



**COUNCIL ON HIGHER EDUCATION  
COMMENT AND ADVICE  
TO THE MINISTER OF EDUCATION ON**

**THE NQF CONSULTATIVE DOCUMENT:  
AN INTERDEPENDENT NATIONAL  
QUALIFICATIONS FRAMEWORK SYSTEM**

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## Introduction

The Higher Education Act (No. 101 of 1997) sets out the roles and responsibilities of the Council on Higher Education (CHE) and its permanent committee, the Higher Education Quality Committee (HEQC), with regard to policy and quality assurance related matters in the Higher Education sector. Stated simply, in terms of their respective mandates, the CHE advises the Minister of Education on all matters relating to higher education and the HEQC is responsible for the quality assurance activities of all public and private providers operating in the Higher Education and Training band of the National Qualification Framework (NQF). Bearing this in mind, the CHE and the HEQC have decided to provide a joint response to the Consultative Document: *An Interdependent National Qualifications Framework System*.

The Consultative Document (CD) is the work of an Interdepartmental Task Team established by the Department of Education (DoE) and Department of Labour (DoL) in response to the *Report of the Study Team on the Implementation of the National Qualifications Framework* (RST). The CD, however, is not just a response to the previous report

“(it) embodies a new perspective on the NQF and proposes significant changes in the structures responsible for its implementation” (CD, p. 3).

The Interdepartmental Task Team goes beyond the proposals of the Study Team through two major interlinked changes. These are:

1. Firstly, the conception of the interface between learning and work. The *‘integrated approach’* to education and training that has been a key objective of South Africa’s NQF and has strongly shaped its implementation over the last seven years is replaced by an *‘interdependent approach’* that rests on conceptual and organisational distinctions between three ‘learning pathways’.
2. Secondly, the co-operative governance structures of the NQF. The CD proposes the creation of three qualification and quality assurance councils (QCs) and making the Interdepartmental Task Team a permanent structure carrying significant advice, policy and planning functions.

Recognising the importance of submitting a comprehensive and constructive response to the CD, the CHE and the HEQC commissioned consultants to prepare reports that were presented to a joint workshop on Friday 3 October and to a meeting of the Board of the CHE on Monday 13 October.<sup>1</sup> These inputs, workshop and meeting provided the substance for this response.

While the CHE and HEQC welcome the release of the Consultative Document and support a number of its recommendations (see sections 2 and 7), **we fundamentally disagree, with its reconceptualisation of the integration of education and training based on conceptual and organisational distinctions between three ‘learning pathways’.** We believe that the concept of **‘interdependence’** marks a dangerous retreat from the principle of the **‘integration’** of

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<sup>1</sup> See the Research Report commissioned by the CHE from Young, M. (2003)

**education and training. This will undermine access with quality to higher education and training especially for learners in the workplace.**

Furthermore, we reject key recommendations on the grounds that these will compromise the development of an equitable, high quality national education and training system in South Africa, and undermine progress already made towards the implementation of the NQF. In these areas of disagreement, alternative proposals are provided.

The CHE and HEQC believe that the Interdepartmental Task Team have provided an accurate description of the problems that have bedeviled implementation of the NQF. However, the proposed solutions to these problems will exacerbate rather remedy the problems and will have a severe negative impact on South Africa's higher education and training system. While we accept that our interpretation of the Consultative Document may not align with the intentions of the Interdepartmental Task Team, we believe the validity of our interpretation is supported by our detailed analysis of the CD in the following sections. **Any policy document is open to multiple interpretations and unintended consequences and it is a major failing of the CD that there are significant areas of ambiguity and lack of detail that open the door to conflicting interpretations.**

The CHE and HEQC believe that the nature and measure of the CD's response to the problems of NQF implementation are inappropriate. The CD acknowledges that the NQF concept and objectives "continue to command widespread support" (CD p. 1). And yet, the CD proposes radical surgery to the concept of the NQF without providing a clear explanation of why this is necessary. It makes far more sense to build on the existing concept and objectives, given that they command 'widespread support'. **By proposing fundamental changes, the CD undermines what has been achieved and will throw the whole education and training system into a state of confusion and uncertainty.**

Broadly, this response will show that the CD is flawed politically, epistemologically, pedagogically and strategically.

- Politically, the unhinging of education and training will result in the 'dumbing-down' of workplace learning and prevent access, mobility and progression for workers wishing to achieve worthwhile higher education and training qualifications.
- Epistemologically and pedagogically, the CD tries to combine two incompatible principles: a principle of equivalence whereby qualifications and the learning they represent are similar across different sites and modes of learning; and, a principle of difference whereby important differences between modes and sites of learning are recognised. The CD assumes, but does not explain how, these tensions will be resolved.
- Strategically, the CD proposes fundamental changes in the way the NQF is governed with new roles and responsibilities for SAQA and the Interdepartmental Task Team. These strategic proposals are not explained clearly and are likely to lead to confusion over the roles and responsibilities of different statutory bodies and hinder effective implementation of the NQF.

The CHE and HEQC also note with regret that the Consultative Document does not provide a synthesis or analysis of the responses to the Report of the Study Team, which we assume was the

point of departure for the production of the Consultative Document. While acknowledging the importance of the DoE and the DoL achieving a “common understanding of how best to advance the objectives of the NQF“ (CD p. 3), this objective should not be prioritised in a manner that undermines key objectives of the NQF and progress that has been made towards implementing these objectives. **We believe that the incremental approach to change adopted in the Report of the Study Team, building on strengths within the present system while addressing weaknesses, provides a better approach to change. The radical recommendations proposed by the CD, if implemented, will have severe negative consequences for the education and training system and will hinder the implementation of the NQF and the effective achievement of the objectives of the government’s Human Resource Development Strategy.**

## Fundamental Principles and Propositions and Points of Agreement

It is important to explicate the CHE's and HEQC's point of departure in analyzing and developing their response to the Consultative Document.

The CHE and HEQC are in the first instance immediately concerned with the implications of the Consultative Document for higher education and training. However, the concerns also extend to the consequences for education and training in general, in so far as education and training are crucial to the social and economic development of South Africa and the creation of a better life for all South Africans, and because there is a relationship between higher education and training and other levels of education and training.

**The fundamental and overriding principle that animates the CHE and HEQC response is that**

- ◆ **The CHE and HEQC are and remain committed to an integrated approach to education and training as an important inheritance of the national democratic struggle of the pre-1994 period and as the most appropriate means to achieve the goals of the NQF: namely an education and training *system* characterised by equity of access, opportunity and outcomes; high quality provision, learning and teaching; learner mobility and progression; and, articulation between programmes, qualifications and institutions.**

In addition, the following propositions inform our views.

- The NQF is a *major* vehicle for the transformation of education and training. However, the NQF is not the sole mechanism for transforming education and training and for realizing various social purposes and goals.

The creation of a qualifications framework cannot on its own bring about fundamental change in education and training provision and practices. Ultimately, it is the concerted and deliberate building of the capabilities and capacities of institutional providers through the support of government and other agencies and through institutional initiatives in the areas of curriculum, learning, teaching and personnel expertise that are the crucial levers of fundamental transformation.

- The transformation and development of South Africa's education and training system, including the NQF, should maintain an adherence to principles, values, vision and goals and within these adopt flexible and incremental approaches that utilize and build on progress already achieved post-1994 by existing systems, institutions and organisations.

This is to be contrasted with initiatives that seek to introduce new conceptual frameworks and attendant implementation trajectories that are not adequately argued for, which may indeed be severely flawed and, in effect, introduce a host of new problems for national quality assurance agencies and providers of education and training. This does not mean that the CHE/HEQC do

not recognize the many acute problems and gaps in the current implementation arrangements for the NQF. The major challenge is to resolve these problems without producing even more obstacles and incoherence in the education and training system.

- Related to the above, national quality assurance agencies, other related bodies and providers of education and training continue to be in flux and to face major challenges. The system, institutions and actors are at the limits of their capacities to cope with policy unpredictability and to continuously absorb policy changes, often in the face of inadequate resourcing. There is considerable stress, strain and anxiety within national quality assurance agencies and providers.

It is imperative that we avoid further debilitation of institutions and ensure policy predictability and institutional stability.

- South Africa's higher education and training system contains significant 'pockets' of excellence in research and teaching. These need to be recognised and developed. To do this requires a policy continuity that acknowledges existing strengths while addressing weaknesses. Fundamental changes in policy will disrupt and weaken institutions in ways that may impact negatively on learner access and success.
- The governance and regulatory architecture of the NQF should be simple, clear, efficient and effective.

Clear jurisdictions for, and responsibilities of, the different agencies must be defined and legislated in unambiguous terms thereby avoiding contestations over 'territory', delays due to overly bureaucratic structures and processes, and uncertainty amongst the QCs and institutional providers.

- The different agencies must be provided with adequate funding from the government to fulfill their responsibilities.

Without adequate funding, the QCs and other agencies will be unable to develop the capacities and capabilities necessary for the successful implementation of the objectives of the NQF.

- The Departments of Education and Labour must assume political leadership of the NQF.

However, this should avoid an absorption and centralization of policy and regulatory powers and functions that are rightfully the responsibilities of relatively autonomous yet publicly accountable national independent statutory agencies and institutions. Above all, independent statutory agencies should not be reduced to the technical implementation instruments of the Departments of Education and Labour.

- Differences between modes of learning should not be trivialised or seen as easily 'overcome'.

Discipline-based learning (mainly in institutions) and occupational context-based learning (mainly in the workplace) can be represented as two 'poles of a continuum' but this should not obscure the hierarchical differences between the two types of learning. Further it may be possible to 'erase' the distinction between unit standards and whole qualifications, but, this will be a slow and

complex process. The reconceptualisation of the distinction requires considerable curriculum research and development to establish a clear relationship between the 'parts' and the 'whole' of a qualification.

- The portfolio division of responsibilities should not lead to situations where the funding of provision is located in one government department and the quality assurance of programmes and qualifications is located in an agency that reports to another government department. This will severely undermine the capacity of the Department of Education to steer and transform higher education through planning, funding and quality assurance.
- Appropriate change initiatives that are already in the public domain, such as the proposed New Academic Policy should be implemented as soon as possible.

The New Academic Policy was produced as a discussion document in December 2001. The lack of a clear academic policy for higher education and training has added considerably to uncertainty amongst quality assurance bodies and providers and has hampered the development of relevant curricula and qualifications.

**The CHE and HEQC support many of the recommendations made by the CD.** However, as we will show in subsequent sections of this response, this support has to be qualified by a realistic assessment of what is possible and conceptually coherent. Given this conditionality, **The CHE and HEQC:**

- Welcome the decision to affirm the ten level NQF recommended by the NQF Study Team.
- Support the establishment and development of a 'Functional Credit Accumulation and Transfer (CAT)' scheme.
- Welcome the CD's understanding of standards-generation and quality assurance as only different moments of the same quality cycle with feedback mechanisms assuring quality and development .
- Agree with the recommendation that accreditation should be reserved for providers and their programmes.
- Support the recommendations that assessor registration should apply only to workplace learning and that the Recognition of Prior Learning should be prioritised.
- Welcome the views on whole qualifications and unit standards.
- Support the recommendations that the size of the SAQA board should be reduced and that a National HRD Forum and an NQF forum be created.
- Welcome the decision to replace the existing National Standards Bodies (NSB) and Standards Generating Bodies (SGB) structures with the QCs and use fit for purpose panels for qualifications and standards generation.



- Strongly support the bringing together under one body of the separate but related functions of standards setting and quality assurance and the principle of “one provider falling under the ambit of one Qualification and Quality Assurance Council” .
- Support the recommendation that private institutions operating within the higher education and training band should continue to register with the DoE in terms of the appropriate legislation and that the quality assurance of these institutions should be the responsibility of the HI-ED QC.
- Acknowledge the need to develop ‘communities of trust’.

Our earlier stated fundamental principles and propositions lead us, however, to disagree with key recommendations and conceptualisations provided by the CD. In order to provide clear explanations for our disagreements, we spell these out in detail in the following sections.

## The Interface between Learning and Working

### 3.1 Introduction

The CHE and HEQC responses to the Consultative Document follow the sequential ordering of the proposals and recommendations made by the Interdepartmental Task Team.

**3.1.1** The Consultative Document sees the Report of the Study Team as the basis for a '*rapprochement*' between the Department of Education and the Department of Labour (CD p. 2). The CD gives substance to this *rapprochement* by showing how the responsibilities of the two Departments can be seen as not in opposition but as complementing each other within the framework provided by the government's *Human Resources Development (HRD) Strategy* for South Africa (CD pages 5 & 6).

"The strategy transcends the line function responsibilities of the two departments with a clear set of national priorities for which they are jointly responsible" (CD p. 5).

The CD recognises the responsibilities of the two Departments for "education and training on the one hand and skills development on the other" (CD p. 5). The emphasis on these different roles and how they might be combined defines the nature of the compromise proposed by the CD. This accepts the need for each Department to be responsible for, and have authority over, both the qualifications appropriate to its remit and the body or bodies established to manage them. **As we shall suggest later in this response, despite many references to the importance of collaboration, this 'divided ownership' approach creates a number of problems. Another consequence of the emphasis in the CD on achieving a compromise acceptable to the two Departments is that other critical issues associated with the framework are not given the attention they deserve.**

**3.1.2** While the CD acknowledges that the HRD strategy is committed to an inclusive interpretation of work that encompasses values such as human dignity, self-expression and full citizenship, the CD itself concentrates on those skills necessary for social and economic development. Without doubt, the development of the personpower of South Africa – in terms of knowledge, skills, competencies and attitudes – is crucial for social and economic development, and the institutions of education and training must make a pivotal contribution in this regard. There is also no doubt that educational institutions must become more responsive to the development of personpower for social and economic development. **However, the CHE and HEQC must express their grave concern that the CD's interpretation of the HRD strategy gives primacy only to the extrinsic or instrumental goals of education and training such as social and economic development (narrowly conceived) and excludes important intrinsic goals such as intellectual development and personal autonomy that are central to values such as human dignity and self-expression.**

### 3.2 Institution– and workplace-based learning in the NQF

The Interdepartmental Task Team believes the initial formulation of the NQF as a 'one-size fits all' model has blurred epistemological and organisational distinctions that have undermined its own development. In the words of the CD: "...the two worlds of discipline-based learning (mainly in

institutions) and skills development (mainly in the workplace, including professional practice), have co-existed uneasily within the common qualifications framework” (CD p. 6); and “There are clear indications that the SAQA architecture is not holding” (CD p. 9).

**The CHE and HEQC agree with these descriptions.**

### **3.3 Defining typical learning modes**

The CD argues for recognition of three distinct but inter-related learning modes or pathways constituting a continuum of learning (CD pages 10-12). The two poles of the continuum are marked by discipline-based learning (mainly in institutions) and occupational context-based learning (mainly in the workplace). In the middle of the continuum is career-focused or general-vocational learning (mainly in institutions). The CD proposes that these three learning pathways form the basis for three distinct but equivalent qualification pathways.

The CHE and HEQC believe that the CD fails to recognise that these different types of learning represent not just differences but also a hierarchy of types of learning. Qualifications have to remain rooted in epistemological reality and in people’s experience if they are to be a vehicle for expanding education and training. The three proposed qualification pathways are not equivalent; parity of esteem is not a reality in any country, partly as a result of continuing social inequalities and the unequal distribution of wealth and partly because there are real differences between types of learning. The CD begins by recognising this reality in its discussion of types of learning but completely loses its implications in its proposals. In effect, workplace learning will be separated from other forms of learning by impermeable barriers, creating a destructive silo effect. **The CHE and HEQC believe that far from improving access, mobility and progression, the recommendations of the Interdepartmental Task Team will lead to the perpetuation of inequalities, and impermeable boundaries between what will be perceived to be superior ‘educational’ institution based qualifications, and what will be perceived to be inferior ‘training’ workplace based qualifications.**

### **3.4 Progression: bands, levels and pathways**

**3.4.1** The CD notes that the attempts by SAQA to create one common set of level descriptors for all forms of education and training have experienced considerable difficulty and that it may be necessary to create fit-for-purpose level descriptors appropriate to distinct modes of learning.

**The CHE and HEQC broadly agree with this sentiment in regard to discipline-based and career-focused/general-vocational qualifications. As will be shown later in this response, we do not believe that occupational context-based qualifications are appropriate in the higher education and training band.**

**3.4.2** The CD implies that public providers of higher education should focus on general formative education and should not compete with private or corporate providers specialising in occupationally oriented training (CD pages 13 & 14).

**The CHE and HEQC strongly object to this caricature of higher education and training. The implication is that universities and technikons should provide only undergraduate general**

formative qualifications and post-graduate discipline-based qualifications, leaving career focused and professional qualifications to private providers. This would decimate enrolments in public higher education institutions and severely undermine the quality of education and training in fields such as health, law, engineering, business, accountancy, teaching and public administration amongst others. It assumes, also, that there are private providers capable of taking on these responsibilities whereas there is no evidence to support this.

### 3.5 Qualification types in a revised National Qualification Framework

The CD proposes a three pathway and three band qualification framework. We reproduce this diagram here because it plays such a key role in the recommendations of the CD:

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

**The CHE and HEQC believe that this framework is fundamentally flawed.** After providing a substantial explanation for this view, we offer an alternative framework as shown in the diagram on page 18.

**3.5.1** In the case of higher education, the CD supports the move to a ten level NQF, in part because of the importance of levels 5 and 6 certificates and diplomas that could be offered by Further Education and Training (FET) colleges by arrangement with a technikon. **The CHE and HEQC welcome the decision to affirm the ten level NQF recommended by the Report of the Study Team.**

**3.5.2** The three pathways will continue through higher education with the discipline-based pathway provided primarily by universities and the trade, occupational and professional (TOP) pathway provided predominantly in the workplace. The career-focused pathway will be provided by universities and technikons and through workplace learning.

**The CHE and HEQC reject the extension of the TOP pathway into higher education and training.**

**3.5.3** The CD rejects the distinction made by the Report of the Study Team between ‘unit standards-based’ and ‘whole qualifications’ which as it points out was largely associated with the different concerns of universities and technikons on the one hand and the SETAs on the other hand. The CD argues that the unit standards/whole qualification distinction masks more fundamental differences between disciplinary and work-based learning and the purposes of the different types of qualifications that they lead to. This is true. However, in rejecting the distinction, it is unclear whether it is assumed that *all* qualifications will consist of unit standards (albeit not necessarily as separate standards) or whether a unit standards definition of a qualification will only apply to work based qualifications. In other words, **it is unclear how far a common definition of a qualification will apply to all three pathways or whether they will be able to conceptualise their qualifications in their own terms and negotiate issues of credit transfer and progression.**

The CD argues that the unit standards/whole qualification distinction is redundant as qualifications are always made up of parts (units) and that there is a requirement that each part has to be coherent in itself as well as in how it contributes to a whole qualification. However the CD does not elaborate on when the parts can be treated separately from the whole, or where and by whom decisions are made about the sequencing or accumulation of parts. The idea that qualifications should be ‘credit based’ and available in units or ‘bite sized chunks’ is fashionable, albeit controversial. On the one hand there is the question as to whether all qualifications should be obtainable on the basis of ‘accumulated credit’ (e.g. through modules) or whether institutions, employers or professional bodies should reserve the right to reject some combinations. There is considerable debate around the rationale for credit-based or unitised qualifications. They are assumed to be attractive to

- (a) Employers who may not want to pay for a whole qualification; and
- (b) Disadvantaged learners who might be put off whole qualifications.

On the other hand, a possible outcome of their availability is narrowly based skills training for some employees and ‘Mickey-mouse’ qualifications for disadvantaged learners which do not give access to progression. **The coherence of whole qualifications can be exclusionary; however it can also be a guarantee of the rigour and validity of the knowledge and/or skills that are being acquired.**

**It should be possible for learners to gain qualifications (and even degrees) by completing the parts (accumulated in the form of credit) over different lengths of time and combining them in different ways rather than necessarily being tied to specific sequential programmes over a particular time. At the same time universities, technikons and professional bodies should be allowed to decide the criteria for adequate and coherent sequences and combinations.**

The implications of the position taken in the CD are unclear as it depends on design issues and how far the unit-standard model is retained for the different types of qualification. It is for example, highly debatable, whether a unit standards model is appropriate for discipline-based qualifications.

**3.5.4** The Report of the Study Team recommended that “regulations on Fundamental Learning should be treated as guidance so as to allow Standard Setting Bodies to take account of the needs of learners” (RST p. iv).

The CD accepts this, but for work-based qualifications only. However this does not grasp the point made by the Study Team. It is not that Fundamental Learning is not important enough to be regulated, rather it is very doubtful that the idea can be expressed in a meaningful way as a regulation that applies to all levels. If Fundamental Learning remains as part of regulations rather than as guidance to institutions it can all too easily lead to little more than forms of ritual compliance and ‘box ticking’. **Other means such as quality assurance mechanisms are likely to be more effective in ensuring that institutions are taking fundamental learning seriously in ways appropriate to the level and content of the programme.**

**3.5.5** The CD supports the NAP model of ‘nested qualifications’ and argues that there are close similarities with the ‘contextual qualifications’ model developed by some of the SETAs. The CD believes these similarities will guarantee valid equivalences or ‘comparabilities’ between qualifications achieved in the work-place and within institutions (CD pages 17 – 20). The CD, however, does not explain how knowledge is to be taught, learnt, and evaluated (assessed and assured) within the different pathways or across institutional and workplace-based sites of learning. Without these details, the CD’s argument is unconvincing. Furthermore, the CD undermines its own argument with its strong recognition of the differences between institution based and workplace based learning. The CD correctly points out that as a result of not recognising these differences, SAQA guidelines attempted to describe all types of learning in terms of a single definition. Instead of trying to develop an NQF that linked the different types of learning, the SAQA approach blurred the differences with its concept of ‘organisational fields’ and failed to take account of the differences in definitions of a qualification. As the CD recognises, the differences neglected by SAQA have emerged anyway and despite the inflexibility of the SAQA guidelines, key groups involved (for example the CHE and the SETAs) have conceptualised or developed qualifications in very different ways. Against this background, **the suggestion that there are strong similarities between institution based and workplace based qualifications appears contradictory.**

**3.5.6** The CD proposes the immediate development of a ‘Functional Credit Accumulation and Transfer (CAT)’ scheme without which the objective of “facilitating access to, mobility and progression within education, training and career paths” will be indefinitely delayed (CD p. 21).

**The CHE and HEQC support the establishment of a CAT scheme but believe that it will be difficult to establish ‘equivalence’ across the different pathways as conceptualized in the CD.**

### **3.6 Interdependence**

The CD provides a useful account of the similar but overlapping concepts used to describe three broadly different types of learning. It recognises that these types or modes of learning are not separate and that any modern framework must include options for vertical, horizontal and diagonal progression within and between them. It follows that the CD emphasises the importance of articulation between the types or pathways; however it says very little about how the processes of articulation might work. The three types are combined with the existing three NQF bands to generate a 3X3 framework.

This is undoubtedly a simpler structure than that developed by SAQA. Furthermore, the three columns have some grounding in practical experience and the structure at least points to an organisational basis for limiting the proliferation of bodies involved in both qualification design and quality assurance. The new framework creates a problem, however, in trying to combine two different principles. From the original NQF concept, it takes ‘the principle of equivalence’ which assumes, as in the 3X3 framework, that it is possible to treat all qualifications and all learning equally, despite recognising their differences. From its analysis of types of learning, the new framework takes the ‘principle of difference’ which contradicts the principle of equivalence on the basis that different types of learning cannot be compared within a single framework or criteria. There is an indication that the CD recognises this problem at two points. The first is in its discussion of level descriptors and its suggestion that they may need to be pathway specific. The second is when it points out that, while the bands apply to the general and general vocational pathways, they do not apply so directly to the occupational pathway. **These concerns raise questions about whether the typology of pathways can be an adequate basis for qualifications and their regulation.**

The framework, as represented in the diagram on page 12, follows the original NQF concept in seeking to impose a single universal model on three types of learning that are quite diverse. However, it does this in a way that differs from the SAQA model in two key aspects. Firstly, instead of treating all learning and qualifications in terms of a single criterion expressed in a single definition of unit standards and qualifications, the new framework licenses the three pathways to define learning and qualifications differently, but then equates them within a single band and level structure. Secondly, instead of blurring differences within a single list of ‘organisational fields’ that straddles disciplines and occupational fields, the new framework makes a three way separation of pathways but has difficulty in specifying adequate criteria for distinguishing between them. **Each of these assumptions is likely to cause problems when the three pathways are mapped on to three Qualification and Quality Assurance Councils as will be seen later in this response.**

We want to concentrate here on the issue of equivalence in relation to bands and levels and to suggest that ‘the principle of equivalence’ which, for example, treats institutional or disciplinary learning as equivalent to learning that ‘is unique to the workplace’ is an assumption that needs to be questioned and that it may be more about aspirations to equality than reality. The CD distinguishes between different types of learning but fails to recognise that, in an important sense, these different types represent not just differences but a hierarchy of types of learning. There is much historic prejudice against practical skills and craft knowledge and much elitism surrounding subjects and disciplines. Both forms of prejudice have origins in the class structure of capitalist societies and both need to be criticised. However, it is equally important to realise that these prejudices, real though they are, are only part of the picture. **Underlying these prejudices are real epistemological differences between the knowledge that can be acquired in the left hand column (institutionally and through disciplines) and that which can be acquired in the right hand column (in the workplace). The ‘principle of equivalence’ is fundamentally misleading in obscuring these real differences.**

The 3X3 framework sends a message that progression is as achievable via the right hand column as via the left hand column. This is not to argue against the importance of promoting progression but that it should not drive the design of the framework in the way suggested in the diagram. Qualifications are limited in what they can achieve. They have a role in promoting progression and eliminating unnecessary barriers. However, relative to the work of teachers and the support of employers, they are marginal. The three types of learning or qualification pathways in the diagram are not equivalent.

Progression is bound to be skewed towards the left of the diagram because, in an important sense, learning in institutions and through disciplines is far more powerful than learning that takes place at work. If this were not the case, then we would not have schools, colleges and universities. Those countries in South East Asia and Northern Europe that have been most successful in limiting this 'skew', have done it by expanding the quality and quantity of institution based education that is available to those that are in employment and following a work-based route. **The CD begins by recognising this reality in its discussion of types of learning but loses its implications in its proposals. The power of different types of learning is a reality that any NQF has to start from. If it does not, it will be a barrier to progression - not a way of overcoming barriers.**

The broad bands in the framework are found in some form in all modern qualification systems. Sometimes they are expressed more explicitly in terms of levels. As the CD notes, the bands tend not to apply to workplace based qualifications. However, the framework is misleading in showing occupational context-based pathways as applying to all levels and bands. This suggests that there are three kinds of pathways to progression when in practice, and for the reasons discussed above, progression in workplace based qualifications ends somewhere in the FET band or even lower. If technicians, for example, with a level 4 qualification in the FET band seek further progression to become engineers, this invariably takes place via an institution based pathway, not through an occupationally-based route. It follows that technician-to-engineer progression depends on partnerships between employers and higher education institutions. This is the most common type of progression for those in employment and does not rely on higher level workplace based qualifications. There is a danger that the new framework, by emphasising 'the principle of equivalence', oversimplifies the possibilities and gives a false or unrealistic picture of progression possibilities. **If the structure proposed by the CD is accepted as it is, it will license SETAs within the new Trade Occupational and Professional pathway to create progression routes via workplace based learning and generate alternative workplace based engineers to compete with university educated engineers. Research and the experience of other countries demonstrate that this is an unworkable approach.**

The CD recognises that whereas bands have a long history in relation to educational institutions, they have little meaning in the workplace. This, of course, is only partly true. An example is the tendency for professional bodies and employers to form links with HE Band institutions and not those offering programmes in other bands. The creation of a 3X3 model generates the possibility of level 6 to level 10 qualifications that are 'occupationally recognised and unique to the workplace'. For the reasons mentioned above, it is very difficult to conceive of level 6 to level 10 qualifications that are not substantially discipline-based for these qualifications to have credibility.

Implicit in the distinctions made by the CD is a view that existing provision of higher education and training ignores the needs of the workplace. There are two inter-related misconceptions contained in this view. Firstly, there is much research and teaching within higher education that is focused *on* the workplace. Secondly, restricting workplace learning to learning *in* the workplace ignores the key role played by research in higher education and training qualifications. The CD does not explain how learning within the TOP pathway will be delivered if not by existing higher education and training institutions. Nor does the CD explain how learning *in* the workplace could encompass the research and conceptual foundations necessary for worthwhile higher education and training qualifications.

**The CHE and HEQC unequivocally reject the extension of the TOP pathway into higher education and training.**



The CHE and HEQC believe that it is beyond their remit to comment on the existence of a TOP pathway in the Further Education and Training Band although we believe that the epistemological and organisational arguments provided in this response are as appropriate to the FET band as they are to the HET band. The integration of education and training is as critical to FET qualifications as to those in the higher education band. Appropriate linkages between workplace arrangements SETAs and technical colleges could address the NQF integration issues.

### 3.7 Conclusion

The CD is committed to a qualifications-driven approach to progression when a quite different form of collaboration between SETAs, employers and higher education institutions might be more appropriate. The CD avoids the critical epistemological issues that distinguish types of learning and assumes that it makes sense to conceive of qualifications in higher education and training that are context-specific and unique to workplaces when any way of expressing levels for these qualifications on a framework must be in terms that are not context specific. **The CHE and HEQC are committed to the view that progression may often start in a pathway ‘unique to the workplace’ but will inevitably not end in that pathway.**

There is nothing wrong with the concept of progression from a ‘sweeper to an engineer’ as proclaimed in a popular slogan of the 1990s. Problems occur, however, if it is assumed that the sweeper can become an engineer through work based learning alone. This flies in the face of what engineering is as a body of largely mathematically-based knowledge which cannot be acquired only in the workplace. The only route for the sweeper, whether part time or full time, is what it always was, via college and university study. The challenge for South Africa is making this route more accessible to people like sweepers, not trying to avoid the problem via an unrealistic view of the potential of workplace based learning to support progression right to the top of the qualifications ladder.

At no point does the CD explain, or give examples, of what is meant by workplace learning. This raises the question as to whether there is such a unique form of learning that cannot be taught by existing higher education and training institutions. The notion that there is a unique form of workplace learning that is separated from other forms of higher education and training, that has to be ‘interdependent’ rather than ‘integrated’ leads to a stunted conception of workplace learning. Workers will be trained only in those skills they require as workers, not as citizens or members of the community who deserve an education that respects and nurtures their dignity and worth as creative human beings.

The proposals of the CD do not address issues of access, progression and mobility within higher education and training. On the contrary, they raise further impermeable barriers to such access, mobility and progression. The CD intends to achieve these objectives by means of RPL and articulation of qualifications and learning based on equivalence. Unfortunately, the CD does not explain how this equivalence could work in practice. **The CHE and HEQC believe that issues of access, mobility and progression are best addressed by working with existing institutions, using incentives where necessary, rather than by changing the qualifications framework.**

**In view of the grave consequences for higher education and its policy goals, and for education and training more generally, the CHE and HEQC reject the proposed framework, because**

- It is conceptually flawed, failing to recognize differences in learning, the hierarchy of learning that exists and the implications of this for provision
- It marks a retreat from the commitment to an integrated education and training system
- There is little congruence between the problems that the Consultative Document seeks to resolve and the solutions that are proposed
- It will lead to further fragmentation and inefficiency rather than improving the higher education and training system.
- It will not necessarily enhance access for historically disadvantaged social groups to high quality learning-teaching experiences and credible qualifications, a key goal of the NQF

Informed by a different conceptualisation (on which we will expand in the next section of this response), our proposal with respect to changes to the framework are represented in the following diagram:

<b>NQF Band</b>	<b>General and Discipline-based Pathway</b>	<b>Articulation Column</b>	<b>General Vocational, Career-focused &amp; Professional pathway</b>	<b>Articulation Column</b>	<b>Trade &amp; Occupational Pathway</b>
<b>Higher Education &amp; Training</b>	Discipline-based qualifications	Articulation credits	Career-focused & professional qualifications	Articulation Credits (up to level 6)	No qualifications
<b>Further Education &amp; Training</b>	Discipline-based qualifications	Articulation credits	General vocational qualifications	Articulation Credits	Occupational recognition or context-based qualifications unique to the workplace
<b>General education</b>	General education qualifications (with ABET defined separately)				

Although there is no Trade and Occupational pathway for qualifications in higher education, there is a need for an articulation column – indicated here as covering levels 5 and 6 – that enables learners to move from the Trade and Occupational pathway at NQF level 4 by moving diagonally into the career-focused and professional pathway. The CHE and HEQC are not committed to the existence of a TOP pathway in the FET band. As stated earlier, we believe it is beyond our remit to make recommendations in this regard although we do believe that the arguments provided above cast serious doubt on the epistemological and organisational coherence and validity of a TOP pathway. However, we have included the TOP pathway in the FET band together with the necessary articulation columns into the higher education and training band for purposes of clarity.

## New Arrangement for Qualifications, Standards and Quality Assurance

### 4.1 Introduction

The CD argues that “...a simple organisational model is required that recognises the existing portfolio division of responsibility for discipline-based learning and occupational context-based learning and advances the proposed three-by-three National Qualification Framework described in the previous chapter” (CD p. 25).

The CD rejects the Study Team’s proposal to use the distinction between unit standards and whole qualifications as a basis for determining jurisdictions on the grounds that the distinction is dysfunctional (CD p. 25). As shown in the previous section of this response, **the CHE and HEQC do not believe that the CD demonstrates that it has a satisfactory alternative to this distinction. The three-by-three model proposed by the CD will not achieve the objectives of improving equity, access, mobility and progression.**

### 4.2 Creating new communities of trust: Qualifications and Quality Assurance Councils

**4.2.1** The CD proposes that the three learning and qualification pathways continue through higher education with the discipline-based pathway provided primarily by universities and the trade, occupational and professional (TOP) pathway provided predominantly in the workplace. The career-focused pathway will be provided by universities and technikons and through workplace learning.

The CD recommends the establishment of three Qualifications and Quality Assurance Councils (QCs) responsible for co-coordinating qualifications mapping and design, standards generation and quality assurance in their respective band or pathways (CD p. 26):

- The GENFET QC – a reconfigured Umalusi - will be responsible for qualifications and quality assurance up to level 4 – except for qualifications under the ambit of the TOP QC.
- The HI-ED QC – a reconfigured HEQC - will be responsible for all qualifications and quality assurance in higher education – except for qualifications under the ambit of the TOP QC.
- The TOP QC – a reconfigured National Skills Authority - will be responsible for competency standards and registration criteria in trade, occupational and professional practice and qualifications unique to the workplace with their own nomenclature distinct from qualifications within the ambit of the other QCs.

**The learning pathways, however, are not mapped onto QCs or NQF Bands in any principled or consistent manner.** The GENFET QC and HI-ED QC have responsibility for all qualifications in their bands – except for those falling within the TOP pathway under the ambit of the TOP QC.

**4.2.2** The majority of qualifications in the career-focused pathway, either by law or by long held custom, fall under the auspices of some or other professional council and will be, therefore, the responsibility of the TOP QC.

**In our view, placing the professions in the TOP pathway and under the jurisdiction of the TOP QC fundamentally changes the relationship between the professions and higher education institutions. This could have a severe negative impact on the Ministry of Education’s goals of creating through planning, funding and quality assurance, and effective steering, a national, coordinated higher education system that is also characterised by differentiation and diversity of provision.**

In effect, the Minister of Labour (through the TOP QC) will control the curriculum of the majority of higher education and training qualifications, while the Minister of Education remains financially accountable for these learning programmes. The HI-ED QC’s ambit of responsibility would be reduced to undergraduate general ‘formative’ qualifications and post-graduate discipline-based qualifications. Given the ambitions for the TOP QC, **there is a silence in the CD as to how the TOP QC would ensure that appropriate higher education and training would be provided in the workplace if it were not provided by existing higher education institutions.**

As argued in the previous section of this response, if technicians, for example, with a level 4 qualification in the FET band seek further progression to become engineers, this invariably takes place via an institution based pathway and not within the workplace. If the structure proposed by the CD is accepted as it is, it will license SETAs within the new TOP QC to create progression routes via work-based learning and generate alternative workplace trained engineers to compete with university educated engineers. This will create a two-tier system of what will be perceived to be superior and inferior qualifications.

**The CHE and HEQC believe that:**

- **This will result in further unnecessary debilitation of the system, organisations and institutions of higher education at a time when predictability and greater certainty is required.**
- **There is no international precedent for funding of provision being located in one government department and the quality assurance of programmes and qualifications being located in an agency that reports to another government department.**

**The CHE and HEQC believe that professional bodies have an important role to play in contributing to transforming education at the level of policies, provision and practice by (a) maintaining and extending their links with university and technikon departments, and (b) collaborating with SETAs and FET colleges in developing FET qualifications that address new needs and offer genuine progression routes.** Addressing new needs and creating better progression opportunities is not, however, primarily a qualification issue. It is, fundamentally, a provision and capacity issue for the universities, technikons and FET colleges.

**In the light of the above, the CHE and HEQC strongly recommend that the proposed framework should be changed by including professional qualifications within a Career-focused and Professional pathway and that the HI-ED QC be responsible, in appropriate**

**relationships with other bodies and especially the professional bodies, for all qualifications and quality assurance in the Higher Education and Training (HET) band.**

The HI-ED QC would work closely with the professional bodies, TOP QC, SETAs, government, civil society, unions and business to ensure that access, mobility, articulation and progression are achieved through an integrated approach to education and training that enables workplace based learners to progress beyond NQF level 4 through appropriate programmes and qualifications.

**4.2.3** The Report of the Study Team laid great stress on the importance of ‘communities of trust’ and this is echoed in the CD. QCs, among other bodies, are expected to build and support ‘communities of trust’. The CD seems to equate this concept with creating consensus. Although consensus is important, this misses the practical ‘usage’ element in the idea of a ‘community of trust’. The concept has two rather different origins. One is in the socio-cultural/anthropological literature on learning. Lave and Wenger (1991) use the idea of ‘communities of practice’ to emphasise the fundamentally social basis of learning, whether formal or informal. This concept, however, has only indirect significance for debates about qualifications. The second origin is in the assessment literature and the debates on normative and criterion referenced assessment. (see Wolf 1995). Outcomes-based education can be seen as part of a move away from normative referencing which in its extreme forms decides a norm (for example, the percentage of candidates that will pass) and grades students accordingly. It is the ‘norm’ that decides whether a student gains a qualification. In extreme cases, normative referencing provides the justification for excluding perfectly capable people. Its priority is not to enable candidates to demonstrate what they know, but to ‘maintain a standard’. University examiners and the external examiner system rely on an informal norm referenced system.

A criterion-referenced system defines the criteria and states that anyone who achieves according to the criterion gets the qualification (even if it is everyone). Research has shown is that it is never possible to develop criteria that are universally applicable to all situations - assessors cannot avoid invoking ‘norms’ in making their judgements. Hence, the importance of ‘communities’ with shared practical experience (which is often expertise in a subject or occupational field), which provides people with the basis for making judgements. In other words, criteria alone are never enough. In relation to qualifications, the idea of ‘communities of trust’ stresses the importance of shared experience and usage. It is because they are trusted and rely on experience and not just individual isolated judgments that written examinations are still respected, despite all the criticisms that have been made of them. In the past, communities of trust referred to trade, professional, craft and subject specialists. If new qualifications are developed that are not based on these old communities, new communities with real shared experience will need to develop. A quality system cannot rely on criteria alone. **Although the concept of ‘communities of trust’ is suggestive of the dangers of over-emphasising the specification of criteria or outcomes as a mechanism for achieving quality, there is much work to be done before it can be a prescription for policy or a clear basis for practice.**

The CD puts great emphasis on the development of ‘rules of engagement’ and ‘communities of trust’ between education and training providers, employers, the QCs, and the two main government departments. To talk of ‘rules of engagement’ is to acknowledge there has been and will continue to be, at least in the short-term, contestation and conflict over jurisdictional and other issues. ‘Communities of trust’, however, implies long-standing partnerships based on integrity and earned mutual respect. This tension remains unresolved in the CD. **The CHE and HEQC acknowledge the need to develop ‘communities of trust’ but emphasise that these develop through**

relationships based on common commitments, integrity and clarity of responsibilities and functions, and are also facilitated by predictability of policies and authoritative leadership on the part of government departments and SAQA.

### 4.3 Management of quality assurance

**4.3.1** With the establishment of the QCs, key elements of the NQF will shift from the South African Qualifications Authority (SAQA) to the new QCs (CD p. 26), as they will be bodies with advisory and executive capacity. SAQA, however, would maintain its ‘oversight responsibilities’ and register qualifications. The QCs will replace the existing National Standards Bodies (NSB) and Standards Generating Bodies (SGB) structures and use fit for purpose panels for qualifications and standards generation. **The CHE and HEQC welcome this decision.**

**4.3.2** The Document proposes that SAQA should give up its operational role and become a coordinating body. SAQA would maintain “its oversight responsibilities for the NQF and ensure that the QCs undertook their responsibilities in support of the NQF’s objectives” (CD p. 27).

It is far from clear what this might mean in practice and the CD provides insufficient details to understand the ‘balance of power’ that should exist between SAQA’s oversight role and the necessary autonomy of the QCs. Furthermore, relations between the government departments and QCs are unclear. Given that QCs are to be ‘coordinated’ by SAQA, they would need to be treated as largely autonomous public bodies with the departments having a hands-off role. These relationships, however, could be further complicated by the portfolio division of responsibility with two of the QCs linked to the DoE (HI-ED and GENFET) and the other QC (TOP) linked to the DoL. **The lack of clarity in the CD increases the possibility of bureaucratic ‘turf-wars’ and jurisdictional ambiguities that will undermine implementation of the objectives of the NQF and HRD strategies.**

**4.3.3** The CD supports the CHE and HEQC understanding of standards-generation and quality assurance as only different moments of the same quality cycle, with feedback mechanisms assuring quality and development (CD p. 29). And that: “ an integrated approach to quality assurance between providers and QA bodies would rely on four main processes:

- Self-evaluation by institutional and workplace providers
- Provider accreditation
- Ongoing monitoring; and
- Quality audit” (CD p. 30).

In addition, the CD recommends that accreditation should be reserved for providers and their programmes (CD p. 31).

**The CHE and HEQC agree with these recommendations.**

**4.3.4** The CD proposes that the HI-ED QC will have two ‘arms’ or directorates (CD pages 42 & 43). On the one hand, the HEQC will provide the basis for quality assurance responsibilities. On the other hand, building on the work of SAUVCA and the CTP, would be a new arm or directorate for

qualifications generation and standard setting. This new 'body' will establish fit-for purpose panels to generate required standards and qualifications at the general level of the nested qualifications model. Within the discipline-based pathway, the directorate would draw on panels consisting mainly of experts in specific knowledge fields drawn from higher education institutions. In the career-focused and professional pathway, the directorate would set up collaborative panels, drawing on experts from professional and occupational bodies and SETAs.

**The CHE and HEQC strongly support the bringing together under one body of the separate but related functions of standards setting and quality assurance and the principle of 'one provider falling under the ambit of one Qualification and Quality Assurance Council'.** There is confidence that a reconfigured HEQC, in close collaboration with SAUVCA, the CTP, APPETD, and other relevant bodies, would be able to form knowledge based 'fit-for-purpose' expert panels. However, developing a 'bottom' up process from these panels to the HI-ED QC will require strong leadership and management at the systemic level balanced by the growing capacities of institutional providers. To be effective, this approach will require effective planning and allocation of the necessary financial and human resources. **The CHE wishes to emphasise that it can only assume such new responsibilities if adequate new resources are provided, including for the initial systems conceptualisation, planning and development phase.**

**4.3.5 The CHE and HEQC believe that the finalisation of the New Academic Policy (NAP) and the acceptance of the proposals for a nested approach to the setting of standards and specification of qualifications will go a long way towards simplifying standards-setting procedures in HE.** In particular, the NAP's recommendation that providers should have the autonomy to design the actual qualification and programme specialisations that are offered, and that these need not be registered on the NQF, but may be nested under a generic qualification standard for the purposes of registration, is important in this regard. This would mean that the CHE would concentrate, in the first instance, on standards setting for registration of qualifications for "designated variants" and selected qualifications for "programme specialisms".

The CHE and HEQC will develop a model of standards setting that draws extensively on the expertise of key stakeholders but also ensures the necessary 'upward' accountability.

**4.3.6 The CHE and HEQC support the retention of two learning and qualification pathways for higher education and training (discipline-based and career-focused/professional) as proposed in the NAP as a means of recognizing the necessary and defensible differences between qualification types and of establishing socially acceptable comparabilities between them, as opposed to assuming epistemological equivalence.**

Appendix A illustrates this two pathway framework and provides an example of what a 10 Level NQF might look like for the HET band. The loss of the NAP's Level 8: PG2 will mean that the Master's Diploma will need to be created as an exit point from the Structured Master's at Level 9. The question of the continued existence and purpose of a Professional Master's Degree (pegged at Level 8: PG2 in the NAP) will need to be resolved. One solution would be to drop this type of Master's degree and conflate it with the Structured Master's – implying that all Structured Master's Degrees would require a minimum of 60 credits of research and that the Level Descriptor for Level 9 should retain the requirement to 'undertake a research project and write up a research dissertation under supervision'. Another solution would be to retain the distinction between the Professional and Structured Master's, but then the Level descriptor for Level 9 would have to soften its research requirements.

The CHE and HEQC prefer the first solution. This means that with respect to Level Descriptors, Level 8 would require competence in research methodology, Level 9 competence to undertake and write up a minimum of 60 credits worth of research and Level 10 competence to undertake and write up a thesis of a minimum of 120 credits worth of research. The CHE and HEQC also recommend that the increased minimum credit-rating per level from 120 to 180 be retained for Levels 9 and 10.

Whilst accepting the continuum between education and training, the CHE and HEQC believe that further discussion is required amongst the different stakeholders of the NQF on the limits and possibilities for integrating education and training. Mergers and combinations of higher education institutions and the implications of some of these for the binary divide may also influence the development of the two tracks.

4.3.7 The CD recommends that private institutions operating within the higher education and training band should continue to register with the DoE in terms of the appropriate legislation and that the quality assurance of these institutions should be the responsibility of the HI-ED QC (CD p. 33).

**The CHE and HEQC support this recommendation.**

4.3.8 The CD supports the Study Team's recommendation that "the registration of assessors should be confined to the assessment of learning achievement in the workplace" and that the Recognition of Prior Learning should be prioritised (CD p. 34).

**The CHE and HEQC support this recommendation.**

#### 4.4 Short courses

The CD argues that "the status of the term qualifications would be devalued if there were no threshold or a variable lower than the norm of 120 credits" (CD p. 36).

The report acknowledges the importance of short courses but believes these should lead to the achievement of credits towards qualifications but not themselves merit the award of a qualification. The CD also acknowledges the need for urgent research into those Vendor and Product Specific courses, presently outside of the NQF (for example, Microsoft) (CD p. 36).

The CD argues that unit standards and whole qualifications are the same and "when the new NQF architecture is brought into being, the distinction between the two should be erased" (CD p. 20). It acknowledges that qualifications are always made up of parts (units) and there is a requirement that each part has to be coherent in itself as well as in how it contributes to a whole qualification. All qualifications should be characterised by their distinct and interdependent purposes, and the integrative and cumulative effects of whole qualifications apply in all three pathways.

**We welcome these views.** The CHE and HEQC, however, believe that the distinction between unit standards and whole qualifications will not disappear overnight and that, in the main, qualifications in the HET Band will be whole qualifications provided through courses that have fairly strict rules of combination, sequencing and duration. This is not to deny that unit standards, or the 'parts'



represented by them, may have a role to play, especially in the FET Band and at levels 5 and 6 of the HET Band.

## Governance, Legislation and Funding

### 5.1 Introduction

The urgent need for clarification and consolidation of regulatory jurisdictions and responsibilities within the higher education and training system is made clear by the Report of the Study Team. Part of the problem arises from the diverse and prolific legislation and regulations (in the form of subsidiary legislation) that ‘govern’ higher education. This legislation includes the South African Qualifications Authority Act, (Act No. 58 of 1995), the Higher Education Act (Act No. 101 of 1997) as amended; the Skills Development Act (Act No. 97 of 1998), the Mine Health and Safety Act (Act 29 of 1996), and the various professional council Acts passed in 2000 (Acts Nos 43, 44, 45, 46, 47, 48, 49, of 2002). The ETQA directory produced by the CHE (2003) covers over 70 bodies including statutory professional councils, non-statutory professional bodies, SETA ETQAs and a category for bodies of unknown status (CHE 2003 p. iv). The bewildering array of activities and responsibilities have made it extremely difficult for the Higher Education Quality Committee (HEQC) to fulfill its mandate and, more broadly, for higher education institutions to meet the many requirements placed on them by different bodies.

If the higher education and training system is to meet the objectives of the NQF and the HRD strategy, there will need to be a radical simplification of the current architecture with a strongly coordinated but simple system of management. This will only happen if the QCs are given sufficient executive powers and financial resources to bring the current fragmented initiatives together and to manage them efficiently. This does not imply a lessening of the autonomy of statutory professional bodies or of the autonomy of institutions. It does indicate however that **there needs to be a much clearer delineation of responsibilities than that provided in the CD if the system is going to hold together and operate efficiently and effectively.**

### 5.2 Strategic Leadership: the NQF and HRD strategy

**5.2.1** The CD proposes the creation of “a non-statutory political-level and stakeholder-representative National HRD Forum that would meet periodically, say annually” (CD p. 38).

#### **The CHE and HEQC support this recommendation.**

**5.2.2** The CD recommends that the Interdepartmental Task Team of the Ministries of Education and Labour become a permanent body that will:

- Be a permanent point of liaison between SAQA and the two departments
- Take forward advice from the proposed National HRD Forum and the NQF Forum
- Develop a broad national plan for implementation of the NQF, to be updated annually, in consultation with SAQA and formulated as an annual remit by the Ministers to SAQA
- Promote the alignment of NQF implementation with the government’s HRD strategy
- Advise Ministers on SAQA’s annual business plan and budget

- Consult regularly with the National Treasury on the funding of NQF implementation; and
- Provide the secretariat to the inter-departmental HRD Co-ordinating Committee (CD p. 38)

This recommendation goes far beyond the recommendation of the Report of the Study Team. The Study Team proposed an NQF strategic partnership whose major functions would be to provide leadership and coordination (RST pages 113 & 114). The CD's proposals would result in a centralisation of executive power within the Interdepartmental Task Team with direct control over the implementation of the NQF.

**The CHE and HEQC propose that role of the Interdepartmental Task Team should be different from that described in the CD. The Interdepartmental Task Team should be focused on interdepartmental relationships and providing political leadership for the national HRD strategy and support for the implementation of the NQF. It should not exercise controls over SAQA and the QCs, thereby reducing them to purely implementation bodies and in the process diluting their policy and regulation generating functions and compromising their autonomy.**

### 5.3 NQF Forum

The CD supports the recommendation of the Study Team for the creation of an NQF Forum for a common platform where SAQA, the QCs, the DoE, the DoL, other government departments, research councils, stakeholders and interested parties could “review and discuss NQF development and implementation” (CD p. 39).

**The CHE and HEQC support this recommendation.**

### 5.4 SAQA

With respect to SAQA, the Report of the Study Team proposed a reduction in the role to be played by SAQA. The CD takes this much further, leaving SAQA with nine functions:

- Execute the annual remit of the Ministers of Education and Labour
- Maintain the national framework for standards generation and quality assurance
- Maintain and develop the NQF level descriptors
- Maintain and develop the register of national qualifications
- Maintain and develop the National Learner's Record Database (NLRD)
- Evaluate foreign qualifications
- Secretariat to the NQF forum
- International liaison; and
- Research (CD p. 40)

The CHE and HEQC believe that the CD describes correctly many of the problems with the existing structure and functions of SAQA. The interpretations of the NQF and its implementation by the SAQA has generated numerous difficulties and obstacles for providers and ETQAs, and not effectively advanced the objectives of the NQF. The solution proposed by the CD, however, would make SAQA 'toothless' and unable to carry out its statutory role of overseeing the implementation of

the NQF. This removal of 'powers' from SAQA to the Interdepartmental Task Team, on the one hand, and to the QCs, on the other hand, will lead to confusion over areas of responsibility and a serious blurring of line-management functions.

**The CHE and HEQC believe that the NQF needs a strong and effective Qualifications Authority to provide intellectual and strategic leadership for the implementation of the NQF. Even though this particular SAQA has not provided such leadership it is most unfortunate that the role of a Qualifications Authority is being reduced to an essentially technical one; and, strongly oppose such a role for the Qualifications Authority.**

Instead the CHE and HEQC believe that the Qualifications Authority has vitally important roles to play in education and training, that its functions and composition need to be reconceptualised. **The CHE and HEQC recommend that in addition to the responsibilities mentioned above, a newly constituted Qualifications Authority should play the following crucial national roles:**

- **Effectively monitor and evaluate how, in what ways, to what extent and with what consequences the goals of the NQF are being achieved, advise the Ministries of Education and Labour in this regard, produce regular publications arising out of the monitoring and evaluation activities and produce regular 'State of the NQF' reports**
- **Effectively monitor and evaluate how, in what ways, to what extent and with what consequences the HRD objectives and requirements of the economy and society are being met through ongoing analysis of the production and provision of qualifications and programmes and, by drawing on the NLRD. And to provide advice to the Ministries of Education and Labour in this regard**
- **Through monitoring and evaluation, identify the obstacles and impediments to the optimal and effective realization of the goals of the NQF and work with quality assurance agencies and other relevant bodies to overcome these**
- **Provide leadership to quality assurance agencies in terms of 'good' practice in different areas of quality assurance through its oversight function and collaboration with other national and international quality assurance agencies so that the capabilities and capacities of agencies are enhanced and they operate more effectively and efficiently.**

## **5.5 Funding**

Finally, the changes proposed by the CD, together with the changes proposed by this response, have major legal and financial implications. Various Acts will require amending, which is likely to be a complex, long-drawn out and contested process that will result in great uncertainty and anxiety for SAQA, quality assurance agencies and for education and training providers.

Moreover, the effective functioning of SAQA and the GENFET and HI-ED QCs will require considerably greater resources than have hitherto been provided by the Department of Education. The CD is much too sanguine and indeed rather unrealistic that 'the total requirement, though considerable, would be substantially offset by the current provision in the DoE budget for SAQA, CHE, Umalusi...(CD p. 44). **The CHE and HEQC recommend that the question of adequate**

**funding of standards generation and quality assurance within education and training must be addressed and resolved as a matter of urgency. The CHE would like to emphasise that its assumption of the standard setting responsibility will not be possible unless sufficient human and financial resources are devoted to it. This will entail an increased personnel complement and an increase in its annual government budget allocation.**

## Conclusion

The fundamental principle that animates the CHE and HEQC response is a commitment to an integrated approach to education and training as an important inheritance of the national democratic struggle of the pre-1994 period and as the most appropriate means to achieve the goals of the NQF and HRD strategy, namely an education and training *system*, characterised by equity of access, opportunity and outcomes; high quality provision, learning and teaching; learner mobility and progression; and, articulation between programmes, qualifications and institutions.

One of the difficulties in interpreting the Consultative Document is its degree of generality and lack of specification. Although over-specification creates problems as has been apparent in the implementation of the NQF, there are also problems in leaving key issues to be resolved by negotiation and collaboration. With resources inevitably limited, competition and disagreements are inevitable, especially when new structures are being established. The issue of trust applies not just to qualifications and quality but also to every situation where there is ambiguity and where no history or tradition of practice can be drawn on. The implications which are brought out strongly in the experience of the Scottish Credit and Qualifications Framework (Raffe 2003) are that incrementalism, building on the past and staying close to institutional providers are crucial to successful implementation. The implications for South Africa must be to emphasise the importance of caution in creating new structures that have a limited grounding in practice.

**The CHE and HEQC believe that the CD identifies correctly the problems and challenges that have bedeviled implementation of the NQF.** However, the CHE and HEQC do not believe that the solutions proposed by the CD are congruent with the description of the problems and challenges facing the NQF. They are likely to exacerbate rather than resolve them, resulting in a serious undermining of the capacity of the higher education and training system to meet the objectives of the NQF and the HRD strategy.

**The CHE and HEQC believe that there is an implicit but fundamental error in the approach of the Interdepartmental Task Team whereby problems with the existing higher education and training system are correctly identified but rather than addressing them and improving the system, the CD proposes abandoning the system and developing alternatives such as the TOP pathway and the use of private providers to provide higher education and training in the workplace.** The CHE and HEQC reject this approach for three reasons:

- a) Firstly, we believe that there is a great deal of capacity and high quality teaching and learning within the higher education and training system. One indication of this is the credibility of many of our qualifications and employability of our graduates overseas.
- b) Secondly, it makes more sense to build on this capacity and address problems within the existing system, rather than abandon it.
- c) We do not believe that private providers have the expertise or resources to meet the country's needs for higher education and training.

At no point does the CD explain, or give examples, of what is meant by workplace learning. This raises the question as to whether there is such a unique form of learning that can not be taught by existing higher education and training institutions. Forms of workplace learning that are separated from other forms of higher education and training and are ‘interdependent’ rather than ‘integrated’ leads to a stunted conception of workplace learning. Workers will be trained only in those skills they require as workers and will not be provided with education for their lives as citizens or members of the community who deserve an education that respects and nurtures their dignity and worth as creative human beings.

The proposals of the CD do not address issues of access to, or progression and mobility within, higher education and training. On the contrary they raise further impermeable barriers to such access, mobility and progression. The CD intends to achieve these objectives by means of RPL and articulation of qualifications and learning based on equivalence. Unfortunately, the CD does not explain how this articulation and equivalence could work in practice. **The CHE and HEQC believe that issues of access, mobility and progression are best addressed by working with existing institutions, using incentives where necessary, rather than by changing the qualification framework.**

Implicit in the distinction between workplace learning and institution-based learning is a view that existing provision of higher education and training ignores the needs of the workplace. There are two inter-related misconceptions contained in this view. Firstly, there is much research and teaching within higher education that is focused *on* the workplace. Secondly, restricting workplace learning to learning *in* the workplace ignores the key role played by research in higher education and training qualifications. The CD does not explain how learning within the TOP pathway will be delivered if not by existing higher education and training institutions. Nor does the CD explain how learning *in* the workplace could encompass the research and conceptual foundations necessary for worthwhile higher education and training qualifications.

For these reasons, **the CHE and HEQC reject the extension of the TOP pathway into higher education and training. The CHE and HEQC believe that it is beyond their remit to comment on the existence of a TOP pathway in the Further Education and Training Band although we believe that the epistemological and organisational arguments provided in this response are as appropriate to the FET band as they are to the HET band.**

**The CHE and HEQC are of the strong view that the framework proposed by the Consultative Document**

- **Is conceptually flawed, failing to recognize differences in learning and the hierarchy of learning that exists in practice and the implications of this for provision**
- **Marks a retreat from the commitment to an integrated education and training system**
- **Displays little congruence between the problems that the Consultative Document seeks to resolve and the solutions that are proposed**
- **Will lead to further fragmentation and inefficiency rather than improving the higher education and training system.**

- Does not enhance access for historically disadvantaged social groups to high quality learning-teaching experiences and credible qualifications, a key goal of the NQF
- Places an unrealistic emphasis on qualification - led transformation with a corresponding underestimation of the importance of higher education institutions
- Will result in unnecessary further debilitation of the system, organisations and institutions when predictability and greater certainty is required
- Provides no international precedent for funding of provision being located in one government department and the quality assurance of programmes and qualifications being located in an agency that reports to another government department.

In summary, the new proposed qualifications framework is conceptually flawed, epistemologically problematic and without clear lines of jurisdiction between the different pathways and the QCs. The proposals have the potential of increasing complexity, further debilitating the system and setting back the advancement of the NQF. For these reasons, **we reject the conceptual framework advanced by the Consultative Document and its key recommendations related to structural arrangements.**

The CHE and HEQC believe that placing the professions in the TOP pathway and under the jurisdiction of the TOP QC fundamentally changes the relationship between the professions and higher education institutions. **This could have a severe negative impact on the Ministry of Education's goals of creating through planning, funding and quality assurance, and effective steering, a national, coordinated higher education system that is also characterised by differentiation and diversity of provision.**

Instead, **we strongly recommend that the proposed framework should be changed by including professional qualifications within a Career-focused and Professional pathway and that the HI-ED QC be responsible, in appropriate relationships with other bodies and especially the professional bodies, for all qualifications and quality assurance in the Higher Education and Training (HET) band.**

With respect to governance, the CHE and HEQC highly regret the technicist approach to the definition of the role of the Qualifications Authority. The functions and composition of SAQA need to be reconceptualised. **The CHE and HEQC have made recommendations above on the crucial national roles that should be played by a new SAQA.**

The CHE and HEQC also have an alternative view of the role of the Interdepartmental Task Team. **In our view, the Interdepartmental Task Team should be focused on interdepartmental relationships and providing political leadership for the national HRD strategy and support for the implementation of the NQF. It should not exercise controls over SAQA and the QCs that reduce them to purely implementation bodies, in the process diluting their policy and regulations generating functions and compromising their autonomy.**



Finally, the CHE and HEQC believe that the Consultative Document is much too sanguine and indeed rather unrealistic that 'the total requirement, though considerable, would be substantially offset by the current provision in the DoE budget for SAQA, CHE, Umalusi (CD p 44). We recommend that the question of the adequate funding of quality assurance within education and training must be addressed and resolved as a matter of urgency.

## The Way Forward

Guided by the fundamental principles and propositions spelt out in section two of this response, and based on the interpretation of the Consultative Document that is evident in this response, **the CHE and HEQC:**

- Welcome the decision to affirm the ten level NQF recommended by the NQF Study Team.
- Support the establishment and development of a ‘Functional Credit Accumulation and Transfer (CAT)’ scheme but believe that it will be difficult to establish ‘equivalence’ across the different pathways as conceptualised in the CD.
- Welcome the understanding of standards-generation and quality assurance as only different moments of the same quality cycle with feedback mechanisms assuring quality and development .
- Agree with the recommendation that accreditation should be reserved for providers and their programmes.
- Support the recommendations that assessor registration should only apply to workplace learning and that the Recognition of Prior Learning should be prioritised.
- Welcome the views on whole qualifications and unit standards although we believe the CD underestimates the difficulties of ‘erasing’ this distinction and fails to provide a clear alternative conceptualisation.
- Support the recommendations that the size of the SAQA board should be reduced and that a National HRD Forum and an NQF forum be created.
- Welcome the decision to replace the existing National Standards Bodies (NSB) and Standards Generating Bodies (SGB) structures with the QCs and use fit for purpose panels for qualifications and standards generation.
- Strongly support the bringing together under one body of the separate but related functions of standards setting and quality assurance and the principle of “one provider falling under the ambit of one Qualification and Quality Assurance Council” . The CHE wishes to emphasise that it can only assume such new responsibilities if adequate new resources are provided, including for the initial systems conceptualisation, planning and development phase.
- Support the recommendation that private institutions operating within the higher education and training band should continue to register with the DoE in terms of the

appropriate legislation and that the quality assurance of these institutions should be the responsibility of the HI-ED QC.

- Acknowledge the need to develop ‘communities of trust’ but emphasise that these develop through relationships based on common commitments and integrity, and clarity of responsibilities and functions, and are also facilitated by predictability of policies and authoritative leadership on the part of government departments and SAQA.

**The CHE and HEQC reaffirm their support for building on existing strengths and addressing weaknesses through the incremental approach suggested in the Report of the Study Team as this would lead to simplifying and streamlining the framework and ensuring its more effective implementation.**

Despite shortcomings and obstacles, through the commitment and initiatives of multiple actors – SAQA, the CHE-HEQC, Umalusi, SETAs, professional bodies, education and training providers and various other bodies - the NQF has made progress in the first five years of operation. Capabilities and capacities have been built in various organisations and institutions. These should be built upon to advance the objectives of the NQF as a major contributor to transforming South Africa’s education and training system.

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## Appendix A: A Qualifications Framework for Higher Education

NQF Levels	(Cumulative min totals) & min credits per qualification	General		Articulation Horizontal & diagonal articulation	Career-focused	
		Vertical articulation			Vertical articulation	
10	(1020) 360	Doctor of Philosophy (360 @ 10)			Doctor of Philosophy, Professional Doctorate (360 @ 10)	
9	(660) 180	Research Master's Degree (180 @ 9)	Structured Master's Degree (180 @ 9)		Research Master's Degree (180 @ 9)	Structured Master's Degree (180 @ 9)
			Master's Diploma (120 @ 9)			Master's Certificate (60 @ 9)
8	(480) 480/ 120	Bachelor Honours Degree (120 @ 8)	General Postgraduate Diploma (120 @ 8)	Postgraduate Certificate (60 @ 8)	Advanced Career- focused Bachelor's Degree, (120 @ 8)	Career-focused Postgraduate Diploma (120 @ 8)
				(articulation credits)		
7	(360) 360/ 120	General Bachelor's Degree (120 @ 7)		Graduate Certificate (60 @ 7)	Career-focused Bachelor's Degree (120 @ 7)	
				(articulation credits)		
6	(240) 240	General Diploma (90 @ 6)		(articulation credits)	Career-focused Diploma (90 @ 6)	
5	(120) 120			Foundation Certificate (60 @ 5)	Career-focused Certificate (72 @ 5)	
4	(120) 120	FETC (72 @ 4)		Bridging Certificate (60 @ 4)	FETC (72 @ 4)	