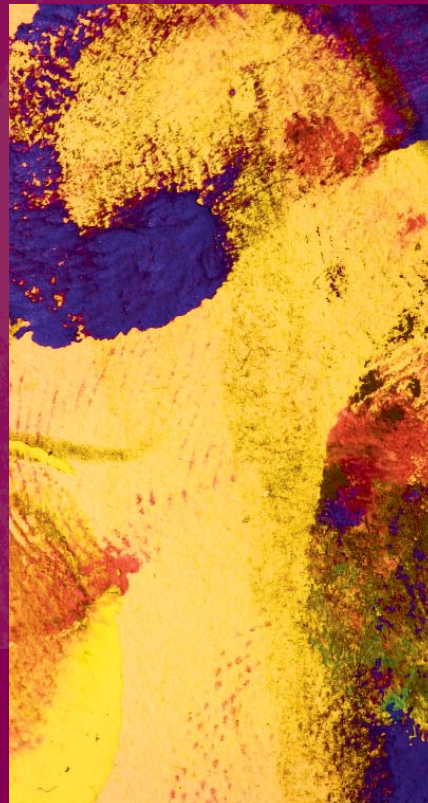


HEQC Framework for Delegated Functions



***Council on Higher Education
Higher Education Quality Committee***

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Published (web only) by
Council on Higher Education (CHE)

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**ISBN: 978-1-919856-69-8
Date of Publication: October 2008**

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FOREWORD

The Higher Education Act of 1997 assigns responsibility for quality assurance in higher education in South Africa to the Council on Higher Education. This responsibility is discharged through its permanent committee, the Higher Education Quality Committee (HEQC).

The overall task of the HEQC since its launch in 2001 has been the development and implementation of a national system of quality assurance which apply to public higher education institutions as well as to private providers of higher education. The first focus of the HEQC was to develop and implement its systems for the accreditation of programmes and institutional audits. This was accompanied by a focus on quality promotion and capacity development aimed at improving the higher education system's capacity to participate in and benefit from a quality assurance regime. In developing and implementing these systems, the HEQC has insisted that "the primary responsibility for the quality of provision and appropriate mechanisms to assure that quality rests with higher education providers." (Founding Document, CHE, 2001)

In this context, it gives me pleasure to introduce the *HEQC Framework for Delegated Functions*. This publication provides institutions with appropriate directives and procedures for the assessment of the effectiveness of their internal mechanisms in relation to the following quality assurance functions:

- Training and development in assessment
- Recognition of Prior Learning
- Short courses
- Moderation of assessment
- Certification arrangements

The purpose of this Framework is for those institutions with sufficiently strong internal quality systems in relation to these functions to have them delegated as an institutional responsibility.

Like with all other HEQC policy documents, this framework has been developed in close cooperation with higher education institutions and has benefitted from the expertise of several colleagues.

As the HEQC and the higher education sector enter the second half of the implementation of the first quality assurance cycle (2004-2011), it is important to note that institutions are progressively moving to self-regulation and that this is based on a greater sense of the importance of having rigorous internal systems to ensure the quality of provision across all core functions.



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ACKNOWLEDGEMENTS

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ACRONYMS

CHE	Council on Higher Education
ETQA	Education and Training Quality Assurer
HEQC	Higher Education Quality Committee
HESA	Higher Education South Africa
NLRD	National Learner Records Database
NQF	National Qualifications Framework
PQM	Programme Qualifications Mix
RPL	Recognition of Prior Learning
SAQA	South African Qualifications Authority
SETA	Sector Education and Training Authority

INTRODUCTION

The Higher Education Act (Act No 101 of 1997) assigns executive responsibility for quality assurance in higher education in South Africa to the Council on Higher Education (CHE). The Council discharges this responsibility through its permanent subcommittee, the Higher Education Quality Committee (HEQC). The specific functions of the HEQC in terms of the Act are to:

- Promote quality assurance in higher education;
- Audit the quality assurance mechanisms of higher education institutions;
- Accredite the programmes offered by higher education institutions.

Moreover, the CHE is deemed by the Higher Education Act to be accredited by the South African Qualifications Authority (SAQA) as the primary Education and Training Quality Assurer (ETQA) for higher education and training. This means that the HEQC as the accredited ETQA with primary responsibility for higher education is expected to operate within the requirements of the SAQA Act (Act No 58 of 1995) and its associated regulations.

One of the responsibilities of the HEQC as an ETQA is to report formally to SAQA on the quality management arrangements of its constituent providers in respect of the following:

- I. Training and development in assessment,
- II. Moderation of assessment,
- III. Short courses,
- IV. Certification arrangements, and
- V. Recognition of Prior Learning (RPL).

While these areas are dealt with as part of the criteria and minimum standards within the accreditation, audit and national review systems of the HEQC, a dedicated system to deal with the above-mentioned specific areas is essential in order to ensure that the HEQC's mandate is discharged with responsibility and appropriate accountability mechanisms.

The purpose of this document is to provide a framework to guide the delegation of specified quality assurance functions to higher education institutions. It also intends to guide the institution in the development of evidence required to demonstrate that it has effective systems and internal capacity for the quality assurance of these functions:

- Training and development in assessment
- Moderation of assessment
- Short courses
- Certification
- Recognition of Prior Learning (RPL).

The document also outlines the procedures, criteria and minimum requirements for the delegation of these functions.

A) PRINCIPLES AND APPLICABILITY

1. LEGISLATIVE BASIS FOR DELEGATION

Both the SAQA Act and Regulations governing ETQAs and the Higher Education Act provide an overall legislative framework within which the HEQC can delegate the stipulated areas to bodies that are capable of performing such delegated functions.

Section 9 (2) of the SAQA *ETQA Regulations*, stipulates the authority of the HEQC to delegate some of its responsibilities as follows:

An ETQA:

- may delegate selected functions to a constituent provider or other body with the prior approval of SAQA, but may not delegate its accountability to SAQA;
- shall delegate the function of registering constituent assessors to accredited providers if their quality management system includes the monitoring of this function and SAQA is notified. It should be noted that this is restricted to ETQAs such as the HEQC, which are established under another Act of Parliament to govern a single co-ordinated system of multi-qualification providers.

The possibility of delegating certain functions in the ETQA regulations is consistent with the Higher Education Act, which stipulates in section 7 that:

- (3) The Higher Education Quality Committee may, with the concurrence of the CHE, delegate any quality promotion and quality assurance functions to other appropriate bodies capable of performing such functions.
- (4) The delegation under subsection (3)-
 - (a) must be in writing and published by notice in the Gazette;
 - (b) is subject to such conditions as the Higher Education Quality Committee may determine; and
 - (c) does not prevent the performance of such functions by the Higher Education Quality Committee.

The delegation of the above mentioned functions to higher education institutions is based on the understanding that higher education institutions have the primary responsibility for quality and quality management while the HEQC is responsible for the validation of institutional information on the effectiveness of internal quality management arrangements.

2. INTERFACE BETWEEN DELEGATED FUNCTIONS AND THE AUDITS AN ACCREDITATION SYSTEMS

The delegation of the identified functions does not remove the accountability of the HEQC to SAQA for the discharging of these functions, as stipulated in section 9 (2) of the ETQA regulations. Until now, the HEQC has been evaluating these functions through the institutional audit and programme accreditation systems. In this regard, higher education institutions have had to demonstrate during site visits that they have quality management systems in place (i.e. policies, systems, strategies and resources) to quality assure, support, develop and monitor the implementation of the specified functions in line with the criteria and requirements of the HEQC.

While the inclusion of these areas as part of the institutional audit and accreditation systems has provided useful insight into the quality management of these areas by various institutions, it was a temporary measure. While this happened, and institutional audit reports attest to this, the core business of institutions such as research, teaching and learning and community engagement needed to maintain their precedence. Time to pay sufficient attention to the collection and collation of documentary and other evidence for quality assurance functions during an audit has been, and will remain, a challenge. Furthermore, institutional audits happen once every six to seven years and not all institutions will be exposed to a full-scale audit, especially smaller private providers. Attaching this area of the HEQC's work to the institutional audit system would mean waiting until an audit is scheduled for each institution, and this will exclude all the private providers who, because of the differentiated approach to institutional audits, will not be exposed to a full-scale institutional audit at least in the first cycle. There are institutions which have been audited already, and some which are scheduled to be audited within the next few years. The procedural application of this Framework, outlined in Section 6 below, is intended to accommodate this diversity of circumstances.

A dedicated evidence-based, minimum standards-driven system is therefore required for these areas in order to make informed decisions regarding delegation. However, for those institutions which will be audited areas such as the quality assurance of the arrangements for assessment and RPL will still be included in the audit analysis of the conceptualisation and organisation of teaching and learning and the conceptualisation and organisation of the process of admission and recruitment. In doing this the HEQC is supporting an understanding of assessment and RPL as integral components of teaching and learning which need to be rooted on a pedagogic understanding of the process of teaching and learning and its role in facilitating access to and success in higher education.

This document outlines a systematic framework to deal with the delegation of the specified functions. Although this will be the case, not all the areas of delegation will be removed from the institutional audits system.

3. APPLICATION OF THIS FRAMEWORK

The initial steps of the process of delegation will vary, according to the particular circumstances of each institution, as follows.

3.1 For institutions that have never submitted documentation on the delegated functions to the HEQC and that will either not be audited at all or are scheduled to be audited in 2009 / 2010

The institution will be required to submit internal policies and procedures for the quality assurance of the delegated functions to the HEQC, the extent of implementation of these policies and procedures, monitoring and oversight arrangements, evaluation and review mechanisms, and follow-up arrangements for improvement as well as implementation timeframes with respect to those aspects that are still under development, taking into account the criteria specified in the Framework.

3.2 For institutions that have already been audited or were scheduled to be audited in 2007/2008

In relation to institutions that have been audited and those that were scheduled to be audited in 2007 and 2008, the HEQC will use the audit reports to decide on the delegation of these areas to such institutions.

The HEQC Secretariat will inform the institution that its audit report will be used as the basis for delegation. The HEQC may request additional information, if necessary. A decision on delegation will be made once the audit report has been approved by the HEQC Board.

3.3 For institutions that provided information on quality assurance management during the first round of submissions (2003 / 2004) but have not been through an institutional audit

The HEQC will give the institution an opportunity to update the information and documentation already submitted, in line with the criteria contained in this Framework.

The full process of decision-making on delegation is included in Appendix A.

The governance responsibility for delegated functions is indicated in Appendix B.

4. DURATION AND TERMINATION, AND INTERIM REPORTING

Delegation of the specified functions will be for an initial period of six years. The HEQC reserves the right, however, to review and terminate the delegation granted to any institution should evidence emerge, during HEQC visits to the institution concerned or through any other means, that the conditions under which delegation has been granted (specified by the criteria and minimum requirements outlined below) are no longer being met.

Institutions which will have delegation to manage the quality of these functions may be requested to submit reports at intervals that will be determined by the HEQC. The HEQC will reserve the right to request reports from institutions on the delegation should the need arise.

B) FUNCTIONS, CRITERIA AND MINIMUM REQUIREMENTS

The criteria and minimum requirements for the functions to be delegated in terms of this Framework are indicated below. They are extrapolated from the *Criteria for Institutional Audits* (CHE 2004: 6-20). The relevant audit criteria, as they relate to the specified functions, are:

- Criteria 11 and 12: training in assessment, and moderation of assessment;
- Criterion 5: short courses;
- Criterion 6: certification;
- Criterion 14: RPL.

In this Framework, the applicable criteria for institutional audits are expanded upon to provide a clear indication of the minimum requirements according to which these functions are to be delegated, and according to which the HEQC accountability for delegation can be ensured.

1. ASSESSMENT OF STUDENT LEARNING

Assessment is central to learning and teaching as it is the key mechanism for evaluating the performance of learners, which is the basis for awarding qualifications, as well as for evaluating the cognitive demands of the academic programmes that lead to whole qualifications. The awarding of qualifications in the form of certification is recognition of achievement and indicates the skills and knowledge that the learners have acquired, which enables them to access and undertake a range of occupational and other functions within the broader society. It impacts on and affects the learners' social and economic progression and mobility and, therefore, status in society. The credibility of the assessment process is thus critical for all concerned, i.e. the learners, parents, employers and the public in general.

Some of the principles that underpin the credibility of the assessment process are: fairness, validity, reliability, practicability, competence and integrity. These principles cut across the assessment process as a whole and are applicable to discrete elements within it, including the elements linked to the delegated functions, that is, training in assessment, moderation, and certification. The delegation presupposes that higher education institutions have an overall assessment policy in place within which the specific procedures for the delegated functions have been developed. Higher education institutions will have to demonstrate and provide evidence of the quality management systems that they have in place, in particular, the policies, strategies, procedures and resources to quality assure, support, develop and monitor the implementation of the delegated functions in line with the criteria and requirements of the HEQC.

Two areas relating to assessment will be addressed here, namely training and development in assessment, and moderation of assessment.

1.1 Training and development in assessment

The ETQA Regulations require all ETQA's to "register constituent assessors for specified registered standards or qualifications in terms of the criteria established for this purpose". The register of assessors, according to SAQA,

... should consist of those individuals who have demonstrated the applied competence to assess learners for summative assessment that culminates in decisions regarding the awarding of credits and/or qualifications. The rationale for such a register is to ensure the credibility of summative assessments in the National Qualifications Framework (NQF) system, i.e. fairness, validity, reliability and practicality of assessments. It is also to ensure that individuals who make decisions about the competence of learners who will acquire credits and/or qualifications, have the requisite knowledge, skills and experience for the specified NQF-registered standards and qualifications to make such a judgment. (*Criteria and Guidelines for the Registration of Assessors, 2001:5*)

There are various ways in which institutions develop the capacity of their academics on assessment practice.¹ The HEQC does not subscribe to the notion of accrediting assessors or maintaining a national database or register of trained 'competent' assessors. The HEQC is of the view that this is a responsibility of higher education institutions and that institutions should demonstrate their strategy/mechanisms for capacitating both new and experienced academics regarding progressive assessment practices. Moreover, while the HEQC does not want to impose on the type of training to be conducted on assessment, it is important that institutions put in place systems to ensure that the quality of training accords respect to the academic standing of its academic staff and is consistent with the depth and breadth of conducting assessment in higher education.²

Training and development in assessment may, but need not, lead to a certificate of attendance or a certificate of competence and as such the staff completing such training would not have to be reflected in the National Learner Records Database (NLRD).

1.2 Moderation of assessment

The moderation of assessment refers to the process used to evaluate assessment practice to ensure that the latter is fair, valid and reliable. It includes both internal moderation, that is,

1 Some institutions use the registered assessor unit standards that fall within the accreditation scope of the ETDP-SETA, which are at NQF level 5. Other institutions have adopted the Postgraduate Certificate in Higher Education and Training (PGCHET) at NQF level 7. There are other modalities where institutions have developed an in-house course through their HR or academic development units or have used an assessment module in a B Ed (Hons) or M Ed programme.

2 Some of the assessment training standards registered on the NQF are industry-based.

moderation at the level of the institution, as well as external examination, that is, at the level of the ETQA or any other independent party. The role of external examination in ensuring the credibility of assessment practice is especially important given that assessment is primarily undertaken by the institution and individual assessors within it.

1.3 Criterion for the quality management of training in assessment, and moderation of assessment

CRITERION 1

The institution has effective policies and procedures which ensure the quality, suitability and depth of training in assessment and facilitate the quality of the internal and external assessment and moderation of its assessment procedures and results, in order to ensure their reliability and the integrity of the qualifications it awards. Rules and regulations pertaining to assessment must be clearly documented – systems, structures, policies, procedures and processes that ensure reliability, fairness, validity and consistency.

The criterion pertains to:

1. training of academics in assessment
2. procedures for internal and external examination
3. links between assessment and the programme – level, outcomes, standards etc.

In order to meet this criterion, the following would be minimum requirements:

- i. Procedures for the management of the quality, suitability and depth of assessor training and development. Such training shall also include orientation with the institutional assessment policies and procedures. Proper records of such training are kept.
- ii. The learning achievements of students are internally assessed by the academic staff responsible for teaching a course/module in terms of a system that includes internal moderation, especially in the case of courses/modules that are not externally examined. This includes the following:
 - Academic staff who teach a course/module are responsible for designing, implementing and marking both formative and summative student assessments, for recording results and for feedback to students.
 - For summative assessment, especially where more than one marker is involved, internal moderation checks are undertaken to ensure the reliability of the assessment procedures.
 - Procedures are in place and are followed to receive, record, process, and return assignments within a timeframe that allows students to benefit from feedback prior to the submission of further assessment tasks.

- There is an internal moderation system at faculty/departmental or equivalent academic level for all programmes leading to full qualifications offered by the institution. This includes a continuous internal process of monitoring assessment processes.
 - There are clear criteria for the appointment of internal moderators which include, among other things, seniority, a qualification at least at the same level as the qualification being examined, relevant teaching and assessment experience and, in the case of postgraduate programmes, research experience.
 - The role of the internal moderator is clear and encompasses the provision of advice, support and guidance to the assessor/examiner in relation to the design of assessment instruments and assessment practices in general (both formative and summative); and, in the case of courses/modules that are not externally examined, moderation of marking across a representative sample of assessment tasks and borderline cases to ensure the fairness, validity, consistency and reliability of assessment and the marking process as well as the quality of students and their degree of attainment.
 - Mechanisms are in place for the internal moderator to provide feedback to the relevant department/faculty/unit.
 - Appropriate steps are taken to address any weaknesses identified by the internal moderator.
- iii. The learning achievements of students, at least at but not necessarily restricted to the exit level of a qualification, are externally examined by appropriately qualified people who have been appointed according to clear criteria and procedures and who conduct their responsibilities in terms of clear guidelines. External examination includes the following:
- External examiners are recommended by the examining academic unit, are independent experts in their fields, have qualifications at least on the same level as the qualification being examined, are changed regularly, are not appointed as part of reciprocal arrangements (where possible), and are approved by and responsible to Senate or the equivalent body that discharges the responsibility.
 - The unit provides information on the curriculum and on continuous assessment, as well as guidelines to assist external examiners in the completion of their reports.
 - External examiners mark a sufficiently representative number and range of scripts, including borderline cases, for each paper written to enable them to verify the relevance, fairness, validity, consistency and reliability of assessment and the marking process as well as the quality of students' work, their degree of attainment, and the overall depth of the programme.
 - External examiners' reports are submitted to the examining academic unit. Problems are discussed with the internal examiner(s), and the programme coordinator monitors the implementation of agreed improvements.
 - External examiners recommend the marks list for the course/module concerned and the marks are finalized by relevant Faculty, Senate or equivalent committees.

- External examiners provide written comment on the validity of the assessment instruments, the quality of student performance and the standard of student attainment, the reliability of the marking process, and any concerns or irregularities with respect to the observation of institutional/professional regulations.
- iv. Assessment practices are effective and reliable in measuring and recording student attainment of the intended learning outcomes, and are aligned with the purpose of the programme. This includes the following:
- Assessment criteria are commensurate with the level of the qualification, the requirements of SAQA and, where appropriate, professional bodies, and are made explicit to staff and students.
 - Learning activities and the required assessment performances are both aligned with learning outcomes at the programme and modular level.
 - Learning outcomes for a programme/module and their link to assessment criteria and judgements are clearly stated and communicated to students. A range of appropriate assessment tasks are effective in measuring student attainment of the intended learning outcomes. In the case of professional, career-oriented programmes, there is at least one integrated assessment procedure for the qualification which is a valid test of the key purposes of the programme.
 - A system is in operation for maximising the accuracy, consistency and credibility of results, including consistency of marking and concurrence between internal and external examiners on the nature and quality of the evidence which indicates achievement of learning outcomes.
 - Students' assessment records are reliable and secure. Assessment data is accessible to academic coordinators, administrators, teaching staff and students, as appropriate.
- v In the case of research degrees, two examiners should be appointed, one of whom must be an external examiner, appointed by the Senate/Academic Board (or equivalent academic structure) on the recommendation of the faculty or relevant head of department or equivalent. A dissertation or thesis supervisor should not be an examiner.

2. THE QUALITY MANAGEMENT OF SHORT COURSES

At the centre of the transformation agenda in education is the principle of lifelong learning and the need to rectify the inequities of the past through increased access to higher education, which is essential to promoting skills and human resource development and a pre-condition for facilitating social and economic transformation.

The provision of a range of short courses and programmes, which is well established within the higher education system world-wide, is very important in contributing to meeting the objectives of lifelong learning and the redressing of past inequalities. They serve the following purposes:

- They enable access to higher education to those who were denied access and/or who may not meet the formal entry requirements for higher education;
- They meet the needs of workers and professionals, including civil society more generally, to continually upgrade their skills and knowledge;
- They generate third stream income for higher education institutions in support of their teaching, research and community service mandate.

2.1 Nature and type of short courses

According to SAQA, “short courses” – or “short learning programmes” – are those courses that are of a shorter duration than courses and programmes leading to formal qualifications in higher education. In line with SAQA criteria, the HEQC therefore defines as short courses those courses which are:

- less than 120 credits (equivalent in time to 10 hours per credit), which is the minimum number of credits required to obtain a full qualification in terms of the NQF;
- focused on a part of a qualification, “which may include learning in the fundamental or core or elective areas (or a combination thereof) but will not lead to the achievement of a full qualification”. A full qualification, on the other hand, must contain “fundamental, core and elective components of learning” (*SAQA Criteria and Guidelines for Short Courses and Skills Programmes*, 2004: 16).

Furthermore, short courses can be divided into two types depending on whether they are credit-bearing or non-credit-bearing:

- credit-bearing courses, which are linked to a registered qualification or unit standard and can lead to the award of a credit towards a particular unit standard or part of a qualification, depending on whether the learner chooses, or is provided with the option, to be formally assessed or not;
- non-credit-bearing courses, which are not linked to a unit standard or qualification but which may carry points required for ongoing registration of occupations linked to professional councils; the points are usually determined on the basis of the number of contact hours. Non-credit bearing courses can be formally assessed resulting in statements of applied competence, or be attendance-based only.

The short courses that are offered within these two types cover a range of social, economic and educational purposes, including access to higher education, skills development, continuing professional development, personal fulfilment and social development and citizenship.

2.2 Criterion for delegation of the quality management of short courses

CRITERION 2

The institution has effective systems in place for the quality management of short courses.

In order to meet this criterion, the following minimum requirements need to be met:

- i. A clear policy framework outlining the role of short courses within the context of the institutional vision, mission and goals, including the faculties and programme areas within which the institution offers or intends to offer short courses and the rationale for offering them in terms of regional and national priorities and institutional capacity.
- ii. A clear distinction is made between short courses and programmes leading to full qualifications in relation to nomenclature, NQF level, credit values and the possible transfer of such credits.
- iii. Policies and mechanisms for the recording and quality assurance of all short courses offered by the institution. These policies and mechanisms are widely known at the institution and encapsulate the development, approval and certification of short courses, the final approval for which, as with all mainstream courses, should rest with the appropriate academic unit or governance structure at the institution.
- iv. Mechanisms which evaluate the impact (both positive and negative) of offering short courses in relation to:
 - the mission, goals and priorities of the institution; and
 - student success rates in whole qualifications.
- v. An integrated institutional strategic planning framework and process for the provision of both whole qualifications and short courses. In this context, the provision and planning of short courses should take into account factors linked to programme planning and quality assurance, including the need for specific courses; the available staff capacity to develop and offer the courses; the impact of offering short courses on the quality of the services provided to students on the mainstream programmes; the administrative capacity at all levels – departmental, faculty and institutional – to co-ordinate and manage the provision of short courses; the design and delivery costs of short courses and the ability to recover the costs through fees and other revenue sources.
- vi. Short courses offered are suitably and effectively coordinated in relation to provision, planning and quality assurance at faculty/departmental and institutional levels.
- vii. Mechanisms are in place for regular review of the effectiveness of the quality management system of short courses.
- viii. A register is in place at the institution which outlines the purpose, nature and status of short courses in relation to whole qualifications offered by the institution as part of its

programme qualifications mix (PQM), as well as qualifications registered on the NQF by professional bodies and sector education training authorities (SETAs), as applicable. Such a register shall include course title and code; statement of purpose; outcomes; credit-bearing status;³ admission requirements; assessment criteria and methods; teaching and learning strategies; coordination and delivery, including the venue, fees and other financial information as well as certification rules and procedures which clearly distinguish between certificates of competence and certificates of attendance.

- viii. The integration of the short course register into the management information system of the institution.
- x. The issuing of certificates complies with the minimum requirements for certification as outlined in Section 10 of this Framework.

3. CERTIFICATION ARRANGEMENTS

Certification signals and recognises, through the awarding of qualifications, the achievement of skills and knowledge that the learners have acquired, which enable them to access and undertake a range of occupational and other functions within the broader society. The integrity of the certification process is therefore critical to ensuring the credibility and confidence of the broader society in the value of the qualification awarded.

3.1 Criterion for certification

CRITERION 3

Clear and efficient arrangements ensure the integrity of learner records and certification processes. Oversight and monitoring responsibility is clearly allocated and acted upon.

In order to meet this criterion, the following minimum requirements need to be met:

- i. A central office responsible for the certification process, and clear lines of accountability and responsibility established within that office, with authority vested in specified persons.
- ii. Effective mechanisms which ensure the integrity of learner records, quality assure the processing and issuing of certificates, and which are secure enough to avoid fraud and/or the illegal issuing of certificates. Such mechanisms should comply with the following:
 - The student record system should be sufficiently secure and include a full audit trail of all marks recorded.
 - There should be a proper record of recommendations from a relevant committee or

³ In the case of credit-bearing courses, the link between the course and other programmes, both internal and external should be indicated, including whether the course carries credits towards registered standards and qualifications and/or whether it enables access to programmes linked to registered standards and qualifications. In the case of non-credit-bearing courses, a clear distinction should be made between courses which are offered for “non-degree purposes”, i.e. courses which carry credits as part of a whole qualification but which can also be offered as stand-alone courses without credit, and courses which have been developed without any reference to credits

office for the award of qualifications to students who meet the relevant requirements for obtaining such qualifications. Such records should be kept permanently in the institutional archives.

- Certificates for full qualifications and credit-bearing short courses should be signed by appropriate levels of accountability at the institution, usually the Registrar and the Vice-Chancellor or equivalent in line with the policy of the institution.
 - Certificates of competence for short courses should be signed in terms of the delegations formally agreed upon within the institution.
- iii. There should be clear arrangements for the preparation, ordering and printing of certificates. The arrangements should include:
- Appropriate security measures in relation to the storage of certificates (both blank and printed).
 - A stock register and audit trail of all certificates in storage, issued and destroyed.
 - The shredding of all cancelled certificates.
 - Due consideration to the quality and size of the paper used with appropriate institutional security systems, such as the embossment of the crest and its use as a watermark or hologram.
 - Security of signatures.
 - The printing of certificates in secure premises and under strict supervision.
 - Appropriate checks to guard against fraud and to ensure the integrity of the process in relation to the issuing of duplicate certificates or transcripts in lieu of certificates lost, destroyed, damaged and/or where the name of the graduate has been officially changed.
- iv. Regular review of the effectiveness of arrangements for ensuring the integrity of learner records and certification processes.

4. RECOGNITION OF PRIOR LEARNING (RPL)

RPL is one of the founding principles of the NQF and is widely associated with its primary objectives, most notably those which focus on redressing past discrimination and widening access to new learning opportunities and pathways in the system. These objectives are echoed in the Department of Education's White Paper 3: A Programme for the Transformation of Higher Education (1997) and specifically in the commitment to equitable and flexible opportunities for students to 'enter and succeed' in higher education.

Notwithstanding the strong endorsement of these objectives nationally, and the history of senate's

⁴ The explicit provision for RPL in the National Professional Diploma in Education is the only case of large scale implementation in most of the public HEIs in system to date.

⁵ This model foregrounds the instrumental purposes of RPL and is based on the assumption that it is possible through assessment to establish direct equivalence between the outcomes (current competence) of experiential learning and the stated outcomes of a module, unit standard or whole qualification.

discretionary admissions, the introduction of RPL policy and practices has been notably slow and small scale⁴ at most institutions of higher learning. For the most part, this reflects a combination of epistemological, logistical and financial constraints associated with the ‘credit exchange’ model⁵ of RPL that has had more success in some trade and occupational sectors than in higher education. More pragmatically, it also reflects the pressure on institutions during the first 13 years of democracy to respond to a raft of new policy and legislative changes, mergers, escalating student enrolments and very low completion rates.

This dilemma is systemic and cannot be resolved without macro-level policy provisions but, in the interim, institutions need to ensure that their commitment to widening access is matched by their commitment to adequate standards of service provision for all students. The criteria for the delegation of the quality management of RPL to institutions which are listed below are designed with this commitment in mind.

RPL research in South Africa and internationally continues to explore the merits of RPL as an assessment device and as a pedagogical practice.⁶ In the case of the former it is understood mainly as a formal assessment of the knowledge and capabilities that people possess (or don’t possess) as a result of prior informal or experiential learning. Here, the focus is retrospectively on current competence: what has been learnt from past experiences and assessment of evidence generated in relation to the prerequisites or outcomes of a specified qualification or module. This may result in a decision to grant exemption from prescribed entry level requirements and/or the award of credits towards part of a qualification. In short, this model gives preference to the efficiencies of admissions tests, challenge exams and a tightly prescribed format for portfolios of evidence when these are used.

In the case of RPL as a pedagogical practice the focus changes from assessment driven activities to a planned exploration of the history, nature and form of learning in and across different learning pathways or communities of practice. The focus here is on both prospective and retrospective and participants wanting to study at university who are exposed to the language, rules and practices of the institution and how this differs from or complements their previous experiences of learning. This form of RPL, often referred to as a developmental model, usually takes the form of a structured portfolio development course⁷ that provides participants with the basis for deciding whether and how to proceed with an application for access into a new programme of study or not.

6 An excellent reference is the book *Re-theorising the Recognition of Prior Learning* edited by Per Andersson and Judy Harris and published by NIACE in 2006.

7 Offered on a group or individualised basis

Different versions of this model have been developed internationally and in many cases the course is offered as part of the entry level suite of courses for an accredited undergraduate programme. This has the added advantage of providing learners with an orientation to the specific discourse and requirements of a cognate programme of study and, where relevant, with the tools and procedures for requesting an assessment for advanced standing in respect of one or more modules of the programme in which they may have specialised knowledge.

It is important to note that in South Africa, with respect to higher education, the practice of using RPL as a basis for admission to undergraduate study is regulated by the provisions of the Higher Education Act of 1997 (Sections 37 and 74). The Act provides the rules that give universities the authority to determine admissions policy in respect of particular programmes and the Matriculation Board of Higher Education South Africa (HESA) the authority to set the minimum requirements for admission to undergraduate study. These currently require matriculation with endorsement, but from 2009 the new National Senior Certificate⁸ will apply. Together these constitute the framework within which higher education institutions are able to provide for mature age exemptions, conditional exemptions for students who satisfy senate's discretionary rules for alternative access, and the 50% residency clause which sets a limit to the number of credits that may be awarded through RPL assessments or credit transfers from other universities.

From a quality perspective, RPL-related practices in higher education are able to draw on a growing body of literature and expertise that testify to the criteria for its success in different institutions and programmes. These acknowledge the limits and possibilities of its application in relation to different institutional missions, locations, infrastructure and qualifications. They also highlight the conceptual complexity of the processes involved at the intersection of different pathways and associated modes of knowledge and learning. These require designated RPL personnel to work with academic and administrative staff to design, plan, implement, monitor and research the provision of core RPL services and programmes. RPL practices should also provide information and advice to prospective students, and mentoring and monitoring services available to them as they progress in the system. Research has shown that the attrition rates are substantially reduced for non-traditional students who succeed in their first semester courses.

RPL is still in its early stages of implementation in most higher education institutions in South Africa and so the criteria listed below need to be read as a guide to developing the quality and standards of the practice. Institutions are advised to consult and benchmark their systems against others which have specialised in this practice.

⁸ Department of Education. *Minimum Admission Requirements for Higher Certificate, Diploma and Bachelor's Degree Programmes requiring a National Senior Certificate*. Pretoria August 2005.

4.1 Criterion for the quality management of RPL

CRITERION 4

The institution has a policy and effective procedures for the recognition and assessment of prior learning.

In order to meet the above criterion, the following minimum requirements need to be met:

- i. A policy outlining the context, purpose, principles and approach to RPL as part of the institution's mission and goals is in place. The Policy has been approved by an appropriate governance structure and forms part of the admission and assessment regime at the institution. It must provide a framework for upholding the equity, integrity, viability, accessibility and quality of all RPL services offered by the institution. Copies of the Policy are available to the public and relevant statutory bodies.
- ii. Effective procedures for the implementation of all RPL services offered by the institution are clearly stipulated, documented and made available to all key role players in the institution (i.e. prospective students, administrators, academics and relevant decision making structures). They include identification, assessment, evaluation and transcription of prior learning against specified learning outcomes, so that prior learning can articulate with current academic programmes and qualifications.
- iii. Details and standards in respect of the following are clearly documented: a) the dissemination of information about the RPL services at the institution and how to access advice; b) administrative systems for the application, registration, record keeping and other operational procedures for all RPL services, including all forms of assessment;
- iv. The provision for quality RPL services inclusive of competent personnel and adequate resources is reflected in the plans and budgets of the institution.
- v. Appropriately qualified and/or experienced staff are in place to ensure the integrity and effective implementation of RPL services at the institution.
- vi. Monitoring and mentoring activities are an integral feature of the operation of the whole system for the benefit of who may be struggling with a range of social, emotional and cognitive barriers during the course of their study.
- vii. Admission of students through an RPL route should not normally constitute more than 10 per cent of the student intake for any of the programmes offered by the institution; in certain cases, however, the institution may demonstrate valid reasons for exceeding this norm within moderate limits.
- viii. Review, planning and research practices are reflected in the continuous improvement of RPL services offered by the institution. They ensure that RPL policies and practices are enriched by scholarship in the field and remain responsive to the changing context and conditions in higher education e.g. new minimum admissions criteria, new qualifications frameworks, new programmes for work integrated learning.

APPENDIX A

PROPOSED HEQC PROCESS FOR THE DELEGATED FUNCTIONS

A. For providers that have never submitted documentation on the delegated functions to the HEQC and that will either not be audited at all or are scheduled to be audited in 2009/2010

STEP	RESPONSIBLE PARTY	PROCESS STEP
1.	Institution	<ul style="list-style-type: none"> Submits internal policies and procedures for the quality assurance of the delegated functions to the HEQC, the extent of implementation of these policies and procedures, monitoring and oversight arrangements, evaluation and review mechanisms, and follow-up arrangements for improvement as well as implementation time frames with respect to those areas still under development taking into account the criteria in this Framework.
2.	HEQC Secretariat	<ul style="list-style-type: none"> Acknowledges the submission. Conducts a desktop preliminary evaluation of the submission. Appoints evaluators to evaluate the submissions and conduct site visits. Arranges site visits.
3.	Evaluators	<ul style="list-style-type: none"> Submit reports to the HEQC Secretariat.
4.	HEQC Secretariat	<ul style="list-style-type: none"> Liaises with the evaluator in relation to the report. Prepares documentation for the HEQC EXCO.
5.	HEQC EXCO	<ul style="list-style-type: none"> Recommends a decision whether or not to delegate in each case. Submits its report to the institution.
6.	Institution	<ul style="list-style-type: none"> Responds to the report within a stipulated timeframe.
7.	HEQC Board	<ul style="list-style-type: none"> Ratifies the decision of the Executive Committee.
8.	HEQC Secretariat	<ul style="list-style-type: none"> Communicates the final outcomes to the institution.

B. For institutions that have already been audited or are scheduled to be audited in 2007/8. These steps can only take place after the audit.

STEP	RESPONSIBLE PARTY	PROCESS STEP
1.	HEQC Secretariat	<ul style="list-style-type: none"> • Informs the institution that its audit report will be used to form the basis for a decision on delegation. • Can request more information, if necessary.
2.	HEQC EXCO	<ul style="list-style-type: none"> • Recommends a decision whether or not to delegate in each case. • Submits its report to the institution.
3.	Institution	<ul style="list-style-type: none"> • Responds to the report within a stipulated timeframe.
4.	HEQC Board	<ul style="list-style-type: none"> • Ratifies the decision of the Executive Committee.
5.	HEQC Secretariat	<ul style="list-style-type: none"> • Communicates the final outcomes to the institution.

C. For HEIs that submitted during the first round of submissions (2003/4) but have not been through an institutional audit.

STEP	RESPONSIBLE PARTY	PROCESS STEP
1.	HEQC Secretariat	<ul style="list-style-type: none"> • Gives the institution the opportunity to update the information/documentation already submitted in line with the criteria contained in this Framework.
2.	Institution	<ul style="list-style-type: none"> • Submits new information, if and as necessary.
3.	HEQC Secretariat	<ul style="list-style-type: none"> • Acknowledges the submission. • Conducts a desktop preliminary evaluation of the submission. • Appoints evaluators to evaluate the submissions and conduct site visits. • Arranges site visits.
4.	Evaluators	<ul style="list-style-type: none"> • Submit reports to the HEQC Secretariat.
5.	HEQC Secretariat	<ul style="list-style-type: none"> • Liases with the evaluator in relation to the report. • Prepares documentation for the HEQC EXCO.
6.	HEQC EXCO	<ul style="list-style-type: none"> • Recommends a decision whether or not to delegate in each case. • Submits its report to the institution.
7.	Institution	<ul style="list-style-type: none"> • Responds to the report within a stipulated timeframe.
8.	HEQC Board	<ul style="list-style-type: none"> • Ratifies the decision of the Executive Committee.
9.	HEQC Secretariat	<ul style="list-style-type: none"> • Communicates the final outcomes to the institution.

APPENDIX B

GOVERNANCE RESPONSIBILITY FOR THE DELEGATED FUNCTIONS

Decision-making responsibility for the delegated functions will reside in the Executive Committee of the HEQC Board. The terms of reference of the HEQC EXCO in relation to this function will be:

- i. To study the reports and recommendations of the appointed evaluators.
- ii. To review evidence from institutions.
- iii. To consider Secretariat recommendations in relation to institutional representations and responses.
- iv. To submit final delegation decisions to the HEQC Board for ratification.
- v. If necessary, to specify in detail necessary additions and/or amendments to institutional submissions.

The HEQC Board will be responsible for ratifying final decisions and for considering any requests for review of decisions.



Published by:
Council on Higher Education
PO Box 13354
The Tramshed
0126
South Africa
Tel: +27 12 392 9100
Fax: +27 12 392 9110
Website: <http://www.che.ac.za>

ISBN: 978-1-919856-69-8

Date of Publication: October 2008

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Designed by Blue Apple Publishing