Report on the
Implementation Evaluation of the National Qualifications Framework Act (2008)

Summary Report

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This report has been independently prepared by DNA Economics, Mzabalazo Advisory Services and Social Surveys Africa. The Evaluation Steering Committee comprises the Department of Higher Education and Training (DHET), the Department of Planning, Monitoring and Evaluation (DPME) and the Department of Basic Education (DBE). The members also included senior management representatives from the South African Qualifications Authority (SAQA), the quality councils and key sector representatives. The Steering Committee oversaw the operation of the evaluation, commented and approved the reports.

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National Evaluation Plan Report

planning, monitoring and evaluation
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GLOSSARY

AET	Adult Education and Training
CEO	Chief Executive Officer
CET	Community Education and Training
CHE	Council on Higher Education
DBE	Department of Basic Education
DoE	Department of Education
DHET	Department of Higher Education and Training
DoL	Department of Labour
DPME	Department of Planning, Monitoring and Evaluation
DG	Director General
E&T	Education and Training
EISA	External Integrated Summative Assessment
GFETQSF	General and Further Education and Training Qualifications Sub-Framework
GENFETQA	General and Further Education and Training Quality Assurance Act
GFET	General Further Education and Training
HE	Higher Education
HEI	Higher Education Institution
HEQF	Higher Education Qualifications Framework
HEQSF	Higher Education Qualifications Sub-Framework
HDU	Historically Disadvantaged Universities
ILO	International Labour Organisation
M:HET	Minister of Higher Education and Training
NATED	National Accredited Technical Education Diploma
NC(V)	National Certificate Vocational
NLRD	National Learners' Record Database
NQF	National Qualifications Framework

NSC	National Senior Certificate
NASCA	National Sencate for Adults
NSB	National Standard Body
OQSF	Occupational Qualifications Sub-Framework
OECD	Organisation for Economic Co-operation and Development
OFO	Organising Framework for Occupations
PSET	Post School Education and Training
PB	Professional Body
PSC	Project Steering Committee
PEDs	Provincial Education Departments
QC	Quality council
QCTO	Quality Council for Trades and Occupations
RPL	Recognition of Prior Learning
SETA	Sector Education Training Authority
SDP	Skills Development Provider
SAQA	South African Qualifications Authority
TVET	Technical and Vocational Education and Training
TOC	Theory of Change
UoT	University of Technology

POLICY SUMMARY

The National Qualifications Framework (NQF) is a comprehensive system for the classification, registration, publication and articulation of quality-assured national qualifications. The NQF was established to (i) create a single integrated national framework for learning achievements, (ii) facilitate access to, mobility and progression within education, training and career paths, (iii) enhance the quality of education and training, and (iv) accelerate the redress of past unfair discrimination. First established under the SAQA Act (No. 58 of 1995), the NQF has undergone several reviews which culminated in the promulgation of the NQF Act (No. 67 of 2008).

Implementation of the NQF Act is happening amidst considerable policy uncertainty in the Education and Training (E&T) system, particularly within the Post School Education and Training (PSET) sub-system. The lack of policy clarity on key issues, such as the long-term qualification offering of Technical and Vocational Education and Training (TVET) colleges, the design of occupational qualifications and structure of the skills system, adversely affects the ability of NQF bodies to execute their legislative responsibilities. The role of Umalusi in assuring the quality of the public schooling system also remains contentious and unclear.

Overall, the evaluation found significant progress in implementing the NQF Act. The Department of Higher Education and Training (DHET), the South African Qualifications Authority (SAQA) and the three quality councils (the Council on Higher Education (CHE), the Quality Council for Trades and Occupations (QCTO) and Umalusi) have established a reasonably robust policy framework to guide implementation of the Act. At the same time, the NQF bodies – consisting of SAQA and the quality councils – have made progress in re-aligning older qualifications, registering new qualifications, accrediting E&T providers and establishing and maintaining the National Learners Records Database (NLRD).

However, implementation is hamstrung by the lack of a common and shared understanding of the specific objectives that the legislation seeks to achieve. The objectives are broadly defined and reflect systemic goals, rather than NQF's specific contribution. This has led to high expectations placed on the NQF bodies without the financial and human resources to deliver on these mandates. This ambiguity has undermined accountability arrangements and allowed senior leadership within the education departments to disengage from the NQF.

Inefficiencies in key regulatory processes, such as qualification development/accreditation and registration, coupled with a lack of capacity due to the underfunding, result in considerable delays in the NQF. Inefficiencies are worsened by a resource-intensive model of quality assurance in some sub-frameworks which has not yet been fully costed or funded. The main recommendations of the evaluation are:

R1: The DHET, the DBE, SAQA and the QCs must revise the objectives of the NQF set out in the Act to ensure that they clarify the specific contribution of the NQF to systemic goals.

R2: The DHET must provide guidance on the areas of policy uncertainty within PSET that affect the implementation of the NQF Act.

R3: The DHET must review the roles, responsibilities and reporting lines within the NQF, including clarifying the lines of accountability, responsibility and reporting of the NQF bodies.

R4: DHET, in collaboration with the DBE, SAQA and the QCs, must develop and agree on a detailed costed implementation plan and monitoring framework that tracks and measures the efficiency and effectiveness of implementation.

R5: Given the current resource-constrained environment, SAQA and the QCs must enhance the efficiency of implementation by minimising areas of duplication in key regulatory processes and adopting risk-based approaches to regulation.

R6: The DHET and DBE should provide appropriate and sufficient resources to the NQF bodies to execute their mandates. If additional funding is not forthcoming, then the scope and mandate of the NQF bodies should be aligned to the levels of funding available, with realistic targets being set to measure progress.

EXECUTIVE SUMMARY

1   INTRODUCTION

1.1   Soon after the transition to democracy, the South African government made the decision to put in place a National Qualifications Framework (NQF) through the promulgation of the South African Qualifications Authority (SAQA) Act (No. 58 of 1995). This was intended to create a single framework for qualifications and learning achievements. A review of the implementation of the NQF, commissioned in 2002, identified several issues. After an extensive period of negotiations, the Ministers of Education and Labour published a joint statement in 2007 which set out the perceived challenges in the system and recommended significant design and organisational changes. As a result, the SAQA Act was repealed in its entirety and replaced by the NQF Act (No. 67 of 2008). The NQF Act broadly retained the objectives of the SAQA Act, but attempted to establish a more differentiated NQF through the creation of three integrated sub-frameworks to be coordinated by SAQA and managed by three quality councils.

1.2   This report provides a summary of the findings and recommendations of the implementation evaluation of the NQF Act, which was jointly commissioned by the Department of Planning, Monitoring and Evaluation (DPME) and the Department of Higher Education and Training (DHET).

1.3   The purpose of this evaluation is to provide an independent and objective examination of the implementation of the NQF Act relative to its goals and objectives, including its associated policies and regulations. The evaluation also seeks to identify the successes and challenges in the implementation of the Act and offer recommendations regarding improvements for the future. The evaluation covers 2009/10 to 2015/16, and is guided by the following questions and associated evaluation criteria (set out in the brackets below):

    1. To what extent is the theory of change of the NQF Act adequately robust, including its main underlying assumptions? (**Relevance and appropriateness**)

    2. To what extent has the implementation of the NQF Act been effective in achieving its policy goal(s), objectives and intended outcomes? (**Effectiveness**)

    3. To what extent has the implementation of the NQF Act been efficient? (**Efficiency**)

    4. What is the emerging impact of the NQF, if any? (**Emerging Impact**)

    The evaluation team additionally included "coherence" as an evaluation criteria given the complex hierarchy of policy present in the NQF.

1.4   The evaluation used a mixed methods approach, combining qualitative and quantitative research to draw out detailed insights into the implementation of the NQF Act. The evaluation uses data and information from the following sources:

- A **comprehensive literature and document review** of relevant legislation, policy, grey literature and research
- More than **100 semi-structured interviews** and **focus-groups** with policymakers, NQF bodies (consisting of SAQA, the Council on Higher Education (CHE), the Quality Council for Trades and Occupations (QCTO) and Umalusi), education and training (E&T) institutions, subject matter experts and other stakeholders
- A **telephonic survey** of 122 E&T institutions and professional bodies
- A **review of the information systems and data** focussing on the detailed analysis of data in the National Learner Records Database (NLRD).

2   KEY FINDINGS FROM THE LITERATURE/DOCUMENT REVIEW

2.1   The literature and document review involved the analysis of a range of publications, policies, legislation and grey literature.

2.2   Following the first democratic elections, the new government was faced with a fragmented and racially divided E&T system, with large variations in quality. The SAQA Act was the first piece of post-apartheid E&T legislation. It established SAQA as a statutory body and mandated it with a wide range of functions relating to the registration of standards and qualifications, the establishment of system-wide quality assurance functions and the establishment of the NLRD. Over the next few years, numerous government acts, policies and regulations emerged that were either affected by or gave guidance to the SAQA Act, or even was in conflict with it.

2.3   The NQF Act was promulgated in 2009, largely in response to the findings from the Study Team on the Review of Implementation of the NQF that commenced in 2002. The NQF Act was the culmination of a protracted period of negotiations and discussions, and incorporated many of the recommendations of the review.

2.4   The NQF Act essentially retained the overall objectives of the SAQA Act, but made significant changes to the design and organisational structure of the NQF. While SAQA was still responsible for the oversight and coordination of the NQF, the policymaking and regulatory functions were distributed across the Minister: Higher Education and Training (M:HET), SAQA and quality councils (QCs). The most significant change was the establishment of three sub-frameworks, with SAQA coordinating and three QCs given the responsibility to develop and manage each:

- General and Further Education and Training Qualifications Sub-Framework (**GFETQSF**), which covers qualifications registered at NQF levels 1 to 4 and is the responsibility of **Umalusi**.
- Higher Education Qualifications Sub-Framework (**HEQSF**) which covers qualifications registered at levels 5 to 10 and is the responsibility of the **CHE**.
- Occupational Qualifications Sub-Framework (**OQSF**) which covers qualifications at levels 1 to 8 and is the responsibility of the **QCTO**.

2.5   Different conceptual understandings of the NQF have shaped the structure and content of the NQF Act, and have been the source of much contention and dispute throughout the NQF's existence. The evaluation has not adopted a particular position in this conceptual debate. Thus, while different interpretations assist in interpreting the NQF, the focus is on the implementation of the Act and its effect on the E&T system.

2.6   South Africa is one of the first generation of NQF adopters, with NQFs now present in some 140 countries. The international literature highlights the difficulties of attributing outcomes to an NQF generally, the long time required for NQFs to develop and be implemented and the challenges of using quantitative data to assess an NQF.

3   THE PROGRAMME: THEORY OF CHANGE

The theory of change of the NQF was developed retrospectively for the evaluation in cooperation with the Evaluation Steering Committee. It can be summarised as:

*If there is a clear national policy framework **and** sub-frameworks take into account the context-specific needs of different sectors within the E&T system, then the qualifications that are registered will be of **acceptable quality and internationally comparable. If** registered qualifications create opportunities for the RPL and lateral, diagonal and vertical articulation, **then** a **single integrated national framework for learning achievements** will emerge. **If** this national framework exists, then it will facilitate **access to, mobility and progression within education, training and career paths**. This will in turn **accelerate redress of past unfair discrimination in education, training and employment**. If the QCs establish effective and appropriate quality assurance systems, then the NQF system will ensure that the delivery of qualifications and the reliability of assessment is of a sufficient standard and is continuously improving; which contributes to the **enhanced quality of education and training.***

4 KEY EVALUATION FINDINGS

4.1 **Relevance and appropriateness** - The NQF Act was attempting simultaneously to resolve both systemic challenges in the broader E&T system as well as structural and governance challenges more specific to the NQF. Systemic challenges included the difficulties of having a single framework for a diverse system, a proliferation of qualifications and disagreements about definitions and nomenclature. Structural issues largely revolved around the large amount of power held by SAQA and tensions between the DoE's and DoL's points of view on the NQF. The NQF Act design focusses on structural issues and does not clarify which systemic issues within the broader E&T system it intends to address. In addition, while the Act clarifies the roles and responsibilities of the NQF bodies, it (and related documents) does not provide any clarity on the roles of other stakeholders such as E&T providers. Perhaps as a result, different understandings and interpretations of the NQF and its contribution to the E&T system continue to exist and seem to undermine its implementation.

4.2 **Coherence** - The evaluation considered policy coherence at three levels:

- **Internal** (common understanding amongst stakeholders): The NQF is commonly accepted as an essential part of the E&T system, with relatively few voicing fundamental disagreements regarding the NQF. However, significant disagreements on what the theory of change of the NQF is (or should be) persist through the system, notably amongst senior DHET managers.
- **Vertical** (alignment between NQF and other E&T policies): While there appears to be a reasonable amount of vertical integration in terms of higher education policy, there is a lack of vertical coherence and clarity in the occupational and vocational training sectors. This includes such issues as the lack of clear definitions of vocational qualifications and the uncertainty about the strategic qualification offering and qualification pathways in TVET colleges.
- **Horizontal** (coherence, alignment and robustness of NQF polices): An analysis of NQF policies relative to a number of objective criteria for good policymaking found that while most NQF policies clearly state their objectives, target audience(s) and their alignment to other policies, they do not provide sufficient information on resourcing requirements, roles and responsibilities, how policy success will be measured or the consequences of not achieving policy goals.

4.3 **Efficiency** - A **system of collaboration** was developed by SAQA to manage the relationships between the NQF bodies and agree on solutions to NQF challenges. While a reasonable level of shared problem solving is present in the system, a key issue appears to be the lack of engagement from senior DHET officials in the NQF, as evidenced by the NQF Forum not having met since 2012.

The QCTO, newly established after the passing of the Act, has taken a significant amount of time to fully set up the design and structures of the **OQSF**, and to start to align qualifications to the OQSF. This appears to be partially the result of insufficient and unstable funding being made available to the organisation, but also reflects the (on-going) disagreement and uncertainty as to the strategic model of qualification development and quality assurance for the OQSF. Two parallel models of quality assurance are currently in place in the OQSF, for new and legacy qualifications respectively, and it appears that this costly situation will remain for some time to come. The strategic model for the QCTO and the OQSF need to be agreed urgently.

The Higher Education Qualifications Framework (HEQF) was put in place under the SAQA Act in 2007, effectively creating a framework designed for higher education before the passing of the NQF Act. The changes brought about by the eventual **HEQSF** have led to a large-scale re-alignment exercise in higher education which appears to have strengthened programme development capacity in many universities. It appears that a major challenge in the HEQSF is the length of time it takes for the accreditation of learning programmes, due to consistently increasing volumes of applications and capacity constraints in the CHE. The CHE is facing a

severe resourcing challenge. Its revenue has been growing at a slower rate than the other NQF bodies and it has been spending more than it receives for four consecutive years.

Of the three quality councils, Umalusi was initially the least affected by the passing of the Act. Its role in quality assurance of the National Senior Certificate school examination is well established and functioning effectively. However, over time the role of Umalusi has expanded across a number of areas, e.g. quality assuring the school curricula. Key issues in the **GFETQSF** relate to the large backlogs in certification in the TVET system (largely due to DHET systems constraints) and the cost and time taken to obtain accreditation from Umalusi.

4.4   **Effectiveness** - The first of the NQF's objectives is the creation of **a single, integrated framework for learning achievement**. This can be said to have been largely achieved in a literal sense, but the creation of a truly "integrated" framework is not straightforward. A number of issues remain, related to the silos that exist between the different sub-frameworks with challenges being experienced in areas of overlap.

In terms of **articulation and progression**, the qualification pathways from school to university is well established, while those into and out of TVET colleges are much less effective and efficient. The achievement of articulation objectives go well beyond the direct control of the NQF bodies however. In the TVET system, the National Certificate (Vocational) (NC(V)) has not created an efficient pathway for learners leaving Grade 9, as originally intended; as evidenced by many NSC (level 4) learners entering this level 2 qualification. In addition, of those who complete level 4, only approximately 3% of learners subsequently enrol in a university programme. This situation is further complicated by the simultaneous processes in the Department of Basic Education (DBE) to create vocational and occupational streams in schools that are not clearly aligned to TVET qualification development processes and broader initiatives to define the role of TVET colleges in the system. The challenge is even more severe in the community college (adult education) space, where there is currently no pathway from NQF level 1 to level 4 that is specifically designed for adults. The White Paper on Post-School E&T (PSET) calls for community colleges to increasingly offer skills/occupational programmes to facilitate expanded pathways, but little progress has been made in this regard.

In relation to the objective of **enhancing the quality of education**, the quality assurance system employed in the HEQSF involves a large degree of peer review, is well understood, agreed upon and entrenched in the higher education sector. Interviewees suggest that the quality assurance system through the NQF is particularly beneficial to historically disadvantaged universities (HDUs) and comprehensive universities, since it helps maintain or improve their "standing" in the university sector and enhances the credibility of their qualifications.

The role of Umalusi within the GFETQSF remains contentious and unclear, particularly as it relates to the quality assurance of the public schooling system where schools are "deemed accredited" and hence not subject to formal accreditation. Firstly, the current situation where Umalusi reports to the DBE, but is also expected to make independent public pronouncements on the quality of the system, raises concerns over its independence and / or power. Secondly, the DBE's role in both delivering the curriculum and setting the examination in public schools is unusual by international standards. Lastly, some in the DBE believe Umalusi is acting beyond its mandate and encroaching on areas which should be the sole preserve of the DBE.

The **redress of unfair discrimination** has been a key priority of the NQF from its inception, with **Recognition of Prior Learning (RPL)** seen as a key mechanism to address past unfair discrimination. Interviewees stated that RPL is increasingly being implemented although not widely enough and is not always funded adequately. The OQSF remains well ahead of the GFETQSF and HEQSF when it comes to RPL implementation, perhaps partially due to the funding available from SETAs.

4.5 **Emerging impact** - After an extended period of significant policy reform, it is too early to tell whether the NQF will achieve its intended impacts. What is emerging from the analysis is that the reforms introduced by the NQF Act are embedding themselves in some parts of the E&T system. A frequently observed example is the development of working partnerships between providers located within different sub-frameworks, where there are efforts being made to expand access, reduce barriers, improve articulation, enable portability and expand the availability of RPL. Importantly, the NQF appears to have gained widespread acceptance within the E&T system.

5 CONCLUSIONS

5.1 In general, it appears that the NQF has gained widespread acceptance within the E&T system. The planned co-existence of three sub-frameworks within a single NQF appears to be working in significant ways, despite the many challenges that remain.

Overall, there has been significant progress in implementing the NQF Act. The DHET, SAQA and the quality councils have established a reasonably robust policy framework to guide the implementation of the NQF Act. At the same time, the NQF bodies have made progress in re-aligning older qualifications, registering new qualifications and accrediting providers to offer these qualifications, establishing the NLRD, recognising professional bodies and registering professional designations.

However, for the implementation of the NQF Act to happen effectively, several areas of policy uncertainty must be resolved, clear goals set, and implementation planning strengthened.

6 RECOMMENDATIONS

The evaluation makes a large number of detailed recommendations that are briefly summarised here:

R1: The DHET, the Department of Basic Education (DBE), SAQA and the QCs must revise the objectives of the NQF set out in the Act to ensure that they set out the specific contribution of the NQF to systemic goals.

R2: The DHET must provide guidance on the areas of policy uncertainty within PSET that affect the implementation of the NQF Act, notably in respect of the OQSF, where policy uncertainty on qualifications offered by TVET colleges, the structure of occupational qualifications and role of the QCTO continues to impede the implementation of the sub-framework.

R3: The DHET must review the roles, responsibilities and reporting lines within the NQF; including clarifying the lines of accountability, responsibility and reporting of the NQF bodies.

R4: DHET, in collaboration with the DBE, SAQA and the QCs, must develop and agree on a detailed costed feasible implementation plan that outlines the key activities, outputs and outcomes that the NQF is expected to achieve over a five-year period. The implementation plan must be accompanied by a monitoring framework that tracks and measures the efficiency and effectiveness of implementation.

R5: Given the current resource-constrained environment, SAQA and the QCs must enhance the efficiency of implementation by minimising areas of duplication in key regulatory processes and adopting risk-based approaches to regulation.

R6: The DHET and DBE should provide appropriate and sufficient resources to the NQF bodies to execute their mandates. If additional funding is not forthcoming, then the scope and mandate of the NQF bodies should be aligned to the levels of funding available, with realistic targets being set to measure progress. This is particularly critical within the OQSF, where the resourcing of the QCTO does not align to the current OQSF qualification development and quality assurance model, which requires that many functions delegated to SETAs are instead performed directly by the QCTO.

1   INTRODUCTION

1.1   Introduction

This report provides a summary of the findings and recommendations of the implementation evaluation of the National Qualifications (NQF) Act (No. 67 of 2008), which was jointly commissioned by the Department of Planning, Monitoring and Evaluation (DPME) and the Department of Higher Education and Training (DHET).

1.2   Background to the intervention

Soon after the transition to democracy, the South African government made the decision to put in place a NQF through the promulgation of the South African Qualifications Authority (SAQA) Act (No. 58 of 1995). The intention was to create a single national framework for qualifications and learning achievements. Eight years after the implementation of the SAQA Act, the Departments of Education and Labour commissioned a review of the implementation of the NQF. The Study Team tasked with the review noted that the NQF was not achieving its objectives due to, amongst other factors:

- an inability to create qualifications that were deemed suitable to the diverse parts of the education and training (E&T) system;

- confusion and disagreement around the definitions and nomenclature in the system;

- a proliferation of qualifications and in particular short courses; and

- a perception from within the Department of Labour that overly "educationalist" (or university focused) approaches were in use.

The findings from the Study Team led to a protracted period of negotiations on how the NQF should be re-configured, which concluded with the issuance of a joint statement by the Ministers of Education and Labour in 2007. This statement set out the perceived challenges and recommended significant design and organisational changes to the way the NQF was implemented. As a result, the SAQA Act was repealed and replaced by the NQF Act (No. 67 of 2008). The NQF Act broadly retained the objectives of the SAQA Act, but attempted to establish a more differentiated NQF through the creation of three integrated sub-frameworks to be coordinated by SAQA and managed by three quality councils:

- **General and Further Education and Training Qualifications Sub-Framework** (GFETQSF), which covers qualifications registered at NQF levels 1 to 4 and is the responsibility of Umalusi.

- **Higher Education Qualifications Sub-Framework** (HEQSF) which covers qualifications at levels 5 to 10 and is the responsibility of the Council on Higher Education (CHE).

- **Occupational Qualifications Sub-Framework** (OQSF) which covers qualifications at levels 1 to 8[1] and is the responsibility of the Quality Council for Trades and Occupations (QCTO).

1.3   Background to the evaluation

Since the passing of the NQF Act, a large amount of legislative, policy and contextual changes have taken place in the E&T system more broadly. It is thus an appropriate time to reflect on the successes and challenges in the NQF to chart the way forward for the system.

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[1] *Although the sub-framework covers NQF levels 1 to 8, the QCTO may also motivate for NQF levels 9 and 10, provided that such motivation is done in collaboration with a recognised professional body and the Council on Higher Education (CHE), and is coordinated by SAQA.*

The purpose of this evaluation is to provide an independent and objective examination of the implementation of the NQF Act relative to its goal(s) and objectives in the period of review, including its associated policies and regulations. The evaluation also seeks to identify the successes and challenges in the implementation of the Act and offer recommendations regarding improvements to the implementation of Act in the future. This evaluation covers an eight-year period from the promulgation of the Act in 2009/10 to 2015/16, and is guided by the following questions – with the four relevant evaluation criteria given in brackets:

- To what extent is the theory of change (intervention logic) of the NQF Act adequately robust, including its main underlying assumptions? (*Relevance and appropriateness*)

- To what extent has the implementation of the NQF Act been effective in achieving its policy goal(s), objectives and intended outcomes? (*Effectiveness*)

- To what extent has the implementation of the NQF Act been efficient? *(Efficiency)*

- What is the emerging impact of the NQF, if any? *(Emerging Impact)*

1.4   Methodology

While this section provides a brief overview of the methodology used in the evaluation, a more detailed exposition can be found in Annex 2.

There are a number of conceptual and methodological challenges inherent in evaluating the NQF Act. The Act creates a complex system where the objectives are broadly defined and decision-making is distributed across multiple organisations, DHET, Department of Basic Education (DBE) and NQF bodies. There is also the question of the differentiation between the NQF Act, which outlines the powers and functions of the DHET and NQF bodies, and the NQF itself, which covers the actions and actors (whether regulated or not) within the E&T system that contribute towards achieving the objectives of the framework.

In response to these measurement challenges, the evaluators adopted a complexity-informed approach that helps to interpret and contextualise the findings emerging from this evaluation. In addition, this evaluation adopts an utilisation-focused approach that aims to maximise the use of its recommendations amongst different users and stakeholders in the E&T system. This is why the recommendations assign accountability and responsibility to key role-players for specific actions.

In responding to the above research questions and the measurement challenges identified, the evaluation makes use of a mixed-methods approach. This approach combines qualitative and quantitative research to draw out detailed insights into the implementation of the NQF Act. In particular, the evaluation combines data and information from the following sources:

- A **comprehensive literature and document review** of relevant legislation, policy, grey literature and research;
- More than **100 semi-structured interviews** and focus-group with policymakers, NQF bodies, education and training institutions, subject matter experts and other stakeholders;
- A **telephonic survey** of 122 education and training institutions and professional bodies;
- **A review of the information systems and data** in the NQF focussing on the detailed analysis of data in the National Learner Records Database (NLRD).

In general, the evaluation team has experienced very good cooperation from all these institutions and have benefited tremendously from the insights provided through the interviews conducted and data provided.

2   KEY FINDINGS FROM LITERATURE AND DOCUMENT REVIEW

2.1   Approach to literature and document review

The literature and document review involved the analysis of:

- publications, policies and legislation that had been identified in the inception phase;

- academic and grey literature related to the NQF in South Africa;

- internal literature on how NQFs had been implemented across the globe.

This review had three important objectives. The first objective was to trace the development and evolution of the NQF in South Africa, from its genesis in the workplace in the 1970s to the promulgation of the NQF Act in 2008. It is within this historical context that the NQF Act and its objectives are interpreted throughout this evaluation. The second was to ground the evaluation in a conceptual understanding of the NQF. Over the years, a large body of work that attempts to conceptualise the NQF has emerged. As such, the review explored the different conceptual understandings of the NQF. The final objective was to describe the international trends in the development and evolution of NQFs. A key aspect of the international review was to examine the role played by governments in the development and reform of an NQF.

2.2   Background to the Act

In 1994, the newly elected democratic government was faced with a fragmented E&T system, divided across racial lines, with large variations in the quality of education and training. In higher education, there were 36 public universities and over 300 private providers (Council on Higher Education, 2016). Less information was available on the number of private providers delivering skills and workplace training at the time. In an attempt to change the skewed and largely dysfunctional system that disadvantaged many to benefit a few, the NQF was seen as a pivotal framework wherein transformation could take place. At the time only a handful of countries had adopted an NQF approach to education and training.

The SAQA Act (No. 58 of 1995) was the first piece of post-apartheid education and training legislation. The SAQA Act established SAQA as a statutory body determined and guided by the Act and mandated it with a wide range of functions relating to the registration of standards and qualifications, the establishment of system-wide quality assurance functions and the establishment of the National Learners' Records Database (NLRD), an electronic management information system (South African Qualifications Authority, 1999). Over the next few years, numerous government acts, policies and regulations emerged that were either affected by the SAQA Act or gave guidance to it, or even was in conflict / competition with it.

In 2002 the Department of Education (DoE) and the Department of Labour (DoL) established a Study Team to report on the implementation of the NQF. Following broad consultations, the Study Team reported that the pace of implementation of the NQF needed to be accelerated, especially in regards to access, progression and redress. The architecture of the NQF, which encompasses policies, regulations, procedures, structures and nomenclature was viewed as complex, confusing, time consuming and unsustainable. There was also a perceived level of uncertainty with regards to the leadership and responsibilities of SAQA, government ministers and departments and concern about the proliferation of bodies involved in standard setting and quality assurance (Department of Education & Department of Labour, 2002).

Tensions and mistrust had arisen between the two key government departments: Labour and Education, and in the role and position of the Sector Education and Training Authorities (SETAs). The Study Team found that there was not one single understanding of what people mean when referring to the NQF. The Report of the Study Team on the Implementation of the NQF went on to make an extensive range of recommendations with regards to every aspect of the NQF. In response, the DoE and DoL published the *NQF Consultative*

Document in July 2003 (Department of Education & Department of Labour, 2003), which further proposed a revised architecture for NQF implementation. The proposal revolved around clarifying the role of the executive authority in the NQF and the introduction of quality councils (QCs) for General and Further Education and Training, Higher Education, and Trades, Occupations and Professions sub-systems.

Prolonged interdepartmental consultation and engagement with SAQA resulted in a Joint Policy Statement in 2007. This Policy Statement brought to an end the review of NQF implementation that had been underway since 2002 and formed the basis for the NQF Act (Department of Education & Department of Labour, 2007) that was enacted in 2008.

2.3   Overview of the NQF Act

The SAQA Act was repealed and replaced by the NQF Act (No. 67 of 2008). The NQF Act defines the NQF as "a comprehensive system approved by the Minister for the classification, registration, publication and articulation of quality-assured national qualifications", and sets out the objectives of the NQF as to:

1. Create a single integrated national framework for learning achievements;
2. Facilitate access to, and mobility and progression within education, training and career paths;
3. Enhance the quality of education and training;
4. Accelerate the redress of past unfair discrimination in education, training and employment opportunities.

The four objectives remained unchanged from those stated in the SAQA Act. The fifth objective from the SAQA Act became an overarching goal:

> *The objectives of the NQF are designed to contribute to the full personal development of each learner and the social and economic development of the nation at large (Republic of South Africa, 2008).*

To enable the NQF system to achieve these objectives, the Act outlines the roles and responsibilities of the M:HET, SAQA and the QCs. According to the NQF Act, the development and implementation of the NQF is overseen and coordinated by SAQA, although SAQA's role has changed significantly relative to the SAQA Act.

The NQF comprises three qualifications sub-frameworks, with three QCs given the responsibility to develop and manage each. The responsibility for making policy is distributed across the M:HET, SAQA and the QCs. In practice, this means that the QCTO policy on Recognition of Prior Learning (RPL) should comply with the SAQA RPL policy, which in turn needs to comply with the Ministerial RPL Coordination policy. The full suite of SAQA policies required by the NQF Act was only completed in 2013, five years after the promulgation of the NQF Act.

The implementation of the NQF Act is supported by three sector-specific pieces of legislation: General and Further Education and Training Quality Assurance Amendment (GENFETQA) Act (2008), Higher Education Amendment Act (2008); and Skills Development Amendment Act (2008). Each of these acts are further accompanied by regulations, policies, guidance and rules. In the case of a conflict between the NQF Act and the sector legislation, the NQF Act takes precedence, although it is not always clear how this provision works in practice. The timeline in Figure 1 below illustrates some of the major milestones in the policy and legislative framework. It reveals that the implementation of the NQF Act is taking place in a continuously evolving legislative and policy landscape.

Figure 1: Major milestones in the policy and legislative framework
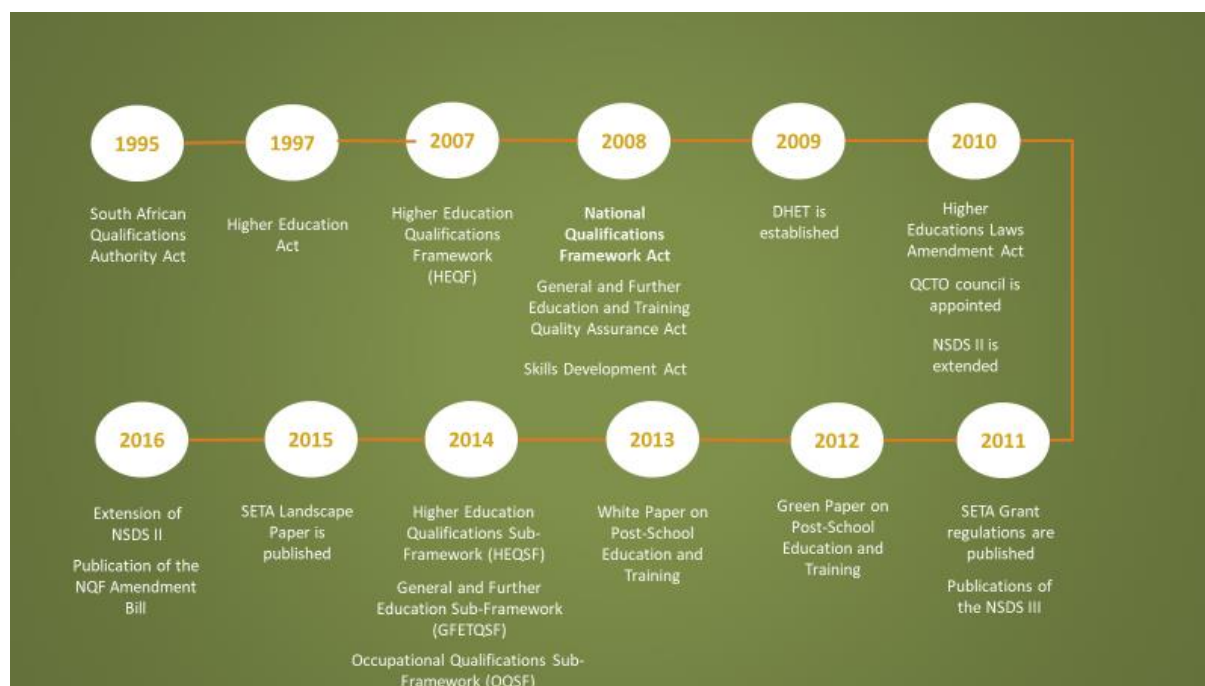
Source: DNA Economics

2.4 Conceptual understanding of the NQF

The conceptual understanding of the NQF has shaped the structure and content of the NQF Act, and has been the source of much contention and dispute throughout the NQF's existence in the country. Over the years, educationalists have developed different theories to explain the NQF. While some argue that an NQF is a "jungle gym" or "register" against which qualifications can be pegged, others refer to an NQF as a social construct that is deeply embedded in power contestations. Both views have merit, depending on the audience and the purpose of the discussions.

However the idea embedded in the NQF Act and related legislation is of the South African NQF as a comprehensive system comprising three sectoral sub-frameworks. This understanding is arguably currently the dominant one, notwithstanding the fact that there are also clear moves towards the view that the NQF is a system for communication, collaboration and coordination (South African Qualifications Authority, 2012). The NQF as a comprehensive system includes integrative aspects such as a single executive authority responsible for the entire post-school system (both education and training) and the three separate (although coordinated) sub-frameworks. Its comprehensiveness lies in the fact that it encompasses all aspects of E&T in the country. This evaluation has not adopted a particular position in this conceptual debate. While this literature assists in understanding the NQF's design and objectives, this evaluation has focused on the implementation of the Act and its effect on the E&T system.

2.5 International experience of the implementation and evaluation of NQFs

The development of NQFs has been a prominent feature of policy and structural developments within national E&T systems since the late 1980s. The literature refers to at least four generations of qualifications frameworks which have been developed during this period. The first generation involved Australia, Scotland, South Africa and a handful of other countries and took place at the time when the shift to learning outcomes and the competency approach had a significant influence on these frameworks. Subsequent generations involved a rapid expansion in the number of countries adopting NQFs, with the total now being some 140 countries (Keevy & Chakroun, 2015). On a regional level, free trade agreements,

enhancing the mobility of learners and workers and support to global business have all provided the impetus for enhanced cross-border recognition of qualifications.

There is a notable international trend towards an increase in national government decisions to develop NQFs, often independent of national economic and social contexts. This is a concerning trend of "policy borrowing" that results in varied and often unrealistic sets of expectations that governments have placed upon qualifications frameworks (Coles 2007; Tuck 2007). The sense of a need for economic and social reforms has nonetheless driven policies of educational expansion and supply side policies of enhanced workforce skill levels and lifelong learning. These policies, including NQFs, have drawn business and union constituents together with governments into increasingly centralised systems reliant on state intervention, as is the case in South Africa.

Coles et al (2014) identify three cross-cutting themes from international NQF developments, looking specifically at South Africa, the United Kingdom and Australia:

1. *Evolution starting with reforms*: Reforms that have led to NQFs have been driven by a sense of crisis or need for renewal.

2. *Limited but formative impact:* Evaluating the impact of NQFs internationally has been limited for at least three reasons: firstly the methodologies have been weak and underdeveloped, secondly, the data has been limited, and thirdly, there is often a lack of understanding of what an NQF constitutes (Keevy & Bolton, 2011)

3. *Trend towards decreased regulatory role of NQFs based on sectoral initiatives.* For example, as evident in South Africa, frameworks increasingly make use of sector-specific frameworks and allow space for sectoral initiatives more broadly.

A number of other national evaluations have been conducted in other countries using methodologies that show both similarities and differences to the South Africa evaluations considered. Sampling approaches were broadly similar and most studies remained mainly qualitative in nature. All the studies acknowledge the relative early stage of development of the NQFs, and the difficulties associated with measuring the impact in this context. A key difference appears to be that the South African studies appear to be very ambitious in their scope. Nonetheless a key challenge across all studies is the difficulties, or even inappropriateness, of attributing outcomes directly to the NQF (Allais, 2010). Thus, the international review provides support for the use of an implementation evaluation which focuses on the execution of the NQF Act, its outputs and outcomes, over an impact evaluation, where given the nature of the NQF, attribution is nearly impossible.

3   THE PROGRAMME

While the previous section provided the background to the NQF Act based on a literature and document review, this section expands upon the intent of the policymaker using the theory of change and logical framework as tools.

3.1   NQF Act's theory of change

A theory of change explains how the activities undertaken by institutions translate into a series of results that contribute to the final intended impacts. For evaluators, a theory of change helps them to discern how change is expected to happen through the implementation of policies, and to identify the assumptions made by policymakers in the design of the policy.

Ideally, when used in the policymaking process, the theory of change can help to design policies, with realistic goals, clear lines of accountability, and a common understanding of the policy that can be actioned by institutions (Rogers, 2014). In practice, however, the theory of change is rarely developed in the policymaking stage. This was also the case for the NQF Act. Therefore the evaluation team and the Project Steering Committee (PSC), using input from qualitative interviews, constructed the theory of change and the logical framework. The theory of change aims to put forth the understanding of the policymaker as to how the NQF Act was intended to achieve its intended outcomes.

The development of a theory of change (and the evaluation framework more broadly) for the NQF Act proved a challenging and time consuming exercise that required a large number of consultations between the evaluation team and the project steering committee (PSC). A key reason for these challenges is the broad objectives for the NQF that are stated in the NQF Act. In particular, the objectives of the NQF as set out in Section 5(1) of the Act seem to reflect the goals of the E&T system as a whole, and not specifically the NQF. The Act does not specify with any detail the mechanisms through which change is expected to occur in the system. In addition, or perhaps a result, there was a wide divergence of views on the specific outcomes and impacts of the NQF. Despite these differences, the evaluation team and the PSC were able to arrive at an approach and methodology that mostly satisfied the relevant parties for the purpose of this evaluation.

There are various ways to present a theory of change; either through a narrative description or illustration, however for the NQF Act, the evaluation team opted for a narrative description, with a logical framework version in Figure 2:

> *If there is a clear national policy framework **and** sub-frameworks take into account the context-specific needs of different sectors within the E&T system, then the qualifications that are registered will be of **acceptable quality and internationally comparable. If** registered qualifications create opportunities for the RPL and lateral, diagonal and vertical articulation, **then** a **single integrated national framework for learning achievements** will emerge. **If** this national framework exists, then it will facilitate **access to, mobility and progression within education, training and career paths**. This will in turn **accelerate redress of past unfair discrimination in education, training and employment**. If the QCs establish effective and appropriate quality assurance systems, then the NQF system will ensure that the delivery of qualifications and the reliability of assessment is of a sufficient standard and is continuously improving; which contributes to the **enhanced quality of education and training.***

3.2   NQF Act's logical framework

The theory of change is supported by a more extensive logical framework, which sets forth the inputs, activities, outputs, outcomes and impacts of the NQF; along with a set of indicators for each of these components. It uses the objectives, set out in Section 5, of the Act, to identify a set of immediate and intermediate outcomes and impacts. Figure 2 graphically summarises the logical framework used for the evaluation.

The intended impact of the NQF Act is clearly set out in the legislation. There are however an array of complex and lengthy causal pathways that lead to these impacts and many factors that could detract from their achievement. The impact statements also identify two groups of beneficiaries: the individual in the form of the learner, and broader society. This suggests that the mechanisms through which the NQF works must target not only individuals but also spur society-wide benefits.

While the benefits to individual learners are self-evident, the pathways through which the NQF influences social and economic development are less clear. It is also hard to isolate the contribution of the NQF to these impacts from that of the broader E&T system. In describing the impact of the NQF, policymakers have used the term "contribution". This may imply that policymakers see the NQF as broader and an enabling framework that could benefit learners and society without necessarily thinking of the causal mechanisms through which these changes are achieved. However the lack of clarity on this point provided a major challenge in the development of the logical framework, and could be clarified in revised legislation in future.

Another key finding emerging out of the development of the logical framework is the lack of clarity on the role of education and training providers in the Act. Aside from Section 3 of the NQF Act which makes the NQF Act applicable to all education institutions and skills development providers, there is little mention of the roles and responsibilities of these institutions in achieving the objectives of the legislation. While some interviewees argue that the NQF Act is designed as a "top-down" legislative framework, with each sub-framework developing its own approach to regulation, the NQF Act fails to recognise that education and training institutions need to perform several actions of their own volition to fulfil the objectives of the Act. For example, institutional articulation refers to the arrangements developed by institutions to promote articulation. These arrangements cannot be imposed on institutions through the legislative, policy and regulatory framework.

The NQF Act makes several **assumptions** that affect how the implementation of the Act works in practice. Eight main assumptions have been identified through the process of developing a theory of change and logical framework:

1. There are sufficient resources within the DHET, SAQA and QCs to develop, manage and monitor policy implementation.
2. There is consensus on the design and conceptual approach on which the NQF is built.
3. The policy framework is targeted at the right problem and remains responsive to emerging challenges.
4. Education and training (E&T) providers understand the legislation and are willing to implement the substance of the policy and legislation.
5. E&T providers, learners, employers and stakeholders see the benefit and value of the NQF.
6. E&T providers have the capacity and skills needed to implement the policy and legislation.
7. There are no other significant external barriers that hinder the implementation of these policies.
8. Implementation of policy leads to the desired changes in the practices and behaviours of E&T providers, stakeholders and learners.

Each of these assumptions has been reviewed and tested in light of the evidence generated by this evaluation and discussed further in Section 4 of this report.

Figure 2: Logical framework

ACTIVITIES | **OUTPUTS** | **IMMEDIATE OUTCOMES** | **INTERMEDIATE OUTCOMES**

INPUTS
- Funding for SAQA
- Skilled human resources
- Technology
- Physical Infrastructure

| Determine policy on NQF matters (MHET) | Develop policy and criteria on: - RPL, CAT and Assessment - Prof. bodies and designations - Dev., registr. & publ. of quals | Implement policy | Policies developed and aligned |

| Determine dispute resolution process & encourage collaboration | Collaboration between QCs, SAQA & other stakeholders | Oversee implementation (SAQA) | System of collaboration developed and implemented with clear roles and responsibilities |
| Develop a system of collaboration | Advise the minister | Uphold the coherence and public credibility of the NQF | |

| Develop and agree level descriptors | Determine sub-frameworks | Develop and manage the sub-framework | Robust sub-frameworks within a single integrated NQF |

| Recommend qualifications | Register qualifications | Verify national qualifications | A complete register of quality qualifications |

| | Maintain databases of learner achievements | Maintain and update NLRD (incl. digitisation) | Updated learner, qualification, Professional Bodies and Professional Designation databases |

| | Develop and implement policy for quality assurance | Ensure necessary quality assurance is undertaken | Effective and context appropriate quality assurance systems and timely certification |

| | Evaluate foreign qualifications | Collaborate with international counterparts | Comparable NQF-level for the foreign qualifications |

| | Conduct of commission research on issues of importance to the NQF | Inform the public (SAQA & QCs) | Evidence generated and information shared on NQF matters |

| | Apply to be recognized as a prof. body and register prof. designation | Recognise professional bodies & register professional designations | A national regulated system for recognition of prof. bodies and registration of prof. designations |

IMMEDIATE OUTCOMES
- A functioning single integrated qualifications system that is context-appropriate
- Improved country capacity for the classification, development, registration & publication of national qualifications
- South African qualifications are of acceptable quality and internationally comparable
- Improved learner access, portability, progression, articulation of qualifications
- Greater awareness about qualifications, providers and career paths
- Increased professionalisation of career paths

INTERMEDIATE OUTCOMES
- Enhanced quality of education and training
- Public credibility of the NQF system
- Improved access to a pool of skilled foreign labour

IMPACTS
- Past unfair discrimination in education, training and employment is redressed
- Social and economic development of the nation at large
- Full personal development of all learners

Source: DNA Economics in collaboration with the PSC

LEGEND: Impacts   Activities   Immediate Outcomes   Intermediate Outcomes   Impacts

4   KEY EVALUATION FINDINGS

The section presents the findings and recommendations of the evaluation according to each of the following DAC evaluation criteria:

- **Relevance** refers to the extent to which the intervention is suited to the country's priorities while **appropriateness** examines the extent to which the intervention's design responds to the policy problem.

- **Coherence** evaluates the extent to which policy frameworks are aligned and consistent with one another across different levels of government.

- **Efficiency** measures the outputs, both qualitative and quantitative, in relation to the inputs.

- **Effectiveness** is a measure of the extent to which an intervention achieves its objectives.

- **Emerging impact** refers to the positive and negative changes produced by a development intervention, directly or indirectly, intended or unintended.

4.1   Relevance and appropriateness

The process of developing the theory of change highlighted a lack of clarity and shared understanding in terms of what specific problems the NQF Act was trying to solve (or what successful practices it aimed to expand or reinforce) and how exactly the Act tried to solve these problems.

The NQF Act was attempting simultaneously to resolve both systemic challenges in the broader E&T system as well as structure and governance challenges that were more specific to the NQF. In terms of structure and governance, there was significant tension over the distribution of roles and responsibilities under the SAQA Act. The Minister of Education and Minister of Labour shared decision-making powers over the NQF and there was also some overlap in terms of their responsibilities and those of SAQA, which many perceived as having too much power for an independent body. A particular concern was over the model of quality assurance that was being promoted by SAQA (unit standard based qualifications in particular) that was deemed as inappropriate within the GFET and higher education sub-systems. Interviewees suggested that at the time it was felt that the three sub-systems needed to have a certain level of autonomy and not be bound by a centrally determined model.

It appears that the NQF Act was drafted as a compromise solution to resolve both the systemic and structural challenges that were present. At the time when the NQF Bill was being drafted, policymakers relied on the findings contained in the report produced by the Study Team on the Implementation of the NQF. This report included mostly perceptual information on the workings of the NQF system and had limited quantitative data on the scale and nature of different issues in the E&T system. This type of evidence formed the basis for the structural and organisational changes brought about by the NQF Act.

More importantly, the NQF Act was based on a politically brokered settlement to end the professional, philosophical and ideological disputes that were paralysing the NQF at the time; as was reiterated in the Post-School Education and Training (PSET) White Paper (2013).

The NQF Act does not clarify which systemic issues within the broader E&T system it intends to address, other than reflecting the high-level E&T system objectives to which it is expected to contribute. The NQF Act addressed a number of structural issues such as the establishment of three QCs and the establishment of 10 levels, but does not clarify the pathways to change through which the NQF is expected to contribute to its high-level goals. Moreover, while the Act clarifies the roles and responsibilities of the NQF bodies (SAQA and the quality councils), it does not provide any clarity on the roles or responsibilities of other stakeholders such as education and training providers, the DHET and the DBE. In relation to

education and training providers, the NQF Act relies on the policy framework that NQF bodies are expected to develop, to guide these entities. While this top-down approach is not inappropriate, the achievement of the NQF's objectives goes far beyond what can be regulated through the policy framework established by the NQF bodies.

In summary, the introduction of the NQF Act was the relevant and appropriate response to the organisational and governance challenges experienced under the SAQA Act. That said, a fundamental weakness in the design of the Act is that it does not clarify the specific contribution of the NQF to the E&T system, nor does in contain a set of focussed and measurable objectives by which to judge the success of the Act.

These weaknesses have created a situation where the NQF bodies established by the Act are held accountable for broad E&T system goals, over which they have little influence. At the same time, by failing to stipulate the role of education and training providers, the Act appears to overlook the important role of these institutions in the achievement of the NQF's goals.

4.2 Coherence

The evaluation considered policy coherence at three levels:[2]

- **Internal policy coherence** corresponds to whether various stakeholders share a common understanding of the NQF purposes, its theory of change, and how these fit with their interests and objectives.

- **Vertical policy coherence** assesses the extent to which the NQF Act is aligned with the broader and higher-level policy framework of the E&T system.

- **Horizontal policy coherence** evaluates how different policies set by the NQF bodies are coordinated and aligned to each other and how rigorous these policy are.

4.2.1 Internal policy coherence

In a complex system like the NQF, internal policy coherence ensures that all stakeholders understand the objectives of the framework and how it is expected to work in the same way. Interviews reveal the NQF is commonly accepted as an essential part of the E&T system, with relatively few respondents voicing fundamental disagreements to the NQF. This represents significant progress from the early 2000s when the NQF was far more controversial. There were, however, significant differences amongst interviewees around what the focus of the NQF is and what its theory of change is (or should be). Particularly noteworthy was the wide range of views expressed by senior members of the DHET. This is likely to undermine the coherent implementation of the Act. Furthermore, each QC has developed its own understanding of the Act, although there was generally more cohesiveness in the way that SAQA and the QCs viewed and interpreted the Act.

4.2.2 Vertical policy coherence

Vertical policy coherence examines the alignment between the NQF and wider E&T policy frameworks. In relation to PSET, there appears to be a reasonable amount of vertical integration in terms of higher education policy, based on policy analysis conducted by the evaluation team. However, there is a lack of vertical coherence and clarity in the occupational and vocational training sectors. The DHET, rather than the NQF bodies, is primarily responsible for most aspects of occupational and vocational policy and there is considerable uncertainty in three key policy areas.

Firstly, there is no clear and commonly accepted definition of vocational and occupational programmes, which creates confusion as to where certain "vocational" occupations should fit in the NQF. This is an area of intense theoretical debate and contestation. Some believe that a broad vocationally orientated qualification is needed and that actual training in an

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[2] Adapted from (Bamberger, Vaessen, & Raimondo, 2016)

occupation occurs in a workplace, while others believe that, provided the "occupation" is defined broadly, the advantages of acquiring an occupational competence (for example an electrician qualification) are substantial. It is difficult to find resolution to debates of this nature and so it will probably be necessary to agree some working definitions that are adequate to ensure that the policy process can move forward.

Secondly, while the White Paper on PSET helped specify the future role of Technical and Vocational Education and Training (TVET) colleges, there is still significant uncertainty around the strategic role that these colleges are expected to play and hence what qualifications and quality assurance systems are required to support them. It is thus not clear what qualifications TVET colleges should strategically focus on; i.e. what level on the NQF and what types of qualifications. This would determine which QCs are responsible for improving quality in the colleges; not to mention how they should be funded and capacitated – and how they build relationships with employers and private providers.

Thirdly, DBE is developing a "three stream" approach which also creates vocational and occupational pathways within schools. It is not clear if these pathways will articulate and align to the vocational and occupational qualifications in TVET and community colleges. In particular, policy processes do not appear to be meaningfully aligned across the education departments, which delays and undermines the achievement of the NQF's articulation objectives, as the expected vocational and occupational pathways in the E&T system remain unclear within and between schools and TVET colleges.

4.2.3   Horizontal policy coherence, alignment and robutness

The policy analysis begins with a review of the ministerial and national policies developed by the M:HET and SAQA. It has taken considerable time to complete the development of the NQF policies as stipulated by the Act. Overall it took six years for SAQA to develop its base policy framework, although changes will still be necessary over time to address emerging issues. There are several reasons for this prolonged policy process. Each of the quality councils publish a range of policies in terms of their sub-frameworks that have to align to the M:HET and SAQA policies. This hierarchy of policymaking is thus inevitably a lengthy process and building consensus on key concepts and policies within the NQF takes time. Given the broad range of stakeholders involved in the NQF, the M:HET and SAQA often have multiple consultations and engagements to gain broad agreement on a policy. The result is that any policymaking process in the NQF involves several groups of stakeholders, multiple drafts and calls for comment.

The policies developed and published by the NQF bodies were analysed relative to a number of objective criteria for good policymaking drawn from the Institute for Government in the UK. This exercise revealed that while most NQF policies state their objectives, target audience(s) and their alignment to other policies, they fall short in several respects. Most notably, they often do not provide sufficient information on resourcing requirements, roles and responsibilities, how policy success will be measured and the consequences of not achieving policy goals.

Finally, the NQF Act and its policy framework have developed their own nomenclature that is well understood by those that work with it on a regular basis but difficult for other stakeholders to comprehend. While some efforts have been made to explain the terminology through for example the NQFPedia, it remains largely inaccessible to those outside the NQF.

Table 1: Findings relating to policy Coherence

Internal policy coherence	Stakeholders agree on the principle of the NQF but not on how it should be implemented.
Vertical policy coherence	Inadequate policy coherence between the NQF and broader E&T system.
Horizontal policy coherence	Reasonable levels of policy coherence within the NQF system.

4.3 Efficiency

4.3.1 Collaboration, coordination and reporting

As required by the Act, a System of Collaboration was put in place to manage the relationships between the NQF bodies and agree on solutions to NQF challenges. Given that the Act distributes the decision making powers across the M:HET and NQF bodies, the System of Collaboration aims to enhance coordination and cooperation to ensure the efficient implementation of the NQF Act.

The System of Collaboration creates several structures to support the implementation of the Act, most importantly the CEO Committee, the NQF Forum and the Inter-Departmental NQF Steering Committee.

The CEO Committee and the Inter-Departmental NQF Steering Committee meet regularly. While, the minutes of the CEO Committee reflect a degree of shared problem-solving and planning across the NQF bodies, some interviewees have raised questions about the ability of the committee to deal with substantive issues around the NQF. An analysis of the minutes of the meeting reveals that while the CEO committee manages the execution of their high-level implementation plan well, there are missed opportunities for deliberation and discussion on key developments and policies in the E&T system that impact on the effectiveness of the NQF.

The NQF Forum is a dedicated platform that allows the M:HET and Director General (DG):HET to engage directly with the NQF bodies. However, this forum has not met since 2012. The fact that the Forum has not met in such a long time despite the existence of several policy issues that require the attention of the department's leadership is concerning.

Another factor that impacts adversely on coordination and collaboration is the lack of clarity around the roles and responsibilities of the DBE and DHET in the NQF system. The NQF Act does not identify the roles of these two departments, nor are their roles explained meaningfully in any other policy documentation. As a result, DHET branches often appear to recommend policy to the Minister without including NQF bodies in these processes or considering the impact on the NQF, and vice versa (with QCs sometimes making recommendations or policy without meaningfully consulting other parties). Similarly, DBE went ahead with the development of the three "stream" model with limited involvement from the NQF bodies.

As the result of a lack of clarity around roles, responsibilities and accountability, a web of complicated reporting lines has emerged. SAQA and the quality councils account to their boards/councils on their performance. The boards/councils in turn report to the M:HET, and Minister: Basic Education in Umalusi's case. In parallel, SAQA and the quality councils report to different branches within the DHET on their operational and expenditure performance. The NQF bodies also have to report to the NQF Directorate on the implementation of the Ministerial Directives and other NQF-related matters. In addition, the QCs must report to SAQA on the implementation of the NQF Act, as the Act envisaged when it assigned the responsibility for overseeing implementation to SAQA. The effect of these multiple lines of reporting is that it adds to the reporting burden of institutions and weakens accountability arrangements.

4.3.2 Qualification registration, evaluation and verification

The NQF Act makes SAQA responsible for two regulatory functions: the registration of qualifications and part qualifications as well as the evaluation of foreign qualifications.

The **number of qualifications registered** grew on average by about 7% per year between 2009/10 and 2015/16, as shown in Figure 3. In contrast, the number of unit standards registered has remained relatively stagnant since 2011/12. Over the medium term, the number of unit standards registered will decline as their registration period ends or they are incorporated into new qualifications.

Figure 3: Number of qualifications and part qualifications registered, 2009/10-2015/16
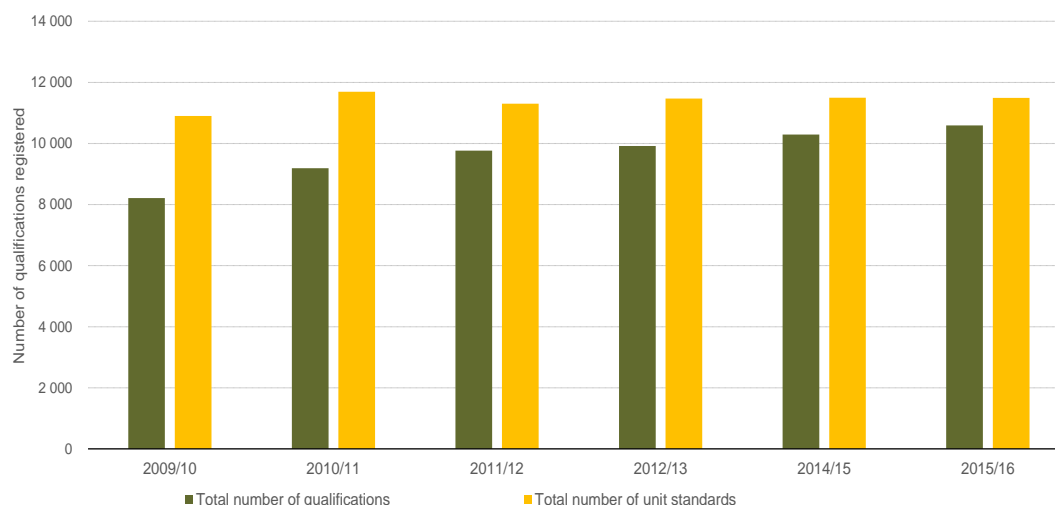
Source: NRLD Comprehensive Reports

Whereas the policymaker's intention was for the NQF system to develop part qualifications to address the needs of learners and employers, this has not happened. Part of the problem is the uncertainty around what constitutes a part-qualification in this new dispensation. Interviewees report that QCs have provided little or no guidance on what they would consider a part-qualification. It could be argued that there has been a conscious effort in the OQSF to remove the reliance on unit standards, in favour of full qualifications, but it is not clear that these full qualifications will address the varied needs of learners in the system. The HEQSF focuses on full qualifications, and leaves it up to the Higher Education Institution to develop "part-qualifications" based on the needs of their curricula. However, despite this policy pronouncement, there is still some confusion in the higher education sector on why the HEQSF differs from SAQA's policy and criteria on the registration of qualification and part qualifications.

Some interviewees also perceive duplication in the registration and accreditation processes, especially between SAQA and the CHE. They intimate that they are required to submit the same information when applying for the accreditation of learning programme and the registration of a qualification. Interviewees also report delays in the registration process, although these are not seen as significant when compared to the delays in accreditation by the CHE.

The **verification of local qualifications** was added later on to SAQA's regulatory powers through a directive from the M:HET. Soon after, the Minister of Public Service and Administration issued a directive that all applicants seeking employment in government should have their qualifications verified by SAQA. For SAQA, this directive fuelled a rapid rise in the demand for the verification of qualifications. Between 2009/10 and 2015/16, the number of requests for verification grew at an average annual rate of 39%. While verifications continue to rise, it is comforting to note that the percentage of misrepresented qualifications hovers around 0.3% and has fallen from a high of 0.6%.

Between 2009/10 and 2014/15, the number of applications received for **foreign qualification evaluations** increased from 25 502 to 35 729 but fell to 24 942 in the following year. SAQA estimates that an evaluation can take anywhere between 15 days to 6 months, depending on whether international issuing institutions respond timeously to SAQA's request to verify their award.

The NQF Act requires SAQA to **recognise professional bodies and register their designations**. Since the promulgation of the Act, SAQA has recognised and registered a growing number of professional bodies (PBs) and designations. The number of PBs

recognised grew from 73 in 2014/15 to 93 in 2016/17, while the number of professional designations registered increased more rapidly, from 260 in 2014/15 to 343 in 2016/17.

The NLRD currently contains more than 17 million records of learner achievements, up from under 10 million in 2009/10, and constitutes an important source of information within the E&T system. While a number of data gaps and issues still exist, with for example the QCTO not yet having an operational management information and certification system, the progress made in updating and maintaining the NLRD is commendable. The NLRD is a powerful source of evidence for policymaking in the E&T system, but it is also under-utilised and it has thus far not been meaningfully used to inform policy.

It is clear that SAQA's workload has increased substantially over the evaluation period. To a large extent, this additional workload has been accommodated within existing resources. After an initial period of growth between 2009/10 and 2013/14, SAQA's revenues fell as expenditure continued to rise, as shown in Figure 4. In 2014/15 and 2015/16, for the first time in the seven-year period, SAQA's spending exceeded its income, causing the organisation to draw on its reserves. This has led to cuts in spending on certain legislated functions, such as communications and research. In parallel, SAQA has delayed investments in critical IT systems and personnel that would allow it to meet the demand for foreign qualification evaluations and verifications, two functions that earn revenue for the organisation.

Figure 4: SAQA's revenue and expenditure, 2009/10-2015/16
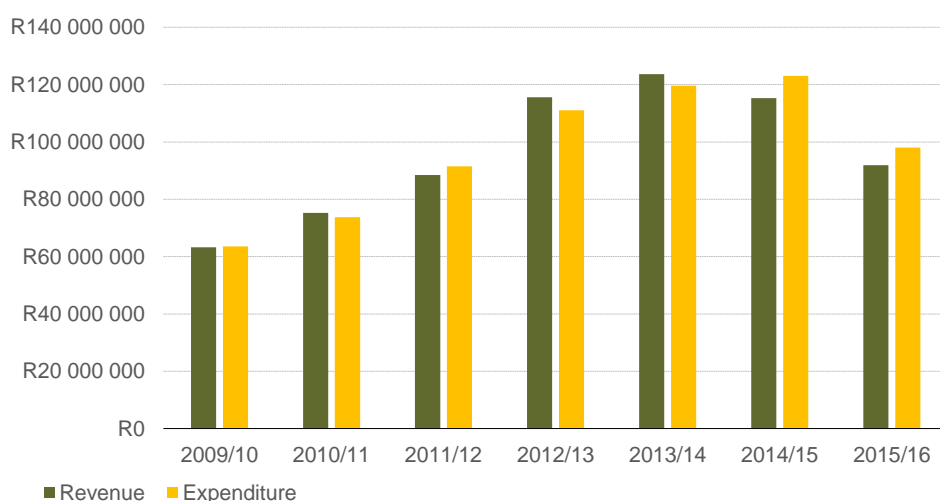
Source: SAQA's Annual Reports

4.3.3 Implementation of the OQSF

While Umalusi and the CHE have been in place for some time, the QCTO was newly established at the time of the NQF Act, through an amendment of the Skills Development Act in 2008, but only became operational in 2010. When the QCTO was established, insufficient planning and costing was done of the role it was to fulfil, and sufficient funds were not made available for it to function in the early years of the NQF Act. Eventually (up to) 0.5% of the Skills Development Levy was allocated to the QCTO in 2012, although again no substantial analysis was undertaken to determine an appropriate level of funding, except through a rough estimation of how much SETAs were spending on these functions at the time.

The main objectives for the newly created QCTO do not seem to have been commonly understood or clearly documented, other than higher level statements such that it is expected to reduce the proliferation of qualifications and simplify quality assurance in the system. A business plan for the QCTO was created by the DHET, but it does not appear that the QCTO has adopted this plan; and has instead interpreted its scope through a different lens.

As a result of these and other challenges, it has taken a significant amount of time to fully set up the design and structures of the OQSF. Soon after its establishment, the QCTO adopted a largely delegated model of qualification development and quality assurance in the OQSF. A large proportion of qualifications, developed mainly by SETAs, are not yet aligned to the OQSF and the relatively few newly developed occupational certificate qualifications are not yet being offered by many E&T providers. Table 1 below gives a summary of the number of qualifications developed on the OQSF since 2010, broken down by the number of qualifications approved by the QCTO and the number that have been registered by SAQA. From the table it is apparent that new qualification development only commenced in earnest in 2013/14, with an annual average of 50 qualifications being approved by the QCTO Council since then, although there is significant variance per year.

This has meant that there are currently two parallel systems of quality assurance operating in the OQSF, with most learners and qualifications still essentially quality assured as before the NQF Act. The new occupational qualification system retains many of the components of the pre-existing system, but makes some significant changes to the quality assurance regime. Occupational certificates (that are newly developed in line with the OQSF) require less assessment during the programme but a more comprehensive external summative assessment or exam at the end of the programme.

Table 1: Number of qualifications approved by the QCTO and registered on the OQSF, 2010/11 to 2017/18

Category	10/11	11/12	12/13	13/14	14/15	15/16	16/17	17/18[3]	Total
Qualifications approved by QCTO Council and recommended to SAQA for registration	0	1	1	52	22	47	80	43	**246**
OQSF qualifications registered by SAQA	0	0	1	18	25	37	73	3	**157**

Source: Provided by the QCTO

While qualification development has been somewhat slow to gain momentum, survey interviewees were fairly positive about the processes put in place. Survey respondents, for example, report that the QCTO qualification development process has been largely successful along a number of dimensions, as shown in Table 2.

Table 2: Survey question: *How successful do you believe that the process followed by QCTO in developing curriculum-based occupational certificate qualifications has been along the following dimensions?*

Area	Highly unsuccessful	Unsuccessful	Sucessful	Highly successful
Improving the effectiveness of the occupational qualification development process	4.3%	26.1%	43.5%	26.1%
Improving the efficiency of the occupational qualification development process	8.7%	21.7%	39.1%	30.4%
Improving the quality of occupational qualifications	8.7%	17.4%	34.8%	39.1%
Improving the relevance of occupational qualifications to industry	4.3%	21.7%	34.8%	39.1%
Reducing the proliferation of qualifications	8.7%	30.4%	34.8%	26.1%

Source: OQSF respondents to the survey

A large degree of policy uncertainty exists as to the strategic quality assurance model within the OQSF, which jeopardises the achievement of the objectives of the NQF Act in the occupational space. The QCTO aims to centralise the quality assurance functions that have

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[3] As at 27 July 2017

been delegated to SETAs, but it is not clear whether funding or capacity will be available to do so. There are also a number of specific areas where clarity is required, including the policy on part qualifications and the related issue of whether all qualifications and part qualifications have to include all three components (knowledge, workplace and practical).

Key officials within the DHET, as well as representatives from business, feel that the OQSF policy will not achieve what they deem to be the QCTO's key original objectives of reducing the proliferation of qualifications and simplifying quality assurance in the system. They suggest that the QCTO did not sufficiently engage with key stakeholders in the skills system on how these objectives could be addressed while the OQSF was being drafted, and hence believe that the OQSF as currently written has deviated from its original intent.

In contrast, officials from the QCTO believe that the OQSF, perhaps with slight amendments, will largely achieve the above-stated objectives once it is implemented as planned and all qualifications have been aligned to it. They point to the move away from unit standards and the creation of a summative assessment as examples of simplification.

As with several aspects of the NQF, the lack of clear implementation guidelines and detailed objectives formally agreed to by all parties at the outset, has led to a situation where different parties have different views on what the system is trying to achieve. Nonetheless it appears likely that significant changes to the OQSF might be necessary, which could severely delay the full alignment of qualifications to the framework and the roll-out of these qualifications into delivery. This will result in the current parallel systems of quality assurance staying place for a long period of time.

Many of the issues raised by providers (front line users of the systems of quality assurance established within the OQSF) however relate to implementation rather than policy or principle. Most say that quality is being achieved and that there are recognised standards and that these are necessary and positive. However, the criticisms are in the implementation:

- Too much reliance on meeting compliance check lists. Education and training providers claim that this is time consuming and do not guarantee quality.

- Providers value visits by either the QCTO, SETAs or Umalusi. They state that the visits assist in clarifying terms and guidelines that they do not understand, help share good practice and often focus on real issues rather than paper compliance. However, these are not frequent and the officials who visit is not always sufficiently experienced.

- There is a general concern over poor communication. New policies and guidelines are produced but not communicated or explained. Delays occur with no explanation. Employers, SETAs and providers have different bits of information and are often not on the same page.

The White Paper promised less complexity, but in many ways the current arrangements are more complex with two systems running in parallel and complex assessment systems. There are plans for a less complex system of assessment for the new qualifications through the External Integrated Summative Assessment (EISA), but the approach to qualification development, accreditation and certification remains complicated. The QCTO seems to be committed to a very elaborate set of rules and requirements that providers and AQPs are required to meet. The focus appears to largely be on institutional capacity, systems and processes, rather than on the quality of delivery. The main concern of providers is that it requires a great deal of time and cost to meet quality assurance requirements but once the requirements are met (on paper at least) there is limited focus on delivery.

Whether the future focus on EISAs will change this or not remains to be seen. Certainly, the inclusion of a workplace component in the qualification (as opposed to it being brought in as part of a learnership or apprenticeship mode of delivery) will make delivery and assessment complex. Putting in place the assessment mechanisms for this in assessment centres will be a huge and complex task and there is no clarity on the resourcing of this issue.

4.3.4 Implementation of the Higher Education Qualifications Sub-framework (HEQSF)

The HEQF was put in place in 2007, effectively creating a framework designed for higher education before the passing of the NQF Act. However, some inconsistencies in the framework needed to be addressed as part of the move to the HEQSF, such as the lack of clarity around qualification pathways, the purpose and "fit" of level 5 and 6 qualifications and potential overlaps between vocational qualifications on the OQSF and HEQSF.

The changes brought about by the HEQSF has led to a large-scale re-alignment exercise in higher education. By the end of this re-alignment process, all qualifications that remain will be aligned to the HEQSF. While the re-alignment process has taken considerable time and effort, private and public HEIs surveyed during this evaluation have found the exercise beneficial.

One of the main concerns of HEIs is the "duplication" between the accreditation functions of the CHE and "recognition/approval" processes undertaken by professional bodies for certain qualifications. They argue that these functions are similar and place an additional compliance and reporting burden on them.

While the Higher Education Act makes it clear that the CHE is responsible for the accreditation of learning programmes, some statutory bodies (particularly those established prior to the year 2000) are also given the power to approve learning programmes by their governing legislation. As a result, the CHE and statutory bodies share concurrent jurisdiction over the accreditation and "approval" of certain programmes. In contrast, non-statutory professional bodies have no legal mandate but have traditionally been involved in "approving" programmes. These bodies are now concerned about their role in the higher education sector.

The number of applications for accreditation and re-accreditation as shown in Figure 5 has grown rapidly between 2009/10 and 2015/16. HEIs surveyed for this study found the length of time it takes for the accreditation of learning programmes problematic. The majority of them reported that it takes more than 1 year to receive a decision on their application for accreditation. Several respondents at public and private HEIs raised concerns about the implications of these delays on their ability to respond to demand from industry, professional bodies, government and learners for nationally-relevant qualifications.

Figure 5: Numbers of applications for accreditation and re-accreditation, 2009/10 to 2015/16

Source: CHE Annual Reports

There are three main reasons for the delays in the accreditation process. First, the accreditation process relies on peer-reviewers and their availability influences the time taken by the accreditation process. Second, the CHE is facing a severe resourcing challenge. The

CHE's revenue has been growing at a slower rate than the other NQF bodies, and it has been spending more than it receives for four consecutive years. The funding challenges have had severe implications on the ability of the CHE to retain experienced staff and implement ICT systems to fast-track the application and accreditation processes. Finally, in the face of these severe funding constraints, the current model of programme accreditation where all applications have to undergo accreditation may no longer be viable.

4.3.5 Implementation of the GFETQSF

Of the three quality councils, Umalusi was initially the least affected by the passing of the NQF Act. It had been performing the roles it inherited from prior examination councils for a number of qualifications since its establishment in 2001. However, over time Umalusi has started viewing its role as a quality council more expansively and widened the scope of its activities across a number of areas, including quality assuring the school curriculum, increasing its research and advocacy outputs and developing a number of qualifications in the adult education and training space.

In the GFETQSF, the core question is whether Umalusi has a mandate to quality assure the whole schooling system – teaching and learning – or whether it should focus on quality assuring the exit exams from the schooling system. A number of respondents also noted the problematic situation the DBE occupies where it designs and delivers the curriculum which it also examines, with many calling for an independent exam board to be established.

The development of adult education and training qualifications (particularly the National Senior Certificate for Adults or NASCA) highlights further issues of responsibilities and ownership in the GFETQSF. In 2008 Umalusi initiated development of adult education qualifications at levels 2 to 4, including the NASCA at level 4, but opposition from the DBE and others delayed its finalisation for a number of years. Even though the NASCA was eventually registered, the DHET has not yet provided funding for, or rolled out this qualification, despite the likely need for such a qualification. This speaks to the lack of coordination in the system and a lack of clarity of who owns qualifications in the GFETQSF.

Surveyed respondents were generally positive about the value of the quality assurance conducted by Umalusi, although several private providers expressed dissatisfaction at the cost and time taken to obtain accreditation from Umalusi. Severe backlogs in certification of TVET qualifications were also present in the GFETQSF. Table 3 highlights the extent of the certification challenge faced by colleges, with, for example, the majority of colleges reporting that on average it takes more than a year for NC(V) learners to receive their certificates. These issues appear to be largely the result of weaknesses in the DHET's examination system, which are being addressed with the cooperation of Umalusi.

Table 3: Survey question: How long (on average) does it take for learners receive their certificates (from the point of completing their final assessment) for the following qualifications?

	NC(V)		N1-N3		N4-N6	
Average length	**Private**	**Public**	**Private**	**Public**	**Private**	**Public**
Less than 1 month	0	0	1	1	0	0
Between 1 and 3 months	1	0	1	1	3	1
Between 3 to 6 months	0	1	9	4	6	4
Between 6 months and a year	0	5	4	6	5	5
Longer than a year	2	17	5	11	5	12
Don't know	0	1	0	1	0	2
TOTAL	*3*	*24*	*20*	*24*	*19*	*24*

Source: Survey conducted by evaluation team. Results provided separately for public and private TVET College respondents

There is a widespread perception that learners are unable to carry credits from the NSC into the National Certificate (Vocational (NC(V)) programme and so a learner going that route will have to do the full NC(V) programme. This is despite Umalusi having published a draft policy on Credit Accumulation Transfer in 2010 and finalised it in 2015. Under this policy, learners

are able to carry language and mathematics credits from NSC to NC(V). Nevertheless, this perception has taken root and become *de facto* practice in TVET colleges. NLRD data further reveals the scale and inefficiency of this problem. About 40% of all students that were registered for NC(V) Level 2 in 2015/16 have an NSC certificate. It is likely that most of these students did not transfer their credits between qualifications.

After the passing of the NQF Act, Umalusi believed that it was not being adequately resourced to fulfil its required mandate. This was particularly in relation to its expanded role in terms of the quality assurance of provisioning, rather than just of assessment, that seemed to be implicit in its new role as quality council (SAQA, 2012, p. 33). In 2012/13 an agreement was reached with DBE to fund Umalusi through "top-slicing" from Provincial Education Departments rather than through certification fees. Umalusi is effectively charging a quality assurance levy whereby it receives grant funding based on the total number of learners (who are all "quality assured") rather than just those who pass and are certified (PMG, 2011).

This has reduced dramatically the dependency Umalusi had on certification fees from provinces which varied and so provided an inconsistent income stream. As a result, Umalusi's total revenue has grown from R36 million in 2007/08 to R146 million in 2015/16, an average growth rate of 19% per annum. Umalusi now gets 77% of its nearly R150m (2015/16) annual funding from a block grant from DBE. Umalusi also continues to charge certification, verification and accreditation fees to private providers, which accounted for 18.8% of its revenue in 2015/16.

4.3.6 Cross-cutting efficiency findings

A number of issues were identified that cut across all the NQF bodies. This includes the lack of feedback from NQF bodies on the time taken to complete processes such as accreditation of programmes / providers and registration of qualifications, a lack of clarity on part qualifications and a lack of indicators that monitor the efficiency of implementation.

The funding received by SAQA and the CHE has decreased in real terms. While Umalusi and the QCTO have not experienced similar declines, the current levels of funding are simply not enough for these institutions to deliver on their mandates. Funding has not kept pace with expanding mandates, nor have business models been significantly adjusted in response to these funding levels. Thus, in this resource-constrained environment, it is important to ask whether the current processes are efficient and optimal. As the evidence collected throughout this evaluation reveals, quality assurance is seen as time-consuming, lengthy and costly processes. Arguably, quality assurance processes might be more efficient if QCs adopt a "risk-based" approach that targets quality assurance efforts and resources to areas of risk. While the QCs have raised concerns about the equity of such risk-based approaches, they are left with two policy choices if additional funding is not made available. QCs can either continue with the current approaches to quality assurance that are resource-intensive and not necessarily effective in addressing the risks in the E&T system or adopt a "risk-based" approach that focuses on the areas where quality problems exist and persist. This is a crucial policy choice that requires the urgent attention of the DHET, DBE and NQF bodies, and has major implications for the overall efficiency and effectiveness of the NQF system.

4.4 Effectiveness

The NQF's objectives are to (i) create a single integrated framework for learning achievements, (ii) facilitate access, portability, progression and articulation, (iii) enhance the quality of education and training, and (iv) redress for past unfair discrimination. In general, the view of stakeholders is that progress is being made in achieving these NQF goals, though it is slow. A large number of challenges nonetheless remain. The achievement of these objectives goes well beyond the direct control of the NQF bodies, and therefore some of the factors that affect the effectiveness of the NQF Act are systemic.

4.4.1 Single integrated framework for learning achievements

The first of the NQF's objectives is the creation of a single, integrated framework for learning achievement. With the publication of all the sub-frameworks and the process of alignment of qualifications to these sub-frameworks well underway, this objective can be said to have been largely achieved in a literal sense. However, the creation of a truly "integrated" framework is not straightforward, and a number of issues still remain. These issues largely relate to the silos that exist between the different sub-frameworks with challenges often being experienced in areas of overlap between sub-frameworks. Examples include TVET colleges having to respond to different qualification development and quality assurance processes, and the overlap in qualification development for level 5 and 6 qualifications between the HEQSF and the OQSF.

Nonetheless, most interviewees recognised the steps that had been taken towards creating a single integrated framework. When asked what the main benefits of the NQF are to their institution, the response "create a single integrated qualifications framework" was the second most common response; as shown in **Error! Reference source not found.**.

Figure 6: Survey question*: In your view, what are the main benefits of the NQF to your institution?*

Source: Survey conducted by evaluation team. Results aggregated across all correspondents (Public universities, private HEIs, private and public TVET, and private SDPs).[4]

4.4.2   Access, portability, progression and articulation

The pathway from school to university is well established and it appears that there is a reasonable amount of trust in the results of the National Senior Certificate (NSC) examination. The qualification pathways in the TVET college and community college sub-systems are much less effective and efficient. In the TVET system, the NC(V) has not created an efficient pathway for learners leaving Grade 9, as originally intended, as evidenced by many NSC (level 4) learners entering this qualification (level 2). Table 4 shows that typically more than a third of learners who completed NC(V) level 2 had already completed the NSC. **Table 4: NLRD Analysis: What proportion of those learners who completed NC(V) level 2 in a given year had previously completed an SC/NSC?**

Description	2007	2008	2009	2010	2011	2012	2013	2014	2015
Number of NC(V) 2 certificants	3531	7262	16001	22960	24954	21376	25857	25020	22423
NC(V) 2 certificants who had	907	2438	6599	9462	9238	7206	8220	8597	8792

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[4] Note that the question was asked in an open-ended way, with surveyors then coding response into a number of categories. In the interest of space, many of the less common response were combined into the "other" category.

previously completed SC/NSC									
% of NC(V) 2 certificants who had previously completed SC/NSC	25.7%	33.6%	41.2%	41.2%	37.0%	33.7%	31.8%	34.4%	39.2%

Source: Analysis of the National Learners Records Database.

Note: Results given by year of completing NC(V) level 2. As an example of how to interpret data: 25.69% of those learners who completed NC(V) level 2 in 2007 has previously completed a Senior Certificate (SC) or National Senior Certificate (NSC).

In addition, of those who complete level 4, only approximately 3% of learners subsequently enrol in a university programme, according to NLRD data. In aggregate, these statistics suggest that NC(V) has not created an efficient pathway for learners to progress from Grade 9 (NQF level 1) to NQF level 4 and further on to higher levels in the NQF.[5]

Nevertheless, there are some signs of progress in creating pathways between TVET colleges and public HEIs. SAQA's National Articulation Baseline Study reports that about half of the HEIs surveyed were participating in formal articulation arrangements. While these articulation pathways are not yet reflected in the NLRD analysis above, it is likely that these types of specific articulation channels will begin to yield benefits in the coming years.

One of the green shoots in the NQF system is the increase in the number of level 5 qualifications, which helps create a greater number of pathways into higher education. 84% of the qualifications registered on NQF level 5 originate from private HEIs. Many of these qualifications are orientated towards vocational work, providing access to employment opportunities in diverse fields such as finance and hospitality. Fewer NQF level 5 qualifications have been registered by public HEIs. Where this has happened, these qualifications have been developed by UoTs and comprehensive universities, which indicates that this is a potential area of future growth.

The development of the community college (adult education) space is being constrained by the lack of policy guidance and attention from policymakers. There is is currently no pathway from NQF level 1 to level 4 that is specifically designed for adults. Beyond literacy or "second-chance matric" programmes, there is also an expectation for community colleges to deliver more skills that could directly make them more employable in specific fields. They are thus likely to require occupational and practical qualifications, between Levels 2 and 4, under the QCTO. However, it is acknowledged that this requires considerable funding, which has so far not been directed at community colleges.

4.4.3 Enhanced quality of education and training

The quality assurance system employed in the HEQSF involves a large degree of peer review, is well understood, agreed upon and entrenched in the higher education sector. These systems have also created some sense of parity between public HEIs and private HEIs. In their interviews, some HEIs reported that the quality assurance system established by the CHE had required them to develop internal capacity for assuring the quality of the curriculum, provision and assessment.

The lack of policy clarity on the role of Umalusi in the public schooling system impacts adversely on the ability of the NQF to deliver on the goal of enhanced quality of education and training. Within the schooling system, there is a conflict of interest in DBE's role in setting the exams for the curriculum and delivering the curriculum. If the quality of exams is to be assessed independently and reliably, then the two functions of developing/delivering the curriculum and examining it need to be separated out, possibly through the establishment of an independent examination body.

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[5] The unavailability of N4 – N6 data in the NQF limits our ability to determine some other likely higher level pathways taken up by NC(V) graduates.

In the OQSF, there seems to be some agreement that the quality assurance processes established by the QCTO are beneficial and useful. Nonetheless, it is too early to say whether these have impacted on the quality of education and training in this sub-framework.

The causal link between what the NQF bodies do and the goal of improving the quality of education and training is tenuous, and follows a lengthy and complex pathway. There are several other factors that influence the quality of education and training, that fall outside the scope of the NQF. Thus, in many respects it is difficult to determine the contribution of the NQF to this goal.

4.4.4   Redress of past unfair discrimination

RPL is seen as a key mechanism to address past unfair discrimination. There is a belief amongst interviewees that RPL is being increasingly implemented, although not widely enough and not always funded adequately. The OQSF remains well ahead of the GFETQSF and HEQSF when it comes to RPL implementation, perhaps partially due to the funding available from SETAs. In the OQSF system RPL is being used for both the gaining of credits and entry to qualifications, although it is still isolated to certain parts of the system. In the HEQSF there has been some progress (particularly in terms of limited entry/access to qualifications), but issues such as a lack of funding for RPL and restrictions on the use of admission through RPL by the CHE were frequently raised as challenges. The majority of RPL takes place at NQF Level 4 and is prevalent in the services, as Figure 7 illustrates. By 2015/16, 42 411 learners had achieved their qualifications through some form of RPL. Of these, 28 969 learners had achieved more than one qualification through RPL. This finding might suggest that once a learner knows and understands how RPL is done, they are more likely to take advantage of RPL opportunities.

Figure 7: Learner achievements through RPL
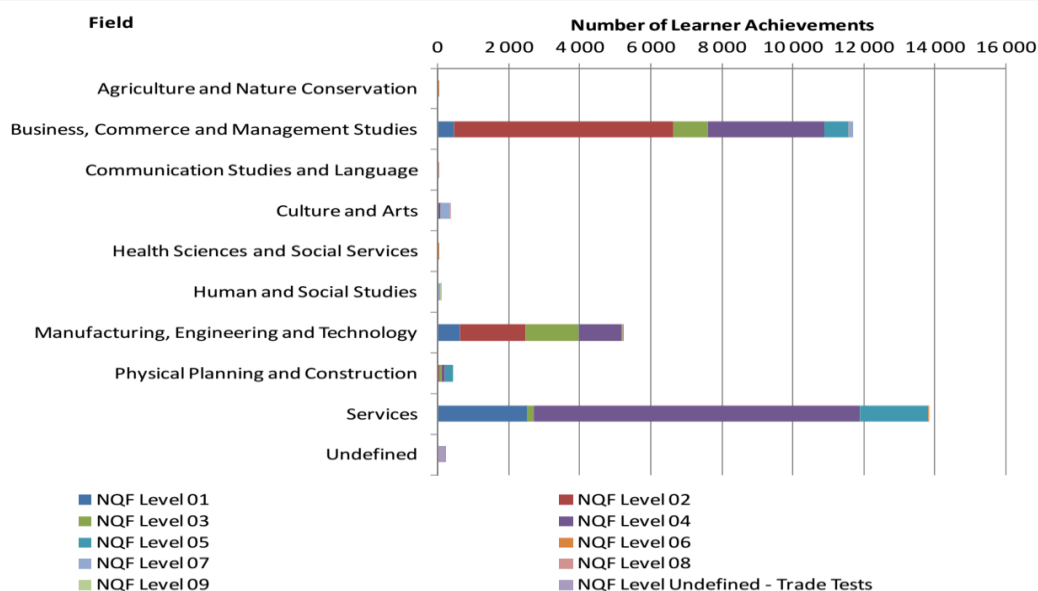
Source: SAQA RPL report

4.5   Emerging Impact

There is growing, but still fairly limited, evidence of the emerging impact of the implementation of the NQF Act. In particular, the findings from this evaluation reveal that E&T providers are expanding their quality assurance capacity. More and more institutions are also developing formal and informal arrangements to facilitate articulation and progression across providers and between providers and workplaces. Finally, there is seemingly a greater public awareness of the NQF, as evidenced by the increasing number of job advertisements that specify an NQF level or calls for a foreign qualification evaluation from SAQA.

5   CONCLUSIONS

This evaluation highlights the considerable progress that has been made in implementing the NQF Act. However, much still needs to be done to improve the efficiency of implementation. In this final section of the evaluation, the evaluation team revisits and responds to the evaluation questions.

5.1   To what extent is the theory of change (intervention logic) of the NQF Act adequately robust, including its main underlying assumptions?

In its simplest form, the theory of change maps out the pathways through which a policy achieves its intended results and final impacts. The process of developing the theory of change for the NQF Act was a difficult exercise, but highlighted a number of fundamental issues with the design of the Act, and the ease of translating legislation into actionable goals and strategies. The retrospectively developed theory of change and logical framework was presented in section 3, while a proposed revised logical framework is given in Annex 3.

The NQF Act provides a fair amount of detail on the responsibilities of the M:HET, SAQA and the QCs. Nevertheless, aside from the activities set out in the Act, the legislation fails to identify the specific contribution of the NQF to the E&T system. The objectives set out in the Act are broad and reflect the goals of the entire E&T system. As a result, there is very little agreement on the immediate outcomes (results) that the NQF Act is expected to deliver or what they would look like if they were delivered. A related consequence is that the NQF bodies are sometimes solely blamed for failures to achieve broad E&T system-wide objectives, despite the fact that many other parties contribute to these objectives.

5.2   To what extent is the policy framework coherent, and creates an enabling environment for the implementation of the Act?

Although this evaluation question was not originally specified in the Terms of Reference, the NQF Act provides for the development of a comprehensive but differentiated policy framework. Thus, it was important to assess the coherence of the policy framework. Interviews reveal the NQF is commonly accepted as a critical part of the E&T system, with relatively few voicing fundamental disagreements to the NQF. Thus, to a large extent, the NQF policy is **internally coherent**. This represents significant progress from the early 2000s when the NQF was far more controversial.

While there appears to be a reasonable amount of **vertical integration** in terms of higher education policy, there is a lack of vertical coherence and clarity in the occupational and vocational training sectors. The DHET, rather than the NQF bodies, is primarily responsible for most aspects of occupational and vocational policy, but current policy uncertainty around the strategic role of TVET colleges and the types of qualifications they will offer is impacting on the development and implementation of the OQSF. In basic education, the implications are not fully understood of the introduction of a "three stream" approach which also creates vocational and occupational pathways on the NQF. Thus, it appears that there is a level of misalignment between the policy-making processes in the broader E&T system and the NQF system.

In relation to **horizontal policy coherence**, it is encouraging to note that NQF bodies have produced a policy framework that clearly states their objectives and is relatively well aligned. Nevertheless, the policy framework developed by the NQF bodies can still be improved by providing information on the resources required for implementation, roles and responsibilities of different stakeholder in the implementation chain, how policy success will be measured and the consequences of not achieving policy goals.

5.3   To what extent has the implementation of the NQF Act been efficient?

It has taken longer than planned to complete the policy framework that supports and informs implementation of the Act. While policy development largely happened between 2009/10 and 2014/15 (and in some instances is ongoing), the NQF bodies have continued to perform key

functions including the development of qualifications, accreditation, registration and quality assurance qualifications, in line with the scope of their authority and mandates.

Over the evaluation period, SAQA and the QCs have faced an increasing volume of applications for (re-)accreditation, review and registration. The re-alignment processes have effectively brought scrutiny to bear on existing qualifications, and where they did not meet certain quality criteria, these have been removed from the NQF. In the HEQSF, the re-alignment process has taken up considerable time and effort, but was completed ahead of schedule. In addition, the emphasis on quality assurance has increased and nearly all the QCs have expanded their efforts in this regard.

In several parts of the NQF system, there are considerable delays from inefficiencies in key regulatory processes such as qualifications development, accreditation and registration. While the causes of the inefficiencies might vary across sub-frameworks, it appears that NQF bodies do not have sufficient capacity to cope with the volumes of submissions they receive while continuing to perform their quality assurance functions.

There appears to be exceptionally high expectations of the NQF structures which is growing as the institutions grow into their roles. The expectations are not matched by human and financial resources, as evidenced by the decline in budgets. SAQA and the CHE have spent in excess of their funding for several years and appear to be heading towards a funding crisis, whereas the likely cost of the QCTO's strategic model for quality assurance appears to substantially exceed the funds it's likely to have available.

These challenges are often seen within the system as under-funding, but in many instances it could also be viewed as poor implementation planning – if a function is developed to deliver a particular model of QA, then it should be costed and funds allocated. If funds are not available then a less costly function and set of processes should be designed. This problem is aggravated by the lack of an integrated plan on what will be required from the E&T system as a whole for the implementation of the policies of the NQF bodies, which implies that prioritisation of specific NQF objectives cannot be effectively implemented/met.

5.4 To what extent has the implementation of the NQF Act been effective in achieving its policy goal(s), objectives and intended outcomes?

This evaluation assesses the effectiveness of the NQF Act in achieving the objectives described in Section 5 of the Act. A number of issues have been identified in the evaluation that are not directly under the control of the NQF bodies, but have a significant impact on the achievement of the NQF's objectives. For example, there is confusion surrounding the qualification mix, pathways, quality assurance and funding of public TVET colleges and community colleges. Furthermore, the implementation of the OQSF is happening in the context of considerable uncertainty in the skills system.

Aside from the policy uncertainty, the effectiveness of the NQF Act remains hamstrung by inappropriate and inadequate approaches to resourcing. The common practice in the NQF has been for the policymaker to provide a mandate or write policies without estimating the resources needed to implement them. This practice undermines the accountability arrangements in the NQF system as it allows the NQF bodies to argue that their non-achievements are due to a lack of funds. In contrast, policymakers maintain that the NQF system has "good" policy that is just not being implemented.

Despite the challenges, the majority of respondents reported that implementation of the NQF Act is contributing to the achievement of these objectives. Many respondents point to green shoots such as increased coordination and cooperation in the OQSF, increased mobility of learners across the E&T system and greater access to qualifications through RPL.

5.5 What is the emerging impact of the NQF, if any?

After an extended period of significant policy reform, it is too early to tell whether the NQF will achieve its intended impacts. What is emerging from the analysis is that the reforms introduced by the NQF Act are embedding themselves in some parts of the E&T system.

6   RECOMMENDATIONS

This section sets out the recommendations of the evaluation based on the findings presented in the preceding sections. The main recommendations are summarised below for the sake of brevity. A detailed set of recommendations can be found in the full version of the evaluation report.

R1. The DHET, the DBE, SAQA and the QCs must revise the objectives of the NQF set out in the Act to ensure that they clarify the specific contribution of the NQF to the systemic goals. In particular, DHET, SAQA, the QCs and other key stakeholders must jointly create theories of change that clarify how specific NQF objectives are to be achieved to enable the formation a shared understanding and consistent implementation plans.

R2. The DHET must provide guidance on the areas of policy certainty within PSET that affect the implementation of the NQF Act. This is particularly important in respect of the OQSF, where policy uncertainty on the types of qualifications offered by TVET colleges, the structure of occupational qualifications, the definitional distinction between occupation and vocational qualifications, and role of the QCTO continues to impede the implementation of the sub-framework.

R3. The M:HET must review the roles, responsibilities and reporting lines within the NQF. This includes clarifying the lines of accountability, responsibility and reporting obligations of SAQA and the QCs. In addition, the roles and responsibilities of the different branches of DHET and the DBE as a whole in the NQF should be agreed and clearly specified.

R4. SAQA, in collaboration with DHET, DBE and QCs, must develop and agree on a detailed costed feasible implementation plan that outlines the key activities, outputs and outcomes that the NQF is expected to achieve over a five-year period. The implementation plan must be accompanied by a monitoring framework that tracks and measures the efficiency and effectiveness of implementation.

R5. Given the current resource-constrained environment, SAQA and the QCs must enhance the efficiency of implementation by minimising areas of duplication in key regulatory processes (particularly related to accreditation and registration processes). Additionally, the quality councils should determine whether more cost-effective risk-based approaches to quality assurance can be adopted, particularly in cases where the cost of compliance and enforcement can be high.

R6. The DHET and DBE should provide appropriate and sufficient resources to the NQF bodies to execute their mandates. If additional funding is not forthcoming, then the scope and mandate of the NQF bodies should be aligned to the levels of funding available, with realistic targets being set to measure progress. This is particularly critical within the OQSF, where the resourcing of the QCTO does not align to the current OQSF qualification development and quality assurance model; which requires that many functions delegated to SETAs are instead performed directly by the QCTO. The model itself also continues to be an area of dispute.

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Annex 2: Detailed methodology

Project stages and approach

Figure 8 depicts the seven stages involved in this evaluation. It should be noted that these stages were not performed perfectly sequentially; they rather form an iterative process of data collection and analysis.

Figure 8: Project stages
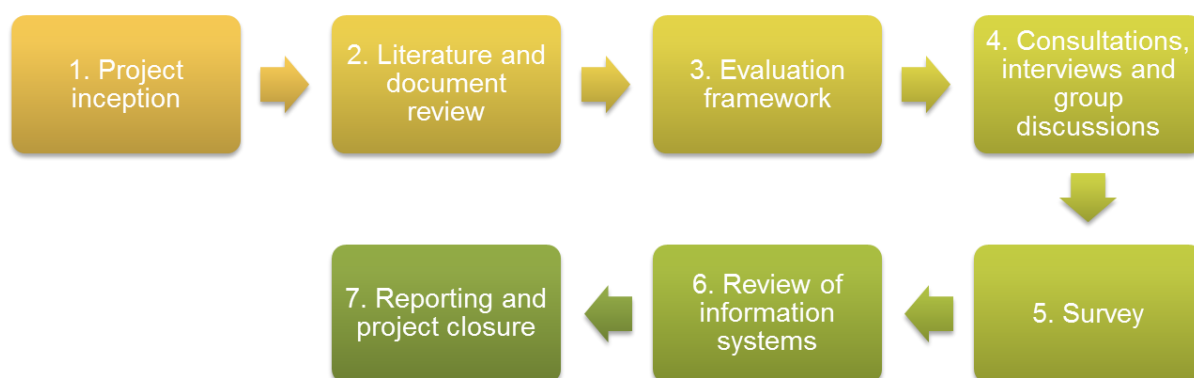
Source: DNA Economics

The final evaluation framework contains five evaluative criteria against which the findings of this study are assessed. Evaluative criteria are the general principles and values that evaluators use to judge the merit of a policy or intervention. For evaluations conducted under the auspices of the National Evaluation Framework, the DPME recommends using the standard OECD-DAC criteria (Organisation for Economic Co-operation and Development , 2017):

- **Relevance** refers to the extent to which the intervention is suited to the country's priorities.
- **Efficiency** measures the outputs, both qualitative and quantitative, in relation to the inputs.
- **Effectiveness** is a measure of the extent to which an intervention achieves its objectives.
- **Emerging impact** refers to the positive and negative changes produced by a development intervention, directly or indirectly, intended or unintended.

In light of the depth and breadth of the policy framework in the NQF and E&T systems, the evaluators have opted to add in a criterion on policy **coherence** to aid in the evaluation of the policy framework.

Literature and document review

This stage of the evaluation involved a review of publications, policies and legislation that had been identified in the inception phase.

The literature and document review had three important objectives. The first objective was to trace the development and evolution of the NQF in South Africa, from its genesis in the workplace in the 1970s to the promulgation of the NQF Act in 2008. It is within this historical context that the NQF Act and its objectives are interpreted throughout this evaluation. The second was to ground the evaluation in a conceptual understanding of the NQF. Over the years, a large body of work that attempts to conceptualise the NQF has emerged. As such, the review explored the different conceptual understandings of the NQF. The final objective

was to describe the international trends in the development and evolution of NQFs. A key aspect of the international review was to examine the role played by governments in the development and reform of the NQF.

Evaluation framework

The development of an evaluation framework for the NQF Act proved challenging and delayed the evaluation considerably. The main area of contention was around the scope of the evaluation and the difference between evaluating the implementation of the NQF Act specifically rather than the NQF more generally. There was also some divergence of views on the outcomes and impacts of the NQF. This reflects a lack of agreement between different policymakers on the specific objectives of the NQF. These problems severely complicated the evaluation team's ability to arrive at a Theory of Change that was seen as suitable by all involved. As a result of the above factors, the evaluation framework required an extensive set of consultations and workshops before it could be finalised. In total, five workshops were held between the evaluation team and the PSC to agree on the evaluation framework. Despite these differences, the evaluation team and the PSC were able to arrive at an approach and methodology that mostly satisfied the relevant parties for the purpose of this evaluation.

Consultations (semi-structured interviews)

To ensure that the evaluation encompasses and considers the views of a sufficiently wide range of stakeholders on the NQF, the evaluation methodology includes conducting a large number of semi-structured interviews and group discussions. These consultations can be divided into two main types:

- Consultations with NQF bodies and NQF experts (incl. DHET, SAQA, Quality Councils)
- Consultations with education and training providers, SETAs and professional bodies

This division reflects the purpose of the consultations as well as when these consultations were undertaken in the project life cycle; and each type will now be discussed in turn. All the qualitative interviews were written up by researchers and analysed thematically to pick up on some of the key issues emerging from the interviews.

The majority of the first set of consultations was conducted before the evaluation framework was signed off, since they played an important role in the design and finalisation of this framework. However, many of these consultations were also conducted later in the process to further unpack the implementation of the Act, collect data and validate emerging findings.

Table 5, below, summarises the number of consultations / interviews conducted for each of the types of interviewees. In general, the evaluation team has experienced very good cooperation from all these institutions and have benefited tremendously from the insights provided through these interviews.

Table 5: Number of NQF bodies and experts interviewed: planned vs actual

Institution	Number of planned interviews	Number of individual interviews completed
DHET	8	15
Ministry of Higher Education and Training	2	1
DBE	3	3
Educational / NQF Experts	8	4
SAQA	7	11
Quality Councils: CHE	6	7

Institution	Number of planned interviews	Number of individual interviews completed
Quality Councils: QCTO	6	10
Quality Councils: Umalusi	6	10
Labour Union	0*	1
Representative body**	0*	2
Student representative	0*	1
Total	**46**	**65**
Completion rate		**141%**

Source: DNA Economics' calculations

* Indicates types of organisations that were not included in the original sample as per the inception report, but were added after the first draft report to broaden the range of stakeholders consulted.

** Representative bodies consulted include Universities South Africa (USAF) and Business Unity South Africa (BUSA)

Consultations with E&T providers, SETAs and professional bodies

The second set of consultations with E&T providers, SETAs and professional bodies was intended to elicit the experiences and views of the stakeholders who are not directly given responsibilities in the NQF Act (2008), but who are fundamental to the implementation of the Act and the success of the NQF.

These consultations commenced after the evaluation framework was finalised and qualitative interview guides were signed off. All interviews were conducted by senior and experienced evaluators, all of whom had considerable education and training sector experience. The evaluation team has experienced some challenges in setting up these consultations. Many of the intended interviewees hold senior positions within their institutions, and hence finding space in their diaries has been challenging at a busy time in the academic year.

Additionally, several institutions have expressed a degree of "research fatigue": they report being frequently asked to participate in research studies – the results of which are often not made public and / or do not always lead to significant (or appropriate) responses from policy makers.

Nonetheless a reasonable level of coverage was achieved by the evaluation team as summarised in Table 6. The interviews have provided many valuable insights and a high level of engagement from those who have made themselves available. Although we had not planned to do so, several individuals were interviewed per institution, often at the institutions behest resulting in a rich information set.

Table 6: Number of providers, SETAs and Professional bodies interviewed: planned vs actual

Institution type	Number of planned interviews	Number of interviews completed
Professional Body	3	3
Traditional University	5	5
Comprehensive University	2	2
University of Technology	3	3

Institution type	Number of planned interviews	Number of interviews completed
Public TVET college	9	6
University: Occupational Provider	2	1
Academies of SOEs	3	0
Community College	5	2
Private training provider	9	7
SETA	7	7
Total	**48**	**36**
Completion rate		**75%**

Source: DNA Economics' calculations

Survey

The telephonic survey was conducted with education and training providers by Social Surveys Africa (SSA). This survey was designed to collect a large number of views on the implementation of the Act in a structured consistent format to ensure that a representative picture of providers' views can be incorporated in the results of the evaluation. Survey respondents were allowed to self-complete the survey electronically if this was their preference, although even in such cases SSA called the individual to confirm responses and ask coded-response question that could not be answered electronically.

SSA recruited eight fieldworkers to conduct computer-assisted telephonic interviews based on an extensive set of selection criteria. SSA and DNA Economics jointly trained fieldworkers for three days in scheduling and conducting interviews. Understanding the Act was a pivotal part of the training process where sessions on the background and objectives of the act, as well as key elements, structures and concepts within the NQF were presented. Another central focus of the training was on telephonic interviewing techniques, etiquette and ethics.

A number of challenges were experienced during the process that reduced the total completion rate, including:

- The contact details in available databases for many providers were out of date
- 20 institutions refused to participate in the study, which is to be expected in a survey of busy senior professionals such as this
- Amongst those willing to participate there were still issues getting in touch with the right person and / or interviewees not honouring commitments

A sample completion rate of 71% was achieved, with the highest interview rate achieved on the OQSF instrument and the lowest on the GFETQSF instrument.

As noted above, some respondents completed the questionnaires in writing while others were interviewed telephonically. As shown in Table 7, 42% of all the interviews conducted were self-completed.

Table 7: Interview completion

Instrument	Intended Sample Size	Telephonic Interviews	Self-Completed Interviews	Total Completed	% Completed
HEQSF	54	20	17	**37**	**69%**
OQSF	30	16	7	**23**	**77%**
GFETQSF	69	29	18	**47**	**68%**
Professional Bodies	20	6	9	**15**	**75%**
TOTAL	**173**	**71**	**51**	**122**	**71%**

Source: Social Survey Africa's calculations

Analysis of information systems

A complete set of learner achievements and enrolments on the NLRD was provided to the evaluation team by SAQA. This provided an invaluable source with which to analyse articulation within the E&T system. In analysing the database, the evaluation team conformed fully to Reproducible Research Standards. In simple terms, all the coding written for the analysis has been documented and can be reproduced by other interested parties.

For each learner, the evaluation team developed a set of summary measures so that each learner could be represented by a row in a table in their entirety. In other words, the NLRD which records the learner achievements was converted into a unit record for each learner. Initially, NLRD contained 17 703 292 records of learner achievements but by the end of the analysis, this was translated into 11 269 760 unique learners.

For the purpose of this study, eight research questions that provided critical evidence on the performance of the NQF in terms of articulation and progression were formulated:

1. What proportion of learners who completed the National School Certificate (NSC) or Senior Certificate (SC) in a given year enrolled in a university qualification at any subsequent point?
2. What proportion of learners that completed a National Certificate Vocational (NC(V)) level 4 qualification in a given year subsequently enrolled in a public university?
3. What proportion of those learners who completed NC(V) level 2 in a given year had previously completed the Senior Certificate (SC) or NSC?
4. What proportion of learners that completed a NC(V) level 4 qualification in a given year subsequently enrolled in a level 5 qualification in a public university?
5. What proportion of learners that completed a NC(V) level 4 qualification in a given year subsequently enrolled in a University of Technology?
6. How many learners that completed an undergraduate qualification (NQF Level 7 or NQF Level 8 first degree) at a Historically Disadvantaged University (HDU) subsequently enrolled in any other qualification at a non-HDU (per year)?
7. How many learners with an undergraduate qualification (NQF Level 7) or NQF Level 8 (first degree) from public universities subsequently enrolled in a private HEI and vice versa?

Reporting

The first step in the reporting process was to conduct a workshop with a range of key stakeholders to validate the emerging findings of the evaluation and ensure that they are sound, evidence-based and meet the scope of the evaluation. The workshop was well attended; with participants including senior representatives from all the NQF bodies, the DHET, the DPME and SETAs; as well as a small number of representatives from professional bodies and education and training providers. These engaging and fruitful discussions were very helpful to the evaluation team in preparation for the writing of the evaluation report. It was agreed that the workshop participants validated the emerging results of the evaluation and the evaluation team were asked to commence drafting of the full evaluation report on this basis.

The draft findings and recommendations of the first report were discussed over two days at the DHET Colloquium on the evaluation. This process allowed key stakeholders to engage with the findings and identified areas where the report's findings or recommendations could be amended or expanded upon. These comments, and those provided separately by the PSC on the first report, informed the completion of the second and final draft of the report.

Limitations and constraints

In quantitative studies, sampling is a balancing act that requires researchers to take into account the statistical power, time and cost of any sampling approach.

In relation to this evaluation, the small population sizes in public universities and to a lesser extent Technical and Vocational Education and Training (TVET) colleges was an important factor. In both cases, the study sampled the majority of institutions to draw out a representative sample. However, unreachable institutions and refusals tend to have a significant effect on the statistical power of the sample and reduce the generalisability of the data. In contrast, there is a large population of Skills Development Providers (SDPs) but for budgetary reasons, the study did not draw out a representative sample. Hence, although the institutions in the sample were chosen randomly, they are not representative of the population and hence the results should be interpreted as trends rather than inferences.

The NQF covers a range of institutions, processes and practices across the E&T system. In contrast, the NQF Act focuses on the roles and responsibilities of the Minister and NQF bodies. It is largely silent the role of education and training institutions and SDPs. Whereas education and training providers are important role-players in the E&T system, this evaluation does not interrogate how these institutions are implementing the NQF Act in great detail. The emphasis of this evaluation remains on the institutions whose powers and functions are stipulated in the Act. Nonetheless, our engagements with education and training institutions points to the need for more research on how the NQF Act and its policies influence their understanding of the Act, decisions and behaviours.

Finally, a number of data issues and discrepancies were identified during the analysis of the NLRD; including the unavailability of certain qualification types in the NLRD such as Report 191 N4-N6. There are documented in the main evaluation report, but despite these challenges the findings from the NLRD analysis reveals and confirms several trends in articulation across the E&T system that policymakers need to act on.

Annex 3: Proposed Revised Logframe

A fundamental recommendation emerging from this evaluation is that the DHET, DBE and NQF bodies should clearly specify the objectives of the NQF and its contribution to the E&T system. Once this is done, a revised theory of change and logical framework will need to be developed. At this stage it is difficult to develop a theory of change in a complex system such as the NQF when there is no common and shared vision of what the NQF aims to achieve. Nevertheless, the logical framework and indicators set out in the table below have been revised following the development of the evaluation framework.

No	Description	Performance indicators	Means of verification
OUTCOMES	A single integrated qualifications framework that is context-appropriate	Percentage of respondents who agree that the NQF creates a single integrated qualifications framework	Survey of education and training providers (universities, TVET colleges and Skills Development Providers)
	Improved country capacity for the classification, development, registration & publication of national qualifications	Change in the **number of qualifications registered** on the NQF between 2009/10 and 2015/16, disaggregated by sub-framework. Average number of months taken to **register a qualification** on the NQF upon receipt of an application by: – A quality council – SAQA Number of **qualifications registered on the NQF**, expressed as a percentage of the number of applications to register qualifications between 2009/10 and 2015/16 Number of **qualifications published** over the period 2009 – 2015 expressed as a percentage of the number of qualifications **registered** on the NQF	National Learners' Records Database
	South African qualifications are of acceptable quality and internationally comparable	Perceptions of the quality of the qualification amongst respondents	Survey of education and training providers (universities, TVET colleges and Skills Development Providers)
		Number of qualifications deregistered from the NQF (involuntarily)	National Learners' Records Database
		Number of institutions whose programme accreditation has been revoked	Quality Council Annual Reports
		Number of fraudulent qualifications identified	SAQA Annual Reports and Documentation

No	Description	Performance indicators	Means of verification
		Percentage of professional designations and qualifications registered by an international professional organisation (selected professions)	Survey of professional bodies
	Improved learner access, portability, progression, articulation of qualifications	Change in the **learner achievements by NQF level** between 2009/10 and 2015/16, disaggregated by sub-framework.	National Learners' Records Database
		Number of learners who have gained access to a qualification through RPL	National Learners' Records Database
		Number of learners who have completed a qualification through RPL	National Learners' Records Database
		Number of learning pathways created between 2009/10 and 2015/16	National Learners' Records Database
		Percentage of learners registered on the NLRD with: - 2 qualifications - 3 qualifications - More than 3 qualifications	National Learners' Records Database
		Percentage of learners who have more than one qualification in the same field of study	National Learners' Records Database
		Number of learners who have transferred credits between universities	HEMIS
		Number of learners whose learning pathway leads to a professional designation	National Learners' Records Database
	Greater awareness of qualifications, providers and career paths	Number of users accessing the NQF helpline, per year Percentage of learners who have visited the SAQA qualifications and part-qualifications database	SAQA Website Statistics CDS statistics and NQF Helpline statistics
	Public credibility of professions	Percentage of respondents who report that the NQF Act has had positive influence on the credibility of professions	Stakeholder surveys undertaken by professional bodies
OUTPUTS	Policy developed and aligned	Number of policies developed and published relative to NQF implementation plan targets per year Documentary evidence of alignment across policies	NQF Implementation Plan 2011 to 2015 and NQF Implementation plan 2015 to 2020 The Tracking Grid of the CEO Committee meeting Documentary Analysis

No	Description	Performance indicators	Means of verification
	System of collaboration developed and implemented with clear roles and responsibilities	The proportion of conflicts resolved between 2009/10 and 2015/16	SAQA and QCs Annual Reports and Documentation CEO Committee meeting minutes IDNQFSC meeting minutes
		The proportion of disputes resolved between 2009/10 and 2015/16	SAQA Annual Reports and Documentation CEO Committee meeting minutes IDNQFSC meeting minutes
	Robust sub-frameworks within a single integrated NQF	Percentage of qualifications approved by the QCs expressed as percentage of total number of qualifications submitted for approval between 2009/10 and 2015/16	Quality Councils database and reports
		Percentage of qualifications (re)-aligned to sub-framework as a percentage of total qualifications between 2009/10 and 2015/16	Quality Councils database and reports
	A complete register of quality qualifications	Number of qualifications registered on the NLRD between 2009/10 and 2015/16	National Learner Record Database
	Updated learner, qualification, Professional Bodies and Professional Designation databases	Availability of a complete set of learner achievement data from the QCs, SETA and professional bodies within 9 months of the financial year end	National Learners' Records Database
	Effective and context-appropriate quality assurance systems and timely certification systems	Percentage of providers accredited by the QCTO between 2009/10 and 2015/16	QCTO annual reports
		Number of national reviews performed between 2009/10 and 2015/16	QC Annual reports and other documentation
		Number of institutional audits carried out between 2009/10 and 2015/16	CHE Annual reports and other documentation
		Number of quality assurance and assessment reports published per year	Umalusi Annual Reports
		Number of AQPs and DQPs appointed per year	QCTO Annual Reports and other documentation
		Percentage of TVET learners graduating between 2009/10 and 2015/16 who have not yet received their certificates	DHET FETMIS
		Percentage of student respondents who rated the effectiveness of certification systems as being good or very good	Survey of learners
	A comparable NQF-level for the foreign qualification	Percentage of applications for equivalence processed within the timeframe set, reported by NQF level	SAQA Annual Reports and Documentation

No	Description	Performance indicators	Means of verification
	Research generated and information shared on NQF matters	Number of research outputs published related to the NQF per year	SAQA, DHET and all QCs Annual Reports and other documentation
		Number of downloads and unique visitors to SAQA and the QCs website.	SAQA, DHET and all QCs Annual Reports and other documentation
	A nationally regulated system for the recognition of prof. bodies and registration of prof. designations	Number of professional designations registered and professional bodies recognised within prescribed timeframes, per year	SAQA Annual Reports and Documentation
		Number of professional designations and professional bodies deregistered, per year	SAQA Annual Reports and Documentation
		Number of audits of professional bodies conducted by SAQA	SAQA Annual Reports and Documentation
		Professional bodies' perceptions on the efficiency of the registration process	Survey of professional bodies
		Number of complaints received about professional bodies, per year	SAQA Annual Reports and Documentation

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