Preamble

The quality of the South African higher education system is critical for the achievement of national development goals, for the transformation of our society and for producing well-rounded graduates with attributes and competencies that are personally, professionally and socially valuable. Graduates of the higher education system should be able to play a central role in the socio-economic development of the country, to participate meaningfully in a robust civil society, to further innovative scientific and technological development, to become highly skilled professionals and to contribute to the solution of the many challenges that face South Africa as a nation.

Higher education institutions are responsible for the quality of their core functions of teaching and learning, research, and community engagement. External quality assurance, however, offers a means of ensuring that institutions have systems in place to maintain or improve the quality of their activities and educational provision. It also ensures that the programmes that they offer have come under external scrutiny and are accredited before being offered, and that existing programmes are reviewed to ensure that the delivery meets a range of quality criteria and minimum standards. External quality assurance applies therefore at both institutional and programme levels.

The Council on Higher Education (CHE) has been responsible for quality assurance in higher education since its inception almost 15 years ago. During this time the quality assurance regimen has become well established, and its impact and reach extensive. It has become apparent, however, that the higher education landscape is a significantly different one to that which provided the backdrop for the establishment of the CHE, the Higher Education Quality Council (HEQC) and the development of its quality assurance regimen.

Globally, higher education is faced with many opportunities and challenges. Many systems are struggling to meet the ever-growing demand for access to higher education, with the affordability of higher education being a major obstacle. It also has become increasingly difficult to ensure that the academic profession is attractive to new generations of academics so that systems can sustain themselves. Other challenges relate to keeping up with expanding knowledge production in an era of mass communication. The rise of accountability regimes, which some argue have tended to increase managerialist cultures in institutions, has compounded the issues, as have increasing demands for responsiveness to the needs of particular external contexts.

In parallel, the rapid development of information technology has afforded a much greater democratisation of knowledge production, spawned different modes of delivery to potentially many more students, and enabled the use of changing pedagogies to suit an increasingly diverse generation of students. Employment patterns and needs have changed. The traditional “front-loading” of content in preparation for a single career has become increasingly outmoded. Changes from manufacturing to knowledge economies in some contexts have influenced how and what students learn and the purposes higher education institutions serve. The systems are in flux; the future being reimagined.

The South African higher education system is affected by many of these trends, and is experiencing its own challenges as well. The CHE’s review of higher education two decades after democracy highlighted a number of faultlines in the system that threatened to undermine the quality of provision, particularly underfunding, noting also that, “the combination of limited financial assistance, poor throughput rates and pressure to increase participation has created arguably the
most difficult challenge for the higher education system to manage”.¹ The review also pointed to other challenges that potentially have an impact on quality – calls for more rapid and thorough transformation of institutions, increasing demands on and the casualisation of an academic staffing body that has not grown in a way commensurate with the growth in enrolments, and leadership challenges and frequent and harmful governance crises at institutional level. The need for quality assurance is more acute than ever.

In this context, and the context of a maturing system of quality assurance, it is timely to reaffirm the fundamental principles that underlie the CHE’s approach to quality, and to interrogate to what extent its current activities are adequately giving expression to those principles. It is also important to focus attention on how the different quality assurance methodologies it employs can be better integrated to ensure the greatest possible impact on quality across the sector. Fragmentation and complexity are inimical to effectiveness. For these reasons, the CHE has reviewed its current operating frameworks and has developed a revised overarching, integrated, approach to quality assurance which extends and adapts existing concepts and practices for a changing context.

1. Introduction

The Council on Higher Education (CHE), through its permanent committee, the Higher Education Quality Committee (HEQC), is mandated to carry out quality assurance in higher education as set down in the Higher Education Act (No. 101 of 1997, as amended). In terms of this Act, the HEQC’s mandate includes quality promotion, institutional audit and programme accreditation. Subsequently, the National Qualifications Framework Act (No. 67 of 2008) establishes the CHE as the sole Quality Council for higher education, which brings with it not only additional responsibilities, such as the management of the sub-framework of the National Qualifications Framework (NQF) pertaining to higher education, (the Higher Education Qualifications Sub-Framework (HEQSF)) and the quality assurance of the qualifications offered in terms of that framework, but it affirms the CHE’s authority and primacy as the quality assurance body for higher education in South Africa.

2. The CHE’s understanding of quality and approach to quality assurance

The concept of quality is a contested and complex one. The CHE’s conception of quality has been based on some of the concepts advanced in literature that are widely used in quality assurance internationally, but adapted to the South African context. In the early 1990s, Harvey and Green² identified five different conceptions of educational quality which still endure: quality as exceptional, quality as perfection, quality as fitness for purpose, quality as value for money and quality as transformation. Some of these are absolutist, while others are relative. The CHE’s concept of quality was informed by three of these: fitness for purpose, value for money and transformation.³ Where Harvey and Green had conceptualised quality as the transformation of the student as an individual, in the CHE’s use of the term this was extrapolated to the transformation of an institution in a particular social context. In such a view, a quality institution would be one that, taking the legacies of apartheid and inequality in South Africa into account, transforms itself in such a way that it adds great value to the learning of individuals, enhances greatly the present knowledge, skills and abilities in the country, and develops an identity and a purpose that fulfils social justice imperatives and is fully appropriate to the South African context. Furthermore, it would itself be empowered through taking on the responsibility for the kind of education it offers, becoming self-aware of its goals and purposes, and monitoring its own quality. Particularly important would be for it to define its own purpose, with reference not to uncritically accepted notions of purpose, but to existing social realities, identifying where value needs to be added.

The CHE’s concept of quality, in light of the above, is a multi-faceted one: fitness for purpose relates to how well an institution carries out its core functions of teaching and learning, research and community engagement, determined by the outcomes of that institution. Value for money relates to the efficiency and effectiveness of an institution’s functioning, while transformation relates to the appropriateness of purpose, identity and role of an institution in the South African context. It is a dynamic and agile concept, which implies an institutional quality assurance framework that brings about improvement, and “helps the organisation engage in collective sense-making and reflection so

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that change can be undertaken continuously in a manner that respects the core values and role of the organisation. Elements of the framework need to ensure that the organisation has the information needed to manage its resources and activities effectively but the focus needs to be on the qualities of the outcomes being achieved and far less on the change mechanisms being used, as in the transformation notion of quality.”

The initial driving force behind the CHE’s approach to quality assurance which was translated into a number of operational frameworks that were implemented from about 2004 was to provide external measures for improving quality and enhancing accountability in an equitable manner across the higher education system. The higher education sector at the time was characterised by a legacy of fragmentation, uneven provision, and racial segregation. The CHE’s approach was intended to address the challenges of transformation in line with the demand for social and economic justice that is at the core of the agenda for socio-political and economic change in South Africa. The focus on the transformation imperative was what set the CHE’s approach apart from many other quality assurance systems in the world that were often motivated by governments’ desires to ensure that higher education was fulfilling a role in producing skills for growing market economies (as in the 1980s in the UK which saw the rise of external quality assurance in the Anglophone world), or to ensure that institutions upheld certain standards where they had been granted more autonomy than in the past (as in previously centralised systems that had prevailed in many European countries).

The transformation imperative underpinned the extensive restructuring of the public higher education system that took place in parallel with the conceptualisation and establishment of an external quality assurance system by the CHE. This included the extensive programme of mergers of particular institutions, the redefining of institutional missions in certain cases, the introduction of a new institutional type (comprehensives) which circumscribed the remit of a handful of institutions, the introduction (and subsequent revision) of a new qualifications framework, the introduction of a new funding formula, and the application of more extensive student financial aid.

The private sector of higher education, which had grown significantly in terms of the number of providers, the number and diversity of students enrolled, and range of qualifications offered, with attendant variations in quality provision, also came under quality assurance scrutiny by the CHE in order to ensure that programmes offered at private institutions met the same minimum standards of quality provision as required in the public sector.

While the initial challenges of transformation, such as the need for increased access and equity in opportunities for previously disadvantaged groups, and the need for improved retention, progression and throughput rates in academic programmes remain, the size and shape of the higher education system has altered significantly, and new challenges have emerged. Among these is the potential growth of a more corporatised and larger private higher education sector, the incomplete process of mission differentiation of different types of public institutions, and the impact thereof on programme offerings, the conceptual shift from unifying the higher education sector to conceiving of it as integral to the post-school education and training sector with a need for articulation across different types of institutions, the emergence of new forms and modes of offering that challenge traditional definitions of contact and distance provision, and differing levels and maturity with respect to the development of institutions’ internal quality assurance processes.

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3. A short history of the CHE’s QA functions

Between 2004 and 2011, the Council on Higher Education discharged its responsibility for quality assurance largely in terms of the functions bestowed on it by the Higher Education Act of 1997: programme accreditation, institutional audit and quality promotion.

Programme-level QA

The accreditation of programmes was carried out in terms of the HEQC’s Framework for Programme Accreditation of 2004, which was an ambitious programme intended to accredit all new programmes in higher education, to conduct mid-term reviews and to regularly review existing ones. Given the size of the mandate and the number of programme offerings in the system, all existing programmes were deemed to be accredited after a single national process, and the focus for the development of the accreditation system became the process for accrediting new offerings – a process that has since grown with the replacement of existing programmes with new ones in the alignment process with the Higher Education Qualifications Sub-Framework (HEQSF). During the period 2011 to 2015, the CHE embarked on a major national project in partnership with the HEIs to align programmes offered to the stipulations of the HEQSF. This peer-review process resulted in HEIs consolidating some programmes, planning the phase out of others, and revising the rest where necessary, to ensure that they were aligned to the HEQSF. Currently there are approximately 11 000 HEQSF aligned programmes in the higher education system.

Existing programmes were reviewed in a number of reviews of offerings in specific disciplines at all institutions across the sector – a reaccreditation process that became known as national reviews. The first decade of the accreditation process ran concurrently with the first cycle of institutional audits and two national reviews (the MBA and teacher education); more recently, national reviews have been extended with the reviews of Social Work degrees and the LLB. The latter coincides with the establishment of the CHE as the Quality Council for higher education in terms of the NQF Act, which requires it to manage its sub-framework of the NQF, i.e. the HEQSF, and to develop standards for higher education qualifications. The qualification standards development function of the CHE has been integrated with national reviews, as the review of programmes implies not only the upholding of the general pre-determined criteria for accreditation, but reviewing the extent to which specific programmes meet the threshold qualification standards developed within the discipline area itself.

The programmes offered by private higher education institutions are also reviewed every three to five years to confirm that they continue to meet the criteria and minimum standards prescribed by the HEQC. Programmes are accredited per site of delivery and during the past few years a large number of site visits have been conducted to institutions’ sites of programme offerings as part of the programme review process. Among the important insights gained is the wide variation in the quality of the programmes offered. The size of the institution is no indication of the quality of its programmes offered. It was found that some large institutions offered poor quality programmes while some small providers offered programmes of excellent quality. Of particular concern are programmes pitched at lower cognitive levels than their NQF levels and qualification type.
Institutional-level QA

Other forms of quality assurance undertaken by the CHE have been institutional audits which focused on the assessment of quality at an institutional level. Institutional audits was conceptualised and undertaken in terms of the Framework for Institutional Audit of 2004. The process involved institutional self-evaluation followed by verification by a panel of peers, of the quality assurance processes employed by institutions to assure quality in the three core functions of universities: teaching and learning, research and community engagement. While the same set of 19 criteria (Criteria for Institutional Audits, 2004) was applied to all institutions involved (all public universities and 11 private institutions), peer review was also undertaken relative to each institution’s particular mission. This audit cycle ran from 2004 to 2011, although it has taken several more years for some institutions to make adequate progress in addressing the audit recommendations, and therefore for the audits to be closed.

Following the first audit cycle, the CHE embarked on a different process of institutional-level QA, the Quality Enhancement Project, which focused on improving the quality of teaching and learning at all institutions simultaneously. This change was motivated by what was learnt about the variable state of educational provision in higher education in the first cycle of institutional audits, and the recognition of generally poor pass and throughput rates across the higher education sector. Among the overall findings of the first audit cycle was that undergraduate teaching and learning in particular was subject to a variety of challenges and constraints that undermined the achievement of desired levels of quality in higher education, and that such challenges required further focused and creative engagement in order to begin to resolve them. Accordingly, the shift in institutional-level QA was towards a greater emphasis on the improvement end of the QA continuum. It was resolved that focused attention would be paid to the improvement of quality in teaching and learning as one of the core areas of institutional operation at a different level than institutional-level policies, structures and processes.

Together the programme and institutional-level activities represent a continuum of external quality assurance processes, ranging from those that have a hard accountability focus to those that are more developmental in orientation, as illuminated below.

4. The CHE’s current QA activities

The CHE’s current quality assurance regimen is organised into different activities that can be located within different parts of an overall conceptual framework. ‘Quality Assurance’ is understood as an overarching term which encapsulates different kinds of activities that span a continuum from quality control to quality enhancement, and which focus on either the institution or the programme level as the unit of analysis. QA is also understood to occur within a dynamic socio-economic and political environment which impose their own influences on the sector and the CHE from time to time.

The current QA activities can be charted as in the concept diagram below:
At the quality control end of the continuum, the overall orientation of quality assurance activities is one characterised by an investigative approach, or one that involves checking whether whatever is assessed meets minimum standards. The tools of such approaches include regulatory frameworks, checklists and minimum standards, and the purpose is generally to establish whether an entity or programme is complying with the minimum regulations or criteria laid down in order to make a summative judgement that can lead to a decision about whether an institution may continue to operate or not, or be put on terms for continued operation, or whether and under what conditions a programme may continue to be offered or not.
In the middle of the spectrum are those activities that combine both verification and improvement purposes. These are generally characterised by a level of self-evaluation of current provision that is verified by external evaluation, both for the purposes of ensuring that certain standards have been met, and to offer recommendations for improvement. The tools for such an approach include sets of predetermined criteria, codes of practice that have been developed in a consultative way, or standards that are aspirational rather than prescriptive of minimum requirements. The assessment is generally of what currently exists, and in that sense is backward-looking.

At the quality enhancement end of the continuum, the overall orientation is towards the improvement of the actual quality of whatever is being assessed, rather than on the mechanisms used by the entity or programme to assure it. The purpose is to raise the level of whatever is being offered, not merely to verify conformity with standards. The tools of such an approach are generally self-evaluation and external assessment of current levels of quality, with recommendations to improve, and a reassessment after a period of time to assess the extent to which improvement has taken place. Such approaches are more forward-looking.

Any quality assurance activity, such as a review, can theoretically be placed anywhere on the continuum, depending on how it is carried out. A review might be undertaken to determine whether a quality concern is justified (and be more of an investigative process), or be enhancement-led (which would focus on improving that which already exists). Where the unit of analysis is the programme, activities can range from those whose orientation is towards quality control, such as investigating complaints about a particular programme, to assistance with curriculum development to enhance the quality of a given programme. Many activities display a mixture of characteristics; a national review of programmes in a specific discipline area will aim both to ensure that minimum standards are being met, where failure may result in the withdrawal of accreditation, and to provide recommendations and advice to enhance the quality of programmes offered in order to reach aspirational standards or comply with a code of good practice.

The CHE’s current quality assurance activities can be arranged on the continuum according to the diagram above. The main current emphases are in the orange ovals; areas of activity in the past are in blue, while the grey areas have only infrequently been undertaken. The accreditation of new programmes is located towards the left of the diagram as it involves the evaluation of institutional applications for new offerings against a set of criteria, which ultimately results in a summative judgement by the HEQC of ‘accredited’, ‘accredited with conditions’ (that are then monitored) or ‘not accredited’. This applies across the system, and until the alignment process of higher education offerings with the HEQSF prompted large-scale curriculum redevelopment in the public sector, most of the applications for new programmes emanated from the private sector. There is currently no equivalent process with the new institution as the unit of analysis; private institutions apply for the accreditation of their intended programme offerings but are registered as higher education institutions by the DHET, while public institutions exist by virtue of the Higher Education Act (1997) and operate under their individual statutes.

The quality assurance of existing programmes (as opposed to new ones) takes place in two different ways. In the private sector, existing programmes are subject to reaccreditation processes based on institutions’ registration cycles, while in the public sector, existing programmes in specific fields may be reviewed in a national review process which looks simultaneously at all the offerings across the
sector in a specific field and evaluates them for reaccreditation purposes against both minimum standards for programmes in general, and against specific qualification standards. The outcome for individual programmes is either ‘accreditation confirmed without conditions’, ‘accreditation confirmed with conditions,’ ‘placed on notice of withdrawal of accreditation’, or ‘withdrawal of accreditation’. A national review process culminates in the production of a report that evaluates the national state of the programmes under review.

Where the unit of analysis is the institution, activities can theoretically range from undertaking a site visit to inspect whether an institution is complying with regulatory prescripts, to institution-level peer quality enhancement reviews. As noted above, in the first decade of quality assurance, the CHE’s institution-level processes were institutional audits, which are located in the middle of the spectrum in that the audit was a verification process by peers of the internal quality assurance mechanisms of institutions based on their self-evaluations, against a set of pre-determined criteria. The purpose was avowedly developmental, in that the audit reports contained commendations and recommendations for improvement which were followed by improvement plans and progress reports. These took place in a sequential fashion from 2005 to 2011, with the last improvement plan and progress report still currently being monitored.

From 2014, the CHE’s activities at an institutional level were undertaken within the Quality Enhancement Project (QEP), a five-year project involving all institutions in a simultaneous process of two phases of self-evaluation; firstly in four focus areas relating to teaching and learning and secondly, in relation to curriculum (this is ongoing). This project is located at the far right end of the continuum, as it is inductive, focused on improvement and does not involve any summative evaluative judgements.

The relationships between the various activities are indicated by the arrows; carrying out one kind of activity may lead to another e.g. institutional quality enhancement activities may lead to the development of codes of good practice to be used in future institutional quality reviews or audits; the investigation of a complaint about a programme may lead to a process to determine whether an institution should be reaccredited or not; institutional audits may indicate the need to undertake a national review of programmes in a specific discipline area or qualification type, such as coursework Masters degrees.

All of these activities involve assessment and evaluation at some level, and all need to be constantly informed by research into trends and developments in quality assurance and the effectiveness of particular approaches, which may change the mix of quality assurance activities undertaken by the CHE at any given time.

In the current ecosystem, three matters are evident. First, the current quality assurance activities at an institutional level are unbalanced, with most activity at the far right end of the spectrum in the QEP and only the occasional foray into the left-hand end. Secondly, the accreditation activity is focused largely on new programmes, with little undertaken with the institution as the main unit of analysis (beyond perhaps reaccreditation within the private institutions but there the unit of analysis is still the programme). Thirdly, the activities, while they lend themselves to inter-relationships, are more or less discrete, where integration and synergy may lead to greater efficiency and effectiveness. For these reasons, the proposed overarching framework is premised on a unit of
analysis that is integrated. i.e. the institution, with its programmes considered in the context of the institution. This has implications for how quality assurance processes are organised and carried out.

The CHE has reinforced and promoted the development of institutional quality assurance mechanisms through its engagement with institutions on institutional audits, the quality enhancement project, national reviews and programme accreditation and acknowledges that after two decades of the introduction of quality assurance in higher education in South Africa, the majority of well-established public and private higher education institutions have embedded quality assurance systems, policies and procedures into their governance, functional and operational structures and processes. It also recognises that some of the founding principles, such as institutional responsibility for quality, need a renewed emphasis and to be taken into account in the new integrated framework.

5. Principles for a new integrated framework for QA.

The CHE 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 and which is premised on the need for transformation and social justice. The following principles guide the CHE’s revised overarching quality assurance framework:

- The CHE’s first principle with respect to QA is that the primary responsibility for programme and institutional quality rests with higher education institutions themselves and an external quality assurance agency plays an oversight role in the main. Institutions should seek to establish and sustain effective mechanisms to facilitate the offering of education of quality and which yield reliable information for internal programme-related planning and self-evaluation, external evaluation and public reporting. In the Founding Document of the HEQC, it is stated that:

  *The HEQC supports the view that the primary responsibility for the quality of provision and appropriate mechanisms to assure that quality rests with higher education providers. The role of the HEQC will be to provide external validation of the judgements of providers about their quality levels, based primarily on self-evaluation reports. It will also provide a comparative framework for quality judgements across the system.*

  This principle is reaffirmed.

- The second principle is that the implementation of quality assurance will adapt to changing levels of QA maturity in the system. The Founding Document states this intention as follows:

  *In its full operational phase, the HEQC will engage in rigorous external validation through site visits and the judicious use of peer review and qualitative and quantitative performance indicators. Once the HEQC is satisfied that demonstrable quality assurance capacity has been established across a spectrum of higher education providers, it will use a ‘light touch’ approach to quality assurance, based on an increasing measure of reliance on the self-evaluation reports of providers.*

  The revisions proposed in this overarching framework are in line with this.

- The third principle is the entrenchment of the QA system as a mechanism for steering the higher education system towards the realisation of the four purposes of higher education as

These are:

a) 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 and an important vehicle for achieving equity in the distribution of opportunity and achievement among South African citizens;

b) 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;

c) 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; and

d) 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, teaching and learning.

To this end the CHE reaffirms its understanding of quality as fitness for purpose, value for money, and transformation within a fitness of purpose framework as elaborated upon in the HEQC Founding Document.

- The fourth principle is that the QA system serves as a mechanism for supporting institutions to make the required contribution towards the realisation of the key objectives of the National Qualifications Framework (NQF), notably those of ensuring that South African qualifications meet appropriate criteria, are internationally comparable and are of acceptable quality.

- The CHE’s quality assurance system will include a range of processes that are designed to provide assurance that higher education institutions are able to demonstrate that their quality assurance systems are functional, credible and effective and that the programmes they offer are of acceptable quality and meet the minimum criteria and qualification

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These goals are somewhat abbreviated in the *White Paper on Post-School Education and Training* as follows, but they are essentially the same: “The National Development Plan outlines three main functions of universities. First, universities educate and provide people with high-level skills for the labour market. Second, they are the dominant producers of new knowledge, they assess and find new applications for existing knowledge, and they validate knowledge and values through their curricula. Third, they provide opportunities for social mobility and strengthen social justice and democracy, thus helping to overcome the inequities inherited from our apartheid past.
standards set, within the overall purpose of furthering the goals of the higher education system in South Africa.

Other key principles are:

- **Holism**: all aspects of the QA mandate of the CHE as laid down in the Higher Education Act are interlinked, such that they cannot exist or be understood independently of each other. Conversely, they cannot be implemented in a reductionist manner. The QA system will strive to cover all aspects of the legislative quality assurance mandate.

- **Alignment**: all QA processes and procedures of the CHE will be aligned to ensure coherence and consistence. This will eliminate the disconnections that are sometimes exploited by those who would not like to do things by the book. It will also assist in reducing unnecessary duplication within the different QA processes, and thus contribute toward improving resource and process efficiencies.

- **Complementarity**: the different QA processes and frameworks will be designed and implemented with due cognisance of the interfaces and synergies between and among them, and with a view towards leveraging such interfaces and synergies. At a practical level, the principle of complementarity means that the processes and procedures of the different components of the QA system are designed in such a way that they fill the gaps in the system; but not to duplicate, overlap with, replace or displace the processes and procedures of the other components.

- **Simplicity**: all QA processes will be simplified to make them less complex, more understandable by stakeholders and more manageable; while at the same time maintaining or improving their sharpness, robustness and effectiveness.

- **Consultation**: all components of the QA system will be developed in a consultative manner. Institutions, professional bodies and other key stakeholders will be consulted extensively to ensure that the processes and procedures are fit for purpose taking into consideration all contextual factors, and that there is buy-in from the stakeholders. The consultative approach advances the accountability goal because it serves to provide assurance to stakeholders.

- **Collaboration**: the implementation of the QA system will take due cognisance of the complementary roles played by professional bodies in the quality assurance of learning programmes that lead to qualifications in professional fields such as engineering, medicine, law and other. The CHE will work cooperatively with such role players and collaborate with them in running joint projects or events, and integrating or harmonising their processes and procedures, where possible.

6. A revised overarching QA framework

The CHE is proposing a revised overarching Quality Assurance Framework that builds on what currently exists, that reaffirms the principles on which its quality assurance is based, but which realigns its current activities to ensure a balanced set of activities across the continuum described above in a far more integrated way that enhances the synergies between them. After 15 years of operation, particular processes tend to take on a life of their own, when a more coordinated system of quality assurance could be more effective.
The CHE believes that there is need to go beyond superficial changes to the current QA system and processes. The aim should rather be to transform it in response to the developments within and outside the sector, and also taking into account international developments and trends insofar as they are relevant to the South African context. The QA processes should be streamlined with a view to greater efficiency, while retaining their rigour, versatility and effectiveness.

The revised framework which emerges in a changed context is characterised by:

- Institutions at different stages in terms of internal QA systems and development, but a more mature system overall;
- The finite nature of the QEP which is reaching end of cycle, and the need for a process to assure the quality assurance systems of institutions going forward in line with the audit mandate of the CHE;
- A protracted and resource-intensive accreditation process for new programmes in which the CHE carries out an evaluation process and thereby tends to assume the responsibility for the quality of offerings in place of the institutions, contrary to the fundamental tenet of the CHE that quality is the responsibility of the institution concerned and that the CHE’s role is assurance;
- The current concentration of activity on the accreditation of new programmes in the context of two changes: firstly, the alignment process of programmes with the HEQSF that has been completed and the probable eventual stabilising of offerings in the public sector; and secondly, the likely entrance of many new providers and/or consolidation in the private sector needing institutional accreditation as well as new programme accreditation to assure students of the quality of offerings in this space;
- The limited number of national reviews of existing programmes that can currently be carried out due to limited capacity when such reviews arguably have the greatest impact on improving quality at programme level;
- Uncertainty regarding the precise articulation between the three QCs and changed roles vis-à-vis other stakeholders in a national regulatory system that is in flux;
- An unclear relationship with professional bodies in the higher education sector and potential overlapping mandates with respect to accreditation; and
- Continued challenges relating to the need to increase access, retention and throughput rates, to improve teaching and learning, to advance curricular reform (especially related to the ideological perspectives, canons of knowledge and content which they portray), and to facilitate the achievement of these ends, which implies that quality improvement should not be neglected.

A revised framework should reaffirm the original principles for quality assurance by the CHE as expounded in the HEQC Founding Document and the Frameworks for the first QA cycle, and in many ways consolidate what is already in place. The main difference in the proposed revised framework is the introduction of a new process of institutional quality review that seeks to align programme accreditation with the quality assurance of institutional arrangements such that the achievement of a particular accreditation status for eligible and qualifying institutions could be facilitated. In this way, the synergies between institution-level and programme-level QA can be enhanced, with greater emphasis placed on the QA of existing (rather than only new) programmes. This process is envisaged to be implemented as a follow-on of the HESQF-alignment process, with a transitional phase leading up to it in which the current operations will overlap with the piloting and introduction
of new ones. While self-accreditation status had been posited in the founding document of the HEQC as noted above, and in the original QA frameworks, the process for achieving it was not developed, in part because the higher education system was undergoing extensive restructuring through mergers, partly because in that period the HEQSF that sought to bring all higher education qualifications onto one platform from an existing array of regulatory frameworks was introduced, and partly because the programme accreditation function proved to be more extensive and complex in operation than originally envisaged. There was also a legal interpretation that the CHE could not delegate or alienate its accreditation responsibility. A further factor was that the first cycle of institutional audits took much longer than expected and there were a number of institutions that were placed under administration. The intention is to treat the new institutional quality review and accreditation process holistically; that is, drawing together information on an institution’s quality maturity gleaned from a variety of external quality assurance processes including institutional audits and reviews, national reviews, and programme accreditation in order to make an assessment whether an institution has the capacity to develop, accredit and manage its programmes for a specified period of time in line with national criteria and standards outside of the CHE’s programme accreditation processes through a demonstrably established and functional internal quality assurance system.

7. The new features of the proposed overarching and integrated QA framework

There are five main features of a proposed revised overarching QA framework for the CHE.

1. **Institutional quality reviews.** The first is the introduction of a new round of institutional level quality assurance, this time referred to as institutional quality reviews (IQRs). While these are intended to have much in common with the first cycle of institutional audits in that they involve institutional self-evaluation and peer review processes, the first main difference is the perspective from which they will be conducted (which to some extent defines the scope) i.e. not dividing an institution’s activities into three core functions and checking whether there are quality assurance mechanisms in place in each of these areas, but focusing on the coherence, integrity and effectiveness of the overall system the institution employs to assure the quality of education it offers. The second main difference is that while the unit of analysis is the institution, a sample of programmes will also be scrutinised to assess to what extent the quality assurance systems are effective at programme level – and in this way, synergies between institutional quality reviews and programme accreditation processes for existing programmes can be achieved. A third difference is the starting point for the analysis; given that the external quality assurance system is now more mature than in the first cycle, there is a wealth of information and data pertaining to an institution that already exists which can be collated to inform such a process, which will also lessen some of the more burdensome aspects of self-evaluation for an institution (such as compiling a comprehensive self-evaluation report or SER from scratch). There are national datasets from which cohort studies can be conducted; programme accreditation, institutional audit and QEP histories of particular institutions; financial data; enrolment plans and other institutional-level information that can be compiled externally (which institutions can then augment) as an institutional profile as a starting point for review conversations.
This is described in more detail in the proposed *Framework for Institutional Quality Review* (August 2017).

2. **Programme accreditation within institutional quality reviews.** The second major shift envisaged is in programme accreditation. Currently, as discussed above, the main activity involves the accreditation of new programmes individually in both the public and private spheres of higher education, and the re-accreditation of all programmes offered by private higher education institutions on a cyclical basis. After a transitional phase the shift will be towards more national reviews of existing programmes, and a review of a sample of existing programmes during institutional quality reviews. Given the outcome of an institutional quality review which would have assessed the effectiveness of an institution’s quality assurance system, an institution may be deemed to be exempt from applying for accreditation for every new programme it offers for a certain period of time, unless there are reasons to reconsider that exemption. In making such an assessment, accreditation histories with the CHE and relevant professional bodies will be taken into account. In this way, the CHE would be reaffirming the responsibility of institutions for the quality of educational provision and lessening the bureaucratic burden of external individual programme accreditation, while not abrogating its oversight role which will be carried out in the context of the institutional quality review process. This would apply to all existing institutions.

3. **Accreditation for new institutions.** The third major shift is that there will be a particular focus on ensuring that new institutions demonstrate that they have the capability to offer programmes. New institutions are a more prominent feature of the private sector, and the climate is conducive for growth in this area (while there may be new higher education colleges established in the public sector this is not likely to be an extensive phenomenon). In place of a programme accreditation process that treats each new programme offered individually with only a secondary reference to the institution offering it, a move towards a more holistic accreditation process of new providers as institutions, including all their proposed programme offerings in a single process, is envisaged. This would be supplemented by a cyclical reaccreditation process of institutions and all their offerings as a whole. The intention here would be to reduce the number and complexity of processing many discrete applications at programme and site level. It also provides for a mechanism for addressing concerns about an institution as a whole, without the CHE being limited to reviewing only specific programmes offered by an institution.

A key indicator of capability is having the necessary teaching and learning infrastructure, staff and curricula in place before opening the doors of the institution to students. The shift is therefore towards assuring quality in a more interventionist manner at the initial stages in the development of an institution. Such an approach ensures that the growth of the institution is anchored in a culture of quality, which then justifies a ‘light touch’ to quality assurance once the institution is fully developed. The proposed new institutional accreditation process is described in the draft *New Accreditation Framework* (2017).
4. **National reviews and qualification standards.** The fourth major shift is towards an increase in the number and frequency of national reviews to be carried out of existing programmes in specific fields, given that these constitute the most effective mechanism within the programme accreditation mandate of the CHE for protecting students from poor quality offerings; substandard offerings can be either discontinued or improved where possible against threshold qualification standards. National qualification standards provide both compliance benchmarks and developmental indicators for qualification types as awarded in particular fields of study or disciplines. They serve an important function as part of the national review process, in that the standard provides a benchmark for the purpose of the qualification and the graduate attributes that manifest it; thus the standard is important for both a national assessment of a qualification and for confirming the accreditation of individual programmes leading to the award of the qualification. This approach represents a cyclical process, from a national qualification benchmark, through the programmes offered by individual institutions, and reflection back on the national perspective revealed by a composite analysis and evaluation of the programmes reviewed.

This is not a change to the current process, but an upscaling thereof. The existing recent National Reviews and Qualification Standards Frameworks will continue to apply.

5. **Quality promotion.** The fifth change is a renewed emphasis on the promotion of quality, particularly through the promotion of good practices. In line with the CHE’s legislated mandate of promoting quality, the ‘promotion of good practices’ aims to facilitate the development of quality awareness and quality responsiveness in both public and private higher education institutions. It supports the institutionalisation of a quality culture and a commitment to continuous improvement in higher education. Its key assumption is that, if quality is to be attained, institutionalised and improved, then ways must be found to make people aware of what quality is or advocated to be, and what practical steps they need to take or what measures they need to implement, in order to achieve it. The focus in the promotion of good practices is both at systemic and institutional levels. The main issues and areas of concern or of interest to higher education at a particular period in time are identified at the level of the system, for example short courses, work-integrated learning (WIL), distance learning, postgraduate research and service learning, with engagement at institutional level.

At international levels, the promotion of good practices is the work of international and regional quality assurance networks such as the International Network of Quality Assurance Agencies in Higher Education (INQAAHE), the African Quality Assurance Network (AfriQAN) and Southern African Quality Assurance Network (SAQAN) which support and complement the promotion of good practices by national agencies such as the CHE. They also assist with developing and strengthening the capacity for the quality management of the core functions of higher education.

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Given that the main unit of analysis in the main processes is the institution, a unifying element is the underlying data and information which will be collated to form institutional profiles.

The concept diagram for the overarching integrated framework therefore looks somewhat different to the existing one, as represented below. Each of the areas of activity will have its own operational frameworks or guidelines, some of which exist, as noted above, and others of which are still in development.

In this diagram, the grey oval signifies activities that will only be infrequently undertaken where the need arises. Where this is prompted by complaints at programme level, these will be investigated in the context of the institution, but generally such an activity applies where persistent institutional-level issues have been indicated.

The first blue oval refers the new emphasis on the holistic accreditation process of new institutions and their programmes which will replace the current process of looking only at individual programmes as the unit of analysis.

The orange oval represents a continuation of the national reviews of selected programmes across the system, albeit an expanded activity.

The yellow oval is the proposed new process of institutional quality review, with a simultaneous review of a sample of programmes for reaccreditation purposes.
The light blue area encompasses a range of quality promotion activities, mostly at systemic and institutional levels. The Quality Enhancement Project would be an example. It may also apply at the programme level, such as guides to good practice offering on-line courses, and at international levels such as liaison and coordination with regional quality assurance agencies.

Other pertinent features of the proposed revised overarching framework are the following:

- The revised framework provides firmer and clearer guidance on managing concerns with quality in an institution that appear after accreditation has been granted and outlines a process for the review of accreditation at an institutional level, its suspension or withdrawal.
- It sets out more clearly the mechanisms for dealing with disputes and for dealing with complaints about the quality of particular offerings.
- It allows for an increase in the number of national reviews carried out, and a shorter cycle.
- In linking programme accreditation and institutional quality reviews, and in increasing the number and frequency of national reviews carried out, it addresses the lack of formal accreditation processes for existing programmes in higher education, particularly with respect to public higher education.
- It establishes integrated institutional profiles within the CHE for information related to all QA tools and processes.
- It establishes a team approach across current CHE Directorates to interacting with institutions on a cyclical basis for simultaneous institution review and programme accreditation processes. Interaction and engagement with institutions would be coordinated, and information requests streamlined.
- Institutions would be expected to conduct their own programme evaluations and/or reviews and report back to the CHE, which will use the information to make recommendations to the HEQC about confirmation or non-confirmation of accreditation of programmes.
- It introduces flexibility in that the CHE would determine the period and terms of accreditation depending on the robustness of institutional quality assurance systems.
- The institutions would have to demonstrate that they have sound and clearly articulated programme evaluation policies and procedures in place; that they use reputable independent evaluators; and that they have functional oversight and governance structures in place to consider and decide on the outcomes of evaluations or reviews.
- The CHE would provide guidance to the institutions about good practices regarding programme evaluations and reviews.
- For private institutions, the CHE would, after studying their programme evaluation reports, recommend to the HEQC whether the programmes should be reaccredited, and to the DHET for re-registration.
- There would be a focus on quality promotion and capacity development work with institutions that have not yet put in place functional quality assurance systems.