

NOTICE 3077 OF 2000  
SOUTH AFRICAN QUALIFICATIONS AUTHORITY

# The Further Education and Training Certificate (FETC)

## Discussion document for public comment

This document was approved for release as a discussion document for public comment at the SAQA meeting of 16 August **2000**.

Comments should be forwarded to:

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The closing date for comments is 27 September 2000.

Submissions should be titled: *FETC Discussion Document for Public Comment*.

## 1. **Background: The establishment of the purpose, guiding principles and criteria for the FETC (and the General Education and Training Certificate - GETC)**

*Comment: In the development process, certain submissions discussed the possibility of hodies other than SAQA taking responsibility for the development of the FETC and determining generic criteria both for the qualification itself and for its purpose, e.g. exemption criteria. This section serves to discuss the legal framework within which these activities occur.*

### 1.1 **The legal responsibility of SAQA as per the SAQA Act No. 58 of 1995**

The functions of the Authority as per the SAQA Act, No. 58 of 1995 are as follows:

The Authority shall

- Oversee the development of the NQF.
- . Formulate and publish policies and criteria for
  - The registration of bodies responsible for establishing education and training standards or qualifications;
  - The accreditation of bodies responsible for monitoring and auditing achievements in terms of such standards or qualifications.
- Oversee the implementation of the NQF including
  - Registration or accreditation of bodies referred to above and the assignment of functions to them;
  - The registration of national standards and qualifications;
  - Steps to ensure compliance with provisions for accreditation;
  - Steps to ensure that registered standards and qualifications are internationally comparable.

### 1.2 **The Regulations for National Standards Bodies (NSBs) and for Education and Training Quality Assurance Bodies (ETQAs)**

Among the functions of NSBs as listed in the Regulations are the following:

- . Ensure that the work of SGBS meets the requirements for the registration of standards and qualifications as determined by the Authority;
- Recommend the registration of standards on the NQF to the Authority;
- Recommend the registration of qualifications to the Authority;
- Update and review qualifications;
- Liaise with ETQAs regarding the procedures for recommending new standards and qualifications, or amending registered standards and qualifications.

Among the functions of ETQAs as listed in the regulations is the following:

- Recommend new standards and qualifications to NSBs, for consideration, or modifications to existing standards or qualifications to NSBS for consideration.

In accordance with the Act and the regulations, SAQA through the NSB-SGB structures is responsible for the registration of qualifications. Furthermore the NSBs have the function of liaising with ETQAs regarding the procedures for recommending new standards and qualifications, or amending registered standards and qualifications. Quality Assurance bodies are responsible for assuring the quality of these qualifications. Through liaison with the NSBS they have a direct role to play in recommending new standards and qualifications as well as modifications to existing standards and qualifications to NSBS for consideration. The ETQA structures then are not legally in a position to assume responsibility for recommending

standards and qualifications to SAQA, as this is clearly the responsibility of the NSB-SGB structures.

### 1.3 **The generalist (or generic) qualifications**

In the case of the FETC and GETC, there is likely to be a range of **recommendations** for such qualifications which cut across all NSBS and SGBS and which attempt to fulfil a variety of needs within the education and training sector at these levels. Provision includes formal schooling, ABET, out-of-school youth and the learners within **learnerships** and skills **programmes** of the Department of Labour.

The NSB regulations provide very general direction in respect of the structure of these qualifications. However, discussions at the NSB level indicate that further guidance and clarity is needed.

In accordance with the regulations, the bodies responsible for recommending standards and qualifications to the Authority are the NSBS. However, as mentioned above, these qualifications cut across all NSB fields and across a variety of contexts of education provision, and since NSBS and particularly SGBS are regarded as having **sectoral** interests, it has been suggested that they are inappropriate structures to make such recommendations. Clearly, since SAQA has the responsibility for the development of the NQF, it is appropriate that it oversees the development of the minimum requirements and guiding principles for these generalist (or generic) qualifications.

### 1.4 **A discussion forum for the development of the purpose, guiding principles and guidelines for the FETC and GETC**

If the NSB-SGB structures are deemed inappropriate for determining the parameters for the generalist (or generic) qualifications, it is likely then that SAQA should convene a forum to establish the basic principles and minimum requirements for these qualifications (FETC and GETC) and recommend these to the Authority for approval or recommend a process whereby these can be established. Once approved at the Authority level, NSBS will have to ensure that the standards and qualifications at these levels which they recommend for registration to the Authority, meet the requirements of the Authority.

Before the forum recommends the basic principles and minimum requirements to the Authority for final approval there will need to be an engagement with all stakeholders, including the Inter-NSB meeting, and a public comment process.

### 1.5 **The FETC/GETC forum**

A forum was established and met on 12 May 2000. The following process was adopted at that meeting:

- There were a number of stakeholder groupings at the meeting who would want to set FETCS. They *were* to make their submissions and/or highlight specific issues that need consideration to the SAQA offices (Attention: Anne Oberholzer) by 31 May 2000.
- These would be synthesised into a first draft discussion document by SAQA staff. This document would be e-mailed to all members of the forum for comment.
- These comments would be incorporated or the problem issues highlighted for tabling to the forum on 10 July 2000. Details of time and venue would be sent to members. The discussion document would be forwarded to members of the forum by the end of June.
- The CTP needed to be approached for their submission and asked to send a representative to the meeting on 10 July.

- A document could be submitted to the SAQA meeting scheduled for 16 August 2000. If accepted by SAQA, a wide consultation process would be undertaken and in that process further comments could be obtained.

### 1.6 Submissions for the FETC and the GETC

Submissions for the FETC received at the SAQA Office by 31 May 2000 were as follows:

- . Department of Education: National Curriculum Framework for Further Education and Training (May 2000)
- SAFCERT: How do we move from the current Senior Certificates to the FETC? Dr Peliwe Lolwana
- Department of Labour: Proposal for Learnerships and the proposed Learnership Regulations
- . The Matriculation Endorsement and the restructuring of the Senior Certificate: Report of the SAUVCA Task Team.

Submissions for the GETC received at the SAQA Office by 31 May 2000 were as follows:

- . Interim ABET Advisory Board: GETC Proposal for ABET.

A letter was forwarded to Mr Williams of the Department of Education requesting input from the Department. It is necessary to emphasize that although there are a number of overlaps in respect of issues between the FETC and the GETC, the needs of learners at the GETC level differ and the choices that face learners are different.

At the SAQA meeting of 16 August 2000, it was approved that a process similar to that followed for the development of a FETC Discussion Document should be initiated for the development of a GETC Discussion document.

## 2. Deficiencies within the current system at the Senior Certificate level

The Department of Education discussion document on FET highlights some of the deficiencies in the current system as follows (page 5):

- **A separation of theory and practice**, giving rise to irrelevant programmed that fail to meet the needs of learners and the changing demands of the economy and society, hence contributing to high levels of unemployment;
- . **Poorly articulated FET programmed and qualifications** for technical colleges and high schools that inhibit learner mobility across programmed and providers/learning sites;
- . **Programmes differ widely with respect to quality**, standards of provision, outcomes and curricula thus affecting equivalence and portability; and
- Learners exiting the system and having **to repeat passed subjects** when they re-enter the system, lead to **high levels of inefficiency**.
- Exemption requirements.

The current system of entry to higher education being permitted primarily on the attainment of a Senior Certificate with matriculation endorsement is one that inhibits rather than promotes lifelong learning. In 1999 only 12% of all Grade 12 candidates who offered the Senior Certificate qualified for entry to universities, i.e. achieved the Senior Certificate with a matriculation endorsement. This percentage does not take into account the high drop-out rates lower down in the system. When these are considered it is closer to 6% of learners who should be in that school leaving cohort that gained a Senior Certificate with exemption. A closer consideration of that cohort indicates an even smaller percentage of learners had

Mathematics (either at functional, standard or higher grade) within their qualifying subject package. The SAWCA document indicated that almost all the universities indicated their support for the revising, and possibly loosening of requirements for university entrance, making the existing endorsement requirements simpler and more flexible. This suggests that the current requirements are inappropriate.

It is worth remembering that many of the learners who have attained a Senior Certificate with matriculation endorsement still fail at the tertiary level, with first year drop-outs and failure rates being the highest. It would appear then that success at the tertiary level is not dependent on perceived academic ability alone. In addition experience with a number of alternate admission procedures indicates that there are learners who have not achieved the exemption requirements but who have succeeded at the tertiary level, thereby supporting the probability that the current set of exemption requirements is not a reliable indicator of success in higher education.

The SAUVCA report (page 1, par. 1.2.2) also indicates that success starkly reflects the apartheid legacy, reflecting the conditions of learning and teaching more profoundly than student ability or potential.

Furthermore, this system means that the vast majority of the population is not encouraged to pursue studies. Little opportunity is created within the working world for the attainment of skills that are recognised by traditional institutions of higher education for entry to higher education. School leavers who do not achieve the Senior Certificate with matriculation endorsement are expected to achieve a Senior Certificate with matriculation endorsement before they can consider progressing along a learning pathway in higher education. This system is wasteful and deters rather than encourages learners who do not have the spare time or resources to spend on studying subjects that do not appear to have any immediate or practical relevance, and which in fact do not necessarily in themselves guarantee success in further study.

Finally the Report of the Ministerial Investigation into the Senior Certificate notes that the Senior Certificate serves three different purposes, failing to achieve any of them successfully. It serves as a school leaving certificate but is not attained by the majority of learners who leave school. It serves as a university screening mechanism but is only effective as a predictor of success among high scoring students. It serves as an employment screening mechanism but does not address work-related competence and is not perceived by employers as a particularly good indicator of success (1998: 10).

### **3. The Further Education and Training Certificate: Discussions and recommendations**

#### **Recommendation 1**

*Each full qualification registered at Level 4 on the National Qualifications Framework will be called a Further Education and Training Certificate and shall conform to the broad requirements recommended in this document. Each FETC will provide access to various learning pathways, both vertical and horizontal. The scope of access provided by each FETC will be determined by the qualification itself.*

#### **Recommendation 2**

*A registered FETC may be constructed from unit standards or it may be registered as a whole qualification, i.e. not constructed from unit standards, in accordance with the requirements of the NSB regulations 8(4).*

### Discussion: SAQA'S definition of a qualification

The NSB regulations in section 8 define a qualification as follows:

8(1) A qualification shall

- represent a planned combination of learning outcomes which has a defined purpose or purposes, and which is intended to provide **qualifying** learners with applied competence and a basis for further learning;
- add value to **qualifying** learner in terms of enrichment of the person through provision of status, recognition, credentials and licensing, marketability and employability; and opening-up of access routes to additional education and training;
- provide benefits to society and the economy through enhancing citizenship, increasing social and economic productivity, providing specifically skilled/professional people and transforming and redressing legacies of inequity;
- comply with objectives of the NQF contained in section 2 of the (SAQA) Act;
- have both specific and critical cross-field outcomes that promote life-long learning;
- where applicable, be internationally comparable;
- incorporate integrated assessment appropriately to ensure that the purpose of the qualification is achieved, and such assessment shall use a range of formative and **summative** assessment such as portfolios, simulations, **workplace** assessments and also written and oral examinations;
- indicate in the rules governing the award of the qualification that the qualification may be achieved in whole or in part through the recognition of prior learning, which concept includes but is not limited to learning outcomes achieved through formal, informal and non-formal learning and work experience.

#### 3.1 The purpose

The first issue that requires discussion is the purpose of the Further Education and Training Certificate.

The NSB regulations stipulate that any qualification registered on the NQF 'is intended to provide qualifying learners with applied competence and a basis for further learning'.

On page 2 of the Department of Education discussion document, the following comment is made: The new system seeks to foster intermediate to high level skills; lay the foundation for entrance to higher education; and facilitate the transition from school to work..

An earlier discussion document identified the purpose of the FETC as follows:

The primary purpose of the Further Education and Training Certificate is to equip learners with the knowledge, skills and values that will **enable** meaningful participation in society as well as continuing learning in higher education and training, and enable learners to embark upon a productive and responsible role in the workplace.

There are **two** threads that are incorporated in these statements of purpose, i.e. to provide qualifying learners with applied competence and a basis for further learning.

On the one hand, the purpose of equipping learners with knowledge and **skills** that will enable participation in continuing learning in higher education and training implies the acquisition of a diversity of skills. This then impacts on the size, the level of complexity and the range of **competencies** that the qualification is likely to **incorporate**. Dr Lolwana terms this a 'neat for purpose' qualification – its breadth makes it a neat, 'catch-all' **qualification**. **Alternatively**, this concept is incorporated in the concept of the 'exchange value' of the qualification – its

diversity gives it broad exchange value, enabling participation in a wide range of learning and qualifications. Even though the qualification may not be specifically related to any one occupation or job of work, the development of the ability to handle volumes as well as diverse and complex tasks would be expected in a working situation.

On the other hand, a qualification that enables learners to embark upon a productive and responsible role in the workplace, is likely to be more specific in its range of competencies and to have less diversity in its skills and knowledge. It is very focussed, encouraging the development of in-depth skills and knowledge in a given area. Dr Lolwana terms this as a 'fit for purpose' qualification. Alternatively, this concept is incorporated in the 'use value' of the qualification – its specificity makes it immediately useful in a specific context.

It is important to note that both FETC qualifications enable progression along a valid career path-and hence they should enjoy equal social value.

In reality then there will be FETC qualifications which spread across a spectrum from more diverse to more specific. The tension then lies in trying to achieve the balance between these two purposes, contained within a single qualification. The question becomes: At what point does diversity become so great that the 'use value' of the qualification is lost? Or: At what point does the specificity of the qualification become so closely defined that the 'exchange value' of the qualification is lost? In other words, as Dr Lolwana asks: How does one create two kinds of qualifications that are equal? 'Equal' here has the specific connotation of usefulness for purpose and social recognition.

One could argue that two issues need consideration to ensure 'equal' recognition of qualifications. The first issue is the set of rules that govern the structure of the qualification, i.e. the rules of combination. These rules however need to be flexible enough to accommodate the different emphases described above, but at the same time ensure that the qualifications are given equal status within society. The second issue is the political and authoritative decision about the acceptability of the qualification for access to further learning. This issue goes to the heart of the NQF and its objectives of promoting life-long learning and challenges the traditional practice of exemption requirements for entry to higher education.

### **Recommendation 3**

*The primary purpose of the Further Education and Training Certificate is to equip learners with the knowledge, skills and values that will enable meaningful participation in society as well as continuing learning in higher education and training, and enable learners to embark upon a productive and responsible role in the workplace.*

#### **3.2 The matriculation endorsement requirements**

It is essential to discuss the desirability of imposing exemption requirements on the Further Education and Training Certificate.

Currently there are two levels of Senior Certificate: the Senior Certificate and the Senior Certificate with matriculation endorsement. Once the matriculation endorsement has been attained, a learner is considered capable of entering universities. If a learner does not achieve a matriculation endorsement, the pathway into traditional higher education and specifically the university sector, is far more difficult and often sufficiently daunting to discourage rather than encourage prospective learners.

Endorsement requirements were imposed on Senior Certificate requirements in an effort to identify students who would be likely to succeed at university. These requirements were

intended to identify so-called 'high flyers', i.e. those with the potential to succeed in a university environment - a test of potential rather than a test of achieved learning outcomes. It is this conflict of purposes, i.e. a test of potential and a test of achievement (which a school leaving certificate suggests), within the Senior Certificate that arguably undermines its ability to serve either purpose appropriately.

Furthermore, this dual purpose in the use of assessment results of the Senior Certificate raises the question: Where does a FETC start and end? Attached to this question is the issue of differing levels of social acceptance but more importantly, the establishment of glass ceilings by institutions or groups of institutions indicating that entrance to that level of learning is subject to the achievement of only certain kinds of FETC and not others, as is the current situation in respect of the Senior Certificate with matriculation endorsement.

It is in this last point in the history of the matriculation endorsement requirements that the concept becomes questionable as an appropriate tool in the South African context. As Dr Lolwana points out: the endorsement questions have to do with what is considered to be important for university entrance and who has made that decision.

The Report of the Ministerial Investigation into the Senior Certificate recognises that the matriculation endorsement requirements provide coherence to the Senior Certificate curriculum, however this coherence relates to qualifications for access to universities but not to higher education in a broader sense. They are not designed to create coherent qualifications for access to careers. Furthermore, they do not provide mechanisms for lateral movement, only vertical movement (1998: 13). South Africa's education and training reforms since 1995 have emphasized that learning is not restricted to formal education institutions and hence higher education must be taken in its broadest sense and not restricted to universities alone.

The existence of the Senior Certificate with matriculation endorsement however, suggests that there is a point at which a learner can be deemed ready for higher education. In NQF terms this point is the Further Education and Training Certificate. An outcomes-based system which acknowledges the need to openly state the learning assumed to be in place before commencement of study towards a particular qualification stands in opposition to such a notion. In other words, the concept of endorsement requirements poses a problem for the NQF in that it identifies learners for further study on the basis of criteria that may not relate directly to the verifiable competencies that have been achieved and are necessary for further study, but rather to broader learning outcomes that have little or no relationship to the actual experience of the learner or the course of further study that the learner wishes to embark upon. The aggregate requirement illustrates the point well: it does not give any indication of potential or achievement of a learner within a specific area of study. Hence a good science student may be denied access to higher education because of poor performance in the language areas of study (there is a requirement that two languages must be offered at the higher grade level) and this may have affected the aggregate score negatively. Others will argue that the aggregate is an indicator of general ability (i.e. success across a number of disciplines) and in that light is a valuable indicator of success. Again this is only guaranteed in the higher categories. The emphasis on achieving these broader generic outcomes whether at national, regional or institutional level, begins the process of establishing 'glass ceilings' while at the same time its reliability and validity are questionable.

The FETC then, as suggested in its primary purpose, must incorporate the requirements for ensuring that learners are equipped with the knowledge and skills that will enable participation in continuing learning in higher education and training. There should therefore not be an additional overlay of generic requirements which relates to entry to particular institution types.



There is a recognition in the purpose of the FETC that acquisition of this qualification must equip learners with the knowledge, skills and values that will enable meaningful participation in society as well as continuing learning in higher education and training. This suggests then that there are certain requirements that should be built into the FETC qualification to enable this purpose to be achieved. There is a general acknowledgement that language proficiency is essential for successful participation in higher learning. Furthermore, South Africa is a multi-lingual society with eleven official languages and a multitude of other languages represented in our societal institutions. The importance of the study of language together with the recognition of the fundamental importance of Mathematics and mathematical literacy is acknowledged in the NSB regulations and is discussed in more detail in section 3.4 below.

The SAUVCA discussion document supports the view that 'coarse' selection processes (basically matriculation endorsement) serve as admission guidelines or indicators to universities, rather than being a statutory requirement (par. 41). A movement away from the concept of an overlay of endorsement requirements for university entrance has been suggested in the Report of the Ministerial Investigation into the Senior Certificate, where the question is asked whether additional requirements should be left to individual institutions or faculties. This however poses the possibility of encouraging the establishment of academically elitist institutions who select learners on an arbitrarily determined set of criteria.

However, one must be aware that unless a system adequately addresses the sectoral needs of society's institutions, there is the very real danger of parallel systems being introduced to address what is perceived as neglected needs. Parallel systems that are perceived as necessary serve only to undermine rather than build a new system. Hence it is critical that sectoral needs are taken seriously and addressed appropriately or acknowledged as not needing specific attention.

The solution to this problem may lie in the rules for registration of a FETC on the NQF. In the SAQA document *'Criteria and Guidelines for the Evaluation of Standards and Qualifications within the NQF'*, there is a requirement for proposers of the qualification to indicate what the requirements are for entry to study of the qualification. Furthermore, the proposers of the qualification are also expected to indicate other qualifications to which the achievement of the particular qualification allows access. In other words, for the broad FETC with a wide range of competencies, the qualifications to which access is permitted may be numerous. However, in the case of the more specific FETC the number of qualifications to which access is possible, may be more limited. Again it must be emphasized that a more focussed FETC does not mean that its depth and complexity are in any way less demanding. However, a requirement for registration (or award) of a FETC is that there is a minimum of one (two? three?) qualification to which access is possible. In other words, any learner who has achieved the outcomes of a particular FETC is able to engage in study of a qualification that is pegged at level 5 at least. Additional access requirements then are linked to learning assumed to be in place before commencing study in a particular qualification, i.e. they are associated with learning programme requirements and not institutional admissions. The SAUVCA document indicates that many institutions maintain that 'fine' selection processes are important at faculty or programme level, and that these should be clearly communicated to prospective students (par. 4.1)

If there is still a question about the viability or the exchange value of the FETC, there may be an additional requirement for proposers to indicate what additional learning would be necessary to expand the scope of qualifications that could be accessed. Considerations of lateral movement may also need to be considered.

A movement in this direction encourages the concept of progression to be linked to actual achievements within a specific area that lead to further qualifications within that specific area, i.e. the creation of learning pathways that enable a learner to progress systematically from

level 1 of the NQF to level 8 within a specific field of learning. The learning pathways will have been created by considering the needs for progression from level to level within the learning field rather than by considering the needs for progression from level to level across a number of learning fields. The pathways are created by ensuring that the links between qualifications are established at their inception and learners are hence not required to start 'at the beginning' when they wish to embark on a new qualification within the field. The learning they have gained in their progression along a pathway must be acknowledged and the established pathways must encourage this.

The danger that must be avoided is the restriction of options to such a point that a learner, once within a particular field of study, is unable to branch out to other fields that are more or less related. The lateral movements at each level must also be considered to enable a learner to move between fields appropriately without necessarily having to go back to a lower level in all aspects of learning.

#### **Recommendation 4**

*The underlying principle in the design of an FETC then must be that the qualifying learner has the [learning assumed to be in place to embark upon the study of qualifications at a higher level and that through the acquisition of the FETC, a viable learning pathway is created This underpins the concept that qualification design must favour the principle of 'dove-tailing', i.e. exiting from one qualification must lead directly to entry to one or more qualifications at the same or higher level of the NQF.*

#### **3.3 Access and selection**

It is crucial to discuss the concepts of access and selection. These related concepts are fundamental in opening up a system and regulations in respect of these two concepts are the real creators of social barriers and glass ceilings.

The concepts of access, i.e. having the learning assumed to be in place before commencement of further study, and selection for admission to a specific institution must be separated. The possibility of participation in a course of study that leads to a particular qualification (access) and admission to an institution of one's choice (selection) are not the same thing. In the case of the former, the learner has the choice over whether s/he will work hard enough to ensure that the required learning outcomes are mastered. In the latter, the learner is subject to choices made by others and perhaps independent of the required learning outcomes, e.g. financial situation, race, gender.

In the past the demand for admission to institutions exceeded the number of places that were available at institutions of tertiary study, hence there was clearly an overlay of selection criteria which resulted in the exclusion of some applicants. However, that exclusion should not, as it has done in the past, prevent access to further study as a whole.

The availability of alternate sites of learning has become a reality in South Africa – distance education, e-learning and learning in alternate learning sites, e.g. formal schooling, community colleges, workplace training centres, etc. Hence it is becoming less likely that learners will be prevented from learning because of a limited number of places within formal institutions. In fact, the number of applications for entry to formal institutions has dropped, indicating either that learners are not continuing their education or that learners are seeking alternate sites of learning. The assumption that learning only happens in fulltime instruction in formal institutions of learning is being challenged by the marketplace, where learners are choosing other routes to advance their studies.

Given this scenario, it is essential to promote access to further learning by clearly **identifying** the learning that needs to be in **place** to continue studying even within the workplace. It is worthy of noting that the emphasis in **learnerships**, a learning initiative of the Department of Labour, is on workplace training and the practical application of acquired skills and knowledge (between 30% and 70% of the credits for a qualification must be attained within a practical or work-based context). The following comment **from Adrienne Bird**, Chief Director in the Department of Labour is also relevant: **I recall** from my days on the National Commission on Higher Education that a massive 70% of what is taught at university is in fact professional training (doctors, **lawyers**, social workers, teachers, architects, etc) and **of course** over 90% of what **technikons** do currently is **para-professional**. The point is that there should be pathways *from* traditionally vocational work-based learning (such as the traditional apprenticeships and the new **learnerships**) to **para-professional** and professional learning opportunities - without having to go back and acquire a general education certificate before proceeding.

The point of this discussion is that where selection to an institution of formal study was a prerequisite for continuing one's education in the past, this additional barrier to learning is becoming less and less of an issue. The barriers now are posed not necessarily by selection (a **fundamental raison d'être** for endorsement requirements) but access: What is the learning assumed to be in place before study at the next level can be undertaken by a learner with any realistic hope of success?

**This** discussion opens up the following scenario: learners exist across a spectrum from those whose site of learning does not **favour** practical or 'hands-on' experience but encourages the abstract development of concepts (so-called 'head skills') to those whose site of learning does not **favour** the **abstract** development of concepts but rather focuses *on* the development of practical skills (so-called practical or vocational skills).

In the **case** of the former set of students the reality is that they hold qualifications that enable access to a wide variety of options for further study, but are unable to do any specific job of work. Often the skills they have developed are so ill-defined or vague that the 'use' value of the qualification is questionable. In the case of the latter, the reality is that the skills of the learner are so specific and devoid of **application** in the abstract that success and access to further study is extremely limited. The broader skills needed for embarking on further study in a related **field** are often absent, making the 'exchange' value of the qualification questionable.

The true test for standards setters in South Africa and for the quality assurance systems that are put in place is to ensure that the gap between the 'use' value and the 'exchange' value of a qualification is minimised. The test is to find the requirements that are necessary to ensure that the multiple pathways to **further** education and training which accommodate these two different aspects, are developed. Furthermore, as **Dr Lolwana** points out, 'the most important element is to ensure that all stakeholders agree on these requirements and that there is a periodic review of how the nation is doing and whether or not **further** modifications are required', In addition the principle of transparency of access requirements to a qualification is a fundamental principle of the NQF.

### 3.4 **Fundamental learning**

One has to then ask how it is possible to reduce the gap between the 'use' and 'exchange' value of qualifications. The answer lies in the basic criteria for registering the qualification; balancing the need for flexibility of learning sites against a minimum set of requirements that enable **successful** participation in further study and the ability to transfer learnt concepts from one situation to another; balancing the need for developing a nation with practical skills to build the economy against developing a nation that can participate **successfully** in further

learning where there may be a need to develop concepts in the abstract as well as apply them in a practical situation; balancing the need for developing citizens whose personal needs and interests are accommodated against developing citizens who adequately understand and can cope with the multiple and complex demands of our society.

The following paragraphs from section 9 of the NSB regulations give some definition to the FETC and GETC, and begin to address the question of basic criteria for the registration of a FETC and GETC.

#### Section 9

- a. A minimum of 72 credits is required *at* or above the level at which the certificate is awarded, which shall consist of fundamental learning, of which at least 20 credits shall be from the field of Communication Studies and Language, and in addition at least 16 credits shall be from the sub-field of Mathematics including numeracy in the case of certificates at level 1.
- b. A minimum of 36 credits at level 1 and 52 at levels 2 to 4 which shall be divided between the Core and Elective categories, with each qualification specifying the distribution of credits required in these categories: provided that the range of additional credits shall be broad enough to enable learners to pursue some of their own learning interests.
- c. By the year 2002, at least 16 of the 52 credits for certificates at levels 2 to 4 shall be from the sub-fields focussing on Mathematics Literacy.

The primary reason for including the requirement for 20 credits of a FETC qualification to be in the field of Language and Communication and 16 credits to be from the field of Mathematics is an attempt to bring some coherence to the qualification. Currently there are a number of qualifications at the Senior Certificate level each of which enjoys different levels of social acceptance. The diversity of construction of qualifications from a Senior Certificate with matriculation endorsement to a National Training Certificate encourages these different perceptions about the validity of the achievement and hence intellectual ability of its holder, i.e. the societal grading of the qualifications.

The danger exists that an attempt to create coherence will result in the compulsory requirements for the FETC to be too prescriptive and thereby create artificial barriers to progression as is the case with the Senior Certificate with matriculation endorsement. Too much flexibility however, inevitably results in social judgments about the 'exchange' value of certain qualifications and ultimately prejudices the learners who hold the qualification, negatively.

The question then arises as to the degree of coherence that should be prescribed or the amount of learning that must be common for all learners in the FET band to ensure that progress to further learning is possible within the variety of contexts. The structure and rules of combination for this qualification then become crucial in ensuring that barriers to access higher education and training are not created. Essential in these considerations is the role of the compulsory credits in Mathematics and Language and Communication.

It is important to emphasize that these two areas of learning provide the key to further learning and hence the complexity and choices of standards are crucial, These have to relate to the purpose of the qualification and the Critical Cross-field Outcomes should be used as the primary measuring stick in the fundamental areas of learning to assess the attainment of the purpose of the qualification as well as to see whether the skills in these areas can be applied in the general arena of the qualification.

### 3.4.1 Language and Communication

The SAUVCA report makes the following comment about language: Member universities generally agree that 'proven ability to communicate at cognitive academic level of proficiency (CALP) in the university medium of instruction' should remain as part of the endorsement (par. 4.4.2).

The Report of the Ministerial Investigation into the Senior Certificate identifies the following problem: There is evidence that a large proportion of our schools do not give students enough practice in reading – that is to say, in developing critical, selective, analytical and interpretive, reflective analytical and transactional writing skills. This lack of opportunity for practice appears to be particularly prevalent in the teaching of African languages (1998: 12). It recommends that assessment of all South African languages **should be** standardised as a matter of urgency, so that all languages at first and second language level are examined in a **comparable** way in terms of critical thinking skills and in terms of internal language components.

#### **Recommendation 5**

With these two observations in mind, namely the importance of language in the development of thinking skills and the necessity for aligning language study with the medium of instruction of further study, in respect of the 20 credits for Language and Communication, the SAQA rule for the FETC could be as follows:

*The 20 compulsory credits in Language and Communication must be obtained in one of the official languages at level 4.*

The learning outcomes and associated assessment criteria at level 4 must be of the standard required by a learner to participate effectively at an institution of higher education and training. An appropriate SGB will need to be established to determine these learning outcomes and assessment criteria. The work of this SGB would clearly have to take into account the particular needs of all stakeholders in the FETC.

#### **Recommendation 6**

To address the need to develop citizens who can participate effectively in a multi-lingual society, the following has been proposed:

*A further 20 credits in Language and Communication must be obtained in a second official language at a minimum of level 3.*

This is not a requirement stipulated in the NSB regulations and hence may require an amendment.

#### **Comment:**

The issue of language in education is a thorny one and opens up questions of access, equity and redress. **These** considerations are **often** in opposition to the practical realities of the country and thereby place considerable pressure on politicians and administrators to try and make decisions that are politically acceptable, fair and practical.

The study of second language also raises issues of equity and redress, particularly when the reality in the country is that **the** majority of learners conduct their studies in a second language, while a few are able to study in their home language. Furthermore, in a country where there are 11 official languages it is politically desirable to insist that learners in formal schooling

study a minimum of two official languages. However, when the achievement of outcomes in a second language becomes a requirement for continuing education, particularly when it is not needed for a learner to progress within a desired career path, this has the potential for becoming an unnecessary barrier to further learning. This will need to be monitored to ensure that this is not the case,

The issue of NQF level addresses the question of complexity of outcomes. It is envisaged that the outcomes for Language and Communication will be the same for the different languages and that the differences in respect of level of study will apply equally in each of the languages.

There is some doubt as to whether **20 credits** in Language and Communication is sufficient to address the needs of CALP (Cognitive Academic Level of Proficiency). Until there is clarity on what outcomes are envisaged by the 20 credits it is difficult to make a judgement.

### 3.4.2 Mathematics

#### Recommendation 7

In respect of the 16 credits for Mathematics, the SAQA rule for the FETC could be as follows:

*The 16 credits in Mathematics must be obtained at level 4.*

The learning outcomes and associated assessment criteria must be of the level required by a learner to participate effectively in society. It should be possible to achieve the outcomes in a variety of learning contexts so that the emphasis is not on the study of concepts in the abstract or more specifically in Mathematics as a subject. An appropriate SGB will need to be established to determine level 4 learning outcomes and assessment criteria.

Discussions in this regard will have to take into account the generally low degree of proficiency in Mathematics in our society and the lack of appropriately qualified teachers in the schooling system. It will be the task of curriculum developers to ensure that Mathematics outcomes are included in learning programmes as appropriate. The intention is that the Mathematics credits must support the purpose of the qualification and the Critical Cross-field Outcomes. Mathematics standards at level 4 that are developed by an SGB other than that dedicated to pure Mathematics should be reviewed by NSB 10 to ensure that the nature and quality of the standards is appropriate.

#### **Comment:**

The SAUVCA report comments as follows (par. 4.4.3): There remains a very real concern among SAUVCA members that the compulsory mathematics requirement in the modified M4 proposal would exclude students unnecessarily from universities.

Even during SAQA discussions of the inclusion of 16 compulsory credits in mathematics “ literacy for qualifications at levels 1 to 4, the concern was raised as to the capacity of the South African teaching corps to deal with this requirement. There is a scarcity of teachers who are adequate] y qualified in mathemat its.

The Department of Education discussion document, perhaps conscious of this concern, has indicated that the compulsory credits for mathematics should be 10 and not 16. Should this proposal be accepted by all stakeholders, there will need to be a change to the SAQA regulations. Otherwise the FETC in formal schooling will not meet the SAQA requirements,

The important point is that the compulsory credits should contribute positively to learning and not pose an unnecessary barrier to further learning.

### 3.4.3 Further credits in Communication and Language and Mathematics

It is clear that different areas of study will require a deeper understanding of the fields of Communication and Language or Mathematics. In these cases, the particular requirements will be included as **further** credits within the qualification.

The most important consideration in including the compulsory credits in fundamental learning was to ensure coherence and equal acceptance of the FETC regardless of its focus. It is essential then that in deciding what learning is envisaged in the compulsory credits, this principle is not forgotten. It is **only** in this way that the **fundamental** learning will remain meaningful and not become a barrier to achievement. The contextualisation of the fundamental learning is also critical to ensure that it remains meaningful for learners within their contexts of learning. Hence in registering an FETC, proposers of the qualification must detail the purpose of the qualification, indicating clearly any overlay in respect of the primary purpose indicated above, as well as ensure that the fundamental learning has a relevant and meaningful role to play within the purpose outlined for the qualification.

### 3.5 Rules of combination

#### 3.5.1 Minimum credits at level 4

Paragraph 8.2 of the NS3 regulations states further that a total of 120 or more credits shall be required for registration of a qualification at levels 1 to 8, with a minimum of 72 credits being obtained at or above the level at which the qualification is registered, and the number and levels of credits constituting the balance (of forty-eight) shall be specified: provided that a qualification consisting of less than 120 credits may be considered if it meets the requirements in regulation 8(1) and complies with the objectives of the NQF contained in section 2 of the Act.

Therefore, in terms of the regulations, the requirements that must be fulfilled by a learner before a FETC can be awarded is as follows:

- 120 credits of which 72 must be at level 4 or above.
- Of these 72 credits, 20 credits must be in Language and Communication and 16 must be in Mathematics.

There is one gap in the Regulations that is immediately evident. In the case of the 48 credits that do not need to be at level 4 or above, the question must be asked as to whether there is a minimum level for them. For example, must all 48 credits be at level 3 minimum, or is there the option of some at level 2 or even level 1? The Department of Education discussion document has indicated that a minimum of 120 credits must be achieved at level 4 for a learner to qualify for the FETC. Differing requirements in respect of the number of credits required at level 4 for an FETC will affect the social acceptability of the qualification – those qualifications with a requirement for 120 credits to be at level 4 will automatically be viewed differently from those which are required to have only 72 credits at level 4.

Another point to be made is that even though a FETC has a minimum of 120 credits, it is highly likely that a learner will accumulate more than 120 credits. Furthermore it is also possible for a learner to achieve more than 72 credits at or above level 4, irrespective of whether the requirements stipulate a minimum of 72. Learners can choose the extent of learning within an area of study by the number of additional credits they choose to study and they can choose the degree of complexity by the NQF level of the credits they choose to study.

### **Recommendation 8**

The following is recommended:

*A maximum of 48 credits for the FETC may be at Level 3.*

#### **Comment:**

It will be necessary to ask the Department of Education to review their recommendation, especially in view of the earlier recommendation that 20 credits at a minimum of Level 3 in a second language should be attained by all holders of a FETC.

### **3.5.2 Core and elective learning**

Paragraph 9(b) of the NSB regulations discusses the question of core and elective learning:

- b. A minimum of 36 credits at level 1 and 52 at levels 2 to 4 which shall be divided between the Core and Elective categories, with each qualification **specifying** the distribution of credits required in these categories: provided that the range of additional credits shall be broad enough to enable **learners** to pursue some of their own learning interests.

It is unlikely that any blanket ruling on the division of credits across these two categories will serve any positive purpose. The reason for this is that the different purposes of qualifications should ultimately determine the ratio of core and elective learning: in some qualifications it may not be very easy to determine what constitutes core learning as opposed to elective learning while in other qualifications the core learning will dominate the necessary credits, by virtue of the purpose of the qualification. The determination of what constitutes core learning for a qualification and what the elective options are, should rest with the proposers of the qualification.

The Department of Education FET discussion document has identified 10 credits in Life Skills as part of the **fundamental** learning. This could be designated as **fundamental** or core learning for this qualification, depending on whether it is desirable for SAQA to consider credits for learning in areas other than Communications and Language and Mathematics as fundamental learning. Whatever decision is made in this regard, the principle that proposers of a certain qualification can designate specific areas of study or credits as compulsory within that qualification is accepted.

### **Recommendation 9**

*The principle is accepted that proposers of a certain qualification can designate specific areas of study or credits as compulsory within that qualification.*

### **3.5.3 Additional rules of combination**

There is a danger in a system of credit accumulation, that credits are accumulated over a period of time, separately at a number of different providers and in that process, although the learner has accumulated all the parts, the overall purpose of the qualification has been lost. In higher education, there is a practice of requiring learners to complete a certain percentage of the qualification requirements or aspects of the qualification within the institution before they will award the qualification – only a limited number of courses from another institutions is taken into consideration. At the Senior Certificate with endorsement there are minimum requirements for the number of subjects that must be offered and passed at one sitting of the examination – the group examination concept. These requirements are attempts at ensuring



coherence within the qualification. This issue needs consideration and guidance on how and where the concerns around the 'shopping basket' accumulation of credits can be addressed. This issue is also discussed in section 3.9 where integrated assessment and recognition of prior learning (RPL) are discussed.

### 3.6 **Progression from further education and training to higher education and training**

Progression within the current system is marked by specific critical points. Furthermore there are different practices within the different bands.

To explain: at school, a learner is able to pass to the next standard, without passing certain subject/s. This is problematic in that in the next grade, the learner continues study in the subject that s/he has failed, at the next grade level, i.e. proceeds with new work before fully mastering the concepts, skills and knowledge of the previous grade. However, at the Grade 12 level, before a learner can progress further, s/he must fulfil the requirements for the Senior Certificate with matriculation endorsement. Progress into higher education is only occasionally permitted without fulfilling all requirements and then usually it is only permitted on condition that certain requirements are met within a given space of time. In reality, this means that the Senior Certificate is a 'halting' point where progress is stopped until minimum requirements have been achieved, e.g. a candidate must pass a minimum of five subjects and attain a minimum aggregate. In fact progression into university study entails the achievement of more stringent requirements as dictated by the Senior Certificate with matriculation endorsement. In higher education, the process unfolds slightly differently. For example, a student is permitted to continue with his/her studies while still completing another requirement which may have been failed. This differs from the schooling sector, in that the student may not continue study in a subject until prior learning outcomes have been achieved. However, there is still a 'halting' point in that a degree or diploma is not awarded until all credits have been fulfilled and hence the learner is likely to be prevented from embarking on further study.

The Department of Education FET discussion document appears to support the notion that a learner may accumulate credits and should certain credits not have been achieved, the learner may enrol concurrently for credits at level 2 and at level 3, for example (page 19). There is also the indication that there is a 'halting' point at the FETC level 4. On page 31, the following statement is made: After a learner has obtained the FETC, s/he can proceed towards the achievement of outcomes leading to a certificate or diploma at level 5, subject to HE admission requirements. This policy reflects the process followed in higher education and indicates a shift from past practice.

It may be necessary for SAQA to take a principle stand that progression within a band may be on the basis of accumulation of credits as determined by the providers within a band. However, progression between bands must be based on the achievement of critical qualifications, e.g. progress from ABET to study of a qualification in the further education and training band requires the achievement of a GETC; progress from study at level 3 and below to a qualification in the higher education and training band requires the achievement of a FETC. Alternatively, proposers of qualifications may be asked to indicate the conditions upon which progress to a qualification at a level in the next band is granted. The danger in this is that the flexibility may ultimately undermine the credibility and coherence of the NQF itself.

The question is how to balance progression and access. There is a need to balance flexibility with rationality in the system so that it is possible for institutions to manage learning in a coherent manner. The real challenge may well be in ensuring that institutions are flexible enough,

### 3.7 Credit accumulation and part awards

The Department of Education FET discussion document suggests that credit accumulation at levels 2 and 3 will be acknowledged by the issuing of credit-based certificates when the minimum compulsory credits have been attained. The accumulated credits will be captured on SAQA's National Learners' Record Database (NLRD). This process motivates learners by accrediting achievement as it occurs.

Certain other proposers of qualifications that span more than one level are experimenting with the concept of designing the qualification in such a way that credit-based certificates can be issued along the way as the necessary credits are achieved.

### 3.8 Grading

Grading is a deeply embedded systemic issue. It is a feature of provisioning and is not a matter that relates directly to the setting of standards and registration of qualifications. It does however relate to issues of selection and hence access. Although it is an issue that needs to be discussed and debated more fully, it will not be addressed in this document as it does not directly affect the parameters for construction of the FETC.

### 3.9 Integrated assessment and recognition of prior learning (RPL)

In the NSB regulations there is the requirement that proposers of qualifications address these two concepts in their submissions.

#### **Recommendation 10**

*Integrated assessment needs to be incorporated appropriately to ensure that the purpose of the qualification is achieved, and such assessment shall use a range of formative and summative assessment such as portfolios, simulations, workplace assessments and also written and oral examinations,*

One of the problems that has faced the system is that the purpose of the Senior Certificate has not been clear. Furthermore, a problem that faces a system that encourages the achievement of a qualification through credit accumulation is that a learner may achieve the required number of credits in the relevant areas of study. However, these credits have been earned over a period of time, at different learning sites, through different assessment modes perhaps even through RPL. Because of the fragmented nature of the learning and assessment, there is no guarantee then that the overall purpose of the qualification has been achieved.

The issue of integrated assessment is addressed in the SAQA publication, *Guidelines for the Assessment of NQF registered unit standards and qualifications*. This is a complex concept and engagement with it by practitioners will inform further developments and debates.

#### **Recommendation 11**

*In their submissions, proposers of a FETC must indicate in the rules governing the award of the qualification that the qualification may be achieved in whole or in part through the recognition of prior learning, which concept includes but is not limited to learning outcomes achieved through formal, informal and non-formal learning and work experience. It will be necessary to spell out the criteria for awarding the qualification (or part of it) through RPL.*

#### 4. Conclusion

The point must be emphasised that one of the strengths of the SAQA system is that it is an open system, allowing flexibility for different bodies to put forward the qualifications that serve their needs. The regulations should not be restrictive and drive the system back towards closing pathways rather than opening up pathways. We must remember that access and portability exist in tension -as access is opened up and flexibility is prioritised, the portability of credits from one qualification to another becomes more limited; on the other hand, the more portability of credits is emphasized, the more restrictive and less flexible access becomes. SAQA must ensure that the system does not become restrictive and place artificial barriers to viable pathways.

Careful consideration must be given as to how one moves a system from the present to the future, i.e. systemic change issues. Even if SAQA accepts qualifications as proposed by different bodies, debated according to agreed principles, the real problem lies with society's acceptance of their value. Consideration of more flexible organisational arrangements within the system are likely to have the effect of 'loosening up' the system and encouraging life-long learning, e.g. semesterisation of assessment, relaxing group examining requirements.

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