

FRAMEWORK FOR THE SECOND CYCLE OF QUALITY ASSURANCE 2012–2017

Consultation Document
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The HEQC is committed to a quality-driven higher education system that contributes to socioeconomic development, social justice and innovative scholarship in South Africa. To achieve this end, the HEQC will support the development, maintenance and enhancement of the quality of public and private higher education provision in order to enable a range of stakeholders to benefit from effective higher education and training. The central objective of the HEQC is to ensure that providers effectively and efficiently deliver education, training, research and community service which are of high quality and which produce socially useful and enriching knowledge as well as a relevant range of graduate skills and competencies necessary for social and economic progress. The policies and programmes of the HEQC will be guided by the above commitments and objectives. (Founding Document, 2001: 9)

1. Introduction

The HEQC first cycle of quality assurance was conceptualised and developed between 2001 and 2004. At that time it was necessary for the national quality assurance system to help overcome the divisions that had characterised higher education under apartheid (historically advantaged and historically disadvantaged higher education institutions (HEIs); English-medium and Afrikaans-medium institutions; universities and technikons) and which had created a range of perceptions, often based on prejudice, about the distribution of quality across the South African higher education system. A further division, although not based on the legacy of apartheid, was that between public and private providers, shaped by their different purposes and roles in relation to the labour market. Given this context, the first cycle focused on providing an integrative foundation for the work of the HEQC: all institutions were subject to the same approach and criteria in order to create a common basis on which to develop a shared understanding and approach to quality. The HEQC system utilised four well-known elements of quality assurance: programme accreditation ensured provider compliance with minimum standards in order to offer learning programmes at higher education level; national reviews focused on existing programmes in a particular area (discipline/qualification) to reinforce the accountability of providers in the relevant academic fields and their alignment with the national regulatory framework; the institutional audit process looked at the effectiveness of an institution's internal quality assurance mechanisms in the three core functions of teaching and learning, research and community engagement with improvement as its main aim. Finally, quality promotion focused on training in quality assurance methods, on the dissemination of information on quality assurance and on supporting the improvement of quality in the core functions. The HEQC added capacity development in addition to quality promotion in recognition of the need to prepare all HEIs to participate in the national quality assurance system. In 2011, at the end of the first cycle, the HEQC will have audited 35 HEIs, accredited close to 5000 new programmes, subjected 85 programmes to national reviews, trained about 550 institutional auditors and over 1500 programme evaluators, and will have organised scores of workshops and training opportunities for HEIs.

After ten years of operation of the HEQC and the completion of the first cycle of quality assurance, it is necessary to evaluate the implementation of the first cycle activities and to use the knowledge and insights gained about the higher education system to conceptualise an approach to quality assurance that will guide the work of the HEQC in

a second cycle of quality assurance. This Framework outlines the HEQC approach to the second cycle of quality assurance. First, it focuses on the achievements of quality assurance during the first cycle, taking into account the findings of the external evaluation of the HEQC in 2008. Secondly, it reflects on the knowledge of the higher education system obtained during the first cycle. Thirdly, it focuses on the purpose and objectives of the second cycle of quality assurance: its conceptual underpinnings and its methodological choices, giving particular attention to the area of institutional reviews. Fourthly, it deals with the future of granting institutional self-accreditation status for programmes. Fifthly, it addresses the HEQC's need to review its approach to the quality assurance of private providers. Finally, it concludes with the next steps to be taken to implement the second cycle, including the continued consultation of stakeholders in the development of the HEQC quality processes.

2. THE FIRST CYCLE OF QUALITY ASSURANCE 2004–2010

Seven years of quality assurance have provided benefits for both HEIs and the higher education system as a whole. Institutional audits, with its focus on fitness for purpose and on the effectiveness of internal systems for quality management across the three core functions, provided institutions with a worthwhile opportunity to identify gaps in terms of policies, processes and structures. Institutions reported that undertaking a self-evaluation process which culminated in the submission of a report for use in the audit was a worthwhile part of the process. At the same time, the audit site visit and the subsequent HEQC audit report confronted institutions with inconsistencies between the theory and practice in their core functions, or highlighted the absence or lack of awareness of institutional conceptualisations of teaching and learning, research and community engagement. As a result of the audit process, institutions have developed and implemented systems for the management of quality in the three core functions. They have produced improvement plans based on audit recommendations, and, generally, incorporated quality issues into their strategic planning processes. In some cases, the interactions with the HEQC allowed institutions to move from the level of policy development and processes to start interrogating the conceptualisations underpinning their policies. The interactions between the HEQC and institutions in relation to their post-audit improvement plans suggest that most institutions have managed to include quality in their strategic plans, consequently enabling them to take a further step to embed quality into institutional practices. The external evaluation of the HEQC concluded that conducting institutional audits was the HEQC's most successful QA methodology.

The implementation of the HEQC's system of programme accreditation enabled institutions to enhance staff awareness of the need to comply with national regulatory frameworks. Through the application of the accreditation criteria, there is a greater institutional awareness of the importance of meeting minimum standards for programme design, teaching and learning, programme coordination, quality of educational infrastructure, and the number and qualifications of academic staff assigned to a programme. Institutions that received provisional accreditation with conditions for their programmes have been provided with a time-frame to meet the required minimum standards, and these standards must be met before the programme can be offered. This reinforces the importance of ensuring minimum quality standards in relation to teaching and learning.

The issue of standards and participation in an intellectual discourse within the disciplines emerged sharply in the context of national reviews in which specialist academic peers probed the content of the programmes in relation to national and international good practice. All of the institutions that participated in the reviews and did not receive full programme accreditation in the first round of evaluations had conditions which had to be met within specific time-frames. This suggests that, in at least some aspects of the programmes which were of concern to specialist peer evaluators, the conditions were adequately addressed. The use of disciplinary peers to develop criteria, conduct site visits and write reports provided an important precedent for the setting of discipline-based standards, the development of a collegial approach to external quality assurance and the establishment or enhancement of cooperation between the HEQC and higher education institutions. The external evaluation of the HEQC found national reviews to be one of the HEQC's most effective mechanisms to promote quality.

Overall, HEIs have improved the quality of their academic programmes by meeting the conditions set by peer evaluators through the process of assessment carried out by national reviews. Minimum quality standards for the offering of new programmes have been achieved through compliance with the programme accreditation criteria. This, in turn, has created the basis for building public confidence in the quality of programmes offered by public and private HEIs.

The 2008 external evaluation panel found that the HEQC had been successful in developing a credible quality assurance system for South African higher education and that it had worked effectively with institutions to develop their own internal quality assurance mechanisms, especially through the audit process. The panel endorsed the principles guiding the work of the HEQC and suggested that it may be necessary to elaborate on the HEQC's understanding of 'transformation' and the concept of 'fitness of purpose' in order to provide institutions with clearer guidelines of what was expected of them. The panel also suggested that, for the notion of 'fitness for purpose' to be applied more effectively in the HEQC quality assurance processes, it is necessary to give greater recognition of and attention to institutional differentiation by way of institutional types.

In assessing the work done by the HEQC in its different sub-systems, the external review panel was satisfied with the effectiveness and appropriateness of the HEQC's goals in relation to promoting quality assurance. However, the panel suggested that the HEQC give increased attention to the promotion of quality in the second cycle of quality assurance.

The review panel also made a number of recommendations in relation to programme accreditation, institutional audits, national reviews, and quality promotion and capacity development. These have been taken into account in developing the second cycle framework, and include the need to further clarify the difference between the 'control' and 'compliance' purposes of accreditation, the 'accountability' purpose of national reviews and the 'improvement' focus of institutional audits. Specifically, in relation to the latter, the external evaluation panel suggested a less all-encompassing second cycle institutional quality focus and that an approach be developed that is targeted to address specific aspects of institutional quality improvement. All of these suggestions, together with the achievements of the first cycle of quality assurance and the changes that have occurred in the higher education system since 2001, have been taken into account in the preparation of this Framework.

3. The Quality Assurance view of South African Higher Education 2004–2010

Much has been learned through the implementation of the first cycle of quality assurance. The approach to the second cycle of quality assurance has been informed by the knowledge gained of the higher education sector and the identification of trends as a result of the analysis of the first cycle, the wider findings of higher education research in this period and the effect of higher education policy in the last decade.

Since 1994, the South African public higher education system has grown in size and has been restructured, and in the process has created three distinct institutional types with different orientations and purposes. In 2011, over 800 000 students are expected to be enrolled in the public higher education system. Despite its expansion, the higher education system does not graduate sufficient numbers of students, and of those who graduate few do so within the stipulated minimum time. Taken as a whole, the South African public higher education system is predominantly an undergraduate system in which the quality of teaching and learning has fundamental importance for institutions' ability to produce the high-level skills required for the country's socio-political and economic development. The contribution of higher education to the national research and development programme is important, but it is presently concentrated in a handful of institutions, both in terms of research outcomes and postgraduate education.

At the system level, there have been important changes in student and staff equity and redress, but it is accepted that more needs to be done for South African universities to attain the higher education goals identified in the existing national policy framework. Enrolment planning, the new funding framework, and a range of funding instruments (mainly focused on teaching and learning) at the policy level have had an uneven impact on the desired increase in graduation numbers at undergraduate and postgraduate levels. The lack of skills in certain areas remains a concern for government and the business sector. In this regard, one area of current research is focussed on student outcomes and graduate attributes, and includes investigating the lack of graduate 'soft skills' and citizenship values. Recent research on the student experience at seven South African institutions shows uneven levels of student engagement and reinforces the need to better understand 'the how' and to what extent institutions provide opportunities and avenues for students to engage with the curriculum and to participate in other purposeful learning activities (Strydom and Mentz, 2009).

In the last 10 years there has been a considerable expansion and consolidation of the private provision of higher education in South Africa. Although, in terms of enrolments, private providers represent less than 10 percent of the total enrolments in the public higher education sector, they perform an important role, particularly in the provision of certificates, diplomas and undergraduate degrees in a number of professional and vocational areas. Much has been achieved in the regularisation of private provision of higher education and in understanding the contribution of private higher education provision to the development of high-level skills in the country. Tasks for the future include a greater definition of mission differentiation among private providers, and a more substantive incorporation of this sector in the higher education system in terms of monitoring their overall contribution to the

achievement of national policy goals through appropriate reporting mechanisms and the use of management information systems at the national level.

This section incorporates the knowledge gained through the HEQC's institutional audits, programme accreditation and national reviews activities on the state of the higher education system in relation to quality in the three core functions, including the use of specialised higher education research findings, to provide an overview of the current challenges and opportunities in South African higher education. It must be noted that this is not a comprehensive system-level analysis, but an indication of a series of salient features that have informed the design of the second cycle.¹

3.1 Mission, Planning and Quality assurance

- While higher education policy distinguishes between universities, comprehensive universities and universities of technology, the missions and visions of public institutions are not always adequately translated into their core functions in a way that is operationally consistent or conceptually coherent.
- Institutions have uneven capacities to engage in debates about the conceptual and operational implications of their mission definitions in the three core functions and the implications that this, in turn, has for their definitions of quality in each case.
- Despite a notional understanding of differences in the programme and qualification mix appropriate to each institutional typology, there seems to be a widespread perception of the existence of a single "gold standard" that most institutions are pursuing regardless of their stipulated mission.
- Most institutions demonstrate a clear understanding of the relationship between strategic planning and
 academic planning and how these relate to quality. However, the actual capacity and capabilities for
 institutional planning, institutional research and the utilisation of data for improvement in the core
 functions is unevenly distributed across institutions.
- Quality assurance has been institutionalised at most higher education institutions.
- All public higher education institutions have an express commitment to transformation. This commitment is variously supported by a range of policies, the majority of which are focused on equity issues. Debates about the understandings, scope, and manifestations of transformation are taken up in very different ways, leading to a range of outcomes at each public institution. Few institutions have engaged systematically with issues of institutional culture, curriculum reform and responsiveness.

3.2 TEACHING AND LEARNING

• All public higher education institutions have increased their enrolments. At most institutions, the student demographic profile is more representative of South Africa's demography than 15 years ago.

¹ It must be noted that the elements provided here stem from the audit, accreditation and national review reports and that many institutions have already addressed a number of the identified problems through the development and implementation of improvement plans.

- The increase in formal access to higher education has not been accompanied by a proportional increase in epistemological access. Most institutions have low throughput rates and student success rates continue to be skewed along racial lines.²
- Teaching and learning philosophies, when articulated or documented, suggest that at many institutions students are seen as a-social, a-cultural, autonomous beings whose ability to succeed in higher education depends on factors inherent in the individual, such as 'motivation' and 'potential'. Parallel to this is the assumption by many academic staff that academic practices are accessible to all types of students and are, therefore, unproblematic for student learning and success.
- The notion of 'disadvantage' is understood as expressing the relationship between socio-economic context and lack of preparedness for the demands of higher education. This, however, has not always resulted in the development of approaches to curriculum and the overall educational process which systematically factors in 'disadvantage' or in the professional development of academics to be able to deal appropriately with the needs of a new and different generation of students.
- There is a lack of capacity in the higher education system to develop quality academic programmes. This is particularly evident in institutions with little tradition of independent curriculum development, but is also true of institutions with no experience of developing curricula with a vocational orientation. These problems are particularly evident in many private provider institutions.
- With few exceptions the utilisation of educational technologies is rudimentary and is not informed by an appropriate conceptualisation of teaching and learning.
- Large classes in a context of lack of resources have meant an increase in staff teaching loads, which combined with other pressures and requirements have conspired against 'good teaching'.
- Assessment practices are uneven and, generally, not in line with expected student outcomes or stated graduate attributes.
- At some institutions, a lack of basic educational infrastructure in terms of laboratories, technology to support education (for example, data projectors, computers, regular access to the internet) and appropriately resourced libraries constitute obstacles to quality learning.
- The state of physical infrastructure on some campuses, particularly in terms of residences, is not conducive to the creation of a learning environment or to the integration of the curricular and the non-curricular activities into a seamless student experience. At many institutions, the student experience of non-residential students is partial or unsatisfactory for a number of reasons, including a lack of resources.
- At the majority of higher education institutions there are examples of excellence in teaching and learning.
 However, on the whole, these occur as a result of the dedication of individuals rather than as a result of
 an institutionally-driven strategy. Regrettably, at some institutions, students experience poor quality
 lecturing, absentee lecturers, and generally erratic and inadequate student support. Under these
 circumstances, the majority of the existing institutional centres or units dedicated to the improvement
 and professionalisation of teaching and learning do not have sufficient capacity to meet the needs of their
 institutions.

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² The HEQC is aware that this statement needs careful explanation as the new democratic dispensation and social mobility among the middle classes render apartheid race categories progressively less useful to explain social phenomena.

- While many lecturers are sensitive to the complexity of teaching a far more diverse group of students
 than previously, the professionalisation of university-level teaching has not been sufficiently achieved,
 and at most institutions research activity continues to be perceived as the 'privileged' core function in
 terms of status and support which accrues to individuals.
- At the majority of institutions there is no consistent use of student and employer satisfaction surveys to ascertain how students and employers experience the education provided by the institution.
- There is a manifest lack of intellectual leadership at most higher education institutions in teaching and learning which undermines staff efforts at the departmental and instructional levels to provide quality education.

3.3 RESEARCH

- Policy directives, both in higher education and science and technology, have had a homogenising effect on
 higher education institutions in that most institutions pursue the same objectives: increased research
 outputs, greater contribution to research and development, better qualified staff, higher international
 profiles, greater applied research, and increased commercialisation of research.
- Despite the superficial commonality of objectives there is a marked difference in the research capacity
 and capability of higher education institutions. This is generally, but not always, a consequence of the
 history of each institution.
- The differences between universities in terms of the size and intensity of the research enterprise are evident in relation to the presence or absence of research policies, research strategies and research plans, research structures, management information systems, and the size and nature of the research budget. While a handful of institutions have all of these elements in place, a number of institutions only have some of them, and others have only the most basic ones in place.
- The majority of South African public universities do not have sufficient postgraduate supervision capacity, and systems to appropriately support postgraduate students.
- At most institutions which define themselves as research intensive, there is no explicit and evident articulation between the functions of teaching and learning, and research.

3.4 COMMUNITY ENGAGEMENT

- There is wide variation in the ways in which community engagement is conceptualised in institutional vision and mission statements, and in the high level engagement priorities that follow from these.
- Community engagement appears to be an under-theorised activity at most institutions. This has important consequences in terms of the integration of community engagement into the other core functions and its levels of resourcing.
- Most institutions have some organisational structure that takes responsibility for community engagement.
- The majority of institutions do not have formal systems for the quality assurance and monitoring of community engagement. Generally, there is little integration between research and community engagement.

 At most institutions there are a range of activities that can be categorised as community engagement but, generally, most of these activities rely on individual initiative rather than them being formally owned, supported and driven by the institution.

In addition to the above points, three issues emerge which must be factored in the design of the second cycle: first, a process of institutional differentiation has been initiated in the higher education system, but it remains at a rudimentary stage and requires further institutional engagement and development, particularly in relation to the manner in which the institutional mission, vision and orientation are translated into the three core functions of higher education. The second cycle of quality assurance will be required to engage with institutional differentiation and provider orientation more directly to produce increasingly comprehensive, precise, and appropriate definitions and assessments of the quality of provision. Secondly, despite policy interventions there is a lack of substantive progress in areas such as undergraduate throughput and graduations which are taken as proxies for good teaching and learning. This suggests that there are systemic and institutional obstacles to the improvement of teaching and learning and that the interaction between these two sets of obstacles compounds the problems of achieving successful teaching and learning. The second cycle of quality assurance must be able to identify and analyse these obstacles, and the manner in which institutional obstacles and national systemic constraints influence each other. Finally, good practices in the four areas listed above are often not being adequately showcased or implemented at either institutional or national level. The second cycle of quality assurance must contribute to the dissemination and sharing of good practice across the national higher education system. In summary, the second cycle of quality assurance will focus more decisively on institutional differentiation, take into account institutional and system level constraints to quality education and actively promote quality at institutional and system-wide levels.

Of the three quality assurance tools used by the HEQC in the first cycle, two (programme accreditation and national reviews) dealt directly with teaching and learning, while institutional audits evaluated the institution as a whole and concentrated on all three core functions, although with a stronger focus on teaching and learning. This has allowed the HEQC to develop an important knowledge base of the state of teaching and learning in South African higher education. The outcomes of the HEQC quality assurance work, as well as research done at universities and independent research centres, show that undergraduate teaching and learning is an area of concern (CHE 2004, 2009, 2010a, 2010b; Kraak & Perold, 2003; Kraak & Press, 2008; Lange & Singh, 2010; Scott, et al, 2007). Whether it is a view of teaching and learning from the perspective of South Africa's economic and national development requirements, its need for research, or its need for social cohesion and democratic consolidation, it is clear that South Africa requires many more graduates whose experience of higher education equips them with the capability to adapt to and function in both the world of work and society.

Based on this, the second cycle of quality assurance will be focused on teaching and learning, particularly on the promotion of quality teaching and learning at all institutions and providers of higher education. This will be given effect differently through each of the quality assurance tools used by the HEQC according to their specific purpose and scope.

4. A FRAMEWORK FOR THE SECOND CYCLE OF QUALITY ASSURANCE 2012—2017

4.1 Principles and definitions

The HEQC reaffirms its commitment to the development and implementation of a quality assurance system which is suited to the local needs and realities of South African higher education. In particular, the HEQC is committed to using quality assurance as a steering mechanism to support institutions in the realisation of the four purposes of higher education identified in the White Paper on Higher Education, 1997:

- To meet the learning needs and aspirations of individuals through the development of their intellectual abilities and aptitudes throughout their lives. Higher education equips individuals to make the best use of their talents and of the opportunities offered by society for self-fulfilment. It is thus a key allocator of life chances an important vehicle for achieving equity in the distribution of opportunity and achievement among South African citizens.
- To address the development needs of society and provide the labour market, in a knowledge-driven and knowledge-dependent society, with the ever-changing high-level competencies and expertise necessary for the growth and prosperity of a modern economy. Higher education teaches and trains people to fulfil specialised social functions, enter the learned professions, or pursue vocations in administration, trade, industry, science and technology and the arts.
- To contribute to the socialisation of enlightened, responsible and constructively critical citizens. Higher education encourages the development of a reflective capacity and a willingness to review and renew prevailing ideas, policies and practices based on a commitment to the common good.
- To contribute to the creation, sharing and evaluation of knowledge. Higher education engages in the pursuit of academic scholarship and intellectual inquiry in all fields of human understanding, through research, learning and teaching. (White Paper 3, 1997: 1.3)

In relation to the purposes of higher education stated in the White Paper and current national priorities in higher education policy the HEQC reasserts the appropriateness of the understanding of quality as fitness for purpose, value for money, and transformation within a fitness of purpose framework (Founding Document, 2001: 15) for the second cycle of quality assurance. Based on stakeholder feedback and on the recommendations of the 2008 external review of the HEQC, this framework expands on the elements of the HEQC approach to quality.

Fitness for purpose: this refers to the ability of institutions to discharge their responsibilities in relation to their missions. The specific combination of an institution's aspirations, areas of specialisation, approach and focus in relation to the core functions, available resources, location, local, regional and international relationships, as well

as student and staff profiles and their fit with the institutional mission, will be taken into account in the implementation of each quality assurance sub-system.

Value for money: higher education represents an investment for society, the State and families, particularly for members of working class and poor families who gain access to higher education for the first time. The efficiency and effectiveness with which institutions discharge their functions (teaching and learning, research and community engagement) in the context of their specific missions is a measure of the value society, the state and families receive from their investment. Depending on the focus and purpose of the specific quality assurance methodologies, the HEQC will look into the efficiency and effectiveness with which institutions discharge their responsibilities in relation to teaching and learning, taking into account the constraints experienced by public providers in terms of state funding.

Transformation: the term 'transformation' in education belongs to the field of pedagogy and is rooted in the idea of the relationship between education and qualitative change. It includes the notion that education "adds value" to the student by enhancing his/her knowledge and skills, drawing on the notion of empowerment, in the sense that the educational process helps students to "influence their own transformation" (Harvey and Knight, 1996: 8-10). In South Africa, the term 'transformation' has been also used to denote a wide range of social, political and economic changes which distinguish apartheid's undemocratic, racially-based society from a non-racial, democratic society. In the area of higher education, transformation as 'societal change' has a number of non-reducible dimensions. The most obvious dimension of transformation refers to equity and access and encompasses race, class, gender, disability, the urban/rural divide, and adult access. In relation to this aspect of transformation institutions are expected to reflect and represent the diversity of South African society in relation to its complement of staff and students. A second, more complex, aspect of transformation refers to the purpose and approach taken by institutions in relation to the conceptualisation and implementation of the core functions. The HEQC Founding Document identifies the core functions of higher education as the 'sites of transformation':

The HEQC will develop a quality assurance framework that includes an explicit focus on the quality of teaching and learning activities, research and community service in order to deepen and extend the process of higher education transformation. (Section 5.5)

The HEQC recognises that there are transformation issues specific to teaching and learning, research and community engagement and, that in addressing these issues, the individual and society converge. In the HEQC's conceptualisation of quality, individual and social transformation are not independent of each other, nor are they different stages of an evolutionary process. The fulfilment of the potential of all individuals who enter higher education (irrespective of race, class and gender) cannot be separated from the role that they have in society as citizens, nor can it be seen independently from the role that the skills, competences and knowledge acquired by individuals have in social and economic development. All these dimensions are integrally connected to educational

processes that have to be enabling in diverse ways in order to make the desired outcomes possible (Lange & Singh, 2010: 59).³

Fitness of purpose: one of the focuses of higher education reform internationally has been the achievement of a closer fit between societal needs and goals, and the work of HEIs with due regard to academic freedom and institutional autonomy. In a society faced with development needs which cut across disciplinary fields, economic and social sectors and encompass the political and the cultural as well as the economic, the responsibility to engage with societal (and not just with individual needs and aspirations) is heightened. How have different institutions factored in national imperatives and goals, and their specific manifestations at local and regional level, into their teaching and learning practices? The HEQC will endeavour to develop quality assurance methodologies which, with due sensitivity to institutional mission and focus, interrogate the manner in which institutions engage with national goals and priorities through their teaching and learning.

4.2 Purposes of the second cycle of quality assurance

As already noted, the purposes of the second cycle of quality assurance are shaped by the vision and mission of the HEQC stated in the *Founding Document*; they also take into account the progress made during the first quality cycle in relation to the development by institutions of appropriate systems for the management of quality in the three core functions and the general awareness about quality at the institutional and system level. The purposes of the second cycle of quality assurance are also influenced by changes in the higher education policy environment.

Taking this into account, the main goal of the second cycle of quality assurance will be to improve the quality of teaching and learning at undergraduate level across the higher education system.

In particular, the second cycle of quality assurance will have the following objectives:

- To contribute to an overall improvement in the retention and progression of students in the higher education system.
 - The HEQC will pay particular attention to institutions' specific approaches to dealing with the problem of low graduation and throughput rates, and racially-skewed academic success rates.
- To identify the internal (pertaining to the institution and its functional units) and external (pertaining to the higher education policy environment) constraints to good teaching and learning in the higher education system.

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³ In terms of this conceptualisation an institution concerned with transformation in the core area of teaching and learning would, for example, endeavour to identify and respond to the specific learning needs of its students, create an enabling environment for students and lecturers in which tolerance, respect, creativity and critique are encouraged through curricular and extra-curricular activities; programme design and development is sensitive to developments in the different fields of knowledge and responsive to local needs and requirements; the scholarship of teaching is supported and encouraged, etc.

The HEQC will pay special attention to what constitute obstacles to the improvement of teaching and learning at different layers of the institution and how these are eliminated or entrenched by national policies affecting higher education institutions. Similarly, the HEQC will pay attention to the role that student support services (counselling, medical services, financial aid, academic support, etc.) play in facilitating student learning.

- To support epistemological access and student success.
 - The HEQC will pay attention to institutions' approaches to helping students develop the range of academic literacies which enable them to be part of disciplinary and professional discourses.
- To support pedagogic and curriculum innovation as well as the professionalisation and recognition of academic staff involved in teaching and learning.
 - The HEQC will pay specific attention to institutions' approaches to teaching and learning, the notion of student experience and the manner in which institutions support their academic staff members and facilitate their development in the area of teaching and learning.
- To ensure that there are minimum levels of quality in programme design and capacity to offer a programme across the higher education system.
 - The HEQC will through its accreditation system ensure that all public and private providers offer curricula which meet minimum standards in terms of design and that appropriately qualified staff are available to offer relevant programmes.
- To develop conscious and systematic approaches to the conceptualisation and monitoring of student outcomes and characteristics taking into account institutions' diverse missions and focus.
 - The HEQC will use different quality assurance methodologies to interrogate the manner in which institutions decide on student outcomes, attitudes and characteristics and ensure that these are embedded in educational processes, and are assessed and monitored, with due regard to the range of institutional missions and purposes in the higher education system as well as disciplinary and professional specificity.
- To facilitate and promote articulation across and between the different levels of the National Qualifications Framework.
 - The HEQC will focus on the different approaches used by institutions to make possible articulation and progression between basic and higher education, and further education and higher education, paying particular attention to the need to facilitate and increase access and success. At the same time it will pay attention to the obstacles to the transfer of students between higher education institutions.
- To contribute to the knowledge base on higher education and the advice and monitoring responsibilities of the Council on Higher Education.
 - The HEQC intends to make more systematic use of quality assurance information in order to understand better the higher education system, to identify areas in which system level intervention is required, and to disseminate good practices.

The different modes of quality assurance employed by the HEQC during the second cycle will provide a range of approaches for the realisation of these purposes.

5. A PROGRAMME FOR QUALITY ASSURANCE AND QUALITY PROMOTION

After 10 years of implementation of a quality assurance system in South Africa it is clear that improvement in the quality of teaching and learning at institutional level cannot be achieved through further multiplication of regulatory mechanisms focused on quality assurance or through the repetition of all the elements of the first cycle. The emphasis on the improvement of teaching and learning in the South African higher education system necessitates a multipronged approach which, taking into account the specific purpose and scope of existing quality assurance modes, uses them with sufficient flexibility to draw institutions into an internal institutional conversation about the multiple understandings of quality and the responsibilities of academics, students, stakeholders and university leadership in this regard.

The HEQC re-affirms that quality is the primary responsibility of institutions and that this responsibility entails different levels and forms of accountability which involve the State, society, students, and the community of academic peers in the different disciplines, the professions and the fields of study. The HEQC will continue to use programme accreditation (for individual programmes) and national reviews (for selected programmes or qualifications at national level) as fundamental tools to ensure the quality of academic offerings in higher education. With the change of name from institutional audits to Institutional reviews, the focus will be on the quality of institutional teaching and learning for student success. Quality promotion and capacity development will continue to identify areas of enhancing quality and developing institutional and sector-wide capacity. The main changes to each of these systems are addressed in this section.

Programme accreditation and national review data available to the HEQC will constitute an important source of information which will be available for the institutional review process and particularly in those cases where institutions meet the criteria for self-accreditation status.

5.1 Programme Accreditation

Programme accreditation refers to the confirmation of an institution's ability and authorisation to offer a higher education programme leading to a qualification listed on the Higher Education Qualifications Framework. The purpose of accreditation is to reach a yes/no decision in terms of an institution's compliance with a number of criteria which indicate its ability to offer a higher education programme. Accreditation processes for higher education programmes by definition fall within the new focus of the second cycle, that is, on teaching and learning. Consequently, there will be a great deal of continuity between the current accreditation system and any modifications introduced in the second cycle. However, the framework for accreditation will be re-examined and revised to ensure that the processes it prescribes are both realistic and consonant with the overall vision and purposes for the new cycle. Similarly, the criteria for accreditation will be adapted where necessary to be more sensitive to specific institutional contexts and different sectors, taking into account the emergence of a greater variety in modes of delivery and lessons learnt through the implementation of the first cycle of quality assurance. The alignment of all existing programmes with the new Higher Education Qualifications Framework and their accreditation is a major project to be carried out during the second cycle of quality assurance.

5.2 NATIONAL REVIEWS

National Reviews focus on the re-accreditation of existing programmes in a particular disciplinary area and/or qualification. The purpose of national reviews is to improve the quality of teaching and learning in specific areas such that they comply with national regulatory frameworks, as well as the norms and standards of particular disciplinary fields as defined by the disciplinary peers in the system. As in the case of accreditation, the outcome of national reviews is a yes/no decision in relation to the accreditation status of a programme. However, the fact that this is a re-accreditation exercise in a disciplinary/qualification area in which peers identify standards and good practices has particular significance for the identification of quality provision. A framework for the conduct of national reviews will be developed by the HEQC which will make explicit the criteria used to select the focus of a national review, the process of development of criteria for programme evaluation and the relationship between the development of criteria for specific national reviews and the process of standard setting.

National reviews, with their focus on the development of standards by peers in a discipline/profession will have an important role in taking the CHE's new responsibility of standard- setting to the programme level as part of a peer review process.

5.3 Institutional Reviews

The framework for the conduct of audits, and the audit system as such, is the one HEQC methodology which will be changed most profoundly. The change in the focus, that is, to the concentration of the process on undergraduate teaching and learning for the purpose of improving its quality, requires a substantive change in the approach used and, with it, a review of the designation of this quality assurance activity. The HEQC will call its assessment of quality at the institutional level an 'institutional review'. This change in name is not only consistent with current trends in international quality assurance, but it is also sensitive to requests from the higher education sector that has indicated a desire to move away from the forensic approach evoked by the name 'audit'. This section of the framework presents the methodological underpinnings of the HEQC institutional review process, its areas of focus and some suggested aspects of its implementation.

5.3.1 Purpose and Methodology

In order to assist institutions to improve the quality of their teaching and learning and identify the obstacles to this improvement, institutional review requires a methodology that will allow the HEQC review panels and institutions to jointly focus on an in-depth examination of institutional practices in relation to the quality of teaching and learning and the manner in which these relate to community engagement and research within the context of the specific institutional context, mission and strategic focus.

This methodology must meet a number of requisites. First, it must to be able to read 'below' the empirical evidence to understand which processes, structures, policies, resources, etc., combine to help or hinder good teaching and learning. Secondly, it needs to be able to explain which interventions work, where and why and, conversely, why interventions or practices successful in one context are not effective in another. Thirdly, it should provide institutions with reasons, where necessary, to re-think and re-conceptualise what they do, in order to improve teaching and learning. Fourthly, it must be sensitive to institutional context and mission differentiation.

Institutional reviews will require staff members at different levels within the institution who are involved in teaching and learning to articulate their theories of teaching and learning, and explain why these are successful or not in accounting for what actually happens to their students by way of academic success or otherwise. The focus of the methodology would then be on evaluating the validity of the reasoning of these accounts and theories.

In the first cycle of quality assurance the evidence provided by institutions in their self-assessment was validated against criteria which acted as external descriptions of a number of 'inputs' and processes that auditors largely expected to find at the institution. Institutional reviews, on the other hand, will be built on questions which attempt to surface the assumptions that academics, senior managers and students themselves have about the teaching and learning process, and the environment in which this takes place. This methodology, therefore, seeks to go behind the 'taken for granted' assumptions which surround learning and which come from either untheorised practice or unproblematised theories.

As a point of departure, institutional reviews make two assumptions. First, that once institutions have enrolled students there is an obligation to provide the necessary conditions for the successful completion by students in their programmes. In other words, and notwithstanding the individual student responsibility for his/her education, the HEQC expects that all higher education institutions take responsibility for providing the appropriate environment and interventions for those students accepted into a programme to be able to complete it within a reasonable time. Secondly, the reality of poor graduation and throughput rates in higher education suggests that regardless of what institutions do in the area of teaching and learning, it is not sufficient to improve the poor performance of the higher education system as a whole. This means that a number of constraints and obstacles, at both the institutional and system level, undermine institutional efforts in the area of improving teaching and learning. Identifying those constraints and obstacles, and designing appropriate interventions to overcome them, is essential for institutions to realise their missions more fully.

Using these two assumptions as a framing lens, the institutional reviews process will require institutions to investigate the following themes in relation to teaching and learning:

• Complexity of the educational process

In most higher education systems, students seek a range of experiences and opportunities which encompass the academic, the social and cultural aspects in higher education institutions. Concepts such as 'graduateness' and 'student attributes' or 'student outcomes' involve much more than the acquisition of discipline/profession-specific skills. This requires that institutions not just provide good teaching and learning, but offer an overall educational experience. How institutions do this in a purposeful manner, and with what results, is one of the questions to be explored during an institutional review. What elements of the institutional culture help or hinder student learning and student development to be responsible persons and good citizens? What are the institutional successes in providing students with an appropriate educational experience? What obstacles do institutions encounter and what strategies can be put in place to address these obstacles?

• Knowledge of students

The limitations of the high-school curriculum and the overall deficiencies of the South African schooling system require institutions to have the ability to assess the student potential to succeed in higher education, but it also necessitates a greater and concentrated follow-up of student performance to ensure that those who can succeed actually succeed. How do institutions ensure that they gather appropriate and sufficient knowledge of potential students at the time of enrolment and placement? What kind of thinking or consideration goes into developing a profile of enrolled students? How is this knowledge used to inform and improve the process of teaching and learning? What are the difficulties encountered by academics in accessing and using this knowledge? How effectively are academics supported to develop the necessary skills to teach and facilitate learning in a responsive way?

Content and process of teaching and learning

Increased access to higher education has made large classes a 'normal' situation at many institutions. What are the most common problems encountered in teaching large classes? What considerations are taken into account with respect to access and effective teaching and learning? What understandings of teaching and learning are manifest in the use of educational technology, assessment, tutorial support, etc? A large number of students enter higher education without having sufficient academic literacy to support their acquisition of knowledge, skills and competences in their chosen fields. How does this inform the institutional provision of academic literacy programmes and to what effect? In this context, to what extent are academic literacy needs considered by academics when they develop and review the curriculum? How effectively do academics juggle disciplinary developments, addressing student learning needs and teaching 'soft-skills' in the curriculum design process, in the context of engaging students in active and purposeful learning?

Teaching renewal

While the issue of the obstacles to learning posed by inadequate schooling tends to be the focus of institutional concern about student performance, the issue of the quality and appropriateness of its own teaching and the facilitation of learning is less often viewed in a systematic way. What does the institution understand by the description of teaching as an area of 'academic performance'? How are academics supported to become better teachers and facilitators of learning? Where does leadership in the area of teaching and learning reside at the institution? How does the institution identify and deal with unprofessional practices in teaching and learning?

• Engagement with institutional identity and national priorities

The translation of differentiated institutional missions into programmes and teaching and learning approaches which are sufficiently distinctive of each institutional type and singular institutions is a difficult process. What are the institutional and systemic obstacles to do this? How does the institution overcome these difficulties? What are reasons for institutional successes or failures in this area? What is the thinking that informs institutional choices in addressing national priorities through its teaching and learning processes? According to the institutional (and differentiated) mission, how is the relationship between teaching and learning and the other core functions conceptualised and integrated in practice?

• The discourse on efficiency and compliance

In the last twenty years there has been an increase in reporting and monitoring systems designed to measure institutional efficiency and effectiveness in the area of teaching and learning. These, usually quantitative indicators, are used to report on a range of internal and external structures that are also responsible for ensuring compliance with regulatory frameworks. What is the impact that these forms of oversight have on the quality of teaching and learning? How do internal reporting and monitoring structures assist academic units to engage with their own teaching and learning practices and their outcomes?

5.3.2 A CASE STUDY METHODOLOGY

The focus of institutional reviews requires an approach that enables institutions and review teams to engage with the conceptualisations, practices and results of teaching and learning in order to evaluate the validity of the reasoning of these theories and accounts. In other words as noted above, institutional reviews will focus on enabling academics and academic leaders to articulate their theories of learning and teaching, and to explain why these work or fail in accounting for what actually happens to their students.

In order to achieve this, institutions will be required to provide a throughput analysis of a cohort of students enrolled 5 years prior (or longer if it is a distance education institution) for the review. This analysis should indicate per programme, college or other administrative unit the number of students who have graduated on time, the number who have finished in N+1, +2, +3 years, those who have dropped out, and those students who have transferred between faculties/programmes. Together with this overview, institutions will be asked to produce a written report updating the information on the organisation of the management of the quality of teaching and learning since the first cycle audit was conducted (Level A of information). This would include a reflection on the wider enablers or barriers which impact on student success, for example, student support, residence life or financial factors.

The throughput data and the updated report will constitute the basic information used by the HEQC to consult with the institution on the units for detailed focus the parameters and schedule for the review at each institution. Taking into account the throughput data and its analysis, and after discussion with the institution, the HEQC will finalise what departments/schools will be considered in detail during the review (Level B of information). This decision will be discussed with the institution's senior management who will be asked to select a number of modules/courses in each department/school for in-depth examination. The modules selected should evidence at least one of the range of characteristics that impact on teaching and learning, such as: large classes, a low pass rate, or an innovative teaching approach (level C of information).

The greatest detail of evidence is expected to be provided in relation to level C, that is, the module/course level. This will constitute the unit of analysis for a series of evaluative questions that the institution will compile and submit to the HEQC as part of the overall self-evaluation report prior to the site visit. The size of the institution will determine the extent and format of the overall self-evaluation process.

The self-evaluation process of the institution will be conducted in relation to the themes listed above and will consist of an analysis of the cohort study; a status report on the organisation of the management of quality of teaching and learning since the previous audit, and a detailed analysis or case study of teaching and learning in a limited number of selected of modules/courses per department/ school selected at each institution.

Further, in the process of systems development, the HEQC will provide more detail on this review methodology (interviews, documentary evidence, and format of the self-evaluation report) and the review process (interactions with the HEQC, scheduling of reviews, identifying departments and modules, composition of review panels, duration of the audit, the nature of the report, etc.) all of which will be included in a manual for the conduct of institutional reviews.

5.3.3 Reporting and consequences of institutional reviews

Taking into account what has been learnt during the first cycle, the HEQC will approve the processes related to producing a review report and its approval by the HEQC. The details of reporting and how they will be managed will address issues such as the review panel report on its assessment of the institutional-level case study. For example, the report will reflect the engagement between the institution and the panel and will provide a number of areas focused on the improvement of teaching and learning at the institution and will point out areas of good practice that will be incorporated into a database of good practices to be made available on the CHE website. The institution will be provided with opportunity to comment on the draft report. The review report, produced by the review panel, will be authorised by the HEQC. The institution will be given an appropriate period of time to develop an improvement plan to address the areas of concern raised in the review report, which will be submitted to the HEQC Institutional Reviews Committee for consideration.

Consistent with international practice and the need for greater transparency in the higher education system, the HEQC will make the full reports of institutional reviews available on the CHE website together with institutional improvement plans.

5.3.4 RELATIONSHIP BETWEEN THE FIRST CYCLE AUDITS AND SECOND CYCLE REVIEWS

The audit reports and improvement plans from the first cycle will be taken into account by the Institutional Reviews Directorate at the time of discussing with institutions the focus and unit of analysis of the self-evaluation report. Should there be any teaching and learning recommendations not adequately addressed by an institution at the time of the institutional review, the Institutional Reviews Directorate will decide, after consultation with the institution, how to include this issue in the review. Unaddressed recommendations in areas other than teaching and learning will be dealt with by the Institutional Reviews Directorate through a separate process presently in operation, which entails follow- up reports and, when necessary, visits to the relevant institutions.

The continuity with institutional audits in the first cycle, however, is also heuristic, in the sense that the audit report and the institutional improvement plan provide an interpretation, a type of knowledge about an institution, and as such constitutes the stepping stone on which the knowledge and interpretations related to the institution will inform the second cycle of quality assurance.

More specifically, the Institutional Reviews Directorate will request a status report on changes introduced to the organisation of teaching and learning at higher education institutions since the first audit. This together with the analysis of data indicated in section 5.3.2 will constitute the documentary basis of an institutional review.

5.4 QUALITY PROMOTION AND CAPACITY DEVELOPMENT

In the first cycle, capacity development and quality promotion had two main purposes: training academics and senior managers to assist in the implementation of the national quality assurance system and helping institutions to prepare for their participation in quality assurance system. Over and above this, the HEQC also developed interventions and activities focused on the promotion of quality and quality assurance. During the second cycle, the HEQC will include a specific focus on a number of targeted interventions to promote quality teaching and learning in the higher education system. Training will be undertaken based on the specific requirements of the different quality assurance methodologies used by the HEQC in the second cycle.

6. INSTITUTIONAL SELF-ACCREDITATION

In 2004, at the time of the release of its first audit framework, the HEQC proposed institutional self-accreditation as one possible outcome of institutional audits. Self-accreditation referred to the ability of institutions to reaccredit existing programmes where no professional council has jurisdiction. The Institutional Audits Framework of 2004 indicated that this status could be attained after the HEQC had considered the audit findings of an institution, as well as drawing on information from the HEQC on programme quality, and information from the then Department of Education and the South African Qualifications Authority. This has not happened for a range of reasons. Chief among these is that the HEQC has concentrated on the accreditation of new programmes for public and private providers. With the exception of the reaccreditation process of HEQF-alignable programmes of private providers, it has not yet reviewed all existing programmes or those provisionally accredited which would involve the application of all 19 of the present programme accreditation criteria.

Therefore, the HEQC does not have evidence of the effectiveness of many existing programmes in terms of process, outputs and outcomes. In addition, many public institutions have not introduced more than a handful of new programmes in recent years. As a result, there is not sufficient information on which to make a decision in relation to granting self-accreditation status. This aside, the HEQC has been debating the gains institutions will accrue if self-accreditation were to be circumscribed, as originally indicated, only to the re-accreditation of existing programmes not dependant on professional councils, and the problematic exclusion of all private providers of higher education from this status.

The HEQC is committed to revising its conceptualisation of self-accreditation for the second cycle and to produce a framework and plan for the operationalisation of this status which will take into account institutional capability in the area of programme design, and teaching and learning.

7. PRIVATE HIGHER EDUCATION AND QUALITY ASSURANCE IN THE SECOND CYCLE

Private provision of higher education has been growing steadily since the mid-1990s. In 2011, there are over a hundred institutions registered with the Department of Higher Education and Training to offer higher education and whose programmes have been accredited by the CHE. During a decade of quality assurance private providers of higher education have been exposed to all of the HEQC quality assurance tools. However, while all private providers are obliged to submit their programmes for accreditation, only those offering specific programmes (Master of Business Administration and teacher education programmes) were included in the two national reviews undertaken by the HEQC in 2003 and 2005, respectively. Only a few private providers were included in the audit schedule 2004–2010, as the institutional audits were not easily adaptable to very small institutions offering a handful of programmes and a limited number of qualifications. Private providers have been systematically included in the HEQC work in the area of capacity development and quality promotion.

As a whole, the HEQC has taken two approaches to private higher education institutions: recognising their specific features and needs, and ensuring that they are fully included in the higher education system. This has implied, for example, taking into consideration that most private providers do not necessarily have the organisational and governance structures that characterise public universities. This has led to differentiated approaches to private providers in relation to programme accreditation and institutional audits. While this step helped to take account of the specificity of private provision as a whole, it has not contributed to developing a sense of differentiation within private higher education provision and to understanding the practical consequences that this has for the implementation of audits, accreditation and national reviews. However, this approach needs to be supported by a more comprehensive understanding of private higher education provision.

The second cycle will focus on the distinctiveness of the private provision of higher education in relation to the history of the sector and each provider, the variation in size and scope of activities of the different providers and the structural and governance arrangements that characterise the sector. A better understanding of private provision in relation to these three elements will provide a more solid foundation for working with this sector and their appropriate and rigorous inclusion within the HEQC quality assurance and quality promotion focus.

Important steps have already been taken to generate a more rigorous and reliable knowledge base of private provision of higher education with the development of a CHE-owned database on private providers. More needs to be done to ensure that enhanced and comprehensive information and analysis of higher education is used to fully integrate private provision within the national higher education system.

While no major changes will be introduced to the programme accreditation framework in the second cycle of quality assurance, the HEQC will review, for example, the extent to which private providers have participated in institutional audits, and is committed to working with private providers to ensure that each HEQC quality assurance tool is applied in a rigorous, appropriate, reliable and fair manner. This requires a holistic approach to the quality assurance of private providers and not simply the introduction of small changes to existing systems.

8. CONCLUSION: THE NEXT STEPS

This document has set out the rationale for the second cycle of quality assurance and laid out its conceptual and methodological choices. As noted, there is a great deal of continuity between the first and the second cycles of quality assurance.

The first sub-framework to be developed and piloted will be in the area of institutional reviews. The HEQC has already held a number of initial consultations with institutions in this regard and it has been encouraged by the positive response from stakeholders of the higher education system. The work ahead includes further consultations with higher education institutions, the refinement and further development of the necessary frameworks, for example, reviewing the programme accreditation instruments and processes, the spelling out of the institutional review methodology in a manual, piloting the new approaches in different institutional contexts, the adjustment of the frameworks according to the findings of pilot processes, and the development of an implementation plan which will include training for evaluators/reviewers and institutions. A task team will be established to deal with the overall quality assurance of private providers. The roll-out of the institutional review system is likely to begin in 2013–2014.

The intentions in the area of programme accreditation have been spelled out clearly in the first CHE Communiqué on the implementation of the HEQF and further communication with the sector will follow as the process of HEQF alignment unfolds. In the area of national reviews the HEQC needs to re-establish its capacity to operate in this area and the production of a framework for national reviews will take some time. Quality promotion and capacity development activities will be developed to support the implementation of the different quality assurance modes but also the work on the promotion of quality in the area of teaching and learning will continue to engage institutions with their practices at a system level.

The external evaluation of the HEQC commended the manner in which higher education institutions had been involved in the development of the first cycle of quality assurance and congratulated the HEQC in having been able to develop a sense of partnership with higher education institutions. It is the commitment of the HEQC that the second cycle of quality assurance will continue to be built on the same tried and tested approach.

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Consultation on the Framework for the Second Cycle of Quality Assurance 2012–2017

Following a consultation process held with a range of higher education stakeholders on 4 – 8 and 15 October 2010, the HEQC is making available for public comment the *Framework for the Second Cycle of Quality Assurance 2012–2017* that sets out the rationale, scope and approach for the next period of quality assurance in higher education. The conceptual and methodological choices that inform the next stage of quality assurance are based on an analysis of the insights and knowledge gained from the First Cycle of Quality Assurance.

A major feature of the Second Cycle will be a focus on the quality of teaching and learning.

Consultation process

This consultation provides the South African higher education sector with the opportunity to consider the proposed Framework for the Second Cycle of Quality Assurance, provide feedback on it and signal its agreement to implement the next cycle. It also provides an opportunity for a wider audience to consider whether the identified activities will safeguard and enhance the quality of South African higher education awards and learning provision. The CHE would therefore like to hear from anyone with an interest in higher education about the proposed Framework.

The HEQC will continue to consult with stakeholders on the draft Framework during the period of consultation, whereafter the HEQC will consider the comments received and finalise the Framework document. The CHE will then develop relevant policies and procedures and produce the necessary documentation for the work of the Second Cycle.

Capacity development workshops and training for institutional reviews will be provided for institutions identified to participate in an institutional review. A schedule of institutional reviews will be developed and, as has previously been the HEQC custom and practice, higher education institutions will be consulted on the timing of their review. It is expected that institutional reviews will begin in 2013/2014.

Consultation questions

Question 1:

Comment on the purposes and objectives in the Framework Document?

Question 2:

Comment on the proposed purpose of institutional reviews?

Question 3:

Comment on the methodology to be used for institutional reviews?

Question 4:

Are there any other comments you would like to make that are not addressed above?

If you are making an institutional submission, please indicate if there was an internal discussion and which institutional structures discussed the document.

Comment on the Framework Document is invited from higher education institutions, students and stakeholders by 31 March 2011. Comments should be sent to ed@che.ac.za.