both use NQF levels as the primary marker, envisage a limited number of qualification types that are readily understood by those outside the system, and provide progression from entry level to specialisation.

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[34] Vorwerk, *Contextual Qualifications Model,* pp. 4, 9, 10.

However they differ according to the logic of the discipline on the one hand and the economic sector on the other, the former being based on discipline or knowledge categories while the latter is based on contextual workplace practice or occupational and professional categories.

The contextual nested model will aid in the development of a new range of qualification types appropriate to workplace and professional practice at all levels.

Unit standards/whole qualifications and credit accumulation and transfer (CAT)

Two years ago the Study Team encountered a serious divergence of view on qualifications design between the education community and the economic sector community. Since they were unable to resolve the problem they offered a pragmatic solution based on the observation that:

"a broad demarcation is emerging between academically and vocationally oriented qualifications, with the former mainly comprising whole qualifications and the latter being based on unit standards."

However the Study Team made clear its view that too much had been made of the distinction between the unit standards-based and whole qualifications patterns. They argued that the national priority for NQF implementation was to make access to programmes leading to qualifications available to learners as quickly and widely as possible both in discipline-based and workplace context-based learning. They saw "no future in endless debates about the respective merits of whole qualifications and unit standards". The Study Team considered that it might ultimately be unnecessary and undesirable to perpetuate the distinction between them since, in practice, all whole qualifications were made up of component parts whatever they were called. Provided that the guidelines for expressing standards were not unduly restrictive, the Study Team saw no reason in principle why all qualifications could not use a form of unit standards.

"This is an important matter for consideration because of the importance of allowing qualifications to be achieved by credit accumulation, especially for adult learners. Reducing unnecessary differences between whole qualifications and those based on unit standards will also aid articulation and thus benefit learners." [35]

These views are supported. Furthermore, both types of qualifications are in fact whole qualifications since a qualification "must represent a planned combination of learning outcomes which has a defined purpose or purposes…." [36] When the new NQF architecture is brought into being the distinction between the two should be erased. In addition to the benefit envisaged by the Study Team, the acknowledgement of a single basis for qualifications, namely whole qualifications made up of component parts, would remove another obstacle to the development of inter-sectoral communities of trust in qualifications design.

The draft *New Academic Policy* document notes that qualifications awarded by higher education institutions involve more than the completion of discrete units of learning and the accumulation of credit:

"…learning in higher education should be developmental, focused and integrative, the whole being more than the sum of its parts. Qualifications based on unit standards must therefore also be designed to produce this integrative and cumulative effect…." [37]

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[35] *Report of the Study Team,* p. 81.
[36] NSB Regulations, reg. 8(1).
[37] Draft *NAP*, pp. 41-42.

This view is supported. It is consistent with the intent of the NSB Regulations, and applies equally to qualifications in all pathways.

The debate over unit standards-based qualifications and whole qualifications should now be laid to rest. Attention should focus on the complex process of establishing a functional credit accumulation and transfer (CAT) scheme, without which the NQF objective of facilitating "access to, and mobility and progression within education, training and career paths" will be indefinitely delayed. [38] The draft *NAP* makes an important contribution to such a scheme. It is true that all learning is not portable, that unit standards and qualifications are not automatically transferable across career paths, and that moving between one learning context and another requires the adaptation of skills and the integration of new knowledge. It is also the case that qualifications designers and learning institutions will be challenged to avoid monolithic courses that create barriers to portability. Modular programmes, flexible learning sequences and appropriately varied learning contexts would enable learners to enter at multiple points and progress in ways that suit their learning needs, prior knowledge and experience. [39]

Interdependence

The proposed new NQF model has three pathways but these do not stand alone. In practice they may relate to one another in a variety of ways.

- *Partnered pairs of qualifications.* These are linked by a common purpose, but separately assessed. Occupational and professional training in many fields exemplifies this model. Learners first get a discipline-based qualification, irrespective of where it may be acquired, and then those who wish to achieve full occupational recognition proceed to structured practice in the work situation which is formally assessed by industry trade bodies or professional bodies.
- *Stand-alone discipline-based qualification with a component of workplace practice.* This is the traditional co-operative education model (which the technikons have exemplified), where the practice is integrated and does not lead to a stand-alone qualification but may or may not carry occupational recognition, depending on the field; and
- *Stand-alone occupational context-based qualification with a component of discipline-based study.* The new Learnership programmes illustrate this type of partnership. The theoretical component of the qualification is fully integrated with the occupational context-based programme.

In each case the design of the qualification needs the contributions of both disciplinary specialists and expert workplace practitioners. In the past it has been common practice for representatives of the appropriate professional body or trade association to sit with specialist lecturers from the provider community and design the required qualification. However, for learning programmes where no organised constituency of that kind exists, advisory bodies have been established by the technikon community or the Department of Education (for the "N" courses). These face a number of difficulties, in particular problems of representivity, continuity, infrequency of meetings and technological currency. A recent study suggests an alternative solution:

"Shifts in labour market demand trends need no longer be distilled directly from individual employers drawn from within a sector and sharing a common interest with the outputs of educational providers. SETAs are beginning to provide these inputs and are beginning to systematise broad sectoral trends on the basis of systematic planning, effective coordination and scrutiny and evaluation. Whilst these present major challenges [they also present] an opportunity to contribute to a new skills development and education and

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[38] SAQA Act, 1995, section 2.
[39] Based on Vorwerk, *Contextual Qualifications Model,* pp. 29-31

training revolution…. What [are] lacking in the final instance are mechanisms whereby these linkages can be systematised." [40]

For the first time in South Africa there is now a full set of industry-based education and training bodies, in the form of Sector Education and Training Authorities, which provide an organised voice in every sector. This opens up new possibilities for partnership with the provider community. The challenge is to create formal linkages between provider representatives and each SETA, just as there are formal linkages between higher education institutions and professional bodies. Successful SGBs have created such linkages, and their example needs to be generalised, especially on the basis of affinity between the respective learning programme interests of SETAs or preferably clusters of SETAs and corresponding FET and higher education providers.

The revised National Qualifications Framework needs to give organisational expression to this opportunity. This will require new sets of relationships between those associated with qualifications design on the provider side with those organised industry voices within the SETAs, working in partnership with the professional bodies. A common framework of sectoral/industry categories for the establishment of fit for purpose panels will go a long way to make this practical to implement. It will also relate well to the qualification classification systems in the General Vocational/Career-focused and TOP pathways. [41]

Conclusion

The discussion in this chapter has examined a fundamental issue underlying the design of the South African NQF. By recognising the different purposes served by different qualifications a major re-conceptualisation of the NQF based on three typical distinct but interdependent learning pathways is proposed. The design solutions suggested are necessarily provisional but they are intended to reinforce the principles underlying the NQF, especially integration and progression, while giving scope to distinct learning communities and the qualifications they require. This is not a proposal for multiple NQFs but a more complex and nuanced single national framework that gives space to the distinct but linked learning cultures that our society and economy require.

A similar evolution of thought is in progress in other NQF jurisdictions. The following statement captures well the responsibility that rests on all those who will be involved in the re-design of our National Qualifications Framework and its supporting structures along the lines proposed in this document:

"Clearly, if such a framework is to be genuinely inclusive it will be self-limiting to perpetuate presuppositions contained in previous, more restricted qualifications frameworks. Assumptions cannot be made that high-level work is necessarily 'academic,' or revolves around declarative or espoused knowledge. There is also no place in such a framework for reinforcing social perceptions of the value of certain types of occupational role, or assuming that because a person is not in a 'high-level' job they cannot think, learn or act at a high level; similarly assumptions based on full-time and sequential models of education and training, and on age-related progression, are out of place in an inclusive framework. Finally, particularly at its highest levels the framework needs to give as much weight to development and creativity as to research and critique:

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[40] Paul Lundall, "Challenges in the Formation of Technikon-Industry Linkages - A Case Study of the Western Cape," DPRU/FES Conference Paper 2002, Labour Markets and Poverty (Johannesburg, 22-24 October 2002), pp. 24-25, 33.

[41] Such system-level links, however necessary, will not substitute for the working relationships that individual providers must have with their local industries, businesses, NGOs and communities.

…the highest-level qualification can relate as much to leading-edge practice as to leading-edge research and theory." [42]

Such views would not have been out of place when the South African NQF was first conceptualised. With the benefit of experience, recognising as we must the distinct interests and the interdependence of discipline-based and occupational context-based learning, they reinforce the requirement for a more diverse but more genuinely collaborative qualifications structure.

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[42] Lester, "The Construction of Qualification Levels and Frameworks". See also QCA [Qualifications and Curriculum Authority, England], "The national qualifications framework," http://www.qca.org.uk/nq/; National Qualifications Authority of Ireland, *Report on the Workshop on the Inclusion of Professional Awards in the National Framework of Qualifications, Dublin, 11 February 2003,* http://www.nqai.ie.inclusion of profbulletin.htm.

3. NEW ARRANGEMENTS FOR QUALIFICATIONS, STANDARDS AND QUALITY ASSURANCE

Introduction

The reorganisation of the architecture of the NQF structures must now be examined in the light of the preceding discussion. In the course of NQF implementation the NSB/SGB process of standards generation envisaged in the NSB Regulations, 1998 has been substantially modified in order to accommodate the needs of the Ministry of Education, the higher education community and the industry sectors respectively. The divergences have been so great that the formal NSB/SGB model no longer provides a suitable organisational framework for the further development of the NQF. A new structure is required that will recognise such interests and their interdependence, as well as give full expression to the three-pathway qualifications model that best reflects the needs of our society and economy.

Based on the evidence presented to it the Study Team concluded that the National Standards Bodies were not sustainable in the long term and ought to be replaced. They proposed that:

"a smaller number of autonomous, permanent standards setting bodies be recognised…[to undertake] the quality management, accountability and leadership functions currently undertaken by the NSBs."

The Study Team proposed an avowedly pragmatic solution to the sectoral stresses being exerted on the NQF standards generating system. They considered that their solution, based on a sectoral division of responsibility, would bring simplicity and role clarity to a complex and confused terrain. Thus their proposals were designed "to reconcile the needs of the different learning communities and help bind each of them to the NQF in its own way". The Department of Education would have responsibility for all school, FET college and general ABET standards and qualifications up to level 4. Above level 4 the responsibility would be split between the CHE and the SETAs, using the perceived difference between unit standards-based qualifications and whole qualifications as the organising principle. The "overlapping nature of standards setting" meant that there would need to be close co-operation among all the responsible standards bodies. [43]

The Study Team's pragmatic proposal bypassed rather than resolved the tensions between the main constituencies concerned with discipline-based learning and occupational context-based learning. The distinction between unit standards-based qualifications and whole qualifications is an unsatisfactory basis on which to organise qualifications development. In fact the distinction is dysfunctional and should be abandoned. Moreover, there is now a more appealing and realistic alternative that derives its strength from the frank acknowledgement of the distinct but interdependent purposes of discipline-based learning and occupational context-based learning and the three-pathway NQF model to which this gives rise.

Creating new communities of trust: Qualifications and Quality Assurance Councils

The recommendation of the Study Team that NSBs should be disbanded in their current form is supported, but a simple organisational model is required that recognises the existing portfolio division of responsibility for discipline-based learning and occupational context-based learning and advances the proposed three-by-three National Qualifications Framework described in the previous chapter.

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[43] *Report of the Study Team,* pp. 96-100, 132. Whereas the Study Team followed SAQA's practice of using the term "standards setting" to cover the whole system by which standards and qualifications are generated and approved, this consultative document differentiates between the terms "standards generation" and "qualification design" on the one hand and "standards setting" on the other. The former is the function of preparing standards and qualifications. It is undertaken by the bodies established for such purpose. The *setting* of standards, however, refers to the statutory recognition of standards and qualifications.

The new structures would perform both standards generation and quality assurance functions, as recommended by the Study Team. [44] They should be called Qualifications and Quality Assurance Councils or QCs. As far as possible they would be based on existing structures and their relationship would be collaborative not competitive. Their organisation and governance are outlined here but discussed in more detail in the next chapter.

QCs would have a structural relationship with SAQA, help create and implement the NQF regulations, and submit all national standards and qualifications for registration by SAQA. The dis-establishment of NSBs and the establishment of QCs as permanent bodies with executive capacity would shift the operational centre of gravity from SAQA to the QCs. Provision could be made for a number of SAQA's specialist staff in Standards Development and Quality Assurance to transfer to an appropriate QC.

Each QC should have the following functions:

- Mapping qualifications within its sphere of competence (for the labour market actors this would specifically mean establishing career progressions, which may be linked to qualifications, which have meaning within a particular sector or cluster of sectors)
- Co-ordinating national qualifications design and standards generation by fit for purpose bodies within its sphere of competence
- Co-ordinating broad stakeholder consultation on draft qualifications
- Recommending national standards and qualifications to SAQA for registration on the NQF
- Co-ordinating quality assurance of qualifications and quality promotion within its sphere of competence (with appropriate organisational separation from standards generation)
- Collaborating with other QCs on all matters of mutual interest
- Promoting communities of trust in qualifications design, standards generation and quality assurance within its sector.

Three QCs should be established:
TOP QC (Trade, Occupational and Professional Qualifications and Quality Assurance Council) would be responsible for co-ordinating qualifications mapping and design, standards generation and quality assurance for competency standards and registration criteria in trade, occupation and professional practice and qualifications unique to the workplace with their own nomenclature distinct from qualifications within the ambit of the other QCs. Its main organisational base would be the SETAs and professional bodies, which would undertake standards generation and qualifications design in their respective fields. TOP QC would incorporate a reconfigured National Skills Authority (NSA) and would report through to the Minister of Labour.

GENFET QC (General and Further Education and Training Qualifications and Quality Assurance Council) would be responsible for co-ordinating qualifications mapping and design, standards generation and quality assurance up to level 4, except for qualifications under the ambit of TOP QC. Its main organisational base would be the General and Further Education and Training Quality Assurance Council (Umalusi). It would incorporate a reconfigured National Board for Further Education and Training (NBFET) and National Board for Adult Basic Education and Training (NABABET). GENFET QC would report through to the Minister of Education.

HI-ED QC (Higher Education and Training Qualifications and Quality Assurance Council) would be responsible for co-ordinating qualifications mapping, qualifications design, standards generation and quality assurance in Higher Education, except for qualifications under the ambit of TOP QC. Its main organisational base would be the Council on Higher Education (CHE) and its Higher Education Quality Committee (HEQC). HI-ED QC would report through to the Minister of Education.

[44] *Report of the Study Team,* pp. 71-72, 97-98.

Standards and qualifications generated by the GENFET and HI-ED QCs would, after approval, be set as policy by the Minister of Education.

Working relations between QCs

The QCs have clearly demarcated responsibilities and would work together on a collaborative basis according to clear rules of engagement. The process of standards generation would be governed by these rules which would be formulated by the three QCs and ratified by SAQA. SAQA would maintain its oversight responsibilities for the NQF and ensure that the QCs undertook their responsibilities in support of the NQF's objectives. The rules should be explicit enough to enable a QC to authorise the setting up of a Standards Generating Body (SGB) in the form of a fit for purpose panel once the need for a set of standards and qualifications has been identified by a sector. When more than one QC has an interest in a qualification a co-ordinating QC would be chosen according to the rules of engagement. The co-ordinating QC would establish an SGB once its membership and terms of reference have been determined by agreement between the interested QCs in terms of the rules of engagement. It is important to emphasise that well-functioning SGBs that command the confidence of their industry and provider communities should continue and serve as models for new SGBs. [45]

The spirit of these proposals is that it is highly desirable to create communities of trust both within learning sectors and across the two worlds of workplace learning and institutional learning. Once the rules of engagement are in place, the interest groups should have every encouragement to re-organise themselves and continue the work.

Managing standards generation within TOP QC and the band QCs for qualifications unique to the workplace and education sectors respectively is likely to be relatively straightforward. Managing the interface between learning assessed in the workplace and learning assessed in an institution is far more challenging, particularly in the case of qualifications with embedded competency standards. There is a real danger that if the band and sector/professional body formations drift apart both sides and the learners will be the poorer. The education community and the economic sector community, through their QCs, should work together to define a common set of occupational/professional boundaries within which qualifications development would proceed. This is essential to avoid ambiguity, overlaps or outright competition, which is the antithesis of what needs to be achieved. Once such occupational/professional boundaries had been constructed, the QCs could consider establishing mutually agreed fit for purpose panels (SGBs) to manage the development of a sequence of collaborative qualifications for each occupational/professional cluster. It would seem essential that only one mutually agreed SGB should be established for each cluster, though specialists would be required for each qualification level. [46] The QC whose ETQA awards the qualification should take the lead in terms of the rules of engagement for QCs. The rules should encourage collaboration of this nature, and

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[45] The 12 NSBs had collectively registered 136 SGBs at 18 November 2002. http://www.saqa.org.za/.

[46] The Social Work SGB provides an instructive example. See the recently published draft qualifications for the "FET Certificate: Social Auxiliary Work - Level 4; Bachelor of Social Work - Level 7; Research Master of Social Work - Level 8 and above; Structured Master of Social Work - Level 8 and above" at http://www.saqa.org.za/. In the consultative document's terminology, the proposed FET Certificate would be an occupational context-based qualification for which TOP QC would be responsible. The proposed BSW would be a qualification for which HI-ED QC would be the co-ordinating QC with a fit for purpose panel incorporating nominees of the professional body. HI-ED QC would be responsible for the proposed Master's degrees. However, the entire sequence of FET Certificate/BSW/Master's qualifications supports a single occupational/professional career path and in reality has been developed by a single SGB. This document argues that such dedicated SGBs should become the pattern for qualifications designed to advance occupational/professional career paths and should be established by collaboration between the education and sector communities. This proposal by no means excludes the necessity for distinct SGBs to be established by GENFET QC and HI-ED QC respectively to deal with qualifications that have no workplace component or for distinct SGBs to be established by TOP QC to design qualifications that have no institutional component where neither is part of an occupational/professional pathway sequence.

encouragement could also be expressed in SAQA's registration requirements for new standards and qualifications. Like-minded groups should be encouraged to find each other without requiring the prior approval of the QCs in order to avoid bureaucratic delay.

In summary, QCs would operate interdependently not in competition. They would construct bridges or interfaces among themselves in order to consult and agree on matters of common interest. Under SAQA's oversight such interfaces should enhance the coherence of the NQF, ensure articulation between qualification pathways, avoid wasteful duplication and overlap of standards and qualifications, and resolve disputes.

TOP QC and the occupational and professional bodies

The envisaged structure and scope of TOP QC is unusual but it is a crucial part of the reconfiguration of the interdependent NQF architecture. The promotion of access to and progression through well-articulated career paths is a fundamental objective of the NQF and it would be TOP QC's responsibility to drive that process in relation to occupational context-based qualifications and forge productive collaboration with the education community through GENFET QC and HI-ED QC.

The role of statutory occupational and professional bodies within this process is particularly important. This issue must be considered sensitively. Accordingly any uncertainty or ambiguity must be removed from these proposals. Occupational and professional bodies are autonomous within the law. It is an essential condition of their integrity, status, statutory responsibilities, accountability to their membership and international recognition that they should remain so. The proposals are made in full awareness of this situation and nothing in them is intended to derogate from that.

It is also the case that, like all institutions in South African society, occupational and professional bodies are expected to join their efforts to the democratic transformation of South Africa and advance human resource development within their respective spheres. Many professional bodies have made significant contributions in this direction. One such contribution is to associate themselves with the mission of the SETAs to advance skills development in every economic sector. This is a bold and welcome departure on the part of professional bodies whose traditions have placed them in close proximity to the higher education system from which they have drawn the bulk of their members. The involvement of professional bodies in occupational skills development supports the development of learning pathways linking trade and occupational qualifications to professional qualifications, thus advancing all the objectives of the NQF. In so doing it creates new communities of trust among the key players in workplace-based learning, especially with respect to the standards required for practise and recognition. It is likely that the interest and involvement of professional bodies in Further Education and Training would be enhanced by such links. The existing strong bonds between professional bodies and the higher education community would continue unimpaired.

The establishment of the TOP QC would not diminish or disturb the functions and responsibilities given to occupational and professional bodies in terms of their own statutes. Its role would be to manage the co-ordination of workplace-related NQF work across the economic sectors in accordance with agreed rules of engagement, in order to maintain collaborative relations among the SETAs and between SETAs and professional bodies. It would also promote the design of career and qualifications pathways across boundaries that were previously blocked. This body would permit due national recognition to be given to the standards and qualifications that are unique to the workplace and distinct from (though at times linked to) the standards and qualifications based on disciplinary learning.

In the chapter on leadership and governance important proposals are made for the incorporation of the functions of the National Skills Authority (NSA) into the TOP QC, and the streamlining of the SETAs by clustering them according to industrial or occupational groups.

Management of quality assurance

A national quality management framework

The Study Team made many recommendations on quality assurance and assessment with which the the departments are broadly in sympathy. [47] It is necessary to clarify the departments' view on several of these matters in the light of the proposed new structure and *modus operandi* of Qualifications and Quality Assurance Councils.

As the Council on Higher Education noted in its response to the Study Team's report, standards setting and quality assurance represent different moments of the same quality cycle. [48] A QA system for the NQF should meet essentially the same criteria that are suggested for the standards generating system and process:

- It should advance the objectives of the NQF
- It should operate in terms of national rules and guidelines approved by SAQA with the agreement of the Ministers of Education and Labour
- It should reflect the distinct but complementary and interdependent mandates of the Ministers of Education and Labour in the sphere of education and training
- It should be based on a collaborative approach by DoE and DoL, the education and labour market constituencies, and the new standards and quality assurance bodies
- It should recognise the distinct labour market and education and training system interests
- It should be mindful of the interests of other Ministers in respect of the training of trade, occupational or professional practitioners within their portfolio responsibilities
- It should incorporate successful NQF experience and important developments and innovations in NQF practice consistent with these criteria
- It should not incorporate elements that have lost or not achieved credibility, or elements that make the NQF structure more rigid or provoke tension rather than teamwork
- It should ensure that standards and qualifications meet real needs and will be supported by appropriate provision, with minimum duplication and redundancy
- It should ensure that quality assessment is undertaken by fit for purpose panels (in the case of discipline-based learning) or registered assessors (in the case of occupational context-based learning) that command the respect of peers and stakeholders
- It should be linked to the appropriate standards generating structure, with appropriate safeguards to ensure the integrity of both quality assessments and national standards
- It should quality assure only such learning that culminates in the acquisition of NQF registered qualifications or part qualifications for credit accumulation or credit transfer towards NQF qualifications
- It should enable all committed and knowledgeable participants in NQF processes to continue contributing to its development.

In the spirit of these criteria, it is essential that the new system of quality assurance embodies the hard-won gains made by the present ETQAs, but within a national framework that relies on and builds communities

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[47] *Report of the Study Team,* pp. 102-107.

[48] Council on Higher Education, *Response to the Report of the Study Team on the Implementation of the National Qualifications Framework* (Pretoria, 16 August 2002), p. 9.

of trust among the diverse components of the system. The precondition for trust is that the division of responsibility matches the core interests of the different learning communities, so that the parties can undertake their work and engage with one another in a respectful, non-competitive, rule-bound and thus predictable manner. The fundamental distinction to be observed is between the quality assurance of occupational context-based and discipline-based learning. Whether workplace-based or institution-based, every provider of NQF-registered education and training qualifications will be subject to the appropriate elements of the NQF quality assurance system.

An integrated partnership approach to quality assurance between providers and QA bodies would rely on four main processes:

- self-evaluation by institutional and workplace providers
- provider accreditation
- ongoing monitoring; and
- quality audit.

QA is part of a quality improvement process, as SAQA's policy emphasises, and providers must be made responsible for the quality of their own education and training programmes and be required to self-assess their effectiveness against explicit agreed criteria. Both the HEQC's and Umalusi's draft frameworks place emphasis on this approach, as do some SETA ETQAs. [49]

The QA of workplace-based and institution-based learning respectively entails different approaches and therefore different management. In order to ensure that all NQF registered qualifications are accorded parity of esteem the differences should be accounted for within a single, regulated quality management framework with rules for collaboration approved by SAQA and the Ministers of Education and Labour. The three QCs would be responsible for the management of the national QA system in terms of SAQA's ETQA regulations, suitably amended to reflect the new institutional framework and rules of engagement.

TOP QC, the oversight body for all occupation-based competency standards, qualifications unique to the workplace and related quality assurance, would operate across its multiple sectors primarily through its institutional base in the network of SETA and professional body ETQAs. Its role would be to manage a common quality system for its sphere of competence, and in particular to facilitate co-ordination and communities of trust between SETAs and professional bodies (and the providers with which they collaborate) while respecting their individual statutory responsibilities.

In managing the accreditation, monitoring and auditing of workplace learning sites, TOP QC would be mandated to nominate the appropriate ETQA through consultation and agreement. The detail and extent of QA processes should be determined by the nature of the learning, teaching and assessment required by the custodians of the standard, namely the SGB, in terms of the applied competence required. The nominated quality assurer would undertake its work through fit for purpose panels.

Programme assessment and moderation should be used to ensure that the responsible QC is involved in the quality assurance of programme components in its sphere of responsibility. As with qualifications design, the QCs must ensure the appropriate participation of relevant QCs in the management of quality through the

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[49] Council on Higher Education, Higher Education Quality Committee, *Programme Accreditation Framework: Draft Document for Comment* (Pretoria, June 2002) and *Institutional Audit Framework: Draft Document for Comment* (Pretoria, June 2002); Umalusi, *Framework for Institutional Accreditation: Draft Document for Discussion* (Pretoria: April 2003). For SETAs see for example http://www.inseta.org.za/ and http://www.poslecseta.org.za/.

formation of fit for purpose quality assurance panels. This should be a system requirement, not a matter for negotiation or memoranda of understanding. This is already happening in the case of the HEQC and the professional bodies. Expression for this principle should be found in the rules of engagement between the QCs that could be enshrined in the ETQA regulations.

ETQAs

Under the SAQA Act, 1995 and ETQA Regulations, 1998 SAQA may accredit "band" and "sector" ETQAs. The CHE/HEQC and Umalusi are accredited band ETQAs. [50] The 25 SETAs and a number of both statutory and non-statutory professional bodies have been accredited by SAQA as economic sector ETQAs. No social sector ETQA has yet been accredited. [51]

As the Study Team observed, the quality assurance of national qualifications is so important that the status of an ETQA should be reserved for statutory bodies. However, several significant professional bodies of long standing have national and international recognition but are not established by statute. They perform necessary quality assurance functions within their sectors and should continue to do so in terms of delegated authority, provided they meet the necessary criteria. An indefinite increase in the number of ETQAs would be undesirable but it is not possible to fix a limit in advance. As elsewhere in the NQF, the principles should be that ETQAs should be fit for purpose, and should not compete with one another.

In terms of the proposed new NQF architecture:
TOP QC will co-ordinate the statutory SETA ETQAs and professional bodies responsible for workplace learning in the form of competency standards and registration criteria for trades, occupations and professional practice, and qualifications unique to the workplace. TOP QC will foster working links to the institutional provider system through the other QCs.

GENFET QC will incorporate Umalusi, organised in chambers for General and General Vocational learning respectively. The chambers will work together wherever necessary, especially to co-ordinate the pegging of standards by NQF level. The GENFET QC will collaborate with HI-ED QC in respect of the articulation between further and higher education, and in particular the proposed provision of level 5 and 6 qualifications at colleges by arrangement with technikons, and with TOP QC in respect of the General Vocational pathway.

HI-ED QC will incorporate the Higher Education Quality Committee (HEQC) and will be responsible for quality assurance and management of all qualifications under its jurisdiction. It will collaborate with TOP QC and GENFET QC as outlined above.

Accreditation

"Accreditation" is an important part of quality assurance but under the SAQA Act, 1995 and the ETQA Regulations, 1998 the term has a very general definition and multiple applications. The term needs to be precisely defined and limited in application. "Accreditation" should not be applied to the recognition of ETQAs by SAQA but reserved for the accreditation of providers and their scope of work or programmes by the appropriate ETQA.

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[50] While the HEQC is accredited by SAQA, each band ETQA is "deemed" accredited by SAQA in terms of the HE Act, 1997 as amended and the GENFETQA Act, 1991.
[51] At December 2002 there were 33 accredited ETQAs (25 SETAs, 2 band ETQAs, 2 statutory professional councils and 4 non-statutory professional bodies). Three applications were pending and three letters of intent had been recorded. http://www.saqa.org.za/.

In view of the need for coherent practice across a very diverse learning system there would be great value in a set of "Quality Standards for Accredited Education and Training Providers in South Africa". The standards would set out the mandatory requirements that all providers would be required to meet in order to obtain and maintain accreditation. They would be approved by SAQA on the recommendation of all three QCs. Each QC might have additional requirements appropriate to its sector.

The term "accreditation" could then be precisely defined as:

"the formal approval and recognition of an education and training provider, by an ETQA, in accordance with the Quality Standards for Accredited Education and Training Providers in South Africa". [52]

At present the accreditation of a provider involves two elements: approval of its institutional viability and approval of each of its programmes, including every amendment to its programmes. The Study Team questioned whether individual programme accreditation was sustainable in view of the very large and increasing numbers of programmes, but it may be well be appropriate or even mandatory for some parts of the education and training system. The HEQC has recently released proposed frameworks for programme accreditation and institutional audits that have been well received by the higher education community. The framework takes full account of the professional bodies' statutory responsibility for quality assurance. [53]

The accreditation of an institution or a programme involves the assembly and scrutiny of a complex body of evidence by competent evaluators, including observations at learning sites and consultation with managers, teachers and learners. The process is time consuming and labour intensive. Once accreditation is granted it must be periodically monitored and reviewed. The number of ETQAs is limited and so is the capacity on which they must draw to undertake their essential scrutiny, monitoring and auditing role. Yet the number of programmes on offer, including programme amendments, is already vast and growing continuously in response to market forces and the expansion of knowledge and technology. ETQAs have been compelled to adopt a phased approach toward provider and programme accreditation.

Programme accreditation is desirable in principle, but the principle should be applied reasonably and flexibly. Professional bodies must undertake programme evaluation and accreditation as an essential part of their mandate to uphold professional standards in their fields and SETA ETQAs, being responsible for the quality assurance of occupational standards in their sectors, will have to do the same. Band ETQAs with a far wider mandate than professional bodies and SETAs may need to consider alternatives. The HEQC has advised that it regards programmes as the fundamental unit of analysis of institutional quality and it couples this principle with the possibility of institutional self-accreditation. [54] Nevertheless, the HEQC has stated that it would be fruitless to attempt to revisit immediately all current and new HE programmes of higher education institutions. Instead it has devised a framework which responds differently to new and existing programmes within a strong institutional accountability system. [55] The Study Team recommended a somewhat different solution for the problem of ETQA overload. Instead of trying to accredit each provider's individual programmes, it proposed that ETQAs should accredit a provider for a particular scope of work (in terms of fields of learning). Umalusi proposes to look at the "overall capacity of the institution to offer and manage the qualifications and programmes it has applied for" (which resembles the Study Team's proposal), and undertake closer scrutiny on a sample basis, and during site visits. [56]

[52] See *Report of the Study Team,* p. 105.
[53] CHE/HEQC, Draft *Programme Accreditation Framework*.
[54] CHE, *Response,* p. 10.
[55] CHE/HEQC, *Draft Programme Accreditation Framework.*
[56] Umalusi, Draft *Framework,* p. 20.

A selective programme accreditation system such as proposed by the CHE/HEQC, or approval of a provider's scope of work, or perhaps a combination of the two approaches, are matters that might be considered by the respective QCs in drawing up the Quality Standards for Accredited Educational and Training Providers.

In managing the accreditation, monitoring and auditing of workplace learning sites and providers offering only qualifications under its own aegis, TOP QC would be mandated to nominate the appropriate ETQA through consultation and agreement. The detail and extent of QA processes should be determined by the nature of the learning, teaching and assessment required by the custodians of the standard, namely the SGB, in terms of the applied competence required. The nominated quality assurer would undertake its work through fit for purpose panels.

The Study Team recommended that the school system should be exempt from provider accreditation processes, for the following reasons:

"Firstly, it would not be practicable to accredit 27 000 schools…. Secondly, the notion of accreditation does not accord with the state's constitutional and statutory duty to provide education for all and radically improve the quality of provision inherited from decades of discriminatory treatment. Thirdly, schools are subject to quality assurance processes in terms of a number of statutes, regulations, and policy instruments. Fourthly, the GENFETQA Act, 2001 in any case excludes the accreditation of public schools."

This reasoning is supported. Nevertheless, in spirit and intent the Quality Standards for Accredited Education and Training Providers in South Africa should be the benchmark, if necessary in modified form, for the schools of South Africa. GENFET QC should concentrate its attentions on working with the national and provincial departments of education to build and monitor appropriate and effective quality management and promotion systems for school education, and undertake external audits in order to assure the public of the extent to which national quality standards are being met. In fact Umalusi is proposing to adopt a similar approach. [57]

Registration of private institutions

Private educational institutions must register with the state in terms of the Constitution (section 29(3)) and the provisions of a number of Education Acts. Private institutions are required to maintain standards that are not inferior to those of comparable public education and training institutions and must undertake to observe the requirements of the appropriate ETQA. Private entities proposing to operate as schools, FET or HE institutions are required to register with the Department of Education in terms of the appropriate legislation. In terms of the QC protocol they would fall within the respective ambit of either GENFET QC or HI-ED QC. The quality assurance of a registered private education and training institution would be the responsibility of GENFET QC or HI-ED QC, depending on its scope of work.

Private entities not falling in this category would not be required to register as education and training institutions. The appropriate laws should be amended to put this beyond doubt. But they would still be subject to SAQA's quality assurance system. Providers (including not for profit organisations offering education and training) that offer only theoretical elements of TOP qualifications would be required to apply for accreditation by the relevant ETQA nominated by the TOP QC to quality assure specified standards and qualifications.

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[57] Umalusi, Draft *Framework,* pp. 16-19.

When the three QCs develop a national quality framework under the new dispensation they should consult with the Department of Education in order to ensure that accreditation requirements and registration requirements are closely compatible.

Assessment and certification, and RPL

SAQA requires that from 2004 only registered assessors will be permitted to undertake summative assessments for a registered national standard or qualification. As the Study Team remarked this requirement is unnecessarily sweeping. The registration of assessors should be confined to the assessment of learning achievement in the workplace, and in particular the assessment of competency standards and registration criteria for trades, occupations or professional practice in the workplace, including qualifications unique to the workplace. It is of the utmost importance to guarantee the quality of assessment in workplace training environments, where credible assessment for national standards and qualifications must be undertaken only by highly competent craftspersons or professionals, backed up by ETQA requirements for external assessment and moderation. This is in any case a requirement of many industries and professions, especially where health, safety, the appropriate use of expensive and complex technology, and the protection of the public are involved. ETD practitioners based at institutions who wish to assess in the workplace must be registered for this purpose.

If regulations are considered necessary to govern the certification of national standards and qualifications these would be the responsibility of the Ministers acting in agreement in terms of the SAQA Act, 1995 or its successor, after consultation with SAQA and the respective QCs. But the actual award of qualifications must be the business of the relevant ETQA. In appropriate cases the ETQA might (subject to stringent criteria) delegate this function to individual learning providers.

The Study Team considered assessment to be the pivotal element in the national quality system and made several recommendations with which the departments are generally in agreement in support of building capacity for the proper assessment of learning outcomes in institutions and workplaces.

The Study Team regarded the Recognition of Prior Learning (or the recognition of current competence) as a strategic goal of the NQF for which appropriate incentive and assessment procedures must be available. The departments agree with the Study Team's proposals. The place of RPL will be particularly important not only in the measurement of current competencies against standards but also in assisting learners to navigate the articulation column in order to progress in a learning pathway or across pathways. [58]

Short courses

For several reasons the extensive provision of short courses has proved to be a difficult matter for the NQF system, and SAQA has justifiably given the issue considerable attention. In 2000-01 SAQA compiled an electronic record of short courses from information voluntarily notified by providers, in order to understand the nature of short course provision and so far as possible bring it within the ambit of the NQF standards generation and quality assurance processes. A helpful discussion document on *Criteria and Guidelines for Short Courses and Skills Programmes* followed. [59] The following observations are not intended as a detailed response.

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[58] See SAQA, *Criteria and Guidelines for the Implementation of Recognition of Prior Learning: Discussion Document for Public Comment* (Pretoria, May 2002), http://www.saqa.org.za/.

[59] SAQA, *The Recording of Short Courses* (Pretoria, 2000), http://www.saqa.gorg.za; SAQA, *Criteria and Guidelines for Short Courses and Skills Programme: Discussion Document for Public Comment*. Pretoria, 6 November 2002, http://www.saqa.org.za/.

The issue of short course provision is unquestionably important. As the SAQA exercise has emphasised, this is a very extensive and exceptionally varied component of the national learning system. It makes a significant contribution to the enhancement of personal learning and the national skills base. Many sectors of the economy rely on short courses for the upgrading of employees' skills and professional development. There is therefore a direct link between short course provision and workplace skills plans. Countless citizens take short courses to enhance their own understanding or for cultural enrichment. At the same time, especially in an unmonitored area of provision, citizens may be being taken advantage of by unscrupulous and incompetent providers. SAQA's actions should result in an acceptable taxonomy of short course provision and should ensure that short course providers are assisted to engage appropriately with the NQF quality processes and enable providers to align themselves with the requirements of the Skills Development Act, 1998.

The debate will continue on this complex aspect of NQF implementation. It would be appropriate for SAQA to consider instruments that might be used to improve the protection of consumers against unscrupulous providers. Three matters warrant particular attention.

Firstly, short course provision is linked to the minimum requirement for a national qualification on the NQF since SAQA's current definition of a short course is a course that has a credit value of less than 120 credits (which is considered equivalent to a year of full-time study). By regulation, SAQA requires that a registered qualification should generally comprise 120 or more credits, of which 72 or more must be obtained at or above the level at which the qualification is registered. [60] The Study Team commented:

"[F]or many possible qualifications, especially those achieved in the workplace, the 120-credit requirement is an unnecessary constraint that could impede the design of a qualification that was "fit for purpose"."

The Study Team noted that SAQA's regulations permitted the registration of qualifications of less than 120 credits provided they complied with the general criteria specified in the regulations and with the objectives of the NQF. They suggested that this should be made more explicit and less discretionary, and that bodies responsible for qualifications design be made aware of it and encouraged to design qualifications based on the needs and purposes of learners and stakeholders. [61]

The draft *NAP* document proposed that SAQA consider registering certificates of 60 credits (equivalent to one semester of full-time study) in the articulation column. The document argued that this would speed up the articulation process for experienced learners, including adults, who could benefit from short, intensive periods of study; it would be consistent with international practice; and it would allow providers to offer short, focused programmes that met the in-service or upgrading needs of adult learners. [62]

The draft NAP document reminds us that:

"…progress on the NQF is not directly linked to time served in the education system or to the number of credits attained, but rather to the level or complexity of the learning outcomes attained, irrespective of how long it takes a learner to achieve these, *provided that a prescribed minimum number of credits (notional hours of learning) have been 'clocked up'*." [63]

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[60] NSB Regulations, 1998, reg. 8(3)(a).
[61] *Report of the Study Team,* p. 82.
[62] Draft *NAP*, pp. 53-54.
[63] Draft *NAP,* p. 42. Italics added.

The departments support the idea of a prescribed minimum. The status of the term qualification would be devalued if there were no threshold or a variable lower threshold than the current norm of 120 credits. A credit value in excess of 120 credits (which many qualifications require) does no harm to the status of a qualification, but a permissive approach to credit values lower than 120 would detract from the public awareness that a qualification required a serious commitment of time and sustained engagement in a complex learning task resulting in significantly enhanced learning achievement. Where appropriate, short courses should lead to the achievement of credits toward qualifications (or to complete articulation requirements) but should not by themselves merit the award of a qualification. This matter should be considered by the three QCs when they are established in order to advise SAQA and the Ministers.

Secondly, it is difficult to exaggerate the significance in modern economies of the phenomenon of vendor- and product-specific short courses, especially in the information technology and communications industry. These comprise a distinctive system of provision, a "parallel universe" of training, competency-based assessment and certification that has developed outside formal state provision and regulatory systems. [64] The branded qualifications of vendors such as Microsoft, Oracle and Novell are examples of this phenomenon. These qualifications are outside the NQF and are unlikely to be included in the short term.

A key issue for further discussion would thus be how all-encompassing should the NQF attempt to be? The NQF should not and could not be all-encompassing. Learning programmes that do not need to meet national standards are by definition outside of the NQF. That criterion covers a very wide range of cultural, recreational, religious and self-improvement courses, as well as fast-changing vendor-specific courses that are quality assured by the corporate proprietor or licensee.

Vendor- and product-specific short courses appear to represent an important avenue for access to employment, upskilling and job mobility. As a phenomenon it deserves closer study in its own right, both to gauge its impact on the South African economy and to assess its significance for South African education and training. TOP QC and HI-ED QC should take particular interest in these matters, in collaboration with the relevant SETAs.

Thirdly, short course learning may be a valuable route to the acquisition of credits toward qualifications registered on the NQF through the Recognition of Prior Learning (RPL). QCs will need to encourage their aligned ETQAs to fashion RPL protocols relevant to their sectors on the basis of SAQA's RPL policy. [65] They will also need to ensure that each short course that leads to a nationally recognised credit is linked to a qualification ladder within a learning pathway, with a credit value representing its contribution to the achievement of the qualification.

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[64] Clifford Adelman, "A Parallel Universe, Expanded: Certification in the Information Technology Guild," [Washington, DC, 2000]. http://www.aahe.org/change/parallel universe.htm.

[65] SAQA, Draft *Criteria and Guidelines for the Implementation of Recognition of Prior Learning,* http://www.saqa.org.za/.

4. GOVERNANCE, LEGISLATION AND FUNDING

Introduction

New systemic relationships between SAQA, the Ministries of Education and Labour, and the proposed Qualifications and Quality Assurance Councils entail important changes in governance structures that supersede some of the Study Team's proposals. Moreover, since the departments relate the implementation of the NQF to the national Human Resource Development Strategy (chapter 2), it is necessary to return to that discussion in order to explore its implications for the governance of the proposed new NQF system.

The Study Team analysed the current NQF legislative framework, which extends well beyond the SAQA Act, 1995 since it has been elaborated in statutes brought to Parliament by several Ministers in addition to the Ministers of Education and Labour. The Study Team concluded that:

"On the whole [the legislative framework] amounts to an impressive reinforcement for the objectives of the NQF, but some provisions in the laws are vague or ambiguous, some overlap, some are inconsistent with others, and some have been overtaken by events." [66]

The Study Team proposed that a review and revision of the NQF legislative framework should be undertaken on a fully consultative basis as soon as the government had determined its response to its report. The departments agree. Many of the proposals in this document would require new legislative provisions. A thorough legislative review is essential not only to identify current anomalies but to enable appropriate new measures to be introduced in a comprehensive, coherent NQF law.

The Study Team laid emphasis on the unsatisfactory basis of NQF funding, especially the reliance on external donor support by SAQA, and proposed a new funding model that addressed the full requirements of NQF implementation. This matter is considered in the light of the proposals for a new standards and QA architecture.

Strategic leadership: the NQF and the HRD strategy

Proposed National HRD Forum

The strategic leadership of NQF implementation is inseparable from the broader policy context in which it is situated. The Study Team noted that:

"The most important characteristic of the South African NQF is its political origins. Some may see the NQF as a more or less technical exercise to convert standards into a new outcomes-based format but it has always been more than that. The NQF is a transformatory project, closely identified with the objective of ridding South Africa of its apartheid legacy and opening the doors of learning to all. This accounts for much of the passion that is invested in NQF implementation and for the depth of the disappointment that so few signs of progress are yet apparent." [67]

The disappointment relates to progress toward the objectives of the NQF: especially the broader objectives of facilitating access, mobility and progression, enhancing quality, accelerating redress, and contributing to personal, social and economic development. The Study Team pointed out that the NQF could not be held

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[66] *Report of the Study Team,* p. 115.
[67] *Report of the Study Team,* p. 131.

uniquely responsible for the achievement of such broad goals, but as the Ministers of Education and Labour have said, its role is "pivotal" to the national HRD strategy. [68] Whereas there is widespread acknowledgement that the NQF objectives are far from being met, we have as yet no authoritative indicators or independently verified quantitative and qualitative measures of the success of the NQF's impact. Such indicators need to be established and trends measured.

The political responsibility for the achievement of the objectives of the HRD strategy and the NQF rests with the elected government and specifically the Ministers of Education and Labour, but the South African democracy has been shaped by a commitment to social partnership and dialogue in advance of decision-making on matters of national importance, and to social participation in the review of government policies and their implementation. Thus far neither the HRD strategy nor the NQF has a permanent vehicle for engaging in such dialogue on a high-level basis. The Ministries of Education and Labour will give further thought to the creation of a non-statutory political-level and stakeholder-representative National HRD Forum that would meet periodically, say annually. It would receive monitoring reports, consider signals relating to the progress of the national HRD strategy and NQF objectives emanating from the political leadership in national, provincial and local government and from the social partners in organised labour, business and the community at large, provide advice to the respective state departments and the QCs on priority issues that need attention, and advise the Ministers on future success indicators.

Inter-departmental NQF Strategic Team

The Study Team's proposal of an NQF Strategic Partnership comprising DoE, DoL and SAQA embodied the vital principle of inter-departmental collaboration in providing strategic leadership to NQF implementation. [69] However the departments could not agree to a tripartite structure with SAQA as the third party, since the constitutional and statutory responsibilities of the state departments (DoE and DoL) on the one hand and the statutory body (SAQA) on the other were not the same. There clearly had to be a much closer working relationship than in the past between the two departments and SAQA but the two departments together had to accept joint responsibility for providing strategic leadership. By implication, the departments should not have membership on the SAQA Board, though their nominees ought to be in attendance at meetings.

A permanent structure, the inter-departmental NQF Strategic Team, along the lines of the inter-departmental task team, should be established by the Ministers to perform the strategic leadership role and provide the bridge between SAQA and the two departments on NQF policy and strategy. Secretariat services would be provided by arrangement between the departments. The team would have the following functions:
- Be a permanent point of liaison between SAQA and the two departments
- Take forward advice from the proposed National HRD Forum (if it is established) and the NQF Forum proposed below
- Develop a broad national plan for the implementation of the NQF, to be updated annually in consultation with SAQA and formulated as an annual remit by the Ministers to SAQA
- Promote the alignment of NQF implementation with the government's HRD strategy
- Advise Ministers on SAQA's annual business plan and budget
- Consult regularly with the National Treasury on the funding of NQF implementation; and
- Provide the secretariat to the inter-departmental HRD Co-ordinating Committee.

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[68] *Report of the Study Team,* p. 65.
[69] *Report of the Study Team,* p. 113.

In the words of the Study Team, this arrangement:

"confirms the leadership of the strategic partners, consolidates the policy-making process, integrates the planning function, and thus eliminates the void that encouraged jurisdictional dispute and strategic drift. Above all, it enables the two Departments to exercise leadership in the NQF in collaboration with SAQA." [70]

NQF Forum

Within the proposed new NQF arrangement, it would be important for SAQA, the QCs and their respective qualifications and QA bodies, the DoE, DoL, other state departments, research councils and other stakeholders and interested bodies to have a common platform to review and discuss NQF development and implementation. The Study Team proposed an NQF Forum for this purpose. Their proposal is supported. The NQF Forum should be convened at least once a year by SAQA as a broad consultative not decision-making body. It would be a kind of "NQF parliament", in contrast to the proposed high-level, politically led National HRD Forum.

SAQA

The Study Team, taking account of the advice it had received, proposed that the SAQA Board should be substantially remodeled, to comprise no more than 15 people appointed by the Minister of Education in consultation with the Minister of Labour on the basis of nominations by stakeholders and the public. Members would be:

"knowledgeable persons, specialists and practitioners broadly representing the bands and functional areas of the NQF, with a blend of the skills required to govern the affairs of this major national public enterprise…. The Ministers would ensure that principles of competence, expertise, representivity, equity and redress were observed in the composition of the Authority, taken as a whole". [71]

The two departments would not have members on the board although their senior representatives would be in attendance at meetings.

The departments support this proposal, which was well received by the respondents to the Study Team's report.

In the light of the proposals for a new NQF architecture, it is apparent that the role of SAQA would change. The most important alteration would be that (once the NSBs had been disbanded and QCs established) SAQA would have much less direct responsibility for the generation of standards and qualifications. However, SAQA would continue to have overall executive responsibility for the development and implementation of the NQF, and in particular would have the following functions:

- *Execute the annual remit of the Ministers of Education and Labour.* The remit would be based on the annual plan for NQF implementation developed by SAQA in consultation with the QCs and in collaboration with the inter-departmental NQF Strategic Team.
- *Maintain the national framework for standards generation and quality assurance.* SAQA would co-ordinate and facilitate the work of the three QCs. The NSB Regulations, 1998 currently provide a common framework for standards generation by the SGBs. In the absence of NSBs, similar regulations or rules should be developed and administered by SAQA to ensure a common

[70] *Report of the Study Team,* p. 114.
[71] *Report of the Study Team,* pp. 114-115.

framework for qualifications mapping, qualifications design and standards generation by the QC system. This would involve working with the three QCs to formulate appropriate qualifications frameworks and nomenclature for the different pathways, as suggested in chapter 3. The current SAQA ETQA Regulations, 1998, suitably amended, should continue to provide a common quality assurance framework for all ETQAs.

- **_Maintain and develop the NQF level descriptors._** The level descriptors are essential to create a coherent, integrated national framework of learning achievement, and would be particularly necessary in the nested approach to qualifications design. As this document indicates in chapter 3 the QCs should seriously consider whether it might be appropriate to develop level descriptors for each of the three qualifications pathways that match their own respective purposes. If so, the three sets of level descriptors must be directly compatible since they would describe similar levels of learning complexity regardless of context, and thus ensure the integrity of the national framework and permit articulation and progression within it.

- **_Maintain and develop the register of national qualifications_**. It is important not only to maintain the register of national qualifications but continuously review the learning pathways they reflect and analyse the use of registered qualifications in the learning system.

- **_Maintain and develop the National Learners' Records Database (NLRD)_**. This unique database must be progressively maintained as a national source of HRD data and an invaluable repository of information for use by all participants in the national learning system.

- **_Evaluate foreign qualifications._** SAQA took over this function from the HSRC and must continue to perform it. Every country requires such a facility.

- **_Secretariat to the NQF Forum_**. SAQA would plan, organise, report on and follow up the advice of the NQF Forum.

- **_International liaison_**. SAQA would continue to be the focal point of liaison with its counterpart organisations in the SADC region and internationally.

- **Research.** SAQA should continue to develop its capacity to conduct policy-related research on issues of importance to the development and implementation of the NQF.

Qualifications and Quality Assurance Councils

Although the new QCs would as far as possible be built on the basis of existing structures, to a greater or lesser degree they would constitute a new suite of arms-length bodies with exceptionally important advisory and executive functions. For the most part the establishment of QCs would entail the replacement or reconfiguration of several existing bodies rather than the creation of additional structures. The new architecture would thus achieve one of the objectives of the Study Team exercise, namely curbing the proliferation of NQF structures. The 12 NSBs would be phased out as the three QCs were phased in. The new QCs would have to review each existing SGB in its area of competence and make decisions about its continuance (with or without a change of membership) or de-registration.

TOP QC

The organisation of TOP QC has been carefully considered. Its structure would necessarily be very different from the other two QCs because it would function as the overall co-ordinator for all workplace-based standards generation and quality assurance across the occupational and professional spectrum. All SETA and professional body ETQAs would become members of the TOP QC. All organised labour market actors need to be represented in its governance. TOP QC's structure therefore needs to be sufficiently clear and simple to bring coherence to its wide brief and sufficiently open to accommodate bodies with autonomous statutory recognition and lines of accountability to several Ministries.

A detailed draft proposal will be presented to the SETAs, professional bodies and organised labour market constituencies in the course of the departments' engagement with them on the new NQF architecture. The proposal will be based on the following considerations.

If the TOP QC is to oversee the registration of standards of professional competence and other TOP qualifications on the NQF, it will need to organise its work in ways that make sense to its membership. Given that the occupational context is the underlying rationale of this QC it follows that contextual communities will need to be established.

One possibility is the use of the Standard Industrial Classification (SIC) codes as a basis for constructing generic "context" communities under the umbrella TOP QC for standards generation.[72] Such clusters should be given the scope to agree on the appropriate level of sub-sector organisation required for the NQF. The current South African SIC classification (by major division or tabulation category) is as follows:

1. Agriculture, hunting, forestry and fishing
2. Mining and quarrying
3. Manufacturing
4. Electricity, gas and water supply
5. Construction
6. Wholesale and retail trade including hotels and restaurants
7. Transport, storage and communication
8. Financial intermediation, insurance, real estate and business services including all computer related activities
9. Private households, extra-territorial organisations, representatives of foreign governments and other activities not adequately defined.

Whether this classification or another is used, within each cluster associated professional bodies and SETAs would group for standards generation and quality assurance.

The membership of the TOP QC would be based on the SETAs and professional bodies, grouped in such clusters. The SETAs are accountable to the Minister of Labour in terms of the Skills Development Act, 1998. It is beyond dispute that statutory professional bodies would remain accountable for their functions to their respective Ministers in terms of their founding legislation. The TOP QC would have a direct relationship with the Minister of Labour with respect to its own clear responsibility for overseeing the development and quality assurance of occupational standards and qualifications. These principles must be reconciled in a form of governance that is appropriate to the size and complexity of the QC, respects the autonomy of the constituent parts, fosters coherent and collegial action, minimises bureaucratic delay and maximises initiative at the level of the fit for purpose panels that are the engine room of standards generation and quality assurance.

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[72] SIC codes are an internationally accepted set of codes for the standard classification, primarily for statistical purposes, of all economic kinds of activity relevant to the supply of goods and services performed by an establishment as part of the social division of work. Matsuo Kazuhiko, "Japanese Experience in the Revision of the Standard Industrial Classification System for Japan," p. 1, http://www.stat.go.jp/. The International SIC Codes (ISIC), which are currently under revision, are prescribed by the United Nations Department of International Economic and Social Affairs, but it is expected by the UN that member governments will adapt the codes to suit their own economic conditions. http://unstats.un.org/. Recent revisions of national or regional SICs have been undertaken by the United States, Canada and Mexico (the North American Industry Classification System (NAICS)), Singapore (SSIC) and Japan (JSIC), and revisions are under way in Australia and New Zealand, the European Union, and the United Kingdom. The South African SIC is managed by Statistics South Africa, http://www.statssa.gov.za.

The scope of the TOP QC's responsibilities would be determined in a new NQF Act, which would stipulate what classes of qualifications were eligible for registration on the NQF and the processes to be followed for registration. The TOP QC would be the custodian of workplace-based qualifications that met the NQF eligibility requirement. Its members, principally SETAs and professional bodies, would collaborate and take decisions as free agents on qualifications design and quality assurance in the same way that member governments agree to conventions in the ILO. Once agreed, corresponding obligations would ensue. This would not compromise the autonomy of the member bodies within their own spheres.

The TOP QC would be established by statute with its own secretariat. Given a reduction in SAQA's standards development functions, subject to labour law and the exercise of employees' rights, a number of current SAQA staff members with workplace-based experience would transfer to the TOP QC secretariat.

Thus far the governance of the TOP QC has been considered only in respect of the NQF. An additional matter of great importance needs to be taken into account: the relationship between the TOP QC and the National Skills Authority (NSA). The NSA was established under the Skills Development Act, 1998. Its main functions are to advise the Minister of Labour on a national skills development policy and strategy, report to the Minister on progress, liase with the SETAs on these matters and advise on the allocation of subsidies from the National Skills Fund. [73] Such functions are not identical to those of TOP QC but there is a strong correspondence and synergy between them, as well as considerable overlap among the constituencies involved in each structure. It seems unwise that two major statutory bodies, both concerned with core elements of the national HRD strategy, should exist side by side and report to the same Minister. On the model of the CHE, which will retain its policy advisory responsibilities in addition to standards generation and quality assurance in its sector, the NSA and the TOP QC should be combined in one body and legislation amended accordingly.

GENFET QC and HI-ED QC

The augmented functions of the CHE provide the model for both HI-ED and GENFET QCs. The proposals for GENFET QC and HI-ED QC would resolve the current anomalies in the statutory body environment and create symmetrical structures for Higher Education and General and Further Education and Training respectively. Each body would be responsible for policy advice, standards generation and quality assurance in its sector, with its own professional secretariat. GENFET QC should comprise a reconfigured Umalusi and take on the policy advisory functions of NBFET and NABABET, which could be brought to a close. It is necessary to emphasise that GEN-FET QC would be a new structure with a new status, new functions and a new alignment with the Ministry of Education and SAQA. HI-ED QC would be the CHE/HEQC, with the addition of a standards generation arm.

Each QC would have the following functions:
- Provide policy advice to the Minister of Education in its sector
- Co-ordinate the mapping and design of qualifications in its sector
- Co-ordinate quality assurance and quality promotion in its sector
- Undertake broad stakeholder consultation on these matters in its sector; and
- Collaborate with the other QCs on all matters of mutual interest in terms of the rules approved by SAQA and the Ministers.

As far as the CHE is concerned, this list fits well with its current responsibilities. It would be equipped to

[73] Skills Development Act, 1998, section 5.

undertake the functions of HI-ED QC merely by the addition of capacity to handle the qualifications design responsibility which is currently managed by SAUVCA and the CTP.

The establishment of GENFET QC on similar lines presents the opportunity to undertake a substantial realignment and introduce symmetry and parity of esteem to statutory bodies under the Minister of Education. The bodies to be affected by the proposed changes are the National Board for Further Education and Training (NBFET), the National Board for Adult Education and Training (NABABET) and the General and Further Education and Training Quality Assurance Council (Umalusi).

Unlike the CHE, which was established under the Higher Education Act, 1997, the NBFET did not feature in the Further Education and Training Act, 1998 but was brought into being by regulation in terms of the National Education Policy Act (NEPA), 1995. NABABET has likewise been established by regulation under NEPA, although its founding members have not yet been appointed. By establishing GENFET QC the Department of Education will ensure that the consultative and policy advisory role of these bodies is undertaken by the new statutory council.

Umalusi is the successor to the South African Certification Council (SAFCERT). It has been established as a band ETQA for both the general and further education bands of the NQF, with defined QA responsibilities for all institutions falling under the South African Schools Act, 1996, the FET Act, 1997 and the ABET Act, 2000, that is for institutions offering qualifications at levels 1-4 of the NQF. [74] The schools component is by far the largest. GENFET QC should be organised in two chambers, one for the General pathway and the other for the General Vocational pathway. Both chambers would have responsibility for standards generation and quality assurance, separately organised.

Funding NQF implementation

The Study Team delivered a detailed analysis and critique of the funding of NQF implementation and proposed a new funding model based on the following conclusions:

"The Study Team's view, based on the South African evidence and international precedent, is that Parliamentary appropriations should be the major source of SAQA's funding. The NQF is a flagship national programme. Its potential to catalyse significant qualitative changes in education and training is well recognized by the stakeholder and provider communities, and such changes are considered crucial for the success of the national HRD Strategy. The case for a major increase in state provision is very strong, on its own merits and because the case for the only plausible alternative, user charges, is very weak…. Donor support is no substitute for a main line obligation of government. In any case donor support will be much scaled down in the near future. It will continue to be highly valued but it should be applied strictly to developmental activities and capacity building, in line with SAQA's practice in using bilateral assistance." [75]

Funding the implementation of the NQF involves more than funding SAQA, however important that is. The departments support the Study Team's assessment that the implementation of the National Qualifications Framework is a very large undertaking and an evolving process. It is unlikely that all the objectives of the NQF will be achieved simultaneously. Of necessity therefore the implementation of the NQF involves a phase plan related to the broader transformation agenda in education and training and skills development, and state funding must be sought on that basis. The proposed inter-departmental NQF Strategic Team, advised by

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[74] General and Further Education and Training Quality Assurance Act, 2001 (Act No. 58 of 2001), section 2.
[75] *Report of the Study Team,* pp. 123-24.

SAQA, would have the prime responsibility to conduct a funding conversation with the National Treasury to establish a secure and predictable basis for the funding of NQF implementation in the medium and long term.

Currently, SAQA receives a state grant through the Department of Education budget. The core grant has been substantially increased but does not cover the total cost of NQF implementation by a large margin. In the future, it would be important for government to take a holistic view of NQF resource requirements based on the new NQF architecture. In the broadest outline it is clear that the main funding responsibility of SAQA and GENFET QC and HI-ED QC would fall to the Department of Education, but this would not all be "new money". The total requirement, though considerable, would be substantially offset by the current provision in the DoE budget for SAQA, CHE, Umalusi, and NBFET and in principle NABABET. Income from self-generated revenue, though modest, and targeted donor support for developmental projects would also be taken into account.

The considerable funding requirements of TOP QC and its sub-structures would fall to the Department of Labour. DoL would have to carefully examine the potential for funding from skills development levy income, raised in terms of the Skills Development Levy Act, 1999. SETAs are already responsible for their ETQA costs and a proportion of levy payments may need to be regularly allocated by them to standards generation, as was done in 2000. [76] If the National Skills Authority (NSA) and the TOP QC become one body, an overall review of funding requirements would be essential.

A separate discussion on resourcing should take place between the Departments of Education and Labour, the National Treasury and SAQA during the forthcoming consultative process.

Transitional arrangements

Once a new NQF architecture is approved, a comprehensive series of meetings should be held between the departments, SAQA and the bodies that would constitute the proposed QCs to discuss transitional arrangements. The departments will examine the possibility of implementing some key policy decisions within the ambit of the current laws in order to accelerate the transition to new NQF structures and modes of operation while the new NQF Bill is proceeding through its consultative and parliamentary stages.

A fully professional transitional operation will need to be planned and executed over a reasonable time period in order to ensure minimum disruption. In the mean time the work of the NQF must continue.

The protracted inter-departmental task team process, though necessary in the circumstances, caused unavoidable strain in relations with SAQA and other key constituencies, largely because it was undertaken on a bilateral basis between the departments without broader consultation. From now on all processes connected with the transition must be publicly known and transacted with full transparency. The departments invite the goodwill and collaboration of SAQA and all other concerned structures in this process.

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[76] [Ministry of Labour] Skills Development Act, 1998, *Regulations for the Period 1 April 2000 to 31 March 2001 regarding the Funding and Related Issues* (No. R 103 of 7 February 2000), reg. 2(1)(b).

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Statistics South Africa, http://statssa.gov.za

United Nations Statistics Division, http://unstats.un.org

ANNEXURE 1

SYNOPTIC COMPARISON OF THE CONSULTATIVE DOCUMENT WITH THE RECOMMENDATIONS OF THE REPORT OF THE NQF STUDY TEAM

Introduction

The Study Team made 79 recommendations on 36 issues ranging from qualifications design and quality assurance to legislative amendments. The public response to the Study Team's report provided excellent feedback on both their analysis of problems and proposed solutions. The DoE/DoL task team examined the Study Team's report systematically but did not confine its own analysis of NQF implementation and proposals for the way forward to the recommendations of the Study Team. The structure of this consultative document is therefore different from that of the Study Team's report. In fact it is a new document in its own right and should be read as such.

Nevertheless this synoptic comparison has been prepared to enable readers to make comparisons between the Study Team's report and the consultative document's proposals. The Study Team's recommendations, which appear in *italics*, have been clustered according to the sequence of the consultative document. The consultative document's views and proposals are in **bold**. The word **"Agreed"** is used where the consultative document agrees with the Study Team without further elaboration. **"Not agreed"** indicates disapproval. Where the consultative document's agreement or disagreement is qualified the qualification is stated in **bold**. A brief summary of additional comment and recommendations is provided separately in **bold** under each heading. The term **"No comment"** indicates that the consultative document is silent on the issue.

A note of caution is required. The Study Team and the task team each worked for many months on complex issues and the analysis they undertook is as important as the proposals themselves. This synoptic document is necessarily fragmented. It does not substitute for either the Study Team report or this consultative document and should be read together with both of them.

Standards and qualifications

1.   *The NQF should:*

   ●   *be based on 10 levels, reflecting the qualification requirements of the respective bands and taking account of international comparability; and*

   ●   *avoid additional sub-levels, in the interests of simplicity.*

   Agreed

2.   *Qualifications design should:*

   ●   *be fit for purpose;*

   Agreed

   ●   explicitly permit qualifications of less than 120 credits when need is demonstrated;

Not agreed.

A minimum threshold is necessary. Programmes carrying less than 120 credits can count towards qualifications.

- *treat the regulations on Fundamental Learning as guidance, so as to allow standards setting bodies to take account of the needs of learners.*

Agreed, for Trade, Occupational and Professional qualifications and competency standards only. For other qualifications the Fundamental Learning regulations are mandatory.

3. *Qualifications policy should recognise that:*

- *qualifications based on unit standards and "whole qualifications" are equally valid expressions of outcomes-based education; and*

- *it may be unnecessary in the longer term to perpetuate the division between these two types of qualification, provided that the concept of unit standards is interpreted flexibly.*

These are not two types of qualifications. There should be a single basis for qualifications. All qualifications must be designed holistically to achieve a planned combination of learning outcomes even if they may be acquired in discrete elements. The debate over unit standards-based qualifications and whole qualifications should now be laid to rest. Attention should now focus on credit accumulation and transfer (CAT) schemes.

4. *Unit standards should:*

- *be devised so as to be easily convertible into corresponding units of learning;*

- *avoid over-specification of written statements alone;*

- *include the exemplification of standards through learners' work;*

No comment.

- *reflect a relationship of trust between those devising them and those who will use them; and*

Agreed.

But applicable to all qualifications.

- *be interpreted flexibly in different contexts, as implied in SAQA guidelines.*

No comment.

5.   *The National Standards Bodies should be*

   ●   *disestablished in a properly phased manner, with care being taken to retain in the NQF system the experience and expertise of NSB members.*

   Agreed.

6.   *New standards setting bodies should:*

   ●   *become responsible for the technical quality, consultation, accountability and*

   ●   *undertake leadership functions currently undertaken by the National Standards Bodies.*

   Agreed.

7.   *The SETAs, Council on Higher Education, Department of Education and Department of Labour should be*

   ●   *formally recognised as standards setting bodies for their defined areas of interest; and*

   ●   *charged with making transitional arrangements for the currently recognised SGBs (which would lose that status), for the work being undertaken under their auspices, and for the retention of SGB members' expertise within the system.*

8.   *The SETAs be recognised as the standards setting bodies for their defined economic sectors for NQF levels 1 to 4 and for unit standards-based qualifications and unit standards in their defined economic sectors for NQF levels 5 and 6.*

9.   *The CHE should be recognised as the standards setting body for NQF levels 7 and 8 and for whole qualifications for NQF levels 5 and 6.*

10.   *The Department of Education should be recognised as the standards setting body for schooling (grades R-12), technical colleges and ABET non-vocational standards and qualifications.*

11.   *The Department of Labour should be recognised as the standards setting body for generic vocational standards.*

12.   *The Department of Education and Department of Labour should be jointly responsible for the development of Critical Outcomes standards.*

   (7-12) Not agreed.

   Consultative document proposes a different standards generation model:

   ●   **Use terms "standards generation" and "qualifications design" instead of "standards setting"**

- **Adopt nested approach to qualifications design**

- **Standards generation and qualifications design to be the responsibility of Qualifications and Quality Assurance Councils (QCs) in place of NSBs**

- **Three QCs proposed with the following scope of operations:**

  - **TOP QC responsible for co-ordinating qualifications mapping and design, standards generation and quality assurance for competency standards and registration criteria in trade, occupation and professional practice and qualifications unique to the workplace with their own nomenclature distinct from qualifications within the ambit of the other QCs. Its main organisational base would be the SETAs and professional bodies. TOP QC would incorporate a reconfigured National Skills Authority (NSA) and would report through to the Minister of Labour.**

  - **GENFET QC would be responsible for co-ordinating qualifications mapping and design, standards generation and quality assurance up to level 4 except for qualifications under the ambit of TOP QC. Its main organisational base would be the General and Further Education and Training Quality Assurance Council (Umalusi). It would incorporate a reconfigured National Board for Further Education and Training (NBFET) and National Board for Adult Basic Education and Training (NABABET). GENFET QC would report through to the Minister of Education.**

  - **HI-ED QC would be responsible for co-ordinating qualifications mapping, qualifications design, standards generation and quality assurance in Higher Education except for qualifications under the ambit of TOP QC. Its main organisational base would be the Council on Higher Education (CHE) and its Higher Education Quality Committee (HEQC). HI-ED QC would report through to the Minister of Education.**

- **The QCs have clearly demarcated responsibilities and would work together on a collaborative basis according to clear rules of engagement.**

- **QCs would have a structural relationship with SAQA, help create and implement the NQF regulations, and submit all national standards and qualifications for registration by SAQA.**

- **Each QC would have the following functions:**
  - **Mapping qualifications within its sphere of competence (for the labour market actors this would specifically mean establishing career progressions, which may be linked to qualifications, which have meaning within a particular sector or cluster of sectors)**
  - **Co-ordinating national qualifications design and standards generation by fit for purpose bodies within its sphere of competence**

- **Co-ordinating broad stakeholder consultation on draft qualifications**
- **Recommending national standards and qualifications to SAQA for registration on the NQF**
- **Co-ordinating quality assurance of qualifications and quality promotion within its sphere of competence (with appropriate organisational separation from standards generation)**
- **Collaborating with other QCs on all matters of mutual interest**
- **Promoting communities of trust in qualifications design, standards generation and quality assurance within its sector.**

Quality assurance

1. *The current quality assurance model should be modified to emphasise an integrated partnership approach to quality which would rely on four main processes. These are:*
   - *self-evaluation by providers;*
   - *institutional accreditation;*
   - *the ongoing monitoring of provider activities, including spot checks; and*
   - *quality audit.*

Agreed.

But: the QA of workplace-based and institution-based learning entails different approaches and therefore different management. The differences should be accounted for within a single, regulated quality management framework with rules of collaboration approved by SAQA and the Ministers of Education and Labour. The three QCs would be responsible for the management of the national QA system in terms of suitably amended ETQA regulations.

The QA system for the NQF should meet essentially the same criteria as for the standards generating system and process:

- **It should advance the objectives of the NQF**

- **It should operate in terms of national rules and guidelines approved by SAQA with the agreement of the Ministers of Education and Labour**

- **It should reflect the distinct but complementary and interdependent mandates of the Ministers of Education and Labour in the sphere of education and training**

- **It should be based on a collaborative approach by DoE and DoL, the education and labour market constituencies, and the new standards and quality assurance bodies**

- **It should recognise the distinct labour market and education and training system interests**

- **It should be mindful of the interests of other Ministers in respect of the**

training of trade, occupational or professional practitioners within their portfolio responsibilities

■ It should incorporate successful NQF experience and important developments and innovations in NQF practice consistent with these criteria

■ It should not incorporate elements that have lost or not achieved credibility, or elements that make the NQF structure more rigid or provoke tension rather than teamwork

■ It should ensure that standards and qualifications meet real needs and will be supported by appropriate provision, with minimum duplication and redundancy

■ It should ensure that quality assessment is undertaken by fit for purpose panels (in the case of institution-based learning) or registered assessors (in the case of workplace-based learning) that command the respect of peers and stakeholders

■ It should be linked to the appropriate standards generating structure, with appropriate safeguards to ensure the integrity of both quality assessments and national standards

■ It should only quality assure learning that culminates in the acquisition of NQF registered qualifications or part qualifications for credit accumulation or credit transfer towards NQF qualifications

■ It should enable all committed and knowledgeable participants in NQF processes to continue contributing to its development.

The QA of workplace-based and institution-based learning respectively entails different approaches and therefore different management.

TOP QC will co-ordinate the statutory SETA ETQAs responsible for workplace learning in the form of competency standards and registration criteria for trades, occupations or professional practice in the workplace, including qualifications unique to the workplace. TOP QC will foster working links to the institutional provider system through the other QCs.

GENFET QC will incorporate Umalusi, organised in chambers for General and General Vocational learning respectively. The chambers will work together wherever necessary, especially to co-ordinate the pegging of standards by NQF level. The GENFET QC will collaborate with HI-ED QC in respect of the articulation between further and higher education, and in particular the proposed provision of level 5 and 6 qualifications at colleges by arrangement with technikons, and with TOP QC in respect of the General Vocational pathway.

HI-ED QC will incorporate the Higher Education Quality Committee (HEQC), and will be responsible for quality assurance and management of all qualifications under its jurisdiction. It will collaborate with TOP QC and GENFET QC as outlined above.

2. *SAQA and the ETQAs should reach an agreement on a set of common quality assurance standards and criteria that would make up the Quality Standards for Accredited Education and Training Providers so as to ensure consistency across ETQAs for provider accreditation.*

Agreed.

ETQA regulations to be amended to provide for the new quality standards.

3. *The term "accreditation" should be applied only to public and private providers outside the schooling system, and should mean: "the formal approval and recognition of an education and training provider, by an ETQA, in accordance with the Standards of Accredited Education and Training Providers".*

Agreed.

4. *An ETQA's obligation to undertake meaningful quality assurance would be discharged by evaluating the systems put in place by each provider for ensuring the quality of education and training for a particular scope of activity. However, in some professional fields a professional body is obliged to undertake programme accreditation in addition to institutional accreditation.*

Agreed.

But, a selective programme accreditation system, such as proposed by the CHE/HEQC, or approval of a provider's scope of work, or perhaps a combination of the two approaches, might be considered by the three QCs in drawing up the Quality Standards for Accredited Education and Training Providers.

5. *Private providers should require registration [with the DoE] if they offer programmes for nationally registered standards and qualifications to the public. Workplaces should not have to register as providers unless they offer programmes at a fee to the public.*

Agreed.

But private providers proposing to operate as schools, FET or HE institutions would be required to register with the DoE and fall within the respective ambit of the GENFET QC of the HI-ED QC. Providers falling under the TOP QC would be regulated differently.

6. *The number of ETQAs be limited by*
    *   *declaring a moratorium on further applications*
    *   *accrediting no additional ETQAs*
    *   *cancelling the category of social sector ETQAs; and*
    *   *giving consideration to confining ETQA status to bodies established by statute.*

Agreed.

In general, but significant professional bodies not established by statute should continue to undertake quality assurance under delegated authority. An indefinite increase in ETQAs is undesirable but it is impossible to fix a limit in advance. ETQAs should be fit for purpose and should not compete with one another.

7.   *In principle a provider should go through one ETQA only for accreditation, depending on the NQF level and the scope of activity.*

Agreed.

8.   *The quality assurance body for a multi-purpose provider should be the band ETQA for the highest NQF level being sought.*

9.   *The quality assurance body for a single purpose provider should be the ETQA responsible for the setting of the standards or the band ETQA where the standard setter is not also an ETQA.*

8-9: Not agreed. A new ETQA system is proposed (see point 1 above).

10.   *Critical Outcomes assessment should be clarified by*

● *drawing a distinction between the first five Critical Outcomes, which are in principle assessable, and the rest, which are educational aims;*

● *integrating Critical Outcomes assessment where possible into the core learning and assessment of the qualification, while recognising the needs of some learners to focus on the acquisition of Critical Outcomes skills and to be assessed discretely; and*

● *developing generic standards for the first five Critical Outcomes at levels 1-4, both to meet the needs of learners who are focussing on the acquisition of skills, and to promote consistency and progression in Critical Outcomes standards.*

11.   *Assessment arrangements should*

● *be devised taking careful note of the views of teachers and trainers on practicability;*

● *be supported by a national bank of assessment instruments; and*

● *accept the use of grading, where appropriate.*

10-11: No comment.

12.   *Registration as assessors should not be required of individuals employed by an accredited institution or accredited workplace provider and the requirement should be amended accordingly.*

Agreed.

For institutions, but assessor registration to be mandatory for workplaces.

13. *Large workplace providers should be required to seek accreditation by the relevant ETQA.*

14. *Small and medium workplace providers be required to use registered assessors to award credit for standards and qualifications registered on the NQF.*

Not agreed. A new ETQA system is proposed (see point 1 above).

But teaching and learning for national qualifications or part-qualifications at all workplaces must be quality assured. All workplace providers must have registered assessors.

15. *The ETQA responsible for the setting of standards/qualifications within its designated area of interest be responsible for moderation, the registration of assessors, and jurisdiction over the issuing of certificates of award and achievement*

Not agreed.

ETQAs do not generate standards.

16. *RPL implementation should be:*

- *accorded priority, provided with appropriate incentives and targets;*
- *speeded up through the simplification of standards setting and quality assurance arrangements; based on the recognition that the assessment processes of RPL do not differ significantly from "normal" assessment; and be*
- *undertaken in a developmental context with the appropriate guidance infrastructure and training for assessors.*

Agreed.

Priority of RPL agreed but no comment on specific recommendations.

Leadership and governance

The Ministries of Education and Labour will give further thought to the creation of a non-statutory political-level and stakeholder-representative National HRD Forum that would:

- **meet periodically, say annually**
- **would be a forum for engagement on emerging research on HRD matters**
- **consider signals relating to the progress of the national HRD strategy**
- **provide advice to the respective state departments on priority HRD issues that need attention; and**
- **advise on success indicators**.

1. *The NQF Strategic Partnership should be established in law, to comprise the senior executives of the Department of Education, the Department of Labour and SAQA, to ensure clear strategic leadership of NQF implementation, to approve and monitor the National Plan on NQF Implementation, and to resolve differences.*

    Not agreed. Instead:

    Propose the continuation of the DoE/DoL task team as the nucleus of the inter-departmental NQF Strategic Team, to
    - **Be a permanent point of liaison between SAQA and the two departments**
    - **Develop a broad national plan for the implementation of the NQF, to be updated annually in consultation with SAQA and formulated as an annual remit by the Ministers to SAQA**
    - **Promote the alignment of NQF implementation with the government's HRD strategy**
    - **Advise Ministers on SAQA's annual business plan and budget; and**
    - **Consult regularly with the National Treasury on the funding of NQF implementation.**

2. *The NQF Strategic Partnership should:*

    - *In connection with the integrated budget exercise, take under review the staff capacity needs of the new standards setting bodies, ETQAs and SAQA; and*

    - *Map provider support across the system in order to determine how the values and objectives of the NQF could be better served through such support.*

    Not agreed.

    Different role for inter-departmental NQF Strategic Team.

3. *The NQF Forum should be established to meet at least annually to exchange experience, review progress and advise the Strategic Partnership on the implementation of the NQF.*

    Agreed.

4. *The SAQA Board should be reconstituted, to comprise not more than 15 members, appointed after public nominations by the Minister of Education in consultation with the Minister of Labour, against clear criteria to be specified in the Act.*

    Agreed.

5. *The NQF legislative framework be reviewed and revised as soon as government has determined its response to this report.*

    Agreed.

6.	*SAQA should*

●	*become an apex national organisation in staff calibre and intellectual culture as well as being highly focussed on its supportive and facilitative role*

●	*undertake a full-scale operational review of its organisation, especially in the light of the new challenges that SAQA would face if the Study Team's proposals were accepted; and*

●	*strengthen urgently the Directorate: Standard Setting and Development in order to support the work of the new standards setting bodies, and the Directorate: Quality Assurance and Development in order to manage the high priority assessment agenda, including RPL.*

Agreed.

But strengthened to fulfil its new role. In the proposed NQF architecture, SAQA would not have operational responsibility for standards generation. However SAQA would continue to have overall responsibility for the development and implementation of the NQF, and in particular would:

■	**Execute the annual remit of the Ministers of Education and Labour**
■	**Maintain the national framework for standards generation and quality**
■	**Maintain and develop the NQF level descriptors**
■	**Maintain and develop the register of national qualifications**
■	**Maintain and develop the National Learners' Records Database (NLRD)**
■	**Undertake evaluation of foreign qualifications**
■	**Be secretariat to the National Forum**
■	**Undertake international liaison; and**
■	**Undertake research.**

7.	*All available talent be made best use of by*

●	*inviting committed former NQF participants back to play their part in a new NQF environment;*

●	*inviting experienced NSB and SGB members to continue their work in the new structures;*

●	*fostering "communities of practice" in the areas of standards setting, quality assurance and learners' records management;*

●	*strengthening SAQA's organisation by contracting a small number of (possibly retired) high-level leaders from the academic, business and skills development environments;*

●	*drawing able South Africans with specialist skills into the work of NQF implementation from the academic, training, NGO and stakeholder communities and the national and provincial education departments, especially in the fields of curriculum development, assessment and policy research.*

Agreed.

But within the new NQF architecture:

Membership of the TOP QC would be based on the SETAs and professional bodies grouped in clusters, possibly based on the SIC codes. TOP QC would incorporate a reconfigured National Skills Authority (NSA) and would report through to the Minister of Labour. A detailed draft proposal will be presented to the SETAs, professional bodies and organised labour market constituencies.

Symmetrical structures would be created for the GENFET and HI-ED QCs, comprising policy advisory, standards generating and quality assurance functions on the model of the augmented CHE. HI-ED QC would comprise the CHE, including the HEQC and the qualifications design responsibilities currently handled by SAUVCA/CTP. GENFET QC would be based on Umalusi, with additional standards generating functions, and policy advisory functions based on those of NBFET and NABABET.

Funding NQF implementation

1. *A long-term budget strategy should be installed by the NQF Strategic Partnership by the start of the 2003/2004 financial year, in order to be prepared for the ending of EU support by considering the funding needs and revenue resources of all NQF operations in an integrated manner.*

2. *SAQA to be funded mainly by a grant from the DoE, supplemented by sales of information products and targeted donor assistance.*

3. *NQF implementation be*

    ●   *funded by a combination of government grants from DoE and DoL, grants from the National Skills Fund, fees for provider accreditation, professional bodies in their own spheres of operation, and targeted donor assistance, according to the following basic funding model:*

    ●   *The DoE makes provision for:*

        ■   *the annual grant to SAQA, taking into account its streamlined responsibilities and identified priorities, and its limited revenue potential from sale of information products, fees for evaluation of external qualifications and targeted grants from donors;*
        ■   *the annual grant to CHE, taking into account the HEQC's needs as an ETQA (offset by its revenue from accreditation fees) as well as the CHE's new role as a standards setting body;*
        ■   *the annual grant to GENFETQA, in respect of its quality assurance function, taking into account its somewhat limited potential for accreditation fee income;*
        ■   *the department's own standards setting responsibilities, on its own and in collaboration with DoL.*

- *The DoL makes provision for:*

  - *the department's own standards setting responsibilities, on its own and in collaboration with DoE;*
  - *an annual grant to SETAs to support the administrative costs of their standards setting activities;*
  - *ensuring that SETAs are funded for their ETQA responsibilities, taking into account their revenue potential from provider accreditation.*

- *The NSA makes provision for:*

  - *annual grants to the SETAs to cover their standards setting requirements.*

- *Statutory professional bodies make provision for:*

  - *their standards setting activities;*
  - *their ETQA responsibilities.*

1-3: Not agreed. The NQF architecture would be different. The implementation of the NQF involves a phase plan related to the broader transformation agenda in education and training and skills development, and state funding must be sought on that basis. The proposed inter-departmental NQF Strategic Team, advised by SAQA, would have the prime responsibility to conduct a funding conversation with the National Treasury, through their respective Ministries, to establish a secure and predictable basis for the funding of NQF implementation in the medium and long term. It would be important for government to take a holistic view of NQF resource requirements based on the new NQF architecture.

Transitional arrangements

- **A comprehensive series of meetings should be held with SAQA and the bodies that would constitute the proposed QCs to discuss transitional arrangements. The DoE and DoL should examine the possibilities of implementing key policy decisions within the ambit of the current laws in order to accelerate the transition to new NQF structures and modes of operation.**

- **A fully professional transitional operation will need to be planned and executed over a reasonable time period in order to ensure minimum disruption. In the mean time the work of the NQF must continue.**

- **From the time the draft NQF policy document is published all processes connected with the transition must be publicly known and transacted with full transparency. The departments should invite the goodwill and collaboration of SAQA and all other concerned structures in this process.**

ANNEXURE 2

ACRONYMS AND ABBREVIATIONS

ABET	Adult Basic Education and Training
ANTA	Australian National Training Agency
BSW	Bachelor of Social Work
CAT	Credit Accumulation and Transfer
CHE	Council on Higher Education
CHIETA	Chemical Industries Education and Training Authority
CTP	Committee of Technikon Principals
DoE	Department of Education
DoL	Department of Labour
DPRU	Development Planning Research Unit (University of Cape Town)
ETD	Education, Training and Development
ETQA	Education and Training Quality Assurance body
FES	Friedrich Ebert Stiftung (Germany)
FET	Further Education and Training
FETC	Further Education and Training Certificate
FoodBev	Food and Beverages Industries SETA
GENFET	(proposed) General and Further Education and Training (QC)
GENFETQA	General and Further Education and Training Quality Assurance body
GETC	General Education and Training Certificate
Grade R	Reception year
GTZ	Deutsche Gesellschaft für Technische Zusammenarbeit (GTZ) GmbH (German Corporation for Technical Co-operation)
HE	Higher Education
HET	Higher Education and Training
HEQC	Higher Education Quality Committee (of the CHE)
HI-ED	(proposed) Higher Education and Training (QC)
HRD	Human Resource Development
HSRC	Human Sciences Research Council
INDLELA	Institute for the National Development of Learnerships, Employment Skills and Labour Assessments (DoL)
INSETA	Insurance SETA
ISIC	International Standard Industrial Classification (System)
JSIC	Japan Standard Industrial Classification (System)
MERSETA	Manufacturing, Engineering and Related Services SETA
MOU	Memorandum of Understanding
NABABET	National Advisory Board for Adult Basic Education and Training
NBFET	National Advisory Board for Further Education and Training
NAICS	North American Industry Classification System
NAP	(draft) New Academic Policy
N courses	National Certificate courses
NCS	National Curriculum Statement

NEPA	National Education Policy Act, 1996 (Act No. 27 of 1996)
NLRD	National Learners' Records Database
NQF	National Qualifications Framework
NSA	National Skills Authority
NSB	National Standards Body
OBE	Outcomes Based Education
POSLECSETA	Police, Private Security, Legal, Correctional Services and Justice SETA
QA	Quality Assurance
QC	(proposed) Qualifications and Quality Assurance Council
QCA	Qualifications and Curriculum Authority (England)
RPL	Recognition of Prior Learning
SAFCERT	(former) South African Certification Council
SAQA	South African Qualifications Authority
SAUVCA	South African Universities Vice-Chancellors' Association
SDA	Skills Development Act, 1998 (Act No. 97 of 1998)
SETA	Sector Education and Training Authority
SGB	Standards Generating Body
SIC	Standard Industrial Classification (System)
SSIC	Singapore Standard Industrial Classification (System)
TOP	(proposed) Trade, Occupational and Professional (QC)
Umalusi	General and Further Education and Training Quality Assurance Council
UK	United Kingdom
UN	United Nations

ANNEXURE 3

INVITATION TO COMMENT ON THE CONSULTATIVE DOCUMENT

Interested organisations and persons are invited to submit written comments on the consultative document, both its conceptual analysis and its policy proposals. It would be helpful if comments were organised according to the sequence of the consultative document's headings.

Written comments on this consultative document should be sent by
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