Comment on the Green Paper for Post-School Education and Training

May 2012

1.   Introduction

1.1   The release of the Green Paper on Post-School Education and Training (PSET) signals a key shift in the evolution and development of the post-apartheid transformation of the education and training system. The integration of the education and training system and its institutional manifestation through the creation of the Department of Higher Education and Training (DHET) provides an opportunity to enhance and strengthen the role of the education and training system in contributing to the development of the knowledge and skills that are essential elements in giving effect to and overcoming the reconstruction and development challenges that face South African society. It provides a framework for developing a national human resource development strategy, which transcends the traditional divide between the formal education system, which operates on the supply-side, and the work-place based skills training system, which operates on the demand-side. The bringing together of the supply-side and the demand-side through the focus in the Green Paper on strengthening the key post-school institutional form where the two intersect, namely the FET colleges, is a step in the right direction. This has the potential to drive the skills revolution that the country sorely needs, while at the same time addressing the challenge of access to education and training opportunities through inverting the enrolment pyramid by focusing expanded access on the base of the pyramid, that is, in post-school institutions other than the universities.

1.2   The Council on Higher Education (CHE) welcomes the release of the Green Paper and the invitation to comment as part of the consultation process. The Council trusts that it comments will contribute to strengthening the policy framework for the post-school education and training system and looks forward to engaging further with the Minister and the DHET on the issues addressed in this response.

1.3   The Green Paper in developing a vision for a single, coherent, differentiated and highly articulated PSET covers a range of issues that are beyond the remit and mandate of the CHE. In the light of this, the Council's response will be limited to the proposed vision for the PSET and two key policy issues addressed in the Green Paper, namely:

(i)   The quantity, quality and diversity of provision, with a particular focus on the proposals relating the Further Education and Training (FET) Colleges and the Universities.

(ii)   The streamlining of the regulatory system, specifically, the National Qualifications Framework (NQF) and the role of the Quality Councils (QCs).

2. Vision and Terminology

2.1 The Council supports the Green Paper's vision for the creation of a single, coherent, differentiated and highly articulated PSET. However, in the Council's view this vision remains undeveloped. What is required is an integrated policy framework, which clearly spells out and delineates the purpose, role and relationship between the different institutional types and associated qualifications that constitute the PSET. Instead, the focus of the Green Paper is on each institutional type as a discrete category.

2.2 The absence of an integrated framework, in the Council's view, is related to the remit of the DHET, which includes, but is not limited to, the post-school system. This is reflected in the definition of post-school, which as the Green Paper indicates, refers to "education for people who have left school as well as those adults who have never been to school but require education opportunities" GP: 1). Thus, the post-school system, which in the normal sense of the term would refer to access to education and training qualifications post the equivalent of the school-leaving certificate, that is, level four of the NQF, also includes in the Green Paper's notion qualifications that are below level four of the NQF. This wide remit, which covers a range of disparate groups needing access to education and training opportunities – from newly literate and numerate adults to youth, both those who have dropped out without completing grade 9, as well as those who have completed matric, makes the development of a coherent vision linked to the provision of education and training opportunities and qualifications in particular institutions difficult.

2.3 The lack of clarity as to what constitutes post-school education is further compounded by the absence of a clear definition as to what constitutes further and vocational education. Further education is defined in relation to institutional type, that is, education offered in the FET colleges, rather than by qualification type. This begs the question, "further to what"? Is it further to the end of grade 9 or the end of grade 12? And if the latter, how is this reconciled with the fact that current legislation defines all post-matric qualifications as higher education? Similarly, the definition of vocational education as "middle level" education begs the question, "middle to what"? Is it post-basic but pre-further education, that is, the equivalent of senior secondary school? Or is it something else altogether? The Council acknowledges that answers to these questions are further complicated by the ambiguity implied in the term "FET College", as FET refers to a band on the NQF that covers levels 2-4. The suggestion in the Green Paper that the DHET is considering renaming the FET colleges Vocational Education and Training Colleges would go some way towards clarifying the role of the FET colleges.

2.4   The Council recognises that the lack of clarity relating to what constitutes post-school education is in part the result of the split of the erstwhile Department of Education and the incorporation of the training mandate of the Department of Labour into the DHET. Furthermore, in raising these issues, the Council is not suggesting that the decision to split the education portfolio be re-visited. What the Council is suggesting, however, is that unless there is clarity on the implications of the remit of the DHET in relation to the purpose and role of the different institutions and associated qualifications that constitute the PSET, including the constituencies they serve, there is a danger that the focus of the different institutions will be dissipated, which would make the realisation of the vision for the creation of a single, coherent, differentiated and highly articulated PSET difficult.

3.   **Quality, Quantity and Diversity of Provision**

3.1   **Broadening the Base of the PSET**

3.1.1 The Council agrees with the Green Paper's assessment that the key challenge facing the post-school system is the inadequate quality, quantity and diversity of provision, in particular, in relation to access to vocational and occupational qualifications for adults and out of school youth. The lack of vocational and occupational alternatives is in large measure responsible for the "inverted pyramid" of enrolments with universities accounting for three times as many enrolments as the FET colleges. This must be reversed, as the Green Paper argues, through expanding enrolments at the base of the post-school system, that is, in the FET colleges and other non-university post-school institutions, if the "shortages of artisanal and other mid-level skills" are to be addressed.

3.1.2 The Council further agrees with the Green Paper that the expansion of the post-school system must be done with care and "mindful of the need to ensure quality", which requires that the "necessary infrastructure and human resource capacity" is in place to support the expansion and to ensure that access is accompanied by success. In addition, in the Council's view, strong and well-functioning institutional governance structures are a pre-requisite for ensuring quality.

3.1.3 However, despite the emphasis on the need to ensure quality, the Green Paper's proposals for expansion – from 900 000 to 1,5 million in higher education and from 300 000 to 4 million in FET colleges, is not based on any assessment of the current and future capacity of the existing institutions to expand or the implications in terms of capacity of establishing new institutions. Indeed, there is no indication of what informs the projected expansion and why this should succeed given that previous projections and targets remain unachieved. Thus, for example, the National Plan for Higher Education (NPHE) in 2001 set a participation rate target of 20% to be achieved over a 10-15 year period based on participation rates in equivalent middle income countries.

However, in practice, the higher education participation rate has increased modestly from 15% in 2000 to just under 18% in 2011. The Green Paper proposes to increase the higher education participation rate to 23% by 2030 without any reference to the previous target or assessment of why it was not achieved.

3.1.4 Moreover, an analysis of recent enrolment trends in higher education suggests that the quality of provision is being compromised as the expansion in enrolments has not been accompanied by a concomitant increase in staffing. To illustrate – between 2005 and 2010 student enrolments grew by 29%, while the staff complement increased by 10%, resulting in an increase in the staff-student ratio from 1:24 to 1:27. And importantly, increasing staff numbers in higher education faces the added challenge that enrolment in research masters and doctoral programmes remains low, which has implications for the production of the next generation of academics and researchers.

3.1.5 In addition, there is no assessment in the Green Paper of the financial implications of the proposed expansion. The discussion on funding largely focuses on the technical aspects of funding, namely, the appropriateness of existing funding frameworks and instruments, rather than on the quantum of funds required to sustain the proposed expansion, including the implications for student funding given the welcome emphasis in the Green Paper on ensuring that the proposed expansion is linked to facilitating access to poor students.

3.1.6 The Council is of the view that proposals for the expansion of the post-school system must be underpinned by detailed modelling based on demographic projections and funding needs, which is essential to ensure the feasibility of the proposals and, in turn, can inform the development of an appropriate implementation plan and strategy. The Council acknowledges that there are a number of investigations currently underway or intended, as indicated in the Green Paper, which would contribute to the modelling suggested by the Council. In the Council's view, it would be prudent for the DHET to await the outcome of these investigations before establishing quantitative targets for the expansion of the post-school system. This need not, however, delay any steps that need to be put in place to enhance the quality of provision in the FET colleges which as the throughput data clearly indicates, is in urgent need of attention.

3.2 FET and other Colleges

3.2.1 The Council strongly supports the Green Paper's view that the strengthening and expansion of the FET colleges as "vibrant institutions that offer vocational and occupational qualifications" is a pre-condition for addressing the shortages of artisan and mid-level skills, which is critical to sustain social and economic development. This requires, as the Green Paper indicates and, as the President affirmed at a recent meeting with the FET college principals, building

the FET colleges as institutions of first choice for young people who do not complete their secondary education and/or who do not meet the requirements for entry into higher education.

3.2.2 The Council is not convinced, however, that the proposals in the Green Paper, while in the right direction, would ensure the development of the FET colleges as first choice institutions. The reason for this, in the Council's view, is that the Green Paper does not make a fundamental break with the current programme and qualification mix of the FET colleges, which is in large part responsible for the low status of the FET colleges and the associated qualifications.

3.2.3 At the heart of the problem and the central issue that needs to be addressed is the question raised in section 2 above, in relation to terminological clarity regarding further education and training, that is, "further to what"? Is it further to the end of grade 9 or the end of grade 12? Currently, as the Green Paper indicates, the main qualification offered by the FET colleges, namely, the National Certificate (Vocational) (NCV), plays a dual role. Although it was introduced as a "parallel (vocationally-oriented) qualification to the NSC" to offer learners who left school after completing grade 9 an "alternative pathway to intermediate occupations", it also seems to be serving as a post-secondary qualification, that is, an alternative pathway to higher education for learners who have completed grade 12 but who do not meet the requirements to enter higher education. However, it does neither. It is, as the Minister has often stated, a dead-end qualification.

3.2.4 The Council is convinced that the solution to enhancing the status of the FET colleges is to create a set of occupational and vocational qualifications that are post-school, that is, post-matric, but alongside higher education and which have status as worthy alternatives to higher education. This is essential if the current perception of the status of FET colleges as nothing more than glorified high schools is to be changed. This would require legislative changes, in particular, amending the Higher Education Act (Act No 101 of 1997), which defines all programmes post-grade 12 as higher education programmes in line with the erstwhile "band" approach to the NQF.

3.2.5 In the Council's view, the occupational and vocational qualifications developed must have a value and status in their own right linked to currency in the labour market, which is imperative if the shortages of middle-level technical and artisan skills are to be addressed. This requires, indeed it is an essential pre-requisite, that the qualifications should not be developed as, or create the perception that they are, an alternative pathway to entry into higher education, as is the case with the NCV. In this sense, the qualifications should be "stand-alone", that is, the primary purpose of obtaining the qualification should be to enable access to employment opportunities rather than direct entry into higher education. However, a "stand-alone" qualification should not be interpreted to mean a "terminal" qualification, that is, that once obtained

further opportunities for access to higher education would be closed off. The latter could be linked to a combination of a minimum number of hours of work experience and the obtaining of intermediate modules and/or qualifications which depending on the nature of the curriculum, could enable articulation and credit exemption, in particular, into diplomas offered by the Universities of Technology (UoTs). This was the case, for example, with the N4-N6 certificates "which could after 2000 hours of work experience, result in the awarding of a National N Diploma", as the Green Paper indicates.

3.2.6 The development of post-school occupational and vocational qualifications alongside higher education qualifications should not be interpreted to suggest that the FET colleges should not offer alternative qualifications for learners who leave school after completing grade 9. On the contrary, given the large number of out-of-school youth who fall into this category, it is essential that they too have access to appropriate education and training opportunities. In the Council's view, a re-curriculated NCV, which is articulated with the post-school occupational and vocational qualifications, should continue to be provided to cater for grade 9 school-leavers. In order to distinguish between school-leavers and school drop-outs, this may require revisiting previous discussions regarding the issuing of General Education and Training Certificate at the end of grade 9.

3.2.7 Similarly, in emphasising the importance of occupational and vocational qualifications as the primary focus of the FET colleges, the Council is not suggesting that there is no scope for the FET colleges to offer other types of programmes such as, for example, bridging and foundation programmes that facilitate access to higher education. However, in the Council's view, it is important to ensure that the focus of the FET colleges is not dissipated. This requires developing a differentiated set of FET colleges in which the programme and qualification mix is determined by a combination of factors such as human resource capacity, local and regional labour market needs, community development initiatives and so on. The Green Paper falls short in this regard, as the discussion of FET differentiation is limited to a narrow focus on issues of governance.

3.2.8 The Council is firmly of the view that if the Green Paper's vision for a single, coherent, differentiated and highly articulated PSET is to be realised all the existing colleges such as nursing and agricultural colleges must be integrated into the PSET and brought under the ambit of the DHET. These colleges play a critical role in providing occupational and vocational qualifications and their continued fragmentation is unacceptable, especially as the quality of provision in many of these colleges is weak, as the Green Paper indicates.

3.3 Universities

3.3.1 In the Council's view the key policy issue that needs resolution is the twin imperatives of equity - in terms of expanding access coupled with success, and development - in terms of strengthening research and the production of new knowledge, are to be successfully addressed is the differentiation of the higher education system. This is essential to ensure the efficient and effective use of scarce resources.

3.3.2 The Council supports the underlying principles outlined in the Green Paper for creating a differentiated higher education system linked to a continuum of institutions, "ranging from specialised research-intensive universities to largely undergraduate institutions, with various levels of research focus and various postgraduate niches at masters and/or doctoral level" (GP: 40). The Council agrees that all programmes both undergraduate and postgraduate are "equally important to the country" and that the "knowledge hierarchy they represent should not be interpreted to represent a hierarchy of importance" in terms of institutional status (GP: 40). In this regard, the Council strongly endorses the principle that while all universities must offer high-quality undergraduate programmes, it is not necessary for all universities to develop as research-intensive universities, as a "strong embedded research and development culture" is expensive and takes years to develop (GP: 40 & 44). This does not mean that all universities should not be research-active in the sense of developing research in niche areas.

3.3.3 The Council is, however, concerned about the efficacy of the process for implementing the principles based on a negotiated process, which would involve "both the universities and the DHET working together to define the mission and role of each institution". The Council's concern stems from the fact that both the principles and the process outlined in the Green Paper for realising the principles is to all intents and purposes similar to the principles and processes for institutional differentiation adopted in the NPHE. In response to the widespread opposition to the CHE's size and shape proposals in 2001 for the structural-functional differentiation of the higher education system, the NPHE argued for mission and programme-based differentiation along a teaching and research continuum linked to institutional capacity and location. This has been implemented through the Programme Qualification Mix (PQM) and enrolment planning process, which is a negotiated process between individual institution's and the DHET. The NPHE argued that the potential weakness of the mission and programme-based differentiation approach in giving rise to mission drift could be avoided by "establishing clear parameters and criteria for determining an institution's programme mix and linking it to the funding of student places" (NPHE: 54).

3.3.4 However, the fact that differentiation remains on the policy agenda suggests that the mission and programme-based differentiation approach is not working. Indeed, although there has been no formal assessment of the impact of the PQM process on institutional differentiation, a cursory analysis is likely to show that the PQM process has not been able to hold the line on mission drift. This is not surprising and is intrinsic to negotiation processes, which are open to political pressures and manipulation by institutions through mobilising external support. The Council would therefore like to caution that while the principle of negotiating institutional missions and roles is important, careful attention needs to be paid to the mechanisms, including funding policies and frameworks, which would ensure that mission drift is discouraged. As a first step, the Council suggests that the DHET undertakes an assessment of the current PQM and enrolment planning process to assess its impact on institutional differentiation.

3.3.5 The Council is concerned, furthermore, that the Green Paper is silent on the potential for mission drift in the Universities of Technology (UoT) and the comprehensive universities in terms of replacing diploma with degree programmes at the undergraduate level. The role of the diplomas, which are vocationally-oriented is critical in two senses; (i) the diplomas play a crucial role in training technicians and technologists, which are in short supply and much needed in the labour market; and (ii) the entry requirement for the majority of diploma programmes are less onerous than for degree programmes, thus a shift away from diplomas is likely to have major consequences for access opportunities in higher education. In the Council's view, it is imperative that the DHET ensures that the role of diplomas in higher education is not downgraded.

3.3.6 The focus on differentiation in the Council's response should not be interpreted to suggest that the other issues relating to higher education in the Green Paper are not important. The Council's focus is informed by its view that differentiation is the key policy issue that requires resolution to enable the strengthening of the higher education system. In addition, the Council recognises that many of the other issues are currently under investigation, the outcomes of which would be subject to consultation in the future.

4. Streamlining of the Regulatory System

4.1 Simplifying the NQF

4.1.1 The Council supports the proposal in the Green Paper that while it is important to clarify and resolve issues relating to the NQF that may hinder the expansion of access to education and training opportunities, a full-scale review of the NQF is not necessary. The main concern that the Green Paper seeks to address in this regard is in relation to the ten levels or steps on the NQF "ladder". This has resulted in the unintended consequence, as the Green Paper indicates, in the public

perception that the progress in acquiring knowledge and skills means moving up the qualifications ladder, that is, vertically (acquiring advance knowledge in the same field), rather than, where appropriate, horizontally (acquiring knowledge in a new or different field), or even below the level at which the individual already has a qualification. In addition, it has resulted in the perception that qualifications obtained on the same level of the NQF are equivalent in terms of outcomes and attributes, irrespective of the purpose the qualification.

4.1.2   The Council agrees with the proposal in the Green Paper that the pitfalls created by the NQF levels can be addressed through mapping and indicating the relationship between the qualification types in the three NQF sub-frameworks, namely, the Higher Education Qualifications Framework (HEQF), the General and Further Education and Training Qualifications Framework (GFETCQF) and the Occupational Qualifications Framework (OQF).

4.1.3   The mapping approach has in fact been used in the development of the revised HEQF, which takes as its starting point the purpose of a qualification as its defining factor, rather than the level at which it is placed, that is, credits are primarily recognised in relation to the qualification type – diploma credits or degree credits, and not as level credits. In other words, for example, level 6 credits in a diploma programme are not necessarily exchangeable with level 6 credits of a degree programme, as the curriculum and the programme purpose and design are different. This enables the mapping or placing of qualifications in relation to each other; for example, an Advanced Diploma follows a Diploma and so on. The role of levels in this approach is limited to identifying at a high-level of abstraction the cognitive demand of the credits at each level. And in this sense, once the qualifications map has been developed, the levels could theoretically be removed as they are somewhat of an artificial construct useful in determining the placement of qualifications in relation to each other while building the framework, but not necessarily in determining the exchange or transfer value of individual credits.

4.1.4   However, while the levels could be removed, the Council suggests that they be retained in the background as they play a useful role in evaluating whether a particular programme offering (which might be a full or part qualification or a short course) indeed meets the cognitive demand similar to other offerings at that level of the NQF. For example, in evaluating whether a particular programme proposed is in fact appropriately named an Advanced Diploma, it is useful to evaluate the programme both against the unique qualification type specifications and the specifications of other offerings at that level of the NQF. In this sense, level descriptors should be informed by, and emerge from, qualification descriptors (or standards) rather than vice-versa.

4.2   Rationalisation of the Quality Councils

4.2.1   The Council agrees with the Green Paper that the demarcation of responsibility among the three QCs needs to be clarified. This is in part necessary because the previous demarcation of qualifications in relation to NQF "bands" linked to levels is unnecessarily restrictive. The Green Paper correctly argues that the latter has given rise, or has the potential to do so, to jurisdictional or "turf" battles between the three QCs in relation to overlapping domains.

4.2.2   In the Council's view, if the starting point for defining and distinguishing between different qualification types is their purpose, rather than the level at which they are placed on the NQF, then the potential for jurisdictional battles between the different QCs could be avoided. What defines the purpose and characteristic of different qualifications is the role of knowledge and the blend of knowledge types in the construction and development of the qualification, irrespective of whether the qualification has a general, professional, vocational or occupational orientation. For example, higher education qualifications are characterised by a particular blend of conceptual or "pure" knowledge in the disciplinary sense and contextual or applied knowledge in relation to professional or vocational domains. This is in contrast to occupational qualifications in which skills derived from the modalities of the workplace and associated processes, rather than conceptually derived knowledge, provide the defining characteristic of the qualification. In this approach there could be a range of different qualification types at a particular level as it is the purpose and characteristics of a qualification, including the institutional context in which it is delivered, that would determine whether a qualification is a higher education, further education or occupational qualification and thus the sub-framework under which it would be regulated. In short, an NQF level is not necessarily the exclusive domain of a particular QC.

4.2.3   The Council recognises that the distinct nature of the different qualification types means, and in this the Council agrees with the Green Paper, that there is "as yet little integration across different types and sites of provision". However, the Council does not agree with the assumption that an amalgamation of the QCs would, in or by itself, improve integration and an accompanying improvement in articulation between qualifications offered by the existing QCs, which is a key challenge. In the Council's view, articulation cannot be determined solely by the credits that have been obtained at a particular NQF level, without reference to the purpose, focus and outcomes of the preceding and succeeding qualifications. To develop better articulation possibilities, attention should be given, not to systemic integration at the level of QCs, but rather to greater emphasis on efficient liaison between institutional types, for example between FET colleges and universities, preferably on a one-to-one basis.

4.2.4   In the light of this, the Council does not support the amalgamation of the QCs into a single overarching Quality Assurance Authority, which is

one of the options proposed in the Green Paper. In the Council's view, the distinct role played by each of the QCs in relation to the purpose of the qualifications, the institutional context in which the qualifications are offered and the quality assurance system required to support the successful delivery of the qualifications is essential to the strength of the PSET.

5. Conclusion

5.1   The Council endorses the Green Paper's vision for an expanded and articulated PSET system to rectify the imbalances and inequities of the past and to address the skills and knowledge needs, which is a pre-condition for the social and economic development.

5.2   However, the Council cautions that the translation of the vision into particular goals and targets needs to be based on realistic analysis of the capacity of the system to respond and a more comprehensive analysis of the resource implications – human, financial and infrastructural, to ensure that the quality and sustainability of provision is not compromised.

5.3   The Council believes that the emphasis in expanding the education and training opportunities for adults and post-school youth should lie in developing a strong set of vocational and occupational qualifications alongside higher education that have currency in their own right, but that in turn can facilitate transfer to higher education where appropriate. In doing so, however, the educational and training needs of those who have not completed matric should not be neglected. The improvement in quality and growth of a vibrant vocational college sector would do much to assist in reshaping the inverted pyramid of enrolments.

5.4   The Council accepts that articulation remains a key challenge in creating an integrated PSET system. However, in the Council's view, the solution to the articulation problems in the regulatory landscape lies not in systemic integration or a restructuring of the various QCs, but in the approach taken to mapping qualifications and their relationships to each other in the three sub-frameworks.