



## Communiqué 9 of 2022

**To:** Public Universities, Private Higher Education Institutions, Professional Bodies, the Department of Higher Education & Training, Universities South Africa, Student Bodies and Research Institutions, all Higher Education Stakeholders

**Subject:** Request for written submissions on the Higher Education Qualification Sub-Framework (HEQSF) Review Report

The Higher Education Qualifications Sub-Framework (HEQSF) is one of the three regulatory policy sub-frameworks of the National Qualifications Framework (NQF) that are stipulated in Section 7 of the National Qualifications Framework (NQF) Act (Act No. 67 of 2008, as amended), hereinafter referred to as the NQF Act. It was published in the Government Gazette Number 36721 of 02 August 2013 as Notice Number 549, subsequently amended by Government Notice Number 819 that was published in the Government Gazette Number 381163 of 17 October 2014.

It is common practice that policies are reviewed at regular intervals, normally every five years. The review of the HEQSF as a policy framework is therefore overdue. Furthermore, in 2016 and 2019 respectively, the Higher Education and National Qualification Framework Acts, as legislation that govern the HEQSF, were amended significantly. The Department of Higher Education and Training (DHET), the South African Qualifications Authority (SAQA) and the Council on Higher Education (CHE) released several policies after the publication of the HEQSF in 2013. The amendments to the legislation and policies have had a bearing, in different ways and to varying extents, on the HEQSF. There have also been developments locally and within the region and continent, and internationally that have a bearing on teaching and learning and qualification design and delivery in higher education in South Africa.

It is important for South Africa to ensure that its higher education system and qualifications align appropriately with regional and continent-wide frameworks and conventions.



The Council on Higher Education is the Quality Council for Higher Education South Africa

**Members:** Prof Mvuyo Tom (Interim Chairperson), Mr Luzuko Buku, Mr Cassie Kruger, Dr Siphokazi Moeng, Prof Selby Ripinga, Prof Mala Singh, Prof Lesley Le Grange, Prof Angina Parekh, Prof Yusef Waghid, Adv. Nomazotsho Memani, Dr Nita Lawton-Misra, Prof Daniel van der Nest, Dr Vukosi Ntsakisi Marivate, Ms Koketjo Rebecca Magongoa and Ms Vuyo Memani-Sedile

**Ex-officio members:** Mr Sagren Govender (Department of Labour), Mr Vijayen Naidoo (CEO: QCTO), Dr Marcia Socikwa (Acting DDG: DHET), Dr Mafu Rakometsi (CEO: Umalusi), Dr Julie Reddy (CEO: SAQA), Dr Fulufhelo V. Nelwamondo (CEO: NRF); Dr M Simelane (DBE), Prof Y Seleti (DSI) and Dr W Green (CEO: CHE)



Furthermore, it is in the interest of South Africa as a member of the global community, to facilitate international comparability of its qualifications.

In September 2020, the CHE appointed a Panel to review the HEQSF.

The Terms of Reference of the HEQSF review are to:

- Align the HEQSF to the governing legislation, including the latest amendments to the HE and NQF Acts, as well as to the various policies and regulations that are based on the governing legislation;
- Identify and address possible conceptual and design flaws, as well as the implementation challenges encountered; and
- Align the HEQSF to the relevant regional, continent-wide, and global frameworks and/or conventions, where practical, balancing the need for alignment with the need to protect the rights and interests of South Africa as a sovereign nation.

The Panel has compiled a Report on its findings and recommends modifications to the HEQSF.

The report and its recommendations are based on: empirical and conceptual literature relevant to the CHE terms of reference for the HEQSF review; engagements with scholars who are researching or have studied the issues relevant to the terms of reference for the review; evaluations of and recent international developments in, National Qualifications Frameworks and related matters that include flexibility in recognising prior learning; feedback from institutions on challenges in the implementation of the HEQSF, and any conceptual and design flaws in the HEQSF that may have a bearing on the responsiveness of the higher education system; consultative workshops on the draft report in November 2021 with staff from private higher education institutions, public universities, professional bodies, and the CHE; institutions, professional bodies and regulatory bodies' responses to the CHE's request to submit written comments on the draft report; and commissioned research on take up rates of qualification types during the period 2015 to 2018; applications for the accreditation of new programmes by the Higher Education Quality Committee (HEQC) as part of the HEQSF alignment exercise and subsequently; and learning pathways of students who attained Higher Certificates.



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The report commences with an analysis of the national, continental, and global context that the review focused on. In Section Two the Panel outlines the elements of the Conceptual Framework, which was developed to look at the current HEQSF, and identify changes to recommend. Section Three summarises the main motivations for, and details of, the Panel's recommendations. Section Four provides the proposed revised Qualification Descriptors and Section Five summarises all the recommendations.

As part of the review of the HEQSF the CHE wishes to invite education and training providers and other key stakeholders to make submissions about the recommendations in the Report.

There are some specific areas for which the CHE would like feedback in addition to general comments on other areas deemed as requiring further consideration. The specific areas are described in Annexure A.

The submissions will be used for preparing a draft gazette on the HEQSF which, after consideration by the HEQC, the public will be invited to submit comments on.

The deadline for written submissions is 30 September 2022.

Written submissions should be sent to [Masiteng.s@che.ac.za](mailto:Masiteng.s@che.ac.za) or [MHEQSF@che.ac.za](mailto:MHEQSF@che.ac.za)



**Dr Whitfield Green**  
**Chief Executive Officer**

**Date: 31 August 2022**

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## Annexure A

### SPECIFIC AREAS AROUND WHICH THE CHE WOULD LIKE FEEDBACK

#### Qualification types

- Retention of the 240-credit diploma? (See Section 3.8 and Recommendation 37).
- Retention of the Advanced Certificate? (See Section 3.8 and Recommendation 39).
- Enhancing flexibility (See Section 3.12, and Recommendations 48 – 52).
- RPL for credit.
- CAT for non-formal learning.
- Setting parameters for recognition of credits/learning achieved outside the awarding institution.
- Incorporating non-formal learning (including micro-learning) into programme design.
- Digital credentialing of higher education.
- Qualification descriptors (See Section 3.9 and Recommendations 24 – 32).
- The use of 'graduate attributes.'
- Broadening conception of WIL and encouraging expansion.
- Suggestions on an appropriate name for 'WIL' given expanded conception?
- Comments on the descriptors for each qualification type.
- Are the purposes of each qualification type clear?
- Are there any inconsistencies or ambiguities in/across the descriptors?
- Is reference to theory and practice in the descriptors aligned to the purpose of qualification?
- Language provisions in the qualification descriptors.

#### Naming of qualifications (See Section 3.7 and Recommendations 16 – 23).

- Retention of designators in the naming of general degrees.
- Not permitting qualifiers as part of the title of general degrees.
- Requiring qualifiers in the name of qualifications for Higher Certificates, Advanced Certificates, Postgraduate Diplomas, and Diplomas.

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- Should parameters be set for using qualifiers?
- Requiring qualifiers in professional qualifications that are linked to professional registration.
- Permitting qualifiers where they provide eligibility for professional practice or where the qualification has a professional orientation.
- Getting rid of second qualifiers.

### Other issues

- Embedded qualifications and early exit qualifications (See Section 3.13 and Recommendations 46 and 47).
- Articulation from OQSF to HEQSF (See Sections 1.4, 3.4 and Recommendations 5 – 8).