Implementation Evaluation of the National Qualifications Framework Act 67 of 2008

Draft evaluation report

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GLOSSARY

This report uses terminology that has a specific meaning in the National Qualifications Framework that would be unfamiliar to a wider audience outside the NQF. The *NQF Standard Glossary of Terms* was developed by SAQA to help readers to understand the NQF nomenclature. Many of the definitions below, marked by an asterisk, are drawn from this *Standard Glossary* which is available online on the SAQA website.

Articulation*	The process of forming possibilities of connection between qualifications and part-qualifications to allow for the vertical, lateral and diagonal movement of learners through the formal E&T system and its linkages with the world of work.
Attribution	The extent to which a particular change is caused by an intervention, after controlling for all other factors that might have influenced the impact of the intervention on beneficiaries.
Evaluation	The systematic collection and objective analysis of evidence on public policies, programmes, projects, functions and organisations to assess issues such as relevance, performance (effectiveness and efficiency), value for money, impact and sustainability and recommend ways forward.
Learning programme	A learning programme is a purposeful and structured set of learning experiences that lead to a qualification.
NQF*	The comprehensive system, approved by the M:HET, for the classification, coordination, registration, publication of articulated and quality-assured national qualifications and part-qualifications. The South African NQF is a single integrated system comprising of three co-ordinated qualifications sub-frameworks for General and Further Education and Training, Higher Education, Trades and Occupations.
NQF bodies	In this report, the term NQF bodies is an overarching term that refers to the SAQA, CHE, Umalusi and QCTO.
Pathway*	The sequencing of qualifications that allows learners to move vertically, diagonally and, in some cases, horizontally, through NQF levels, giving learners recognition for full or partially completed qualifications or part-qualifications

Progression*	The means by which individuals are permitted to move through NQF levels by accumulating appropriate combinations of credits.
Qualification*	A qualification is a registered national qualification consisting of a planned combination of learning outcomes which has a defined purpose or purposes, intended to provide qualifying learners with applied competence and a basis for further learning and which has been assessed in terms of exit level outcomes, registered on the NQF and certified and awarded by a recognised body

ACRONYMS

AET	Adult Education and Training
ANC	African National Congress
ASC	Amended Senior Certificate
ACF	American Credential Framework
AQP	Assessment Quality Partner
ASEAN	Association of Southeast Asian Nations
AQF	Australian Qualifications Framework
CDS	Career Development Services
CEPD	Centre for Education Policy Development
CA(SA)	Chartered Accountant (South Africa)
CEO	Chief Executive Officer
CAPS	Common Assessment Policy Statement
CC	Community Colleges
CET	Community Education and Training
COSATU	Congress of South African Trade Unions
CHE	Council on Higher Education
CAT	Credit Accumulation Transfer
CHAT	Cultural Historical Activity Theory
CVs	Curriculum Vitae
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
DVC	Deputy Vice-Chancellor
DAC	Development Assistance Committee
DQP	Development Quality Partner
DG:HET	Director General: Higher Education and Training
E&T	Education and Training
EMIS	Education Management Information System
ETQA	Education Training Quality Assurance
EQF	European Qualifications Framework
ETF	European Training Foundation
EU	European Union
ESC	Evaluation Steering Committee
EISA	External Integrated Summative Assessment
Fasset	Finance and Accounting Services Sector Education and Training Authority
FSB	Financial Services Board
FLC	Foundational Learning Certificate
FE/HE	Further Education/Higher Education
GFETQSF	General and Further Education and Training Qualifications Sub-Framework
GENFETQA	General and Further Education and Training Quality Assurance Act
GETCA	General Education and Training Certificate for Adults
GFET	General Further Education and Training
HE	Higher Education
HEI	Higher Education Institution

HEMIS	Higher Education Management Information System
HEQF	Higher Education Qualifications Framework
HEQSF	Higher Education Qualifications Sub-Framework
HEQC	Higher Education Quality Committee '
HEQCIS	Higher Education Quality Committee Information System
HDU	Historically Disadvantaged Universities
HSRC	Human Sciences Research Council
ID	Identification Number
ISATs	Integrated Summative Assessments Tasks
ICASS	Internal Continuous assessments
IEQF	International Events Qualifications Framework
ILO	International Labour Organisation
JSE	Johannesburg Securities Exchange
MQA	Mining Qualifications Authority
M:HET	Minister of Higher Education and Training
NATED	National Accredited Technical Education Diploma
NC(V)	National Certificate Vocational
NFQ	National Framework of Qualifications
NIC	National Independent Certificate
NLRD	National Learners' Record Database
NQAI	National Qualifications Authority of Ireland
NQF	National Qualifications Framework
NSC	National Senior Certificate
NASCA	National Senior Certificate for Adults
NSB	National Standard Body
NUMSA	National Union of Metalworkers of South Africa
NZQA	New Zealand Qualifications Authority
OQSF	Occupational Qualifications Sub-Framework
OECD	Organisation for Economic Co-operation and Development
OFO	Organising Framework for Occupations
OBE	Outcomes Based Education
PSET	Post School Education and Training
PB	Professional Body
PD	Professional Designation
PQM	Programme Qualification Mix
PSC	Project Steering Committee
PEDs	Provincial Education Departments
QDF	Qualification Development Facilitator
QAP	Quality Assurance Partner
QC	Quality Council
QCTO	Quality Council for Trades and Occupations
QEP	Quality Enhancement Project
RPL	Recognition of Prior Learning
RQF	Regional Qualifications Framework
SCQF	Scottish Credit and Qualifications Framework
SQA	Scottish Qualifications Authority
SETA	Sector Education Training Authority

SC	Senior Certificate
SDP	Skills Development Provider
SAICA	South African Institute of Chartered Accountants
SAIFM	South African Institute of Financial Markets
SAIS	South African Institute of Stockbrokers
SAQA	South African Qualifications Authority
SADC	Southern African Development Community
SGB	Standard Generating Body
SITA	State Information Technology Agency
TVET	Technical and Vocational Education and Training
TOC	Theory of Change
USA	The United States of America
UJ	University of Johannesburg
UoT	University of Technology
VCET	Vocational and Continuing Education Training
VET	Vocational Education and Training
WP	White Paper

EXECUTIVE SUMMARY

Introduction and background

Soon after the transition to the democracy, the South African government decided to establish 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 by the Departments of Education and Labour, identified a number of issues in the NQF at the time. This led to an extended 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 specified the perceived challenges in the system and recommended significant design and organisational changes in the system.

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 that were to be managed by three quality councils:

- The **Occupational Qualifications Sub-Framework (OQSF)** managed by the Quality Council for Trades and Occupations (QCTO)
- The **Higher Education Qualifications Sub-Framework (HEQSF)** managed by the Council on Higher Education (CHE)
- The **General and Further Education Qualifications Sub-Framework (GFETQSF)** managed by Umalusi

The purpose of this evaluation is to provide an independent and objective examination of the implementation of the NQF Act, including its associated policies and regulations, relative to its goal(s) and objectives. 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 research questions:

- To what extent is the theory of change (intervention logic) of the NQF Act adequately robust, including its main underlying assumptions?
- To what extent has the implementation of the NQF Act been effective in achieving its policy goal(s), objectives and intended outcomes?
- To what extent has the implementation of the NQF Act been efficient?
- What is the emerging impact of the NQF, if any?

This report sets out the findings and recommendations of the implementation evaluation of the National Qualifications (NQF) Act, which was jointly commissioned by the Department of Planning, Monitoring and Evaluation (DPME) and the Department of Higher Education and Training (DHET).

Methodology

In responding to the above research questions, 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 in the NQF focussing on the detailed analysis of data in the National Learner Records Database (NLRD).

Summary of findings and recommendations

In general, considerable progress has been made in implementing the NQF Act. The NQF Act requires the Minister of Higher Education and Training (MHET), SAQA and the quality councils to develop the policies and guidelines to give effect to the Act. Most of the policy framework has developed and published. The policy consultation processes have been robust and garnered buy-in from the wide range of stakeholders involved in the implementation of the Act.

In parallel, SAQA and the quality councils have performed their advisory, regulatory, research and coordination functions set out in the Act. The quality councils have established their sub-frameworks, re-aligned and rationed older qualifications and recommended new qualifications for registration.

However, progress in implementing the Act has been slow, with policy development taking longer than planned. The time taken to develop policies is often affected by a lack of clarity and agreement on the roles, responsibilities and reporting lines of the different NQF stakeholders in relation to specific functions within the NQF. Moreover, education and training providers surveyed as part of this evaluation see specific regulatory processes such as accreditation, registration and quality assurance as lengthy and inefficient. That said, they also noted that accreditation, registration and quality

assurance processes all play an essential role in enhancing the quality of education and training and promoting articulation and progression.

Aside from the inefficiencies in the implementation of the NQF, the effectiveness of the NQF Act is hamstrung by an uncertain policy environment within the E&T system, particularly in the Post School Education and Training (PSET) system, where fundamental policy questions remain unanswered.

The rest of this section will present the findings and recommendations of the evaluation according to each of the following 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.

Relevance and appropriateness

Findings related to relevance and appropriateness

A critical first step in evaluating the implementation of the NQF Act was to understand the intention of the policymakers at the time of the passing of the NQF Act. This was achieved through the development of a theory of change for the NQF which attempts to explain how the activities undertaken by institutions translate into a series of results that contribute to the final intended impacts. 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 attempted to solve these issues.

The NQF Act was attempting simultaneously to resolve both systemic challenges in the broader education and training (E&T) system as well as structure and governance challenges that were more specific to the NQF. In terms of systemic challenges, the Study Team on the Implementation of the NQF noted that the NQF was not achieving its objectives due to, amongst other factors:

(i) an inability to create qualifications that were deemed suitable to the diverse parts of the E&T system,

(ii) confusion and disagreement around the definitions and nomenclature in the system,

(iii) a proliferation of qualifications and in particular short courses, as well as,

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

Regarding 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 were jointly responsible for decisions over certain NQF matters, 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. 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 broadly, some interviewees suggested that the NQF Act was based on a politically brokered settlement of what had become an almost intractable dispute. It can be seen as a political decision to end the philosophical and ideological conflicts that were paralysing the NQF at the time; as was reiterated in the 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. While the NQF Act dealt with structural issues such as the establishment of three quality councils and the establishment of ten levels; the legislation did not clarify how the institutional arrangements would achieve the NQF objectives.

Stated differently, the NQF Act does not clarify the pathways to change through which the NQF is expected to contribute to its high-level goals. While the Act specifies 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. Some interviewees have argued that it is not necessary for the Act to define the roles and responsibilities of education and training providers, as their roles will be defined in the policy framework developed by the MHET, SAQA and the quality councils. While this may be true, good regulatory practice dictates that the role of regulated entities (in this case the education and training providers), and any sanctions that might apply for not fulfilling these functions, must be expressed in legislation.

Recommendation related to relevance and appropriateness

Recommendation 1: The DHET, the Department of Basic Education (DBE), SAQA and the quality councils must, as a matter of priority, revise the objectives of the NQF set out in the Act to ensure that they describe the specific contribution of the NQF to the systemic goals. To do this, the DHET, SAQA and quality councils must consider the following actions:

- **Recommendation 1.1:** SAQA, DHET and the quality councils must create theories of change that clarify how the specific NQF objectives are expected to be achieved. These theories should be developed through cooperation between the NQF bodies and other key stakeholders and experts in these areas. Fundamentally, the intent of this recommendation is to use the theory of change approach (or any other appropriate method) to agree on how the NQF Act will be implemented and its objectives achieved.
- **Recommendation 1.2:** Based on these theories of change, SAQA in collaboration with the DHET, DBE and quality councils, must develop a detailed implementation plan that outlines the key activities, outputs and outcomes that the NQF is expected to achieve over a five-year period.
- **Recommendation 1.3:** SAQA, in collaboration with the DHET, DBE and the quality councils, should develop a monitoring and evaluation framework (including indicators and targets) to assess progress in the implementation of the Act and achievement of the NQF objectives. The monitoring and evaluation framework must allow for monitoring to happen throughout implementation with feedback loops that are timed to feed into decision-making processes.

Coherence

Findings related to coherence

The evaluation considered policy coherence at three levels[1]:

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

- **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.

Given the large number of stakeholders involved in the implementation of the NQF Act, it is essential that internal policy coherence is achieved. 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. 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 Act is, how it will be implemented 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, which is likely to undermine the coherent implementation of the Act.

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 Department, rather than the NQF bodies[2], is primarily responsible for most aspects of occupational and vocational policy, but the current issues are of such importance to the NQF that they need to be highlighted in this report. While the White Paper on PSET expressed 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. Simultaneously the DBE is developing a "three stream" approach which also creates vocational and occupational pathways at equivalent levels on the NQF.

These policy processes do not appear to be meaningfully aligned, which delays and undermines the achievement of the NQF's objectives. For example, the following fundamental policy questions remain largely unanswered:

- What is the exact definition of vocational and occupational programmes and is this commonly understood? Where should vocational programmes fit within the NQF sub-frameworks?
- If the DBE implements the "three stream" approach, which involves the creation of vocational and occupational pathways in schools: What will be the expected

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[2] NQF bodies refer to SAQA, CHE, Umalusi and the QCTO.

pathway for learners at levels 2 to 4 within schools and TVET colleges if they want to follow vocational or occupational routes?

- o Would the NC(V) also be presented within schools?
- o How do the departments ensure that these potentially different pathways do not undermine either the school or TVET pathway(s)?
- o Would these qualifications articulate effectively between each other? The current experience from school to college would suggest not; and it is not clear that curriculum development is being effectively aligned through the current processes.

- What would be the most effective approach to quality assurance, when the mix of qualifications offered by institutions fall under the ambit of both the GFETQSF and OQSF?
- Fundamentally: Are vocational or occupational programmes to be the main qualification type delivered in public TVET colleges?

  - o Public colleges do not currently require accreditation to present NC(V) or Report 191 N1-N6 programmes, but they will need accreditation to deliver QCTO occupational programmes. N4-N6 are seemingly being phased out by the QCTO. Will the many under-capacitated TVET colleges be able to obtain such QCTO accreditation?
  - o If they cannot obtain accreditation, their enrolment numbers will plummet if they can no longer accept N4-N6 students. Is a qualification other than the NC(V) necessary to fill this potential void at levels 5 and 6 in colleges that cannot in the medium-term present occupational qualifications? It seems likely that N4 to N6 will not be phased out in this situation, which just reinforces confusion if occupational qualifications in the same fields exist in some but not all colleges.
  - o Setting up colleges to focus primarily on occupational programmes would require a very different approach to resourcing, capacitating and quality assuring colleges than vocational qualifications. Is it clear which colleges are to focus on what and what role QCs and the DHET should play in these different colleges?

It is these unanswered policy questions, which extend well beyond the NQF, that make for so much instability in the QCTO and Umalusi; not to even mention the colleges themselves. Any significant progress towards a simplified and harmonised system is unlikely while these fundamental questions remain unanswered. The PSET White Paper

Implementation Plan process is intended to resolve many of these questions. While early drafts of the Implementation Plan made some progress in this regard much still needs to clarified and agreed.

The analysis of horizontal alignment included an assessment of NQF policies relative to objective criteria for sound policymaking. 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, as with every technical discipline or specialist area, the NQF Act and its policy framework have developed its own nomenclature that is well understood by those that work with it on a regular basis. However, when the NQF was adopted in South Africa, it was premised on the principles of democratic participation of stakeholders and transparency.

The complex nature of the language used in the policies and guidelines undermines these tenets and makes the framework inaccessible to policymakers, education and training providers, learners and the general public. Thus, these stakeholders within the E&T system find it challenging to meaningfully engage with and comprehend the NQF Act and its policies. While some efforts have been made to increase the availability and accessibility of information on the NQF Act, its policies and terminology (e.g. NQFPedia), these initiatives are still not enough to make a difference to the wide range of stakeholders that benefit from and interact with the NQF.

Recommendations related to coherence

Recommendation 2: SAQA, after consultation with the DHET and quality councils, must determine the standards and criteria that all policies and guidelines developed under the NQF Act should meet. At a minimum, these standards and criteria must ensure that policies contain:

- A clear and detailed demarcation of roles and responsibilities,
- An analysis of the likely resourcing requirements or how they will be determined, and how resource availability might affect the implementation of the policy,
- Indicators that measure progress and success,
- An approach to monitoring the success of the policy,
- Consequences for not achieving the policy goals, and

- A commitment to writing policy and guidelines in Plain English[3].

Recommendation 3: The DHET, after consultation with SAQA and the quality councils, must:

- Provide clarity on the conceptions/definitions of the different categories of qualifications, namely: Occupational, Vocational, General, Academic and Technical.
- Specify the modes and approaches to delivering and quality assuring these qualifications, i.e. what are the criteria that determine which sub-framework a qualification (type) is assigned to?
- Revise existing legislation governing the work of the quality councils (i.e. the Higher Education Act, Skills Development Act and the GENFETQA Act) to ensure that they are aligned to the NQF Act.[4]
- In relation to the OQSF, provide clear direction on the policy issues that will affect how the QCTO plans its work and structures its operations over the next five years.

Efficiency

Findings related to efficiency: 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 seeks to enhance coordination and cooperation, thereby ensuring that the implementation of the NQF Act is efficient.

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 meets regularly and its minutes reflect a degree of shared problem solving and planning across the NQF bodies. The tracking grid, used by the CEO Committee, tracks progress against milestones set out in the NQF Implementation Plan and ensures that SAQA and quality councils follow through on their commitments.

Although the CEO Committee is functioning, some interviewees have however questioned whether the committee deals with substantive issues around the NQF, suggesting that it currently narrowly focusses on bureaucratic process management.

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[3] Plain English is a worldwide campaign to eliminate jargon and improve the readability of government documents.
[4] The Higher Education Act was amended in 2016 to improve its alignment with the NQF.

They also indicate that there is a lack of accountability when targets are not met. To some extent, this suggestion is substantiated through the analysis of the minutes. There are several instances, where the committee simply noted that policies impacted on the work of the quality councils, but did not deliberate on them, nor devise a strategy to voice their concerns to the DHET formally.

The NQF Forum is a dedicated platform that allows the M:HET and DG:HET to meet directly with the NQF bodies. However, this forum has not met since 2012. This suggests a lack of engagement and support from senior DHET officials in the NQF; a point also raised in various interviews. The NQF Forum is an important platform for the M:HET to engage with the NQF bodies, and hold them to account, and conversely for the NQF bodies to bring key policy issues to the attention of the Minister. The fact that the Forum has not met since 2012, despite the existence of policy issues that require Ministerial attention, is concerning.

The Inter-Departmental NQF Steering Committee, which includes officials from DHET and DBE, is an important structure given the Act's silence on the role of the DBE. However, despite this committee remaining functional, critical NQF issues regarding the role of the DBE or the ownership of the GFETQSF have not yet been resolved eight years after the promulgation of the NQF Act. While the committee is not a decision-making body, the extent to which its recommendations have influenced much-needed policy decisions and reforms is unclear. This raises questions about the effectiveness of the Inter-Departmental NQF Steering Committee.

The NQF Act fails to clarify the roles and responsibilities of the DBE and DHET in the NQF; nor is this explained meaningfully in any other policy documentation. The result appears to be a degree of detachment from many in the education departments to the NQF and its objectives. Several members of senior leadership in the DHET and DBE do not appear to be closely engaged with the NQF, nor do they provide strategic leadership. This is evident from the inactivity of the NQF Forum, and the limited direct interaction between senior leadership in the DHET and the NQF bodies; a point reiterated in some interviews.

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). It is clear that although senior DHET managers have accepted the principles that underpin the NQF Act, they are less sure about how to move forward within the NQF framework.

In recognition of the need for a structure within the department to handle NQF matters, the DHET established the NQF Directorate in 2012. The Directorate's purpose is to

provide support and advice to the Minister to help him or her discharge their responsibilities in terms of Act. As the Act confers a set of wide-ranging powers unto the M:HET, the roles and responsibilities of the NQF Directorate have evolved as the need for the Minister to exercise his or her powers has arisen.

The NQF Directorate is also drawn into responding to *ad hoc* queries sent to the Minister, often by stakeholders who seek to bypass the existing systems and structures established by the NQF Act. As a result of the broad scope of the NQF Directorate's functions, some interviewees were unclear about the exact role of the NQF Directorate.

While the roles and responsibilities of different role-players in the implementation of the NQF Act are somewhat unclear, a web of complicated reporting lines has also 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 M:BE in Umalusi's case. In parallel, SAQA and the quality councils report to different branches within the DHET on their operational and expenditure performance. They 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. For example, there did not appear to be a common understanding of SAQA's monitoring role relative to that of the NQF Directorate or the DHET branches. Additionally, both SAQA and the quality councils report to the Minister, though the channel of reporting is not consistently or optimally applied: recommendations are often not coordinated or even jointly discussed before being made.

There are divergent views as to how the NQF should develop into the future, with some believing that there should be a single centre that is stronger and more interventionist and others pushing hard for each sub-framework to build its own identity and direction. Even those who believe there should be a stronger centre differ as to where that centre would be with some suggesting a more hands-on role for the Department and others a stronger role for SAQA. A number of those interviewed expressed concern that there was not adequate discussion and agreement on important issues, with some even suggesting that there was a reluctance to allow space for such discussions because there would not be agreement. Thus while an agreement has been reached at the political level on the design of the NQF, that deal is far from being embraced collectively across the DHET beyond high-level acceptance of the concept of an NQF, which is necessary but not sufficient for implementation to happen successfully.

Recommendations related to efficiency: collaboration and coordination

Recommendation 4: SAQA, in consultation with the DHET, DBE and quality councils should strengthen the System of Collaboration. In particular, it needs to:

- **Recommendation 4.1:** specify the roles and responsibilities of the NQF Forum, CEO Committee and Inter-Departmental NQF Steering Committee in greater detail. Particular emphasis should be placed on defining the scope and authority for decision of each structure, their accountability and reporting lines.

- **Recommendation 4.2:** provide for a dedicated channel for the CEO committee, as a distinct structure, to engage with the DBE and DHET on policy issues. This recommendation does not duplicate the work of the NQF Forum and Inter-Departmental NQF Steering Committee but instead aims to establish an avenue for the NQF bodies to provide inputs into policy making, as a collective. This channel will also ensure that the CEO Committee not only manages the NQF implementation processes but also focuses its attention on external factors that impact on the efficiency and effectiveness of the NQF.

- **Recommendation 4.3:** ensure that the NQF Forum is again held on at least an annual basis. For this to happen, SAQA will require the support from the M:HET and DG:HET. It is important to note that for the Forum to achieve its goals it needs to be attended by the right policymakers who have the authority to address the complex issues being raised.

- **Recommendation 4.4:** establish monitoring mechanisms and report on the functioning of the System of Collaboration.

Recommendation 5: As the executive authority responsible for the NQF, the M:HET must ensure that **roles, responsibilities and reporting lines are appropriately delineated and clear to all stakeholders**. Different tools, including revising the NQF Act itself, should be used to resolve these issues:

- **Recommendation 5.1a:** DBE is a crucial stakeholder in the NQF. Its roles and responsibilities should be specified in the policy framework. Once this is done, the DBE should ensure that the GENFETQA Act and other pieces of legislation in the basic education sector are aligned to the NQF Act.

- **Recommendation 5.1b:** The DBE and Umalusi must clarify who owns the GFETQSF (in terms of, for example, qualification development) and delineate their responsibilities with regard to managing the sub-framework.

- **Recommendation 5.2a:** The roles and responsibilities of the DHET and its branches in implementing the Act should be clarified in the policy framework and presented as detailed policy guidelines in support of the Act.
- **Recommendation 5.2b**: The DHET should clarify and document the role of the NQF Directorate in the policy framework, and if necessary, review its location within the department. Ideally, the NQF Directorate's role should focus on:
  - Supporting the Minister to specify the NQF implementation priorities, and setting measurable indicators and appropriate targets against which the NQF bodies can be held to account.
  - Acting as the crucial link between the DHET's policymaking and planning processes and those of the NQF bodies.
  - Monitoring the achievement or non-achievement of the NQF Act and Ministerial decisions on implementation of NQF policy.
- **Recommendation 5.3:** The DHET and the DBE must clarify in precise detail the reporting lines of the quality councils and SAQA, including who has oversight over these bodies, who is responsible for monitoring, and the channel through which reports and recommendations should be sent.

Findings related to efficiency: Management and maintenance of the NLRD

The NLRD currently holds more than 17 million records of learner achievements and constitutes an essential source of information within the E&T system. While some data gaps and issues still exist, the progress made in updating and maintaining the NLRD is commendable. As such, the NLRD is an important source of evidence for policymaking in the education and training system, but it is also under-utilised, and it has thus far not been meaningfully used to inform policy.

Recommendation related to efficiency: Management and maintenance of the NLRD

Recommendation 6: SAQA must use the data from the NLRD to track and monitor policy changes and developments across the NQF. The indicators and performance metrics could be defined by the NQF Forum, after consultation with the Inter-Departmental NQF Steering Committee.

Findings related to efficiency: Occupational Qualifications Sub-Framework (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, some additional funding was made available from the Skills Development Levy, although again no substantial analysis was undertaken to determine an appropriate level of funding. In this context, the QCTO has adopted a delegated model of qualification development and quality assurance in the OQSF.

As a result of these and other challenges, it has taken a significant amount of time to set up the design and structures of the OQSF fully. A large proportion of qualifications, developed mainly by SETAs, are not yet aligned to the OQSF, and relatively few newly developed occupational certificate qualifications are yet being presented.

This means 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 certificate 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 (typically taking the form of an exam) at the end of the programme. The problem is that with two resource-intensive quality assurance systems running alongside each other and the serious budgetary constraints being experienced across government, the likelihood is that the new system will take a long time to develop and the old system may need to be retained indefinitely. A situation has been created where two systems need to be resourced in parallel for an extended period of time; with significant uncertainty as to when this situation will come to an end..

A significant 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 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 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.

Indeed, the current OQSF may result in hundreds, if not thousands, of qualifications (as was the case before the NQF Act) – depending on what digit of the OFO code is used for classification – and it's not clear that the ultimate quality assurance system will be significantly simpler or more efficient than what it replaced. The QCTO, however, believe that the OQSF, perhaps with slight amendments, will mostly achieve the above-stated objectives once it is implemented as planned and all qualifications have been aligned with 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 the DHET, DBE and NQF bodies) at the outset, has led to a situation where different parties have different views on what the system is trying to achieve.

The importance and significance of these uncertainties and disagreements cannot be understated. They likely require substantial revisions to the OQSF, which in turn will significantly extend the amount of time before all qualifications can be aligned to this revised sub-framework.

Effective coordination between the large number of stakeholders in the skills system and clear policies are required in this area. While there are some encouraging signs of greater cooperation between stakeholders more recently, it is distressing that such fundamental disagreements on objectives and change mechanisms could have persisted for such an extended period; and indeed still exist at the time of writing.

There is currently a proposal to more closely integrate the QCTO's strategies to the National Skills Development Strategy (NSDS) IV and require it to report to the National Skills Authority (NSA); in an attempt to address some of these issues. However, such a change to reporting would require significant legislative amendments to, for example, the Skills Development Act. The QCTO has indicated that this proposal could create overly complex and unclear reporting lines, and potentially undermine its independence as a quality council. Indeed, having the QCTO management be simultaneously accountable to their Board, the NSA and the NQF structures which likely all have different objectives could be quite challenging.

One issue that has been resolved is that SETAs, while losing their role in quality assuring the new qualifications, will retain a role in quality assurance of workplace provision. However, the nature of such quality assurance has yet to be defined, and there are fears that an overly bureaucratic and demanding set of processes could result in employers not buying into the new qualifications.

Recommendations related to efficiency: OQSF

Recommendation 7: The DHET must provide clear guidance and direction on the following OQSF-related matters:

- **Recommendation 7.1:** The DHET must review the funding model of the QCTO based on a costed implementation plan that estimates the cost of the organisational capacity needed to implement different options/models.

- **Recommendation 7.2:** The DHET must resolve the future role of the QCTO, vis a vis SETAs on the basis of the cost of different options. Whichever option is chosen, the DHET needs to ensure that funding covers the cost of implementation to ensure that the intervention is resourced appropriately.

- **Recommendation 7.3**: The DHET must take reasonable steps to ensure that the final OQSF model is understood and supported by key stakeholders within the skills sector.

- **Recommendation 7.4**: When considering the model for qualifications development, the DHET and QCTO must take into account the diverse nature of the skills development space and its potential implications on the effectiveness of the proposed centralised model of the QCTO. Before these decisions are made, this evaluation recommends that centralised model is carefully considered and costed. Variants of such a model could also be formulated that includes a more pragmatic distribution of powers and functions between the QCTO, SETAs and professional bodies over the short to medium term.

Recommendation 8: The QCTO and DHET must review and reconsider the blanket requirement for a workplace training component in all qualifications and part-qualifications in the OQSF should be reconsidered. This could mean that the definition of occupational qualifications, as stipulated in the Skills Development Act, needs to be reviewed.

Alternatively, if this requirement remains, at a policy level there must be acceptance and clarification that occupational qualifications will be a relatively small proportion of public colleges' programme mix, and that the strict requirement in relation to the workplace component will inevitably mean that some colleges will be unable to offer them and will, therefore, focus programmes such as the NC(V) exclusively. In this case, additional vocational qualifications might be necessary in this space to meet the significant needs of those Not in Employment, Education or Training (NEET), as the N4 to N6 qualifications are currently being replaced by occupational qualifications that will require workplace training.

Findings related to efficiency: 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 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 and have traditionally been involved in "approving" programmes. These bodies are now concerned about their role in the higher education sector.

Another major challenge raised by HEIs surveyed for this study 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. 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. Respondents also suggested that there is a duplication in some of the processes between the qualification registration and learning programme accreditation in the HEQSF.

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. More generally, 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 increasing volumes of applications and funding challenges, the current model of programme accreditation where all applications have to undergo accreditation may no longer be viable.

Recommendations related to efficiency: HEQSF

Recommendation 9: While the resourcing challenges faced by the CHE are acknowledged, there remains a need for the CHE to enhance the efficiency of its accreditation processes. The organisation must consider the following recommendations.

- **Recommendation 9.1:** The CHE must review its programme accreditation processes to determine whether there are steps where efficiency improvements are required.

- **Recommendation 9.2:** The CHE must consider alternative models of accreditation including full or partial self-accreditation or delegating part of the accreditation process to professional bodies. These alternatives may require legislative amendments.

- **Recommendation 9.3:** The CHE, in collaboration with the DHET, must develop a framework that provides guidance on the role and responsibilities of statutory professional bodies in qualifications development and quality assurance.

- **Recommendation 9.4:** The CHE and SAQA must review their processes to identify areas of actual and perceived duplication in the accreditation and registration processes. Where needed, the accreditation and registration processes must be re-configured to remove these inefficiencies, and information on the correct procedure shared with HEIs.

Findings related to efficiency: 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 some areas; including quality assuring the school curricula, increasing its research and advocacy outputs and developing a number of qualifications in the adult education and training space.

However, Umalusi expresses a desire to expand further its role in the quality assurance of the public education system: the core question being 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.

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. Umalusi initiated development of adult education qualifications at levels 2 to 4, including the NASCA at level 4, in 2008, 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 in TVET colleges and SDPs were 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 the certification of TVET qualifications were also present in the GFETQSF. These issues appear to be primarily the result of weaknesses in the DHET's examination information system, which are being addressed with the cooperation of Umalusi.

A particular problem related to credit transfer was raised in relation to learners who have studied in school to grade 12 and passed the NSC and then go on to study for an NC(V). There is a widespread perception that learners are unable to carry credits from the NSC into the NC(V) programme and so a learner going that route will have to do the full NC(V) programme. This is despite Umalusi having first 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 become practice, and the NLRD data shows that 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.

The causes of this practice are unclear, but it would seem that the awarding of credits is not easy and the bureaucratic challenges make it easier for the full programme to be studied. The solution to this issue extends far beyond credit transfers and the NQF however, and need to be viewed in the broader context of inefficient learning pathways and the incentives and choices that colleges face to enrol learners in the NC(V).

Findings related to efficiency: Cross-cutting
Some issues were identified that cut across all the NQF bodies. This includes the lack of feedback from NQF bodies on time taken to complete processes such as accreditation of

programmes and registration of qualifications, a lack of clarity on part qualifications and a lack of indicators that monitor the effectiveness and efficiency of the implementation of the NQF.

Most notably, there appears to be exceptionally high expectations of the NQF structures which are growing as the institutions grow into their roles. Human and financial resources do not match the expectations to the point where core functions are carried out at a slow pace and service standards drop. This is often described within the system as under-funding, but in many instances, it could also be viewed as weak policymaking and implementation planning – if a function is developed to deliver a particular model of QA, then it should be costed and funds allocated accordingly. In other words, funding should follow function. 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.

Given the current resource-constrained environment, it would be sensible for NQF bodies also to determine whether (1) any duplications exist within current processes (between the QC processes for recommending qualifications and the SAQA processes for registering qualifications for example). (2) whether teach-out period deadlines[5] are reasonable given the time taken to develop qualifications (see recommendation below) or (3) whether other efficiencies can be found in the system. Implementation plans and models must be achievable within the likely resource envelope, and should not be designed in isolation of funding as sometimes appears to be the case currently.

Quality assurance processes could likely also be made more efficient across all quality councils. The evidence available (policies, procedures, criteria and guidelines published by the three QCs) all point to the use of extensive checklists that require a lot of work by those being quality assured and a lot of evidence to be collected.

The quality assurance model that is in place in all three quality councils is one that consumes considerable resources. Within quality councils, the model of quality assurance requires takes up significant and scarce administrative and technical capacity. Education and training providers also face compliance requirements, which can consume large amounts of resources. As a result, some interviewees suggest that limited

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[5] "Teach out periods" here refers to the following: Even after a qualification is no longer registered on the NQF, E&T institutions can still accept enrolments on that qualification for a pre-defined period of time after the qualification has expired; and the learners enrolled are given a period of time to complete the qualification. Thus providers do not immediately have to stop enrolling learners when qualification registration expires (and not renewed): there follows a teach-out period which can take a number of years for multi-year programmes.

resources are available for rectifying poor performance and doing follow-ups where a need has been clearly established.

For example, a well-resourced private school can find itself engaged for several weeks with Umalusi searching for and making available data required for accreditation whereas a school that has 100% failure in the NSC attracts hardly any direct attention. A similar situation exists in the occupational sub-framework.

In the CHE's case, the Higher Education Act requires all learning programmes to undergo accreditation. While this approach is equitable, it is not risk-based and still requires significant resources to operate, although, in the CHE's case, the resource needs involved in quality assurance are lessened through the use of a peer-review system. The downside of the peer-review system is that the accreditation process is dependent on the availability of peer-reviewers, which is one of the causes of the delays experienced.

In a constrained funding environment, a "risk-based" approach that targets quality assurance efforts and resources to areas of risk might be more efficient. While the quality councils have raised concerns about the equity of risk-based approaches, there are two alternative policy choices. Quality councils can either continue with the current approaches to quality assurance that are resource-intensive and not proportionate to the risks within the E&T system. Alternatively, they could adopt a "risk-based" approach that focuses on the areas where quality problems exist and persist, and where learners are most at risk, making for efficient use of their resources. 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 effectiveness of the NQF.

Ultimately, whichever approach to quality assurance is adopted, it must be accompanied by funding. There will inevitably be little accountability in such a system since NQF bodies could rightfully blame non-achievements on a lack of funds while policymakers can keep pointing to "good" policy is just not being implemented.

Recommendations related to efficiency: Cross-cutting

Recommendation 10: 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 scope and mandate of these NQF bodies should be aligned to the levels of funding available, with realistic targets being set to measure progress.

- **Recommendation 10.1**: The DHET should, after consultation with the DBE, SAQA, QCs and other key stakeholders, develop and publish a five-year **costed implementation plan** that is achievable within available resources. The implementation plan should align with the broader PSET implementation plan, and include:

- o Detailed description of the activities and outputs that will be delivered (aligning to recommendation 1)
- o The roles and responsibilities of different institutions
- o The costs of implementation; not only to the NQF bodies but also to the regulated entities such as education and training providers
- o Approach to monitoring and evaluation.

- **Recommendation 10.2**: As part of developing an implementation plan, 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.

Recommendation 11: The quality councils must respond to the concerns around the looming deadlines on last dates for new enrolments for qualifications that have not been aligned to the HEQSF and OQSF:

- The DHET and CHE must either decide on an extension or re-affirm their decision on the teach-out periods to education and training institutions. If the deadlines are confirmed, one option for the CHE to consider is to give priority to applications for the accreditation of new programmes that replace the older ones, but by charging an additional fee for an expedited application process to private HEIs.
- In the OQSF it appears likely that a large number of qualifications will not have been replaced or re-aligned to the OQSF by the deadline, given the lack of resources and typical turn-around times to develop qualifications and accredit providers. It also appears likely that the OQSF will have to be revised, which will delay the alignment process further. It is thus expected that there will be no qualifications to present in a number of fields soon after these deadlines. It is also unlikely that sufficient workplaces will be secured for all new qualifications. The DHET and QCTO must consider extending these deadlines and communicate any such change clearly (and well in advance) to education and training institutions. A firm (and non-negotiable) timeframe must be set that is achievable within existing resources.

Recommendation 12: SAQA should establish an NQF-wide workflow system that tracks and monitors applications from the time they are submitted to quality councils to the time they are registered. Ideally, this system should be accessible to any interested party so that they can check on their application through the accreditation/review and registration processes.

Recommendation 13: The NQF Bodies should put in place a process to discuss and then resolve any actual or perceived duplications in regulation between themselves and statutory (see recommendation 9.3) and non-statutory professional bodies during the

qualification design and quality assurance processes. This should be coordinated by SAQA, in consultation and cooperation/collaboration with the quality councils and professional bodies.

Recommendation 14: The QCTO and Umalusi must issue guidelines clarifying what a part-qualification is in the context of their sub-framework and specify what is allowable or not in terms of a part-qualification (e.g. will a part-qualification require a workplace component in the OQSF?).

Effectiveness

Findings related to effectiveness

To evaluate the effectiveness of the NQF Act, this evaluation examines the progress made in achieving the objectives of the NQF set out in the legislation. The first of the NQF's objectives is the creation of a single, integrated framework for learning achievements. 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 broad, literal sense.

However, the creation of a truly "integrated" framework is not straightforward, and some issues remain. These issues principally 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. Different sub-frameworks make use of different qualification types, which distinguishes qualifications at the same level, but such a system can still be confusing to navigate for those who are not intimately familiar with the design and operation of the NQF's qualifications and organisational structures.

The NQF's other objectives relate to (i) access, portability, progression and articulation, (ii) enhanced quality of education and training, and (iii) redress of past unfair discrimination. The majority of interviewees report that the NQF is contributing significantly to these objectives, but a large number of challenges remain. The achievement of these objectives go well beyond the direct control of the NQF bodies, and therefore the issues identified go beyond the control of the NQF.

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 result of the National Senior Certificate (NSC) examination quality assured by Umalusi. However, the lack of significant independent

quality assurance of public schools outside of the examinations system is seen by many as a concern.

The qualification pathways in the TVET college and community college systems are much less effective and efficient. 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. NC(V) level 4 certificants also struggle to gain access to public HEIs.

This situation is further complicated by the simultaneous processes in the DBE to create vocational and occupational streams in schools. While there is no conceptual issue with having vocational and occupational qualifications in schools and colleges simultaneously, there does not appear to be a commonly agreed conceptual framework for the different roles and contributions of these programmes to the E&T system. It is not clear what the difference is between schools' and colleges' roles in this space, and without this high-level policy clarity it is unlikely that appropriate qualifications, pathways, resourcing systems and funding regimes could be created and executed. The White Paper on PSET's call to turn TVET colleges into institutions of choice is undermined by the lack of clear qualification pathways. Additionally, NATED (Report 191) curricula are often outdated, and TVET colleges do not yet present occupational qualifications in any significant volumes; largely due to a lack of funding and capacity to so.

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

The development of the community college (adult education) space is being constrained by the lack of policy guidance and attention from policymakers. There is currently no pathway from NQF level 1 to level 4 that is specially designed for adults, as mentioned earlier. Despite some progress, there also still appears to be an inadequate number of qualifications at level 5 and 6 across both public HEIs and TVET colleges, which further limit opportunities for articulation.

Enhanced quality of education and training

The quality assurance system employed in the HEQSF, which 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. However, the articulation between Historically Disadvantaged Universities (HDUs) and Traditional Universities is still seen as difficult for learners from HDUs.

There are different views as to whether these articulation difficulties should be seen as a failure of the NQF or merely an inevitability of a diverse system that is beyond the control of the NQF. Some have called for an ombuds function that could help to reduce any discrimination that exists in the system.

The role of Umalusi within the GFETQSF is a point of dispute for a number of reasons. 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 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 feel that Umalusi is already overstepping its boundaries in activities such as conducting readiness assessments of provincial DOEs and publishing reports that comment on and aim to influence the curriculum.

A major issue related to all quality assurance discussions on schools and colleges is where responsibility lies for quality in the public system. It appears that the QCTO will increasingly have a role in attempting to raise standards in the public TVET colleges through the accreditation and QA processes for occupational qualifications. However, Umalusi continues to have a limited role in quality assurance in public schools beyond examinations. It may be time for the government to consider whether it is not time to create an independent body that has such a responsibility and/or acts as an independent examinations body. This would be a complex policy challenge and a difficult process to achieve, but a review of the NQF legislation may be an opportune time to engage in this.

NATED (Report 191) N1 to N3 qualifications are currently quality assured by Umalusi, while N4 to N6 and the National N-diploma fall under the QCTO. N1 to N6 are part qualifications, with the full qualification (the N-diploma) also requiring experiential work learning. It is not sensible to have the different parts of a qualification with different quality councils, particularly since N4 to N6 is currently being "re-constructed" by the QCTO into new occupational qualifications, while N1 to N3 is being left unchanged despite its often outdated curricula.

Redress of past unfair discrimination

Recognition of prior learning (RPL) is seen as a critical mechanism to address past unfair discrimination. 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 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. The QCTO has also suggested that the use of RPL will increase as new occupational certificate qualifications that make use of the External Integrated Summative Assessment (EISA) are implemented. 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 the perceived restrictions on the use of admission through RPL (based on an incorrect interpretation of the CHE's policy) were frequently raised as challenges by education and training providers.

Recommendations related to effectiveness

Recommendation 15: If RPL is to become a policy reality, the DHET must sustainably fund this priority, possibly intervening to ensure that SETAs ring-fence funds to enable this important transformational goal.

Recommendation 16: The DHET, in collaboration with the NQF bodies, should organise forums or platforms to allow for collaboration between public and private Higher Education Institutions (HEIs), TVET colleges and SDPs to support the design of qualifications that can articulate from an NQF Level 4 to Level 5 across the sub-frameworks. There is no simple solution to this problem, and while amended legislation could be helpful, the focus should be on creating and supporting strengthened relationships between institutions and amending funding models to incentivise qualifications at this level.

Recommendation 17: There is currently no suitable qualification designed for adults who want to obtain a general qualification at levels 2 to 4. In this regard:

- **Recommendation 17.1:** Umalusi, DHET and the DBE must clarify the status of the NASCA in terms of where in the system the qualification is to be offered, how it is to be funded and what upwards articulation possibilities exist for those completing the NASCA.

- **Recommendation 17.2:** The adult education pathway needs to be clarified, publicised and disseminated to education and training providers and the public, with qualification pathways created and explained for those adults who cannot go straight into a level 4 qualification. While it is clear that there is limited funding to offer these qualifications currently, they should be available to enable the strengthening of this system over time.

- **Recommendation 17.3:** Umalusi and the DBE need to clarify the articulation opportunities for Senior Certificate (Amended).

Recommendation 18: The DBE must provide policy clarity on the following issues.

- **Recommendation 18.1:** There are already discussions underway to establish an independent examinations body for the NSC. This evidence from this evaluation report supports the need for an independent examination body that is distinct from the DBE. Thus, this report recommends that the DBE and give due consideration to this option and assess its feasibility in terms of the legislative provisions and the resourcing requirements.

- **Recommendation 18.2**: The DBE and Umalusi must publish a joint directive that outlines the role of Umalusi in the quality assurance of public schools in the current system and what the bounds are of its responsibilities.

Recommendation 19: Umalusi must transfer the quality-assurance of N1-N3 qualifications to QCTO. This should happen as part of a coherent longer-term plan for these (part-) qualifications to be determined through cooperation between the QCTO, the DHET and other key stakeholders such as private providers and business.

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. There is some evidence of the following:

- Expanded capacity within many provider institutions to address quality assurance;

- Greater confidence in foreign qualifications, once SAQA has recognised them;

- The development of working partnerships between providers located within different sub-frameworks, where efforts are being made to expand access, reduce barriers, improve articulation, enable portability and expand the availability of RPL. While it is early to state that the partnerships are achieving long-term impact, it is evident that the work being done is achieving some results. Concrete examples have been provided, for instance, of learners from TVET colleges, or of workers with occupational qualifications, accessing university programmes.

- Increasingly, job adverts (and nearly all national and provincial vacancy announcements) identify the qualification type and its NQF level. Some public HEIs suggested that learners are more aware of the NQF and ask about the registration status of qualifications.

The above are green shoots rather than evidence of widespread impact, but provide a basis for measuring impact in the future.

Conclusion

This evaluation highlights the considerable progress that has been made in implementing the NQF Act. Much of the policy and regulatory framework has been developed and is now in place. Work on qualifications development has gathered pace across all sub-frameworks. Existing qualifications have been or are undergoing review to ensure that they meet the criteria for registration onto the NQF.

The principles and construct underpinning the NQF is now widely accepted by policymakers and stakeholders across the E&T system. There is also greater awareness of the framework and the NQF bodies that spearhead its implementation amongst education and training providers, workplaces, learners and the general public. There is emerging evidence that the higher levels of awareness are translating into better implementation practices across parts of the E&T system. In other words, this framework is beginning to embed itself in the education and training system.

While this progress is encouraging, the implementation of the Act has been slow. It has taken longer than planned to complete the policy framework that supports and informs the implementation of the Act. Part of the problem is that the Act itself sets high-level objectives that are subject to interpretation by various stakeholders in the E&T system. It takes time to achieve consensus in an environment where divergent views exist. Moreover, while the Act establishes a hierarchy of policy layers, it also distributes decision making powers across various bodies, often requiring consultation and agreement before policies can be adopted.

If the decentralised decision-making approach is to work, the DHET, DBE and NQF bodies must find better ways of jointly identifying the problems and agreeing on specific goals and objectives. Having a clear set of objectives will not only improve coordination but also enhance the ability of DHET, DBE and the NQF bodies to implement the Act.

The evaluation also highlights some inefficiencies in the implementation of the NQF Act and its policy framework. These inefficiencies stem from the lack of clarity around the objectives of the NQF Act that make implementation planning unduly difficult. Because of the weak implementation planning, there are no reliable estimates of how much funding is needed to implement the Act successfully. At the same time, within a resource-constrained environment, there is a need for the DHET, DBE and NQF bodies to seriously consider how to allocate their resources to areas where they will be the most effective. Even after accounting for the inefficiencies in the system, it appears that NQF bodies are underfunded, with some more severely than others. The funding challenges will potentially undermine the gains made thus far, if they are not addressed urgently.

The overall effectiveness of the NQF Act, that is, its ability to translate the outputs of the NQF bodies into outcomes is lessened by the high degree of policy and funding instability and uncertainty present throughout the E&T system. This puts achievement of the NQF's objectives at risk and will continue to do so if key policy questions remain unanswered by the DHET and DBE.

For some aspects of the NQF Act's policy framework such as RPL, a more systemic approach is needed to achieve the intended outcomes. Thus, having a policy framework in place is a necessary but not sufficient condition for the implementation of RPL. Policymakers must also decide on how RPL will be funded and delivered if the NQF Act's objective of achieving redress is to be met. Put differently, the achievement of the NQF Act's goals and objectives requires a "joined-up" approach.

In conclusion, the NQF is widely recognised as a critical contributor to the attainment of the long-term objectives of the South African E&T system. Considerable time, effort and resources have been spent on developing the policy framework and strengthening the NQF bodies. At this stage in the implementation of the Act and at a time of uncertainty and instability in the E&T system, the evaluation team does not believe there is a need to fundamentally restructure or change the NQF bodies. Rather, the recommendations presented in this report focus on improving efficiency in parts of the system and enhancing the effectiveness of the Act. These improvements are possible through collective and collaborative efforts by stakeholders. For this to happen, there is a need to align legislation with the intentions of policymakers and to put in place mechanisms for ensuring delivery and increasing accountability.

1 INTRODUCTION

1.1 Background to the NQF Act

At the very beginning of South Africa's democracy, the newly elected ANC government took very deliberate steps to embrace an integrated nation-wide approach to education, training and the encouragement of life-long learning for its citizens. At the time only a handful of countries, namely New Zealand, Australia and the United Kingdom had adopted an NQF "approach" to education and training (Allais, Raffe, Strathdee, Wheelahan, & Young, 2009). The leadership in South Africa saw this as an opportunity to leapfrog to the forefront of practice in this area.

The NQF's genesis harks back to 1970s and to tensions between black trade unions and employers. The unions, which were demanding a living wage were facing unrelenting employers who argued that their level of skill, or rather lack thereof, could not justify increased wages. The need for improved training and skills, therefore, became the means for achieving their demands for better wages. Concurrently, the demand for changes in the Bantu education system, epitomised in the Soweto student uprising of 1976, also turned attention to the education sector and its substantial shortcomings.

By the 1980s the entire education system had been discredited and rejected, and the struggle to persuade employers to accede to worker demands continued. Some initiatives were undertaken during the 1980s by the apartheid government's Department of Manpower, mostly through the restructuring of the apprenticeship system, which included a competency-based segmented training system that was managed by independent training boards. The unions, however, did not support the process as it was narrowly focused and did not address the issues of basic education. Only following the conciliatory efforts towards dismantling apartheid in the early 1990s, did the trade unions and Department of Manpower start to revive the process (South African Qualifications Authority, 2016).

In an attempt to change the skewed and largely dysfunctional system that disadvantaged many at the benefit of a few, the NQF was seen as a pivotal framework wherein transformation could take place. The official enactment of the NQF was expressed in the SAQA Act of 1995 (Republic of South Africa, 1995). It was informed by the ANC Policy Framework for Education and Training (1994); the Discussion Document on a National Training Strategy Initiative (African National Congress, 1994); and the Implementation Plan for Education and Training (1994). The White Paper on Education and Training was also published in the same year (Department of Education, 1995). The overarching vision for the NQF was a contribution to the full personal development of each learner and the social and economic development of the country. According to the SAQA Bill, this would be realised through the creation of an integrated national framework for learning

achievements. Additionally, the Act would serve to: facilitate access, mobility and progression within education, training and career paths; improve the quality of education and training; and redress past discrimination in education, training and employment.

The SAQA Act was promulgated in 1995 as the first piece of post-apartheid education and training legislation. The Act established SAQA as a statutory body determined and guided by the Act. It mandated SAQA with the responsibility to provide for the development and implementation the NQF and the three main the main functions:

- The registration of qualifications and standards on the NQF (standards setting)
- The establishment of a system-wide quality assurance system (quality assurance)
- The creation of a 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 that were either affected by the SAQA Act or gave guidance to it, emerged. Despite the various pieces of legislation to support the implementation of the NQF, challenges remained with regards to the registration of new quality qualifications and standards, launching the National Standards Bodies (NSB) and ensuring their effectiveness, and quickening the mechanisms for delivering qualifications and standards. Data sourcing remained an ongoing challenge for the National Learners' Records Database (NLRD), as did putting into effect the Recognition of Prior Learning (RPL).

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. The team was briefed with the task of reporting on how the 1995 Act could be streamlined and accelerated. Following broad consultations, the Study Team reported that the pace of implementation of the NQF, especially in regards to access, progression and redress, needed to be accelerated. 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 and leadership with regards to the responsibilities of SAQA, government Ministers and departments (Department of Education & Department of Labour, 2002).

Concerns were also raised about the proliferation of bodies responsible for standards settings and quality assurance. Government structures were found to be slow and indecisive, there was inadequate funding of state resources, and the implementation was too dependent upon the voluntary involvement of stakeholders in the standards setting process. The Report of the Study Team on the Implementation of the NQF went on to make an expansive range of recommendations with regards to every aspect of the NQF. Between 2002 and 2007, negotiations between the Department of Education, Labour and SAQA resulted in a ministerial agreement in late 2007.

The Ministers of Education and Labour published a Joint Policy Statement on "Enhancing the Efficacy and Efficiency of the National Qualifications Framework". This was the first formal statement of government's policy on the implementation of the NQF since the promulgation of the SAQA Act in 1995. This Policy Statement brought to an end the review of NQF implementation that had been underway since 2001. The Joint Policy Statement formed the basis for the NQF Act (Department of Education & Department of Labour, 2007) that was promulgated one year later in 2008.

The NQF Act has the stated objective *"to provide for the further development, organisation and governance of the NQF". 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 fifth objective sums up the contribution of the first four objectives, and states that the NQF *"contributes to the full personal development of each learner and the social and economic development of the nation at large"* (Republic of South Africa, 2008).

1.2 Background to the evaluation

The promulgation of the NQF Act brought about substantial changes to the governance and organisation of the NQF. In particular, the Act clarified the role of the Minister of Higher Education and Training within the NQF. [6] In contrast to its predecessor, the NQF Act contains considerable detail on the powers and functions of the NQF bodies, that is, SAQA and the Quality Councils. It empowers these NQF bodies to perform a broad range of functions from policy development to quality assurance. It also confirms the role of Umalusi and the Council on Higher Education (CHE) as Quality Councils and makes provision for the establishment of a new Quality Council for Trades and Occupations.

In many respects, the NQF Act is more prescriptive than the SAQA Act. The Act stipulates in great detail the policies that SAQA and the QCs must develop to guide the implementation of the NQF across the E&T system. In the period between 2009 and 2017, the NQF bodies have made significant inroads in developing the policy framework to guide the implementation of the NQF. In parallel, the Umalusi and CHE have

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[6] When the NQF Act was enacted in 2008, the Department of Education (DoE) still existed. The functional split between Basic and Higher Education only came about a year later in April 2009, when the Department of Higher Education was established.

strengthened their quality assurance processes, and the QCTO has established a new system of quality assurance for trades and occupations.

Nevertheless, there is a perception that the implementation of the NQF Act and the achievement of its objectives has been slow and hampered by several systemic factors. As the Terms of Reference for this evaluation note:

> *"The DHET has observed that despite improvements brought about by the promulgation of the NQF Act,* **systemic issues** *(emphasis added) need to be resolved urgently, in order for the NQF objectives to be fully met and mature."*

Another major concern raised by policymakers is that the implementation of the NQF Act has not translated into meaningful improvements in articulation and RPL, which remain key government priorities in the education and training sector. Against this background, the Department of Planning, Monitoring and Evaluation (DPME) and the Department of Higher Education and Training (DHET) have decided to jointly commission an evaluation of the implementation of the NQF Act.

1.3 Purpose of this evaluation

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 to 2017.

Although there are many different types of evaluation, the DPME and DHET have opted for an implementation evaluation. In the evaluation nomenclature, implementation evaluations measure the completion of the activities and the achievement of outputs. These types of studies can also anticipate the likely achievement of outcomes and impacts over time (Department of Planning, Monitoring and Evaluation, 2014). The findings and recommendations seek to empower the executive authority and administration with the information they require to improve performance and where appropriate take corrective action. In the context of the National Evaluation Policy Framework, the key difference between impact and implementation evaluations is the ability of the former to attribute the changes experienced by beneficiaries directly to the intervention.

Whereas several studies of the NQF have used the term "impact", this study does not purport to measure the impact of the NQF Act. Rather, it focuses on whether the Act has been implemented as planned and examines the intended and unintended outcomes that might have arisen as a consequence of its implementation. The evaluation also

interrogates the external factors that might have a bearing on the implementation of the Act, but are not within the direct control of the NQF bodies.

1.4 Structure of the report

This report is divided into 10 sections:

- Section 1 introduces the evaluation and describes its purpose.
- Section 2 describes the approach and methodology used in this evaluation.
- Section 3 sets out the literature and documentary review.
- Section 4 discusses the theory of change underpinning the NQF Act and highlights the assumptions made in the design of the legislation.
- Sections 5 to 9 presents the findings for each evaluation criteria.
- Section 10 concludes this report and outlines the recommendations.

It should be noted that substantial supporting documentation has been placed in appendices, to keep the main report to a readable length.

2 APPROACH AND METHODOLOGY

2.1 Approach

Any evaluation of the NQF is bound to be a challenging exercise. As the literature review will show in Section 3, there have been several "reviews" and "impact assessments" of the NQF. Many of these studies have tried to establish a link between the NQF and the performance of the E&T system. Other studies have relied on qualitative methods and drawn criticism for their dependence on perceptual data. Despite these efforts by researchers, there are some inherent difficulties in measuring the NQF that are worth mentioning.

It is a challenge for any evaluation to assess a programme that has broad objectives. In this case, the objectives of the NQF as set out in Section 5(1) of the Act are as some officials argue, reflect the goals of the E&T system as a whole, and not specifically the NQF. For example, one of the objectives of the NQF is to *"accelerate the redress of past unfair opportunities in education, training and employment opportunites".*

One way of measuring this objective is to examine the trends in qualifications awarded to black African students in public HEIs, as was done in SAQA's 2014 Impact Assessment (South African Qualifications Authority, 2017).[7] However, the causal link between the NQF and the higher number of qualifications awarded to black African students is weak. Arguably, in this case, factors such as enrolment planning and funding, which fall outside the scope of the NQF, have a bigger influence on the goal of accelerating redress. Nevertheless, the NQF does have an important contribution to make to this system-wide goal by, for instance, creating opportunities for access through RPL. Better defined objectives can help reduce these ambiguities and improve the approach and reliability to measuring the NQF.

Another problem experienced in measuring the NQF lays in the complex nature of the framework. There are three particular features of complexity inherent in the NQF (Buffardi, 2016):

- **Distributed powers and capacities** refers to a situation when decision-making powers, skills, capacities and resources are held by many institutions in a system. Joint interactions are required amongst institutions and stakeholders to address the problem and achieve the outcomes.
- **Goal divergence** refers to the situation where policymakers, regulators and implementers have different perspectives on the problem, its root causes and how best to address it. Goal divergence affects policymaking and planning and can create tensions between institutions.

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[7] See page 142 of the report.

- **Uncertainty** relates to the lack of information and data that adversely affects how institutions plan to achieve the desired outcomes. In the case of the NQF, policy uncertainty in the E&T, particularly within PSET influences the implementation of the Act.

In response to these measurement challenges, the evaluators have 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.

2.2 Methodology

Most evaluations follow a standard methodology that involves the development of an evaluation framework, information gathering and data analysis. Figure 1 depicts the seven stages involved in this evaluation. It should be noted that these stages are not performed perfectly sequentially; they rather form an iterative process of data collection and analysis.

Figure 1: Project stages
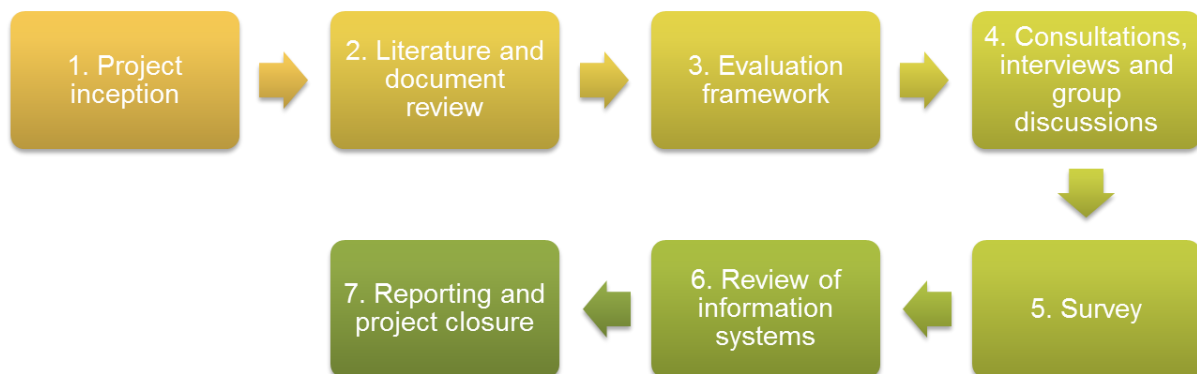
Source: DNA Economics

2.2.1 Project inception

The evaluation started with an inception meeting between core members of the evaluation team and the Project Steering Committee (PSC). Members of the PSC included the DHET, DPME, SAQA and Quality Councils. The inception meeting was held on the 21 July 2016 and clarified the scope of the evaluation, the role of the PSC and the execution of the evaluation. Following the inception meeting, the inception report was drafted and disseminated to the steering committee. It was subsequently approved by the PSC in August 2017.

2.2.2 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 literature review further elaborates on the NQF Act and explains the rationale behind the organisation and governance changes brought about by the legislation.

The second objective of the literature review 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. In the South African context, there are four main interpretations of the NQF, that range from a strictly technocratic view of the NQF as a system for data management to that of a social construct that seeks to transform the E&T system. In developing the legislation, aspects of these different conceptual frameworks were incorporated into the Act.

The final objective of the literature review 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. The literature review was submitted to the PSC for review. The committee approved the literature and document review in August 2016.

2.2.3 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 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. The technical reasons for these challenges are explained in greater detail in Section 5.2.

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. Final approval of the evaluation framework was received on the 23 March 2017 and this has been used as the basis against which the NQF Act is evaluated. 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.
- **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.

In light of the depth and breadth of the policy framework in the NQF and PSET systems, the evaluators have opted to add in a criterion on policy coherence to aid in the evaluation of the policy framework. The complete set of evaluation questions is shown in Table 1.

Additionally, some members of the PSC requested that the team analyse the resources made available to the NQF bodies. Since, this was not part of the initial scope of work, the team was asked to motivate for additional funding. The team was informed on 21 April 2017 that the resourcing analysis and additional case studies were not approved due to funding constraints.

Table 1: Evaluation questions

No	Primary evaluation questions	No	Secondary questions	Evaluation criteria	Source of question	Sources of evidence
1	To what extent is the theory of change (intervention logic) of the NQF Act adequately robust, including its main underlying assumptions?	1.1	What is the underlying theory of change of the NQF Act?	Relevance and Appropriateness	Terms of reference	- Review of policy, legislative and regulatory framework

- Academic and grey literature

- Government reports (e.g. annual reports, strategic plans)

- Interviews with key experts

- Interviews with NQF Bodies (DHET, SAQA, QCs) |
		1.2	To what extent is the theory of change that underpins the NQF Act valid in terms of education theory and practice?		Terms of reference	
		1.3	To what extent is the theory of change that underpins the NQF Act consistent with the vision set out in the White Paper for Post-School Education and Training?		Terms of reference	
		1.4	What are the assumptions made by the NQF Act and how do these affect the achievement of the NQF's objectives?		Additional question	
2	To what extent has the implementation of the NQF Act been effective in achieving its policy goal(s), objectives and intended outcomes?	1.5	What are the measurable results to date, in relation to the NQF Act's goals and objectives? (Specify the indicators or yardsticks of measurement used to measure performance in relation to results identified).	Effectiveness	Terms of reference	- Academic and grey literature

- Government reports (e.g. annual reports, strategic plans)

- Interviews with NQF Bodies

- Survey of private and public public HEIs, TVET colleges, Community Learning Centres/Adult |
| | | 2.2 | Overall, what have been the successes and challenges of the implementation of the NQF Act, and what are the reasons for these? | | Terms of reference | |

No	Primary evaluation questions	No	Secondary questions	Evaluation criteria	Source of question	Sources of evidence
						Education Centres, Professional Bodies, Private Providers
3	To what extent has the implementation of the NQF Act been efficient?	3.1	Are the roles of the institutional players of the NQF system clearly defined, understood and accepted by the different role-players?	Efficiency	Terms of reference	
		3.2	Are the institutional players of the NQF system adequately resourced to implement the NQF Act?		Additional question	- Document and literature review
		3.3	The three (3) NQF sub-frameworks have different designs for defining qualifications. To what extent are these appropriate to the furtherance of the aims of the NQF?		Terms of reference	- Survey of private and public public HEIs, TVET colleges, Community Learning Centres/Adult Education Centres, Professional Bodies, Private Providers
		3.4	How have the current standard-setting processes contributed to, or hindered the furtherance of the aims of the NQF?		Terms of reference	
		3.5	What challenges, if any, have users of the NQF system experienced in registering qualifications and part-qualifications on the NQF? What are the reasons for these?		Terms of reference	
		3.6	What aspects of the registration system do stakeholders perceive as being enabling or not?			- Interviews with key experts - Interviews with NQF Bodies - Analysis of the systems supporting the NQF (NLRD)
		3.7	Which groups of beneficiaries have found the NQF system to be most beneficial and why?		Terms of reference	
		3.8	What practical challenges have institutions, private providers and other stakeholders faced, in the use the NQF system?		Terms of reference	

No	Primary evaluation questions	No	Secondary questions	Evaluation criteria	Source of question	Sources of evidence
		3.9	What are stakeholder perceptions of the successes of the NQF?		Terms of reference	
		3.10	What are the reasons for and challenges related to many learners not receiving their certificates on time?		Terms of reference	
4	What is the emerging impact of the NQF, if any?	4.1	What are the indications of emerging impact of the NQF Act, if any?	Emerging impact	Terms of reference	- Document and literature review - Survey of private and public public HEIs, TVET colleges, Community Learning Centres/Adult Education Centres, Professional Bodies, Private Providers - Interviews with key experts - Interviews with NQF Bodies - Focus groups with public HEIs and TVET colleges
		4.2	Are there any unintended consequences that have arisen over the period?	Emerging impact	Terms of reference	
		4.3	What are the main lessons identifiable regarding the implementation of the NQF Act?	Effectiveness	Terms of reference	

Source: (Department of Planning, Monitoring and Evaluation, 2014)

2.2.4 Consultations, interviews and group discussions

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 E&T 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.

Consultations with NQF bodies and NQF experts

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 2, below, summarises the number of consultations / interviews conducted for each of the types of interviewees. Note that the final column lists the number of consultations completed while the second column lists the initial targeted number of respondents. However, many consultations were conducted with several respondents at a time and the total number of actual respondents far exceeds the initial target. 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. A number of additional interviews were done with these senior representatives from these institutions to validate and discuss the emerging findings in the final stages of this evaluation.

Table 2: 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 E&T	2	1
DBE	3	3
Educational / NQF Experts	8	4
SAQA	7	11
Quality Councils: CHE	6	7
Quality Councils: QCTO	6	10
Quality Councils: Umalusi	6	10
Labour Union	0*	1

Institution	Number of planned interviews	Number of individual interviews completed
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 is 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 in May 2017 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 E&T sector experience. Table 3 summarises the number of interviews completed.

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. We had originally planned to meet with the training academies of larger state-owned enterprises such as Eskom. However, despite numerous attempts at contacting them, our requests for an interview went unanswered.

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. In particular, interviewees noted that many of them had recently completed the SAQA articulation study and were unclear about the relationship between this evaluation and the work done by SAQA. Other interviewees in E&T institutions expressed concern that the results of this evaluation would lead to changes in the NQF and create further confusion. Other interviewees were hesitant to comment on the work of the NQF bodies.

Nonetheless a reasonable level of coverage was achieved by the evaluation team; and 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, resulting in a rich information set. In many institutions, group discussions were held at the behest of the institution.

Table 3: 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
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

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 themes were analysed to identify the underlying root causes that might have led to these issues in the implementation of the NQF.

2.2.5 Survey

This section summarises the telephonic survey that was conducted with E&T providers by Social Surveys Africa. 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.

Recruitment of fieldworkers

Social Surveys Africa (SSA) recruited eight fieldworkers to conduct computer-assisted telephonic interviews. The selection criteria included:

- At minimum, an undergraduate degree
- Fluency in English and comprehension of at least two other official languages
- Demonstration of telephonic interviewing etiquette
- Experience setting up appointments and conducting telephonic interviews
- Extensive experience in survey work, including past experience working with SSA
- Demonstration of a general understanding of the NQF Act, based on the training provided
- Demonstrated understanding of the objectives of the study

Training of fieldworkers

SSA and DNA Economics jointly trained fieldworkers for three days in scheduling and conducting interviews. Understanding the NQF Act (No. 67 of 2008) 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.

The training included intensive role playing in identifying the relevant person to interview within an institution, securing and scheduling interviews, conducting interviews and capturing the data. All fieldworkers were tested on their comprehension of the Act as well as their practical and technical abilities to schedule, conduct and capture an interview. Only those who successfully completed all the tests were appointed to the final field team. Fieldworkers were trained on all four interview questionnaires to ensure that fieldworkers were fully equipped to interview any potential respondent. However, each fieldworker was allocated a primary instrument on which to focus for the duration of fieldwork.

Creating a contacts database

The participating institutions were selected using stratified random sampling, based on the number of institutions agreed with the PSC.

Table 4 below shows the total number of institutions that we attempted to contact, which includes the original sample plus replacement options for institutions that could not be reached or for whom contact details could not be found. This shows that for some sub-frameworks, notably the OQSF, a number of institutions present in official databases, from which the sample was drawn, are no longer reachable and have no web presence from which contact details could be sourced. A similar problem was experienced in the Higher Education Qualifications Sub-Framework, particularly in relation to the private Higher Education Institutions (HEI) where out-dated contact details made institutions unreachable.

Table 4: Reliability of contact details on contacts database

Instrument	No. of Institutions	Intended Sample Size	Functional Contact Details
HEQSF	54	54	51
OQSFSF	51	30	40
GFETSF	79	69	77
Professional Bodies	20	20	20
Total	**204**	**173**	**188**

Source: Social Survey Africa's calculations

Scheduling of interviews

Fieldworkers (FW) received the contacts database for their allocated sub-framework. They used the institutional contact details to find specific contact details of targeted respondents. In general, this meant initially speaking with personal assistants or secretaries to request email addresses for targeted respondents. Once a respondent was identified, the fieldworkers sent the official introduction letters from DHET and DPME to targeted respondents requesting their participation in the study. Follow-up calls and emails were made to secure an appointment date to conduct the telephonic interview. Some respondents were interviewed in the first telephonic conversation while others scheduled follow-up appointments.

A number of respondents (and in some cases, the personal assistants speaking for the respondents) requested to complete the questionnaire in writing in their own time rather than being interviewed telephonically. In cases of written self-completed questionnaires, fieldworkers made follow up calls to verify any missing or unclear responses in the written answers received.

If all qualifying respondents in an institution refused to participate or were not reachable after more than three attempts at setting appointments, the institution was replaced from the back-up sample.

Refusals

In surveys of senior professionals, a high refusal rate is common. Fieldworkers documented the number of times each institution and targeted respondent was approached and recorded reasons for all refusals. A common reason given for refusal was that the institution had no association with the NQF. For example, the South African Institute of the Interior Design Professions responded by saying *"It is not necessary for us to fill out the questionnaire because we do not provide training"*. In some cases, however, these responses seemed to reflect a misunderstanding of the scope of the NQF. In other words, this professional body did not recognise the NQF Act as one piece of legislation that governs its operations.

There were also several institutions where fieldworkers attempted to conduct an interview or speak to the relevant individual three or more times without being able to secure an appointment with any respondents. In such instances, the interviews were deemed indirect refusals. All interviews classified as indirect refusals were called and/ or sent an email reminder and request for a telephonic interview or for them to self-complete a form. When the institution or potential respondent failed to respond to this final email, the interview was then regarded as a refusal.

Table 5 gives a detailed account of the all refusals per sector and also provides a breakdown of the refusals for each type (private vs public) of institution. Some public public HEIs refused to participate in the survey because they had recently completed questionnaires sent by SAQA for its articulation study, and thought they were being overburdened by research requests.

Table 5: Institution Refusals by Institution Type

Instrument	No. of Institutions	Public Institutions		Private Institutions		Other*		Total Refusals
		No. of Institutions	Refusals	No. of Institutions	Refusals	No. of Institutions	Refusals	
HEQSF	54	*24*	*8*	*30*	*6*			**14**
OQSF	51	N/A	N/A	51	5			5
GFETQSF	79	42	11	27	5			16
Professional Bodies	20	N/A	N/A			20	4	4
TOTAL	**204**	**66**	**19**	**78**	**16**	**20**	**4**	**39**

Source: Social Survey Africa's calculations
* Professional bodies are incorporated under different legal forms. Some are statutory institutions, others are Non Profit Companies and there are some registered in terms of the NPO Act.

Completion rate

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 3, 42% of all the interviews conducted were self-completed.

Table 3: 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

Challenges

As with all surveys, there are always challenges in reaching the respondent. In the case of E&T providers, senior academics could only be reached through personal assistants or switchboard operators, who did not always know who the most relevant respondent was or where to direct the call.

Field workers spent significant amounts of time explaining the study to intermediaries, without this information being passed on to the correct respondent or being used to identify the correct respondent. For institutions with multiple campuses, call centre contact details available publicly and on the web were often not useful in identifying the right respondents.

Senior respondents were often extremely busy and not available. Reasons for their non-availability included being in a meeting, out of the office, not office bound, on leave, invigilating exams, attending a workshop or attending graduations.

While most of the respondents adhered to their appointments, there were instances where the respondent would not prioritise the appointment, reschedule for another date, ignore their phone or relay a message through their personal assistant to let the fieldworker know that they are busy. The fieldworkers followed up through calls and emails on missed appointments.

Some self-completed questionnaires were incomplete. To ensure that they were completed, field workers followed up telephonically to complete the interviews in these cases but were not always able to secure a follow up interview.

Analysis

The survey results were analysed, and a set of descriptive statistics produced for each set of questionnaires. In most cases, the survey results are reported by sub-framework, however for some questions, the evaluation team combined the results to demonstrate the common patterns or trends across the different sub-frameworks.

2.2.6 Analysis of information systems

The evaluation team submitted a request to SAQA which detailed the data required from the National Learners' Records Database (NLRD). A complete set of learner achievements and enrolments was finally received on the 17 July 2017. DNA Economics

submitted queries on the dataset and final responses were received from SAQA on the 18 August 2017.

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. The process for analysing the database followed several steps which are summarised below.

Database cleaning

SAQA provided the research team with two separate databases: a record of learner achievements and a record of enrolments. In addition, SAQA supplied reference files that contained the list of, providers, quality assurances bodies, qualifications names and qualification identity numbers. On receiving these two files, the team read the records in R, an open source statistical package that is able to handle large datasets. The database was then cleaned to remove special characters and standardise the qualification and provider names.

Database compilation

The two datasets were merged to create a single dataset. Once merged, the reference files containing the list of providers, quality assurance bodies and qualifications names were incorporated into a consolidated database. The consolidated database was cleaned further to remove any extraneous columns and special characters.

Database analysis

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 HEIs subsequently enrolled in a private HEI and vice versa?

The database was analysed and extractions by qualification and subsetted by institution type (HDI/Private etc.) were performed on the entirety of the data. Each extraction created an indicator variable as to whether the learner had enrolled or graduated from a particular qualification, and the corresponding achievement and enrolment years were extracted for each qualification. The evaluation team tabulated the results and compiled graphs for the draft evaluation report.

2.2.7 Reporting

Stakeholder validation workshop

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.

This validation workshop was held on 27 July 2017 at the DPME's offices in Hatfield. 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 E&T providers.

The workshop commenced with a presentation from the DPME on the purpose and scope of the workshop and the evaluation. The bulk of the workshop consisted of a presentation by the evaluation team on the emerging findings and recommendations of the report. Findings were presented within each of the evaluation criteria; in line with the proposed structure of the final report. The session allowed participants to comment on the findings and recommendations presented. These engaging and fruitful discussions were very helpful to the evaluation team in preparation for the writing of the evaluation report. The workshop concluded with a summary of the key learnings of the day and the way forward, presented by the DHET.

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.

Updated evaluation timeline

The draft report will be finalised in September 2017 and submitted to the PSC and final report submitted by November 2017. Thereafter, the DPME will table the evaluation report for consideration at Cabinet.

A summary of the major milestones achieved over the duration of this evaluation is depicted below. We estimate that in total, the evaluation team has interviewed over 200 individuals across a range of institutions. The scale and number of interviews completed provide reliable insights into implementation of the NQF, its successes and challenges. As with any qualitative research process increasing convergence of responses and less new evidence/interpretations in later interviews indicates that the evaluators had an adequate sample, and therefore level of validity can be assured.

Figure 2: Milestones and key events in the evaluation

Project inception	Literature and document review	Evaluation framework	Consultations, interviews and group discussions	Survey	Reporting and closure
Project inception meeting (July 2016)	Literature review (Approved August 2016)	Evaluation framework / Research instruments / Approved by the Steering Committee (March 2017)	Fieldwork carried out between March-July 2017	Fieldwork conducted in May-June 2017	Stakeholder validation (July 2017) / 1st Draft report (August 2017) / Final report (September 2017)

Source: DNA Economics

2.3 Limitations of this evaluation

The evaluation team acknowledges that there are always constraints in undertaking an evaluation of this scale and nature. 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 HEIs and to a lesser extent Technical and Vocational Education and Training (TVET) colleges was an important factor. There are 26 public HEIs and 50 TVET colleges from which a sample could be drawn for this study. 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 E&T institutions and SDPs. Whereas E&T 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 E&T 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, the analysis of the NLRD is constrained by missing records for the National Senior Certificate (NSC) and the N4-N6. These missing records account for a fair proportion of the NLRD and as a result overestimate the number of learners with single achievements and underestimate those with multiple achievements. The incomplete dataset also limits the ability of this evaluation study to analyse transitions within across learner pathways. Nevertheless, the NLRD remains a useful source of data and evidence on learner achievements and articulation in the E&T system. The findings from the NLRD analysis reveals and confirms several trends in articulation across the E&T system that policymakers need to act on.

3 LITERATURE AND DOCUMENTARY REVIEW

3.1 Conceptual understanding of the NQF

The conceptual understanding of the NQF has shaped the structure and content of the NQF Act. Over the years, educationalists have developed different theories to explain the NQF. While some argue that an NQF is nothing more than 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 (Isaacs, S.B.A, 2001) (Keevy, A Foucauldian critique of the South African NQF, 2005). Both views have merit and are used interchangeably, depending on the audience and the purpose.

At one level, the South African NQF has been and continues to be understood, viewed and implemented as a register of qualifications that serves as a template for the development and classification of new qualifications. In this model, a number of levels are specified, within which qualifications are located. The idea is that the positioning of individual types of qualifications within a system of qualifications aids learner mobility vertically between qualifications spanning levels increasing in conceptual complexity, and horizontally from one type of qualification to another. In this view learner mobility is not facilitated by NQF levels in isolation; NQF levels are used in conjunction with associated policies such as those for recognition of prior learning (RPL), credit accumulation and transfer (CAT), and others. This interpretation is in line with that of the OECD (Organisation for Economic Co-operation and Development, 2007):

> *A qualifications framework is an instrument for the development and classification of qualifications according to a set of criteria for levels of learning achieved*

The South African NQF has been conceived as a *social construct* (Isaacs, S.B.A, 2001):

> *The essential nature of [an NQF] is that of a social construct, in that we as social actors in society not only theorise about, construct and implement it, but we also enable, actively change or work against it.*

In this interpretation of an NQF it has been suggested that there are three necessary criteria: the democratic participation of stakeholders; intellectual scrutiny; and adequate resourcing (Isaacs, S.B.A, 2001). Keevy (2005) shows how NQFs as social constructs are inextricably linked to power struggles, while Bernstein's (1996) concept of the *pedagogic device* is useful for theorising such power relations.

It is elaborated here as it can be used to broaden understanding of an NQF as a mechanism for relaying communications, i.e. how the NQF works as a relay, as well as what it relays. The understanding of the NQF in South Africa as a multi-stranded entity simultaneously enacted by a wide range of differing types of actors in different contexts, one which is evolving over time, is in line with this view. The idea of the NQF as a register

of qualifications is not incompatible with the NQF as a multi-stranded social construct, providing that the register of qualifications is but one thread running through the NQF discourse. The four main interpretations of the South African NQF are illustrated in the diagram from below (Isaacs, S.B.A, 2011).

Figure 3: (R)evolving understandings of the NQF
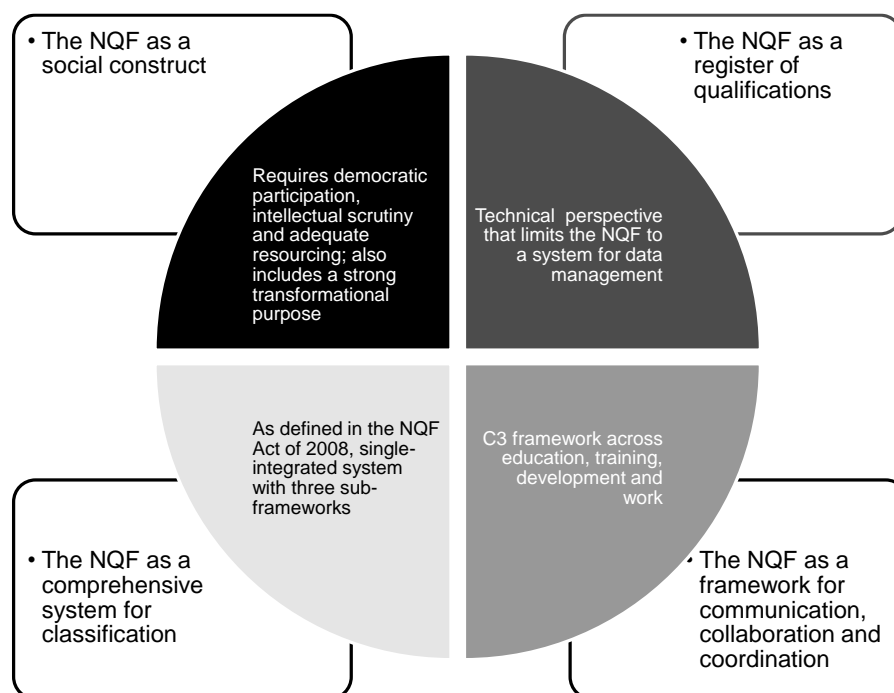
Leading up to the promulgation of the NQF Act in 2008, Walters (the then chairperson of the SAQA) championed the notion of the three "C's: Coordination, Collaboration and Communication (Parker & Walters, 2008).

The idea of the South African NQF as a comprehensive system comprising three sectoral sub-frameworks, namely those for General and Further Education and Training; Higher Education; and Trades and Occupations is embedded in the NQF Act (Republic of South Africa, 2008) and related legislation (Republic of South Africa, 2008). 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 paradoxically includes integrative aspects such as a single Department of Higher Education and Training responsible for the entire post-school system (both education and training); and the three separate (although coordinated) sub-frameworks noted immediately above. Its comprehensiveness lies in

the fact that the South African NQF, through its distinct but coordinated bodies, encompasses all aspects of E&T in the country.

3.2 Background to the NQF Act

Under the apartheid state, education was organised and divided along racial lines. In higher education, all public higher education institutions were designated for a particular race. Hence, different administrative departments were responsible for public higher education institutions, which created a complex set of governance arrangements (Council on Higher Education, 2004). The majority of funding went towards the "white" public HEIs, building the capacity of these institutions to deliver quality education.

While public higher education institutions catered for the needs of a select few, workers faced significant challenges in securing a living wage from employers. The workers' requests were rejected by employers on the basis that they were unskilled and hence their demands for higher wages were not justified (South African Qualifications Authority, 2016). These engagements soon established the link between training and wages. The assumption was that trained and skilled workers would command higher wages. This tension between employers and workers led to an increased demand for education and training.

The struggle to persuade employers to accede to worker demands continued into the 1980s and in 1989 the National Union of Metalworkers of South Africa (NUMSA), established a research group comprising workers and union officials, to formulate recommendations on training. The proposal stressed the need not only for basic education, without which workers would not be able to access the proposed system, but also for portability and national recognition of training so that workers would not be at the mercy of a single employer. In July 1991, COSATU formally adopted the proposal, making it an integral part of its education and training strategy.

Whereas COSATU represented the interests of workers, the non-government sector, developed policy and proposals on restructuring the formal education system through their National Education Policy Initiative (NEPI), a collaborative and consultative effort between multiple stakeholders. The NEPI publication in 1992 set out the principles for a non-discriminatory and equal opportunity E&T system. Fundamentally, the NEPI process helped to frame and shape the education system post-1994 (South African Qualifications Authority, 2016).

Following the first democratic elections in 1994, the new 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 HEIs and over 300 largely unregulated 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 at the benefit of a few, the NQF was seen as a pivotal framework wherein transformation could take place. At the time only a handful of countries, namely New Zealand, Australia and the United Kingdom had adopted an NQF "approach" to education and training (Allais, Raffe, Strathdee, Wheelahan, & Young, 2009). The leadership in South Africa saw this as an opportunity to leapfrog to the forefront of practice in this area.

The official enactment of the NQF was expressed in the SAQA Act of 1995 (Republic of South Africa, 1995). It was informed by the ANC Policy Framework for Education and Training (1994); the Discussion Document on a National Training Strategy Initiative (1994); and the Implementation Plan for Education and Training (1994). The White Paper on Education and Training was also published in the same year (Department of Education, 1995).

The SAQA Act was promulgated in 1995 as the first piece of post-apartheid education and training legislation. The Act established SAQA as a statutory body determined and guided by the Act. It mandated SAQA with the responsibility to provide for the development and implementation the NQF and the three main the main functions:

- The registration of qualifications and standards on the NQF (standards setting);
- The establishment of a system-wide quality assurance system (quality assurance); and
- The establishment of a National Learners' Records Database, an electronic management information system (South African Qualifications Authority, 1999).

Over the next few years, numerous government acts, policies and regulations that were either affected by the SAQA Act or gave guidance to it, emerged. These included:

- The National Education Policy Act, No. 27 of 1996
- The Education White Paper 3 – Programme for the transformation of higher education, 1997
- The Skills Development Act, No. 97 of 1998
- The Further Education and Training Act, No. 98 of 1998
- The National Standards Bodies Regulations No. 452 of 1998
- The Education and Training Quality Assurance Regulations No. 19231 of 1998
- Higher Education Act, No. 101 of 1997
- The National Education Policy Act No. 22512 of 2001

By 1999, 12 National Standard Bodies (NSBs) were fully operational and 30 Standard Generating Bodies (SGBs) had been registered and ready to commence work. In

addition, 82 SGBs were in the process of formation. The first phase of registering qualifications was completed – with the second phase due to commence in the year 2000. In terms of quality assurance, two E&T Quality Assurance bodies (ETQAs) were accredited: the Mining Qualifications Authority (MQA) and the South African Institute of Chartered Accountants (SAICA).

An additional, 45 applications were under review. By December 1999, the National Learners' Records Database had been launched, and was regularly upgraded and expanded to include additional functions. In an attempt to strengthen the implementation structure within SAQA, an organisational realignment was also undertaken in 1995 to align SAQA's operations to the requirements of the SAQA Act.

Despite the various pieces of legislation to support the implementation of the NQF, challenges remained with regards to the registration of new quality qualifications and standards, launching the NSBs and ensuring their effectiveness, and quickening the mechanisms for delivering qualifications and standards. Data sourcing remained an ongoing challenge for the NLRD, as did putting into effect the Recognition of Prior Learning (RPL).

In 2002 the DoE and the DoL established a Study Team to report on the implementation of the NQF. The team was briefed with the task of reporting on how the 1995 Act could be streamlined and accelerated. Following broad consultations, the Study Team reported that the pace of implementation of the NQF, especially in regards to access, progression and redress, needed to be accelerated. 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 (Department of Education & Department of Labour, 2002).

Concerns were also raised about the proliferation of bodies responsible for standards settings and quality assurance. Government structures were found to be slow and indecisive, there was inadequate funding of state resources, and the implementation was too dependent upon the voluntary involvement of stakeholders in the standards setting process.

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 – established via the Skills Development Act). The Study Team found that there was not one single understanding of what people mean when referring to the NQF (Ibid). 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).

The Consultative Document went further to propose a revised architecture for NQF implementation, based on structures responsible for Qualifications and Quality Assurance, known as Quality Councils or "QC's". Three such structures were proposed, for General and Further Education and Training, Higher Education, and Trades, Occupations and Professions. Prolonged interdepartmental consultation and engagement with SAQA resulted in ministerial agreement in late 2007. The Ministers of Education and Labour published a Joint Policy Statement on "Enhancing the Efficacy and Efficiency of the National Qualifications Framework". This was the first formal statement of government's policy on the implementation of the NQF since the promulgation of the SAQA Act in 1995. This Policy Statement brought to an end the review of NQF implementation that had been underway since 2001. The Joint Policy Statement formed the basis for the NQF Act (Department of Education & Department of Labour, 2007) that was promulgated one year later.

3.3 An overview of the NQF Act

In 2008 the SAQA Act was repealed and replaced by the NQF Act (No. 67 of 2008). The NQF Act has the stated objective *"to provide for the further development, organisation and governance of the NQF"*. 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 of the NQF remained unchanged from those stated in the 1995 SAQA Act. While the fifth objective from the SAQA Act (*"To contribute to the full personal development of each learner and the social and economic development of the nation at large"*) became an overarching statement that summarises the other objectives:

> 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).

According to the NQF Act, the development, implementation and maintenance of the NQF is overseen and co-ordinated by SAQA. The NQF comprises three qualifications sub-

frameworks, with three quality councils given the responsibility to develop and manage each of these sub-frameworks:

- General and Further Education and Training Qualifications Sub-Framework (GFETQSF). This sub-framework covers qualifications registered at NQF levels 1 to 4 and is the responsibility of the Quality Council for General and Further Education and Training (commonly referred to as Umalusi). Umalusi is established through the General and Further Education and Training Quality Assurance Act (GENFETQA Act) No. 58 of 2001,
- Higher Education Qualifications Sub-Framework (HEQSF). This sub-framework covers qualifications registered at NQF levels 5 to 10 and is the responsibility of the Council on Higher Education (CHE); the CHE established through the Higher Education Act No. 101 of 1997.
- Occupational Qualifications Sub-Framework (OQSF). This sub-framework covers qualifications registered at NQF levels 1 to 8 and is the responsibility of the Quality Council for Trades and Occupations (QCTO) provided for in the Skills Development Amendment Act No. 37 of 2008. 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 CHE, and is coordinated by SAQA.

An important feature of the NQF Act is that it provides for a hierarchy of policy layers from the Minister of Higher Education (M:HET), SAQA and then the QCs. For example, the QCTO policy on RPL should comply with the SAQA RPL policy, which in turn needs to comply with the Ministerial RPL policy. The full suite of SAQA policies required by the NQF Act were only completed in 2013, five years after the promulgation of the NQF Act, resulting in some uncertainty on a QC level. More recently, the M:HET has also embarked a national policy processes for both articulation and RPL, despite the fact that the SAQA policies are also national in scope, and cover the same terrain. Here it is also important to note the clause on the NQF Act (Section 34) that gives the NQF Act supremacy over the three acts related to the QCs.

The three Acts, including their amendments, that support the NQF Act are: General and Further Education and Training Quality Assurance Amendment (GENFETQA) Act (2008), Higher Education Act (1997) as amended; and Skills Development Amendment Act (2008). Each of these Acts are further accompanied by regulations, policies, guidance and rules, all of which are included in this documentary and literature review, insofar as they support the implementation of the NQF Act.

The figure below illustrates some of the major milestones in the policy and legislative framework in a timeline.

Figure 4: Major milestones in the policy and legislative framework

Source: DNA Economics

3.4 Evaluations of the South African NQF to date

This section provides a summary of the attempts to evaluate the NQF (and not the NQF Act) that have been conducted since the establishment of the NQF. The section provides a brief overview of these evaluations and concludes with comments on the learnings that will be of value to the evaluation of the NQF Act.

The NQF Act requires SAQA to undertake or commission investigations on issues pertinent to the development and implementation of the NQF, as well as to the impact that it is having or has had on education, training and employment in the country. These findings have been published by SAQA on regular intervals (SAQA 2003; 2005; 2014). There are however several other "evaluations" associated with the NQF (see Table 1) which have been undertaken by SAQA prior to the NQF Act, and in some instances undertaken by bodies other than SAQA.

Table 6: "Evaluations" of the South African NQF

"Evaluations"	Purpose	Year
HSRC	Evaluation of the design of the NQF	1999
Ministerial Study Team	To recommend ways in which the implementation of the NQF could be streamlined and accelerated	2001
European Union	Internal review linked to EU funding received by SAQA	2002
Consultative Document	To offer a new perspective on the NQF and propose significant changes in the structures responsible for its	2003

"Evaluations"	Purpose	Year
	implementation and to provide an opportunity to for comments before new policy and legislative proposals are laid before Cabinet for approval.	
NQF Impact Study Cycle 1	Establishing the criteria against which to measure progress of the NQF	2004
NQF Impact Study Cycle 2	Establishing a baseline against which to measure progress of the NQF	2005
NQF Act Implementation Evaluation	The impact of the NQF, based on eight sub-questions relating specifically to the impact of the NQF on systemic integration, systemic transparency, redress, learner access, success, and progression, and systemic quality	2015

The latest impact study of the NQF *"Assessment of the impact of the South African National Qualifications Framework"* published by SAQA in March 2015 aimed to address what impact the NQF has had. Eight other sub-questions, relating specifically to the impact of the NQF on systemic integrations, transparency, and quality, redress, learner access, success and progression were also studied. The study conceptualised the NQF as an activity system and collected data that revealed trends in relation to the NQF objectives. Cultural Historical Activity Theory (CHAT) was then used to link the trends to the activity system of the NQF for analysis. Readily-available national datasets were used for the documentary and first-level analysis, with further inputs obtained from NQF partners.

The meta-analysis was then shaped by using CHAT, as well as recontextualisation and relational agency concepts. Data sources included the NLRD, the national Education Management Information System (EMIS), the Higher Education Management Information System (HEMIS), the Higher Education Quality Committee Information System (HEQCIS), as well publications issued by the Department of Basic Education (DBE), SAQA, QCs, and the Minister and Department of Higher Educations and Training (M:HET and DHET). The sources also included discussions with senior staff members from SAQA and QCs (SAQA 2015).

While the methodology (along with the data sets) used is said to have: (i) made it possible for the QCs to analyse quality-related initiatives over time, taking into consideration the differences in the sub-frameworks and the different developmental stages of the QCs, (ii) provided for the inclusion of contextual features in the analysis and (iii) enabled the inclusion of the analysis of the state of the datasets, shifts in the state of the national datasets over time, and the extent of gaps to be addressed, which have been found to be declining over time; the methodology had its own limitations. These included: the inability to ascertain association, and the lack of triangulation of the first-level data analysis.

Overall the evaluations of the NQF to date, as listed in Table 1, are useful to consider in the evaluation of the NQF Act, but only to a limited degree. This is mainly due to the fact that the studies focused on the NQF itself and the NQF Act, but also as a result of the following:

- Limited empirical data existed in the early years. With the exception of the 2015 study (SAQA 2015), the research was mainly qualitative and largely unable to draw on verified data.
- The methodologies were not sophisticated enough. Here again, the most recent SAQA study (2015) has provided an important and theoretically grounded contribution. The weakness is perhaps that the methodology has not been able to draw sufficiently from the local and international monitoring and evaluation school of thought.

A key feature of most of these evaluations were to strengthen certain positions and discredit others. The HSRC review is a case in point when Jansen's meta-evaluation was used to conclude that the research did not meet minimum required standards:

The main report fails to meet acceptable standards of evaluation and research practice…The main report has methodological, organisational and editorial flaws that call into question the validity of several of the key findings (Jansen, 2000:11).

This study takes note of these "evaluations" but has attempted to stay clear of the contestations that in many instances compromised their findings. The methodologies have been considered and where relevant good practice has been factored into this evaluation of the NQF Act.

3.5 International experience

3.5.1 International experience in the evolution of the NQF

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 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 to Vocational Education and Training (VET) influenced the process in a significant manner.

The second generation of qualifications frameworks included countries such as Malaysia, Mauritius and Hong Kong. These frameworks were characterized by more modest approaches building on the experiences of the first generation frameworks. This was also the period that regional and international qualifications frameworks came to the fore drawing largely on regional processes and international conventions.

The third generation of qualifications frameworks now include a total of at least 100 countries, making up a total across the generations of some 140 countries (Keevy & Chakroun, 2015). A fourth generation is also mentioned. Here the advent of regional qualifications frameworks, notably in Europe and Asia, are directly influencing the development of NQFs. Table 7 outlines some of the key characteristics of each the different generations of qualifications frameworks.

Table 7: Different generations of qualifications frameworks

	Generation			
	First	**Second**	**Third**	**Fourth**
Period developed (approximate)	1980s	2000s	2010s	2014
Examples	Australia, Scotland, South Africa, France, etc. (7)	Malaysia, Mauritius, Hong Kong, etc. (20)	Ethiopia, Barbados, India, Chile, etc. (100)	American Credential Framework (ACF), International Events Qualifications Framework (IEQF) etc.
Key characteristics	Strongly influenced by new approaches to learning outcomes and competency approaches	Period wherein transnational qualifications frameworks started to develop; regional conventions provide an important basis for collaboration; some separation from provision	Regional qualifications frameworks are increasingly developed and influence NQFs; more sectoral frameworks emerge; referencing between NQFs and RQFs (mainly in Europe) increase	Regional qualifications frameworks continue to influence NQFs; sectoral frameworks gain more traction; convergence of some recognition technologies such as credential evaluation and professional and occupational standards; continued shift to learning outcomes; more inclusive of non-degree credentials
Strengths	Pioneering frameworks; strong initial support from stakeholders	Learnt from the mistakes of the 1st generation; strong impetus for regional collaboration	More involvement of social partners	Improved conceptual clarity of domains of learning; "competence" viewed as too limited
Weaknesses	Pragmatic (non-scientific) approach followed leading to weak conceptual basis	Regional frameworks start to exert overly strong influence on NQFs	Too much policy borrowing	Too soon to say

Source: (Keevy & Chakroun, 2015)

Important for this evaluation of the NQF Act, 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 concerning trend of "policy borrowing" that results in varied and often unrealistic sets of expectations that governments have placed upon them (Coles 2007; Tuck 2007). The sense of need for economic and social reforms

have 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 ever increasing centralised systems reliant on state intervention. Examples of this trend includes the establishment of national standards setting bodies, qualifications accreditation and awarding systems, and provider registration systems. South Africa is a case in point.

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. Here regional qualifications frameworks are increasingly playing a role. Examples include the European Qualifications Framework (EQF), the ASEAN Qualifications Reference Framework, the Pacific Qualifications Framework, the Southern African Development Community (SADC) Regional Qualifications Framework (RQF), and the TVET RQF in the Caribbean region (ETF 2012). These frameworks are developed as "meta frameworks" that provide a neutral reference point for the relevant countries. Regional qualifications frameworks do not have their own quality assurance regimes, nor are they directly related to provisioning.

Considering the international context, it is important to note that some countries, such as the United States of America (USA) and Canada, have opted to stay outside of this global movement towards qualifications frameworks until very recently (Keevy & Chakroun, 2015). In the USA, the development of a Degree Qualifications Profile to promote transparency, mobility and accountability is underway. It is steered through a non-governmental consortium that have developed an "American Credential Framework". In Canada, the development of a sectoral International Events Qualifications Framework has been underway since 2011 (Canadian Tourism Human Resource Council 2012:1) that has been developed in conjunction with a Canadian Degree Qualifications Framework since 2007 (Council of Ministers of Education 2007). The recent developments in Canada and the USA are important to note as they are largely undocumented and provide insights into the potential future of new "fourth generation" qualifications frameworks.

Coles et al (2014) identify three cross-cutting themes from international NQF developments, looking specifically at South Africa, the United Kingdom and Australia. These themes are useful to briefly summarise here.

Theme 1: Evolution starting with reforms. Reforms that have led to NQFs have been driven by a sense of crisis or need for renewal. In South Africa, the post-apartheid agenda of economic and social inclusion for those members of society who had faced exclusion, including exclusion from education and training, was a key driver. Importantly, the scale of the reforms and the levels of the investments that were required to achieve access and redress were beyond the immediate means of the new government. At the

time, the NQF came to the fore as a type of proxy for the intention of government. Internationally NQFs were only starting to gain traction, and provided South African policy makers the tool to accelerate a process that would otherwise have taken many years.

Theme 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, as a result of the lack of understanding of what an NQF constitutes (Keevy & Bolton, 2011).

Theme 3: Trend towards decreased regulatory role of NQFs based on sectoral initiatives. Coles *et al* (2014) make a number of important observations related to the direction of qualifications framework development is taking internationally:

- There is a trend for the NQFs to become less hard-nosed and more reliant on sectoral initiatives. The revised South African NQF looks to be more inclusive by design and able to accommodate difference and is now made up of three sub-frameworks;

- The governance of frameworks seems to be more remote from government as time passes, with a strong move towards the development of sector-specific frameworks. The mature frameworks are managed by agencies with strong links to government but also independent structures of consultation with main stakeholder groups. Whilst mainstream government policy is supported, the frameworks also support other functions that are improving practice and co-ordinating changing social and technical contexts;

- Learners seem to remain remote from these frameworks even though they are intended to be the main beneficiaries of NQF effects. Between the learner and the framework architecture there are a wide range of interventions from curricula and programmes, assessment, teachers, and qualifications. Each of these interventions has a multitude of influences and pressures that moderate the intended effects of frameworks; and

- There is no evidence for raised standards directly attributed to frameworks. Have the NQFs cleared the 'jungle' of qualifications? Again the answer is that qualifications systems remain confusing even though the introduction of qualifications *types* has made systems more transparent.

3.5.2 *International examples of the evaluation of NQFs*

International examples of the evaluation of NQFs include the evaluation of the impact of the SQCF (Scottish Executive 2005), the implementation and impact study of the National Framework of Qualifications (NFQ) in Ireland (NQAI 2009) and the evaluation of the implementation and impact of NQFs conducted by the ILO (Allais et al 2009). The methodologies employed in these studies show both similarities and differences.

The South African NQF impact study (SAQA 2003 and 2005) is a longitudinal and comparative study using purposive quota sampling, based on impact indicators and used the NQF objectives as a fixed point of reference. The study had a strong focus on contextualization during each new cycle, and considered replicability, cost-effectiveness and credibility factors. Data sources included interviews and focus groups, analysis of NLRD data, as well as a national survey. While the study was described as ambitious and innovative, the methodology was generally viewed as problematic and the findings based on perceptual data.

The evaluation of the impact of the SQCF (Scottish Executive 2005) is a qualitative study that used a purposive sampling framework involving interviews with nearly 70 specialists, practitioners and stakeholders from national organisations, FE/HE institutions, employers and professional bodies. The implementation and impact study of the NFQ in Ireland (NQAI 2009) is also a qualitative study, and is based on a background paper, two case studies in nursing and counselling, as well as submissions from the public. No explicit critiques of the research design of the Scottish or Irish studies were found. The implementation and impact evaluation of NQFs conducted by the ILO (Allais et al 2009, and Allais 2010) consists of ten case studies conducted through fieldwork, including a collection and summary of official documentation, interviews with wide range of stakeholders and role-players, while six countries were reviewed based one existing literature only. Researchers were provided with an indicative list of possible negative/positive outcomes. The research design of the ILO study was viewed as particularly problematic by SAQA, notably due to the inherent bias which was built into the study.

When considering similarities, it is notable that all the studies are mainly qualitative in nature. Only the South African study attempted to provide some quantitative data, but this was questioned in terms of relevance to the purpose of the study. All the studies overtly focused on the "impact" of NQFs despite the common acknowledgement regarding the difficulty associated with studies of this nature (Schuller 2006). All three studies relied heavily on the views and opinions of stakeholders. The problems experienced in the South African study with perceptual data were mitigated to some extent in the other studies, but despite these attempts, even the ILO study acknowledges the digression towards using the views of only experts.

All the studies acknowledge the relative early stage of development of the NQFs, and the difficulties associated with measuring the impact of an incomplete or "early stage" policy mechanism. Most studies include a strong emphasis on contextualisation of the research. In some cases this was done through a literature review, and in others, through a short description of the context and the specific purpose and objectives of the NQF. The small pool of researchers involved in qualifications frameworks is evident from the studies and

undoubtedly contributed to the similarities in the research designs, but also to the attempts at addressing the shortcomings, in this case, notably the identified problems experienced in the South African NQF impact study which preceded the other studies.

Sampling across the four studies is noticeably similar, though not identical. The South African case study opted for stratified random sampling and encountered several difficulties as a result (SAQA 2003 and 2005). The Scottish study used purposive sampling, but included an incremental approach that involved the identification of additional respondents based on an initial set of exploratory interviews (Scottish Executive 2005). The Irish study was based on submissions from stakeholders and could be classified as purposive (NQAI 2009). The ILO study does not offer an explanation of its sampling strategy, but it was clearly also not representative.

The differences between the studies are just as important to note. The most striking difference is the very ambitious purpose of the South African studies, as compared to the others (SAQA 2003 and 2005). In this regard both the Scottish and Irish studies make findings related to the impact of their frameworks, but clearly without the pressure to defend the methodologies to the extent the South African study had to. Here the ILO study in particular is helpful in reflecting on the interrelatedness between an NQF and the various other policy tools that function within the E&T systems in countries. Trying to isolate any specific intervention will always be problematic, while on the other hand, identifying and measuring overall changes without attributing these to a specific intervention, is much more realistic (Allais 2010).

The South African example is a case in point. The overt critique of the NQF required an evidence-based response to ensure its ongoing implementation, something the first two cycles of the NQF impact study failed to provide (SAQA 2003 and 2005). In the Scottish and Irish cases the situation was different and required only a realistic reflection of progress made in order to improve the system. The ILO study was weakened in that it attempted to prove that limited evidence of the effectiveness of NQFs exists (Allais et al 2009, and Allais 2010). Only the South African study included the development of indicators in an attempt to provide a consistent profile of the conditions, change and effect of the South African NQF on the transformation of education and training. The SCQF and NQAI studies made no attempt to develop indicators, while the ILO study opted to replace indicators with specific focus areas (Scottish Executive 2005; NQAI 2009).

3.5.3 International examples of the relationships between legislation and NQFs

The process through which countries have established NQFs, the manner in which they were introduced, and the extent to which they have been and continue to be regulated, have been as varied as the countries themselves. In many instances changes in regulation have been driven by the political economy of changing national governments'

ruling parties, especially in the case of New Zealand, and to a lesser extent, Australia. Three main framework 'types' have been identified that could be viewed as a continuum from voluntary and loosely specified on one end, to more tightly specified and centrally controlled on the other. The typology, depicted below, range from a 'communications' framework, which are voluntary, moderate in purpose and applied through 'bottom-up' structures, through to a 'transformational' framework which is compulsory and led by government. In-between a 'reforming' framework is located, which focuses more on rationalising a system, than transforming it. The nature of the system is very much driven by the objectives of what it sets out to achieve, which can vary from simply trying to improve transparency and increase coherence, to one that aims to develop an entirely new system (Allais, Raffe, Strathdee, Wheelahan, & Young, 2009). The table below summarises some of the key features of these typologies.

Table 8: Types of NQFs

Criteria	Type of NQF		
	Communications	Reforming	Transformational
Starting point	Existing E&T system	Existing E&T system	Future E&T system
Purpose	- Increase transparency - Rationalise system & increase coherence - Facilitate access transfer and progression	- Achieve specific reforms - Rationalise system & increase coherence	- Transform and lead development of a new system
Design	- Loose, varies across sub-frameworks	- Tighter, but varies across sub-frameworks	- Tight, centralised, imposed more uniformly
Leadership & control	- Voluntary - Bottom up - Shared leadership - Substantial decision making of sub-framework	- Compulsory - Top down - Led by gov/central agency - Institution key partners, control may vary across sub-frameworks	- Compulsory - Top down - Institutions among partners - Centralised control
Expected role in change	- Requires complementary drivers to ensure tool is used	- Drives specific change; requires complementary drivers for other impacts	- Expected to drive

Source: (Allais, Raffe, Strathdee, Wheelahan, & Young, 2009)

Scotland, considered one of the first generation adopters and leaders in the approach, adopted a very loose and voluntary approach to its NQF. The framework, referred to as the SCQF was initiated, owned and driven by its two main sub-frameworks – the Scottish Qualifications Authority (SQA) and higher education. Whilst playing a supportive and facilitating role, the government has been very judicious in not assuming principle ownership. Those involved in its early development argued that a strong leadership role from government would undermine the process, a view that was and continues to be largely accepted by government. The role of the SCQF is therefore seen primarily that of

a 'communications' framework where the existing education and training sector is taken as the foundation, with the purpose of the framework to make it more transparent, easier to understand and more coherent. It aims to encourage access and facilitate transfer and progression between programmes (Ibid).

In comparison to Scotland and the minimal role played by government, the case of New Zealand, another one of the other early adopters, has been quite the opposite. In fact, major changes and reforms to the NQF system in New Zealand are directly linked to the changing policy and ideological views of successive ruling parties. The NQF was established in 1990 as part of the Education Amendment Act and was designed to replace all existing qualifications with a new series of certificates, diplomas and degrees awarded according to the unified framework. As described by Allais et al (2009). At the time, the NZQA had adopted an activist approach in which it was trying to revolutionize New Zealand's education and training sector". Not long after its launch in 1991, the NQF faced difficulties, with resistance coming from a range of groups, namely employers and universities, who were not convinced of its value. In 1994 the New Zealand Vice Chancellors Committee withdrew the university sector from the NQF. A stalemate followed that was not addressed until 1999 when the government produced a white paper on education that required the NQF to broaden its outlook, and to be more inclusive in its approach and with greater powers delegated to universities (Ibid.).

The Australian Qualifications Framework (AQF) describes itself as the national policy for regulated qualifications in its E&T system, and encompasses higher education, vocational education and training, and schools (Allais, Raffe, Strathdee, Wheelahan, & Young, 2009). It was developed at the request of the Ministerial Council on Education, Employment, Training and Youth Affairs and was established via a Charter in 1994, although phased in over five years. An advisory board was established as the custodian of the AQF, on behalf of the ministers. The Charter was revised in 2000 and an AQF Advisory Council was established in 2008. The council had authority delegated to it by the relevant ministers, and is comprised of experts from the various relevant sectors. The Council was headed by an independent chair whose responsibility was to ensure that its advice benefited the education sector as a whole. In 2014 the Advisory Council was disbanded and the management of the AQF came under the national Department of Education and Training, in consultation with the Department of Industry and Science. The Department of Education and Training monitors and maintains the AQF (Ibid.)

In Malaysia, the Malaysian Qualifications Agency was formed as an Act of parliament in 2007, following the merger between the National Accreditation Board and the Quality Assurance Division of the Ministry of Higher Education. The Malaysian Qualifications Agency is responsible for the implementation of the Malaysian Qualifications Framework, including the monitoring of quality assurance and accreditation of national higher

education. The extensive Act provides for the establishment of the agency and for the establishment of a council. It also describes the qualifications framework, the processes of accreditation, prior learning and credit transfer and provisions for a qualifications register (Allais, Raffe, Strathdee, Wheelahan, & Young, 2009).

Other countries that followed the legislated route include Namibia, which promulgated the Namibia Qualifications Authority Act in 1996. It closely follows the South African model. Quality and Qualifications Ireland is a state agency that was established by the Qualifications and Quality Assurance Act of 2012 and has a board appointed by the Minister for Education and Skills. In the United Arab Emirates, an NQF was established by royal decree in 2010 and is guided by a handbook (Allais, Raffe, Strathdee, Wheelahan, & Young, 2009).

4 THEORY OF CHANGE AND LOGICAL FRAMEWORK

4.1 Overview

The theory of change explains how the activities undertaken by institutions translate into a series of results that contribute to the final intended impacts. A theory of change can be developed for policies, programmes and projects (Rogers, 2014). The theory of change for a national policy will be more complicated than that of a discrete project. In the case of national policy, the theory of change for a policy might span across different levels of government, geographical locations and involve multiple stakeholders.

Why has the theory of change become so popular? And, why is it used in evaluation? The popularity of the theory of change coincides with the increase in demand for evaluations. More and more, governments around the world see the value of understanding why policies work and don't work in certain conditions. 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. These assumptions are the conditions necessary for a policy to work, and are sometimes outside the control of implementers.

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, and in the case of the NQF Act, was not done prior to its enactment.

4.2 NQF Act's theory of change

Therefore, in order to evaluate the NQF Act, the evaluation team and PSC reconstructed the theory of change and the logical framework. Some of the officials involved in the drafting of the NQF Act were also members of the PSC, and hence the theory of change reflects the understanding of the policymaker as to how the NQF Act was intended to achieve its intended outcomes. 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, as shown below:

> *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.**

The logical framework, depicted in Figure 5 shows the inputs, activities and outputs described in the NQF Act. It uses the objectives, set out in Section 5, of the Act to identify a set of immediate and intermediate outcomes and impacts.

4.2.1 Impacts

The impact of the NQF Act is clearly set out in the legislation. In designing the NQF, the policymakers envisaged a framework that would "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). These impact statements are highlighted in purple boxes in the theory of change, seen in Figure 5.

However, there are an array of complex and lengthy causal pathways that lead to these impacts and many factors that could detract from their achievement. Another important point worth mentioning is that the impact statements identify two groups of beneficiaries: the individual in the form of the learner, and the broader society. This approach to framing the impact suggests that the mechanisms through which the NQF works must target not only individuals but also spur economy-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. Also, it is 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 enabling framework that could benefit learners and society without necessarily thinking of the causal mechanisms through which these changes are achieved.

4.2.2 Outcomes

The theory of change identifies two sets of outcomes: immediate (shaded in green) and intermediate outcomes (coloured in blue). One way of distinguishing between the two levels of outcomes is to examine their *timespan* and *reach*. Immediate outcomes are the changes brought about by public policies on individuals, social structures or the physical environment over a period of three to five years, whereas intermediate outcomes tend to happen over a longer timeframe.

In developing the theory of change, **three** intermediate outcomes and **six** immediate outcomes have been identified. The **intermediate outcomes** focus on the medium-term benefits of the NQF and are as follows:

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

The six **immediate outcomes** identified in the theory of change are:

- 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 achieved by the learner are of acceptable quality and internationally comparable
- Improved learner access, portability, progression, articulation of qualifications
- Greater awareness about qualifications, providers and career paths
- Public credibility of professions

4.2.3 Outputs, activities and inputs

The outputs (shaded in grey) in the logical framework are relatively easy to develop from the activities described in the Act. In the case of the NQF Act, the outputs are the immediate results of the activities (shaded in dark blue) performed by the NQF bodies.

4.2.4   Assumptions

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.

Figure 5: Logical framework

INPUTS	ACTIVITIES			OUTPUTS
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

5   FINDINGS: RELEVANCE AND APPROPRIATENESS

Evaluations use the evaluative criteria to organise the findings of the study. The first evaluation criterion examines the **relevance and appropriateness** of the NQF Act. It evaluates the extent to which a policy or intervention addresses the problem and is suited to the country's needs and priorities. This section presents the findings from an assessment of the relevance and appropriateness of the NQF Act. It responds to the following evaluation question formulated in the Terms of Reference:

> *EQ1: To what extent is the theory of change (intervention logic) of the NQF Act adequately robust, including its main underlying assumptions?*

5.1   Relevance

Good policy begins by identifying the problems, determining their causes, analysing their effects on the population or subgroups within the population and measuring the nature and scale of the problem. By the time, the NQF Act came into force the NQF had been in law for about ten years, established in 1998 under the SAQA Act. In this period, the problem that the SAQA Act was intended to address might have remained the same, changed or new challenges might have emerged in response to reforms within the E&T system or from implementation of the SAQA Act itself.

This evaluation report draws on the literature review in Section 3 and categorises the problems into two broad groups: (i) systemic challenges, and (ii) structural and governance problems.

5.1.1   Systemic challenges

Historical, social and economic factors have played a significant role in shaping the E&T system. In 1994, the newly elected democratic government inherited a fragmented E&T system. Institutions were divided along racial lines and geared towards providing education to specific race groups. Historically disadvantaged education and training institutions were under-resourced, lacked capacity and had limited qualification offerings. Moreover, there were few opportunities for progression and promotion within the workplace as training programmes and qualifications available to workers were limited. It is against this background that the SAQA Act was promulgated. At the time, many of the objectives of the Act coincided with the policy objectives of the democratic government; whose stated intent was to use the NQF to transform the E&T system.

Between 1995 and 2009, when the NQF Act came into effect, the E&T system underwent a period of intense change. The government implemented planning, funding and structural reforms to address the legacy of a divided and fragmented E&T system. In higher education, the mergers of universities rationalised the number of public higher education institutions

and sought to transform them into non-racial and inclusive universities. In parallel, the rapid increase in demand for higher education placed additional pressure on public universities to expand enrollments. Changes to the funding framework were made to enable a fairer and more equitable distribution of funds in higher education.

Similarly, the basic education sector had increased its enrollment rates rapidly in post-apartheid South Africa, and introduced major curriculum reforms, moving towards Outcomes Based Education (OBE) in 1997. Despite these changes, public schools, particularly those in quintiles 1 to 3, continued to perform poorly on national assessments and exams, and there was mounting evidence that OBE was not working in South Africa. At the same time, the dynamics of the basic education system were changing. As the middle class grew, so too did the demand for private schooling, and new private sector entrants came into the market, giving rise to the need for greater regulation. This led to a growing gap between the quality of public and private schooling in South Africa.

In parallel to these reforms, the country had adopted and begun to implement the NQF. The NQF was designed to integrate education and training into a single framework, broaden opportunities for learning and achieve redress by recognising prior learning (Department of Education & Department of Labour, 2002).

However, implementation challenges soon began to emerge and triggered the first review in 2002. The Ministers of Education and Labour appointed the Study Team on the Implementation of the NQF to "recommend ways in which the implementation of South Africa's National Qualifications Framework" could be streamlined and accelerated. In their report, the Study Team's recommendations focused on enhancing the leadership and governance practices, simplifying the complex architecture of the NQF and improving the efficiency of standard setting and quality assurance systems (Department of Education & Department of Labour, 2002).

Following the Study Team's report and after five years of negotiations and discussions, the Ministers of Labour and Education finally released the *Joint Policy Statement.* In it, they agreed to retain objectives of the NQF as they were formulated in the SAQA Act. In addition, the Ministers decided to implement a structural fix that would enhance the lines of accountability and responsibility, resolve overlapping mandates and tensions between role-players, and streamline the architecture of the NQF (Department of Education & Department of Labour, 2007).

Interviews conducted by the evaluation team further contextualised some of the reasons for changes made between the SAQA Act and NQF Act. Interviewees involved in the

negotiations stated that there were a number of challenges and disputes that contributed to the eventual solution:

- In the 1990s talk of the development of 'standards' translated into the concept of 'unit standards'. But unit standards did not have integrity or currency attached to them. If the legislature uses the words 'qualification' and 'standards' in the same context then there must be a difference – there wasn't. So, a standard cannot be a qualification. The system developed through the SAQA Act was built on "good principles but without architecture that deals with the finer nuances of it". The word 'standards' was a difficulty brought in under the SAQA Act. But it did provide insight. It brought understanding that labour market standards are different from the traditional educational qualifications. It broadened the concept and made people realise that our understanding of 'qualification' needed to be broader so that the one does not exclude the other.

- Within the occupational and vocational strand a tendency had developed for short courses. So, the language of standards and unit standards was overtaken by short courses. Money was made available through the SETAs; and money caused a paradigm shift, with too many examples of training including "a lunch in a hotel with someone talking about something interesting: It was not real education". There is no currency to that sort of training and experience. There was a level of frustration over the proliferation of short courses and the perception that even full qualifications gained were not being recognised or valued in the labour market or in institutions of higher education. The perception was of people accumulating a thick stack of "useless" attendance certificates in CVs. There was also a feeling that the "SAQA QA processes" that were viewed as mainly directed at the massively expanded private sector, were being "imposed" on the GFET and HE sub-systems and that they were inappropriate. It needs to be remembered that GFET and HE had their own structures that they felt were working in their sub-sectors.

- The turf war between Labour and Education began to resolve towards a set of sub-frameworks which would allow for the identity of qualifications (and unit standards) in the training system in an acceptable manner. It would involve the development of a qualification system that protects standards. This led to the NQF Act. Even though SAQA struggled with the development of the system, SAQA had gained international recognition and "SAQA approved" started to develop a currency. So, policymakers didn't want to remove that. The concept of a framework was also important. The thinking was that this framework must be "accommodative and not restrictive". In 1995/6 the aim was to give authority to SAQA to determine the structure and fabric of this system using regulations, which is sub-ordinate legislation. But Parliament rejected this idea as it argued that sub-ordinate legislation must be within government

control not delegated to SAQA. Due to Parliament's reticence to devolve the development and imposition of regulations to SAQA, SAQA did not have the power to compel compliance to the Act and its regulations – it did not have the structure and stature. So, the result was an accommodative system of approvals. As a result, the ETQAs were allowed to apply different standards even though the application was the same.

- The lack of consistency across ETQAs created challenges and undermined occupational directed qualifications. People recognised a B degree and knew how to interpret it. There might be differences, but overall it complied with certain standards accepted locally and internationally. Similarly, under Umalusi schools had a single certification system, based on the same principle as higher education – setting and applying standards. But each SETA had its own domain and was "king of its own rubbish heap". Service providers just needed SAQA approval to operate, but there was limited quality control. The standards differed vastly, so one couldn't move between sectors (if you are an electrician you could not go from a mining concern to a municipality). Professional bodies were also ETQAs and they were "gatekeeping rather than developing knowledge". These situations were not what was envisaged in the SAQA Act.

- At the same time, there was pressure to add more levels, as the pre-2008 system was seen as too restrictive and the lack of levels restricted articulation and pathways. The problem was particularly in relation to further education and training which was stuck and only able to offer up to Level 4. This was linked to the view that the SAQA Act had created many learning *cul de sacs*.

- The qualification architecture was too inaccessible and language too opaque. Even professionals in the DoE struggled to comprehend it and, like Curriculum 2005, it fostered a language that only the select few accessed and those who were meant to use the system felt, and in fact were, excluded. Most importantly those who were meant to implement the programmes and qualifications (the lecturers, trainers and teachers) were often confused by the language and complexity of the system. As a result of the poor relationship between the qualification and knowledge inherent in the NQF, all too often people got a qualification but couldn't practice what they had learned with any competence. It is argued that the way that the NQF structured qualifications encouraged this disconnect.

- Many felt that a single framework would not work as the more advanced system (universities) will dominate the others. This would also be costly if everyone has to go through a university type processes. The concept of three tiers became the reality. At that stage skills development was seen as a form of education, so the DoE moved to the concept of qualifications rather than standards. The sub-frameworks were

expected to allow some flexibility and differences in the way qualifications are conceptualised and developed, but still within a single system.

A very large number of other issues with the SAQA Act and its implementation were also raised during interviews conducted by the evaluation team. It should be emphasised that the period in which the NQF Act was conceptualised was a time of tremendous friction and tension between NQF stakeholders. Many interviewees' perspectives seemed contradictory or at least in competition with each other. Many issues appeared to be related to broader issues in the E&T system, but were held up as failures of SAQA or the SAQA Act. The NQF Act thus appears to be in many ways the result of a negotiation where different stakeholders were solving different problems. It hence should not be seen as a legislative solution in response to a well researched, clearly expressed or commonly understood set of problems.

Similarly, while the Study Team's report contained many valuable insights, many of the statements in the report, and by policymakers at the time, were not substantiated by hard evidence. Significant findings such as the fact that the NQF had not achieved its objectives were not supported by evidence, other than submissions and interviews. In some respects, the report missed an opportunity to measure actual progress in the implementation of the Act. The report itself lacked some critical information that would help contextualise the performance of the NQF under the SAQA Act. For example, it did not contain information on the number of qualifications developed by the NSBs and SGBs, in effect assuming that all standard-setting bodies performed equally poorly. Mostly, the report relied on perceptual information and made recommendations on the basis of this information.

Hence, although the reforms introduced by the NQF Act were reasonable in many respects, they were largely premised on perceptions of performance. Many felt frustrated that the NQF was not acting as the transformational device it was intended to be, although it does not appear that sufficient consideration was given as to whether the original objectives set for the NQF were achievable in such a time-frame. Moreover, almost no effort was made to understand and measure the scale of the problem that the NQF was attempting to address within the E&T system. For example, one of the major complaints was the slow pace of qualifications design and development that constrained access to training for workers.

Based on the documentation the evaluation team has reviewed, there are no estimates of the number of occupational qualifications developed and registered under the SAQA Act, nor of the time taken to design and register these qualifications. It is reasonable to assume that these rather basic pieces of information would have helped SAQA and its sub-structures forecast the number of qualifications required and estimated the resources needed to meet this level of demand. It would have also helped policymakers to set measurable targets and hold institutions to account for their performance. At least with benchmarks and targets in

place, it is possible to make more objective, reliable assessments of whether the legislation achieved its intended objectives.

While the Study Team's report recognises the goodwill that exists amongst stakeholders towards the NQF, it also acknowledges that there are substantial differences in how the NQF is viewed and understood. It is therefore strange that policymakers choose to retain the broad and vague objectives of the NQF when drafting the NQF Bill, rather than express the specific goals. This might suggest that although there was general agreement on the importance of the NQF, policymakers still found it hard to formulate specific (and measurable) objectives for the NQF.

5.1.2 Structure and governance of the NQF

By 2008, the SAQA Act had created a complex arrangement of institutions and processes which gave rise to several problems discussed below.

Unclear roles and responsibilities

Under the SAQA Act, the NQF system consisted of the Minister of Labour, Minister of Education, SAQA and all the standard-setting and quality assurance bodies established under the Act. In this system, the Minister of Labour and Minister of Education shared concurrent jurisdiction over the NQF. However, tensions between the Minister of Education and Minister of Labour arose because of their different views and needs. Nevertheless, these pressures created confusion amongst stakeholders.

This spilt responsibility compounded existing tensions between education and training. Academics in Higher Education were concerned that the unit-standard approach adopted by the NQF, would undermine the concept of a whole qualification, where knowledge was built in a sequenced and integrated manner. On the other hand, labour was worried that academic institutions would not be able to develop qualifications that were appropriate for the workplace and that they would place more weight on academic content rather than practical skills (Department of Education & Department of Labour, 2002). One quality council interviewee summarised this issue by saying that government failed to provide "*some understanding of what is a qualification in education; and what is the outcome of learning that is linked to the labour market*".

There were perceived overlaps between SAQA and the Ministries of Education and Labour. It appears that there was some confusion as to which body had executive authority over the NQF, and hence the ability to make policy and pass regulation. This situation led to the perception amongst policymakers that SAQA had too much power over the NQF. Some felt it was not appropriate to have a largely independent organisation with such strong influence over the E&T system; as this undermined the Ministries' control. While these tensions played

out, it created a gap in leadership that impacted adversely on the implementation of the NQF.

To address these problems, the NQF Act clarifies the role of the Minister as the executive authority in Chapter 3. It specifies the powers and functions of the SAQA in Chapter 4, establishes the sub-frameworks in Section 7 and makes the QCs responsible for their management in Chapter 5. Furthermore, the Act creates a policy making hierarchy, giving the Minister the power to develop overarching policy on all NQF matters. It locates SAQA as the apex organisation, responsible for overseeing the further development and implementation of the NQF and coordination of the sub-frameworks.

Proliferation of NQF bodies and institutions

The implementation of the SAQA Act led to the proliferation of an alphabet soup of standard setting and quality assurance bodies. NSBs and SGBs were established to design qualifications, while the primary role of the EQTAs was to quality assure these qualifications. These complex arrangements also created an entire profession of assessors, moderators, and education, training and development practitioners. Collectively, these structures imposed complex policies and processes that made qualifications design and quality assurance drawn-out, inefficient and costly exercises (Department of Education & Department of Labour, 2007). The NQF Act responds to this problem by simplifying the architecture of the NQF considerably. The three QCs have replaced the Band ETQAs, and have developed their quality assurance processes. The QCTO's subsequent delegation of many of their functions has somewhat undermined this objective and meant the OQSF remains a complex institutional landscape.

Lack of policy coherence

During the implementation of the SAQA Act, conflicts between the policies governing the NQF and other sector-specific policies and practices had adversely impacted on the implementation of the Act. For instance, public HEIs applied the residency requirement, a common practice in higher education which restricted learners to transferring only 50% of their credits to another university. The rest of their credits must be earned at the awarding university. For all intents and purposes, the "residency clause" has become a de-facto policy that continues to prevent and constrain articulation through Credit Accumulation Transfer (CAT).

 Inefficient standard setting and quality assurance processes

The proliferation of NQF bodies and structures translated into uneven and inefficient standard setting and quality assurance processes. Those education and training institutions

that worked across fields had to deal with mostly different processes across the SGBs and EQTAs. The stakeholder principle of ensuring that all stakeholders were involved in the qualifications design made the process exceedingly lengthy and slow. While the NQF Act has done away with the separation between standard setting and quality assurance processes, it is up to each QC to design their standard setting and quality assurance processes. In the HEQSF, the process of developing qualification standards is still in its infancy and seen a "hybrid process" driven by experts with extensive inputs from stakeholders. It's is too early to tell whether this model is more efficient than its predecessor, where the CHE was the Band ETQA. The QCTO is currently running two quality assurance models side-by-side. For legacy qualifications, SETAs remain the ETQAs in their delegated role as Quality Assurance Partners (QAPs). For new qualifications, QCTO oversees qualification development and quality assurance, but has delegated much these functions to SETAs and Professionals who act Development Quality Partners (DQPs) and Assessment Quality Partners (AQPs); although efforts are underway to centralise these functions if funding is made available.

5.2 Appropriateness

Once the problems are identified, policymakers must design appropriate policies or interventions to address them. The analysis below examines the theory of change of the NQF Act and outlines some of its drawbacks.

5.2.1 Broad and system-wide objectives

The Act contains a fair amount of detail on the activities of the NQF bodies. It is possible from these legislated activities to determine the outputs of the NQF bodies. Outcomes, on the other hand, are harder to formulate as most of the objectives set out in the Act are broad and reflect the goals of the E&T system. In other words, the objectives of the Act are not necessarily peculiar to the NQF.

Let's take the legislative objective of *"enhancing the quality of education and training"* as an example. In general, there is a host of factors that influence the quality of education and training. These include the resources available to the institution, and the experience and competency of academic staff.

The NQF makes a particular contribution to this objective by subjecting all qualifications to some form of review or accreditation before they are registered onto the NQF. Through these reviews, it attempts to influence how the qualification is delivered and assessed before an award is made. Using the example of HEQSF, one of the criteria for accreditation is that (Council on Higher Education, 2012b):

The number of students selected takes into account the programme's intended learning outcomes, its capacity to offer good quality education and the needs of the particular profession (in the case of professional and vocational programmes).

Underpinning this criterion is the assumption that class sizes and the ratio of lectures to students have a profound influence on the quality of teaching and learning in higher education institutions. However, over the last decade, public universities have been under considerable pressure from the political executive and students to expand access to the education. As the CHE notes (Council on Higher Education, 2016):

The task of responding to the increased need has largely been left to individual institutions, many of which have found it difficult in the face of constrained resources. The general response has been to introduce one or more of the following approaches: increasing class sizes in contact mode teaching to improve financial efficiency. Cases have been reported of classes with more than 1000 students facing a single lecturer, seriously compromising opportunities for what would be considered normal classroom engagement between students and lecturers…

There is a multitude of factors that determines the quality of education and training, some of which work in concert with the NQF to achieve the desired outcomes, others do not. For evaluators, the difficulty arises in trying to isolate the effects of the NQF on the broad objectives set out in the Act. These measurement challenges are evident in previous "evaluations" of the NQF which have tried to use systemic-wide indicators such as learner access, progression and mobility as a proxy for the NQF's performance.

This evaluation finds that the NQF Act's objectives are broadly defined and overshadow the specific outcomes policymakers want to achieve. For the NQF Act to succeed in achieving its intended outcomes, it must specify its own objectives clearly and avoid conflating them with the broader goals of the E&T system. This is not to say that the goals of the NQF should be separate from or independent of the goals for education and training – far from it, the NQF must contribute to wider educational outcomes and impact. However the specific outputs and outcomes that the NQF seeks to achieve must be measurable and achievable in their own right, not subsumed into those of the system as a whole.

5.2.2 Lengthy and complex pathways to change

A defining feature of the NQF Act is that it prescribes the responsibilities of the M:HET and NQF bodies, and gives them powers to guide, direct and influence the development of the NQF. The Act is silent the roles of education and training institutions in the NQF, even though these organisations play a crucial role in implementing the NQF. There are complex and distant causal pathways between the outputs produced by the NQF bodies and the desired outcomes, many of which happen in education and training institutions.

To illustrate this assertion, the evaluation team has developed the intervention logic for RPL in a public university. As Figure 6 shows, in order to increase access to qualifications through RPL, several change processes must take place, at different levels.

Change processes begin with the Act, which gives the Ministers and NQF bodies policymaking powers over their respective jurisdictions. The Minister is responsible for the overarching policy, whereas SAQA develops a national policy to guide the implementation of the Act. The policymaking powers of QCs are limited to their sub-frameworks. This layered approach creates a hierarchy of policy in the NQF, where each layer informs and guides the next.

In fulfilling his legislative mandate, the Minister must publish his policy on RPL. This has been done through the *Recognition of Prior Learning Coordination Policy,* published in 2016*.* In turn, the Ministerial policy must inform SAQA's national policy on RPL which provides broad guidance on how implementation should happen. However, in practice, the SAQA policy predates the Ministerial RPL policy as it was issued in 2013 and may have to be updated in order to align with the Ministerial policy. Similarly, the Act requires the QCs to develop their own policies to guide their sub-frameworks. The CHE as the quality council responsible for the HEQSF must develop a policy on the RPL that is appropriate and relevant to its sub-framework.

For the policy framework to achieve meaningful change, public universities must adopt and implement it. Ideally, the university should establish its own RPL policy to promote this form of specialised pedagogy throughout the institution, and to signal its importance to academics. However, for the university policy to change existing behaviours and processes, it needs to go further and build capacity amongst academics in RPL, create awareness about RPL, configure admissions systems to allow learners to apply for RPL, and make academics and other resources available to assess prior knowledge. These processes will only happen consistently if certain conditions are present. For instance, a dedicated funding stream could incentivise public universities to promote RPL.

The NQF Act establishes the governance structure and policy framework for the NQF. It presumes that the policies and NQF bodies will influence, persuade and regulate education and training institutions in order to achieve objectives of the Act. In developing the Act, the policymakers might have underestimated the lengthy and complex pathways that exist between what the NQF bodies do and the outcomes they want to achieve. As a result, it is difficult to hold the NQF bodies accountable for the outcomes and impacts envisaged by the Act, which are beyond their sphere of direct control. However, for the NQF Act to be implemented successfully, a "joined-up approach" is needed that makes stakeholders collectively accountable for the implementation of the Act. As the roles and responsibilities

of the M:HET and NQF bodies are already outlined in the Act, an additional amendment that places clear obligations and responsibilities on education and training providers, the M:BE, DHET and DBE might entrench a sense of collective responsibility and accountability for achieving the NQF's objectives.

Figure 6: Access to qualifications through RPL in a public university.

Assumptions

DHET	
NQF Bodies	
University	
Learner	

RPL Coordination Policy published

There is consistency and alignment between the RPL policies of different NQF bodies.

There are resources available to disseminate the policy to E&T and wider public

The are resources available to build capacity on RPL

SAQA policy on RPL published

CHE policy on RPL published

Enrolments and achievements through RPL recorded on the NLRD

Increased awareness of the policy on RPL

Better understanding of RPL as specialised pedagogy among academics

Academics value RPL as an important access route into the university sector.

Officials or organisational unit champions RPL within the institution

Institutional policies for RPL adopted by senate

Applications for RPL and intakes are monitored by the university

Revised admission policies reflect the RPL policy

RPL requirements are clearly defined

More academics trained in RPL

Academics available to administer RPL

There is demand for RPL from learners

RPL requirements are clearly defined in the qualifications design phase

Universities have the resources to train academics in RPL

Learners meet the RPL requirements

Increased access to qualifications through RPL

Universities create awareness about RPL

There is funding for RPL from the fiscus

Learners can afford the RPL fees levied by the university

Source: Funnell, Sue C.; Rogers, Patricia J.. Purposeful Program Theory: Effective Use of Theories of Change and Logic Models (Research Methods for the Social Sciences) (Kindle Location 6949). Wiley. Kindle Edition.

5.3 Conclusion in relation to relevance and appropriateness

The SAQA Act was an important and much-needed policy response to the challenges within the E&T system in 1995. At the time, the NQF's aim was to enable all learners to access quality-assured qualifications and move unencumbered through the E&T system. These goals were probably still relevant when the NQF Act was promulgated. Although, one would have expected that after a decade of implementing the NQF, there would be more information on the performance of the NQF, it appears that the bill was drafted without much evidence on the overall effectiveness of the NQF system.

Key questions that might have helped the policymakers understand the scale and nature of the problem remained unanswered. For example, there was very little information on the progression and movement of learners and workers across the E&T system. It is also unclear whether there were policy and structural barriers within the E&T system that hindered the ability of institutions to implement the NQF.

In the end, the policymakers focused their attention on the governance and organisation of the NQF. As a result, the NQF Act introduced several structural changes and clarified the roles and responsibilities of key role-players. In adopting this policy response, the underlying assumption was that if policymakers restructured the organisation of the NQF, this would resolve many of the problems. Hence, the NQF Act and its theory of change captures in great detail the activities of the M:HET, NQF bodies and professional bodies. In doing so, it overlooks the role of education and training providers and other key stakeholders such as the Minister of Basic Education and of Labour in the NQF. It also fails to recognise the considerable distance between the outputs delivered by the NQF bodies and the outcomes of the NQF. This contributes to the perception that the NQF bodies are primarily accountable for the outcomes of the NQF stated in the Act, some of which are beyond their sphere of influence.

Hence, this evaluation finds that although the NQF Act remains relevant to the broader goals of the E&T system, there is a need to reformulate some of its objectives, and develop a theory of change that better reflects the multiple stakeholders, processes and contexts involved in the implementation of the NQF.

6 FINDINGS: COHERENCE

A complex system such as the NQF needs a coherent policy framework to direct and guide its development. The NQF Act recognises the importance of the policy framework and specifies the types of policies that must be developed by the NQF bodies. The Act also gives the Minister broad policymaking powers. As, the M:HET, SAQA and QCs all share the policy-making functions in the NQF, the NQF Act develops a hierarchy of policy layers to minimise the potential for overlap and duplication.

Policy coherence is measured at three levels (Bamberger, Vaessen, & Raimondo, 2016):

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

6.1 Internal policy coherence

Unlike simple policy interventions where there is a shared and common understanding of the objectives, the NQF system has a multiplicity of stakeholders with divergent views and expectations. Achieving agreement under these conditions can be challenging (Bamberger, Vaessen, & Raimondo, 2016). And, where stakeholders cannot reach an agreement, they tend to respond in one of three ways. Either, they will ignore the policy and continue with their work, comply with the letter of the law (if the policy is legislated) or they will implement the policies as they feel fit, without taking into account other interventions happening in the system. These typical responses impact adversely on the achievement of intended outcomes.

In general, the qualitative interviews confirm that the NQF is increasingly accepted as an essential part of SA educational architecture. There is some agreement amongst key policymakers and the NQF bodies on the purpose of the NQF and what it is trying to achieve. Surprisingly, it is the interviews with DHET officials where the differences in views of the NQF Act surfaced.

Seemingly, there are many different opinions in the DHET on the NQF. This is not surprising as many of the different camps that contested the design of the NQF in the early 2000s have been brought together within the DHET. Although there is acceptance of the compromises reached politically in 2007 and reiterated in the PSET White Paper, the underlying concerns remain and find expression in different understandings of the current situation and different ideas on the way forward. Given the background to the formation of the DHET some form of

brokering should have been done to fashion a common approach within the Department, and it would appear that this has not been achieved. Managers in DHET acknowledge that there is no single departmental position, and that this is a weakness. Many outside DHET also complained about the lack of a clear single vision on the NQF coming from DHET top leadership and management. This creates opportunities and loopholes which are exploited by QCs, whereby you can choose which one of the many "DHET" positions you would like to treat as the Minister's position. In the long run this situation will only reduce the coherence of the NQF, the QCs' policies and the qualifications system.

The evaluation team asked similar questions about the purpose and objectives of the NQF Act to E&T institutions and providers. In these qualitative interviews, it became apparent that for public universities, the NQF Act's primary objective is to promote progression and articulation within the HEQSF and across sub-frameworks by creating a single integrated qualifications framework. The Act is seen as part of government's broader transformation agenda in the HE. Although most interviewees agreed that the NQF Act played a significant role in enhancing the quality of qualifications, there were notable differences in views on this issue. According to traditional universities, they always had focused on quality. Even before the NQF Act, traditional universities had established internal quality assurance processes to ensure that their qualifications meet the institution's quality standards. For them, the objective of "enhancing quality" seemed less relevant. On the other hand, Comprehensive Universities and Universities of Technology agreed that the NQF Act plays a substantive role in ensuring that qualifications meet agreed quality standards and criteria.

Interviews with TVET colleges elicited a range of responses. TVET colleges seem less familiar with the NQF Act. That said, the evaluation also found that there was often one academic within the college who had a good grasp of the NQF and what it seeks to achieve. For TVET colleges, it appears that the primary objective of the NQF Act was to promote quality in the delivery and assessment of qualifications and enhance progression and mobility. SDPs held a similar view. For them, the NQF Act was promulgated to facilitate articulation and improve the quality of education. Some SDPs felt that the Act was also established to facilitate movement between education and training and workplaces.

6.2 Vertical policy coherence

Vertical policy coherences examines the alignment between the NQF and wider PSET policy frameworks. By combining a review of policies with interviews, this evaluation assesses the extent to which policies are coherent and aligned between the NQF and PSET systems. A few key findings emerge from the analysis.

Stronger alignment between PSET White Paper and NQF policy framework is observed in higher education. However, some Universities of Technology (UoTs) and Comprehensive

Universities are finding it difficult to develop a Programme Qualifications Mix (PQM) that reflects their identity while meeting the policy imperatives of the NQF. For instance, interviewed officials point out that the draft *Articulation Policy* calls for all QCs to develop NQF Level 5 qualifications. Some of the public HEIs are unsure how they should respond to this policy imperative, and whether it aligns with the differentiated approach to the university sector adopted by the DHET. In other words, would traditional universities which do not offer such qualifications now be required to develop NQF Level 5 qualifications?

Although not strictly an "NQF" issue, there are some important Departmental policy matters being discussed that are impacting on implementation of the NQF Act and which will have a significant impact on the way that NQF institutions interact with TVET colleges. There are concerns about the lack of clear direction for the occupational and TVET training sub-sectors. Interviewees suggest that there is some agreement on the direction of the sector, but many feel it is not sufficiently clearly expressed. For example the future of the NC(V) is being discussed and there is no certainty about whether it will be retained in its present form, revised and strengthened, or replaced by a qualification at a higher level. The uncertainty has been increased by the DBE decision to introduce three pathways to an NSC, including a vocational and an occupational route. There are indications that the schooling sub-system will take over the role of a technical alternative pathway to the NSC, which is currently mostly the role of TVET colleges. At the same time, TVET colleges are subject to a large number of policy initiatives that are not necessarily coordinated. There has been a recapitalisation programme, various programmes to expand the skills of educators. Whilst there is uncertainty over the NC(V), there is a major drive to develop and deliver occupational qualifications. Whereas the NC(V) comes under Umalusi, the occupational programmes are driven by the QCTO. So the SETA ETQAs and the QCTO are starting to play an important role in the colleges, which colleges acknowkedge as important but which they struggle to deal with because of the resources needed to address SETA and QCTO QA requirements, alongside the pre-existing DHET and Umalusi requirements. The SETA landscape paper process has created further uncertainty around the future role of these organisations and its quality assurance functions. While there is an expectation from the DHET and the QCTO council that the QCTO will take greater ownership of its delegated quality assurance functions (that are currently larged performed by SETAs), it is still not clear how and when this will happen. So colleges are having to deal with both the SETAs and the QCTO as well as their traditional quality partner, Umalusi.

Finally, the "three steam" model is a more recent example of disconnected policy framework. Based on interviews, the evaluation team understands that a DBE task team has been established to develop a "three stream" model for schools that includes a vocational version of the NSC. It is not yet clear how this vocational version of the NSC will overlap with the NC(V) and how it will articulate with other qualifications.

A large number of questions need to be answered clearly, and agreed between stakeholders for this uncertainty in the TVET system to be (at least partially) resolved. For example:

- What is the exact definition of vocational and occupational programmes and is this commonly understood? Where should vocational programmes fit within the NQF sub-frameworks?
- If the DBE implements the "three stream" approach across levels 2 to 4, what is the logic of TVET colleges presenting qualifications at the same levels in the same areas; but using a different qualification (e.g. the National Certificate Vocational, or NC(V)).
  - How do the departments ensure that this would not undermine either the school or TVET pathway?
  - Would these qualifications articulate effectively between each other? The current experience from school to college would suggest not.
- What would be the most effective approach to quality assurance, when the mix of qualifications offered by institutions falls under the ambit of both the GFETQSF and OQSF?
- Fundamentally: Are vocational or occupational programmes to be the main qualification type delivered in public TVET colleges?
  - Public colleges do not currently require accreditation to present NC(V) or N1-N6 programmes, but they will require accreditation to present QCTO occupational programmes. N4-N6 are seemingly being phased out by the QCTO. Will the many under-capacitated TVET colleges be able to obtain such QCTO accreditation?
  - If they cannot obtain accreditation their enrolment numbers will plummit if they can no longer accept N4-N6 students. Is a qualification other than the NC(V) necessary to fill this potential void at levels 5 and 6 in colleges that cannot in the medium term present occupational qualification? It seems likely that N4 to N6 will not be phased out in this situation, which just reinforce confusion if occupational qualifications in the same fields exist in some but not all colleges.
  - Setting up colleges to focus primarily on occupational programmes would require a very different approach to resourcing, capacitating and quality assuring colleges than vocational qualifications. Is it clear which colleges are

to focus on what and what role QCs and the DHET should play in these different colleges?

It is these unanswered policy questions, which extend well beyond the NQF, that make for so much instability in the QCTO and Umalusi; not to even mention the colleges themselves. Any significant progress towards a simplified and harmonised system is unlikely while these fundamental questions remain unanswered.

6.3 Horizontal policy coherence

For this evaluation, the research team reviewed the policies issued by the Minister and NQF bodies and evaluated them against what constitutes good policy. Appendix 1: contains a description of these criteria used in the analysis.

6.3.1 Ministerial and national policies

The policy analysis begins with a review of the ministerial and national policies developed by the M:HET and SAQA. As Figure 7 shows, it has taken considerable time to complete the development of the NQF policies as stipulated by the Act. Although, Parliament passed the NQF Act in 2008, it only came into effect in 2009. After that, it took six years for SAQA to develop its policy framework.

There are several reasons for this prolonged policy process. 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 the a policy. The result is that any policymaking process in the NQF involves several groups of stakeholders, multiple drafts and calls for comment. While this participative and consultative approach is good practice, it does prolong policy development.

Aside from the lengthy process, SAQA had to ensure that policies were published in the correct sequence. This was because some policies depended on others being gazetted. For example, the level descriptors are the foundation of the NQF and had to be published before the sub-frameworks. Although respondents found these delays frustrating, many interviewees recognised the amount of work and effort that the M:HET and SAQA have put into creating a coherent and aligned policy framework for the NQF.

It is interesting to note that the M:HET has been more active in setting policy in recent years. In 2016, the M:HET published two major policies: the draft *Articulation Policy* and the *Recognition of Prior Learning (RPL) Coordination Policy*. The decision to publish these Ministerial policies in areas, where slow progress had been made to advance the objectives of the NQF, points to the M:HET taking a more active role in steering the NQF. But, it also

means that SAQA and the QCs will have to revise and update their policies on RPL to align these with the ministerial one. While the hierarchy of policy creates alignment and coherence across the NQF, it does appear to frequently delay and complicate the policymaking process.

Figure 7: Timeline showing the publication of key ministerial and national polices
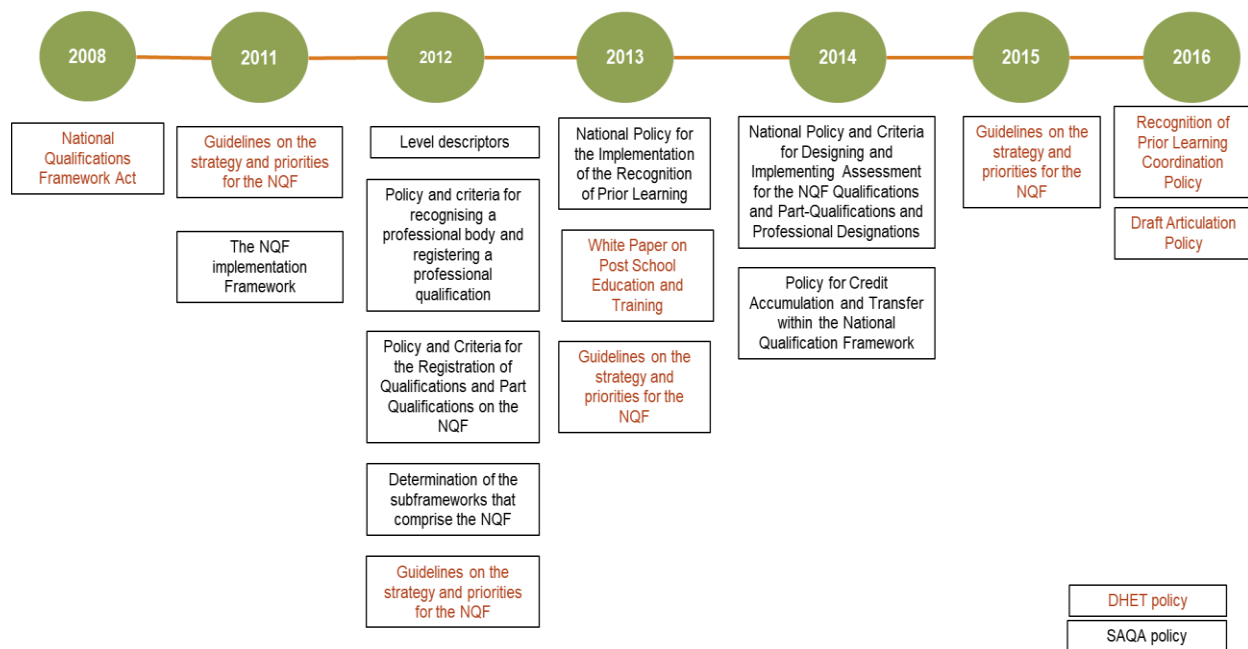
The policy analysis exercise provides useful insights into the extent to which the ministerial and national policies meet certain of the standards of good policy. It finds that the ministerial and national policies generally contain a clear statement of the policy objectives and identify their target audience. As Table 9 shows about half of all the policies indicated who was responsible for implementing the policy. While the earlier policies focused on the functions of the M:HET and NQF bodies, more recent policies provide guidance on the responsibilities of a wider range of stakeholders including education and training institutions.

In a complex system where policymaking powers are dispersed across various institutions, policies can either be mutually reinforcing or they may diverge from each other (Bamberger, Vaessen, & Raimondo, 2016). Where policies are not aligned, implementing agents are left to decipher what needs to be done. Many respondents recognise that the M:HET and SAQA have invested considerable effort in establishing and creating alignment in this hierarchical policy framework.

In reviewing the policy framework, it is clear that policies cross-reference each other to allow the reader to trace the common thread throughout the policy framework. Second, the NQF

nomenclature is used consistently within and across most policies. To help readers understand the NQF's language, SAQA has developed an *NQF Standard Glossary of Terms* and published it on their website.

Table 9: Ministerial and national policy analysis scores

Criteria	Does not meet criteria	Partially meets criteria	Meets criteria
The policy clearly states the policy goals or objectives.	0%	33%	67%
The target audience is clearly identified.	33%	0%	67%
The roles and responsibilities for policy implementation are clearly stated.	0%	50%	50%
The actions / requirements for implementation is clearly stated in the policy.	17%	50%	33%
The policy identifies the resourcing requirements, and where appropriate determines the cost of implementation.	50%	50%	0%
The policy stipulates the mechanism for monitoring implementation.	40%	60%	0%
The policy identifies performance indicators for assessing success.	100%	0%	0%
The policy clearly describes how it changes the pre-existing policy in the relevant area.	75%	25%	0%
The policy aligns to the policies of this and other NQF bodies.	0%	0%	100%
There is sufficient clarity on the standing of different policies, particularly in cases where policies diverge.	25%	25%	50%
The policy is accessible, consistent, written in plain language, and easy to understand.	0%	50%	50%
The consequences of not meeting or implementing the policy are stated.	75%	0%	25%

Source: DNA Economics

Although most policies are written in plain language and are easy to understand, interviewees reveal that the NQF nomenclature creates a barrier to constructive engagements. Unsurprisingly, respondents who deal with NQF matters on a regular basis found the documents clear and easy to read. However, they also admitted that it took them a while to come to terms with the NQF "jargon". Other respondents whose work is influenced by the NQF but are not involved directly in managing the interface between their institution and the NQF bodies found the language confusing and difficult to grasp. As one of the registrars at a public university stated during an interview:

"I wish the documents would just say what they mean and be clear on what we as universities have to do when it comes to articulation. I have spent hours poring over the articulation policy and still am not sure what I need to do differently."

It is the view of the evaluation team that the language or jargon of the NQF has become a serious barrier to progress. Often someone will make a small error using a word or concept slightly differently to what is contained in policy and they will find themselves being questioned and challenged over the word used, rather than being engaged in the point they try to make. The result is that many people withdraw from discussions on NQF matters. Whether the term "system" or "sub-system" is used should not be so important, whether we talk of registration or accreditation, portability or articulation, clearly matters in a written policy paper, but NQF stakeholders should be able to communicate with each other without fear of getting a word out of place. It needs to be recognised that senior policy makers are unlikely to be NQF specialists and need to be engaged in a practical way. Though it is normal for technical fields to develop their own nomenclature and "jargon", for the NQF to extend its reach beyond its current audience, it must learn to organise and present its policies in plain language. This will make it more accessible to educators, employers and learners, and will empower senior policy makers to make the decisions they are often criticised for avoiding.

Table 9 summarises the strengths and weaknesses of the ministerial and national policies. It shows that almost 75% of the policies that should have mentioned the resources needed for implementation, did not.[8] Policies are written without much thought given to how much funding the NQF bodies, DHET and education and training institutions will need to implement these policies.

In the rare instances, where policies mention resourcing requirements, estimates of the amount of funding needed are often not made. For example, the *Guidelines on Strategy and Priorities for the National Qualifications Framework (NQF), 2015/16* calls for SAQA to establish and operate a fraud unit. In the same policy, the Minister makes it incumbent on SAQA and the QCs to "set aside funds from their voted budget, to support this activity as a point of focus within their quality assurance mandated function" (Department of Higher Education and Training, 2015). These types of instructions can give rise to unfunded mandates, which are particularly concerning in light of the severe funding constraints faced by SAQA and the QCs. Very often NQF stakeholders will talk of "underfunding" but it would be more accurate to describe the situation as one of not matching resources to the functions being agreed. If the functions and activities that are being described as underfunded had been costed when they were adopted and budgets agreed on the basis of the costed models being implemented then the problem would not have occurred in the way it has. Many qualification development and quality assurance processes have been adopted and implemented without a clear understanding of the resource implications. It is really not

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[8] Not all policies needed to meet all criteria. Where a policy criteria was not relevant, it was marked "not applicable" and excluded from the scoring grid.

sufficient to state that these functions are simply "underfunded". They should not have been approved for implementation without a costed budget. Significant mandates should not be extended if no funding is provided to accompany these mandates.

The ministerial and national policies also lack the performance indicators that would allow the M:HET and SAQA to measure the NQF's progress against its objectives and where appropriate identify improvement opportunities. In the NQF system, performance measures serve three important purposes.

First, they establish what success looks like and set targets for the NQF system. By setting clear benchmarks against which the performance of the NQF will be measured, performance indicators can help the Minister hold the key role-players accountable for performance. A common refrain encountered during this evaluation is that data is not available. While this might be the case in some parts of the NQF, as this evaluation shows, the NQF system is beginning to produce evidence that can be used in decision-making, as long as it can be located and accessed by those who need to use it.

Second, performance indicators provide comparative information so that the M:HET and SAQA can trace performance across different years to determine where the policy is working or not. For example, if the M:HET and NQF bodies were interested in articulation between Historically Disadvantaged Universities (HDUs) and "other" universities, then they would set a simple indicator that measures the "percentage of learners that transitions from HDUs to other universities" in the draft articulation policy. Finally, performance indicators are an important signal to implementers of the priorities of the Minister and SAQA. They can also help implementers design indicators to monitor their performance.

Lastly, linked to the issue of performance indicators is the lack of monitoring arrangements. As the policy analysis reveals, about 40% of all policies do not even make mention of a monitoring system. Nevertheless, given the complexity of the NQF, monitoring systems can supply critical information to decision makers. Hence, NQF policies should ideally elaborate on the monitoring mechanisms where possible.

6.3.2 Sub-framework policies

The same policy analysis was repeated for each sub-framework, and the results are similar. In general, policies are clear in their objectives and align reasonably well with the national and ministerial policies. Moreover, the policies are well written and clear. This finding is confirmed by the survey where about 86% of respondents in the HEQSF found the policy guidance clear and easy to understand, compared with 78% of respondents in the OQSF. Lower levels of agreement in the OQSF only mean that it takes time for Skills Development

Providers (SDPs) to come to terms with the policy reforms and new nomenclature introduced by the QCTO.

Figure 8: Survey question: To what extent do you agree or disagree with the following statement - the policy guidance produced by the NQF bodies on NQF matters is clear and easy to understand.

Response	HEQSF	GFETQSF	OQSF
Disagree	0%	11%	17%
Neither agree or disagree	0%	4%	0%
Agree	86%	82%	78%
Don't know	14%	2%	4%

Source: HEQSF, GEFQSF and OQSF surveys

Few policies across the sub-frameworks contain performance indicators or refer to any form of monitoring. It is also concerning that the policies do not consider the level of resourcing needed for implementation. In particular, little attention is given to the capacity of education and training institutions to implement the policy framework. For example, from reading the HEQF, it is clear that the re-alignment process would take considerable time and effort from HEIs. Although, the implementation of the HEQF was phased in, interviewees in public HEIs mentioned that the re-alignment process consumed a significant amount of time and resources. As an interviewee from an HDU notes in their interview:

> *"There are so many new policies. We had just finished our institutional audit, when we had to re-align all our learning programmes to the HEQF. Then, a few years later, we had to learn about the HEQSF. After that, we had national reviews and then there was the QEP. We have a small quality assurance office and all of these things have to go through us. It does create a capacity challenge for us."*

There are a few areas of uncertainty that are not addressed in the policy framework. In particular, the HEQSF and OQSF both have qualification types located at Levels 5, 6, 7 and 8 on the NQF. Some respondents from public HEIs think that the current policy framework did not provide sufficient guidance on the vocationally-orientated NQF Level 5. In their interviews, they said that when the NQF bodies were designing the sub-frameworks, there was considerable debate about where NQF Level 5 qualifications should be located. In the end, all stakeholders decided that the HEQSF and OQSF would both have qualifications types on this level.

While the NQF Level 5 is seen as a bridge between the different sub-frameworks, there is some policy uncertainty around how qualifications at this level will work and articulate within the NQF. In the HE sector, some HEIs offer NQF Level 5 qualifications whereas others don't because these qualifications do not fit within their institution's mandate. HEIs that currently have NQF Level 5 qualifications report having some difficulty in creating articulation

arrangements. To confirm this perception, the evaluation team examined information provided by HEIs to learners on progression pathways. Many of the prospectuses do not set out the progression pathway for the higher certificate on NQF Level 5. Instead, progression pathways tend to focus on diplomas and degrees, that is NQF Level 6 and up. On the whole, NQF Level 5 qualifications remain an area of policy uncertainty within the NQF. More guidance and engagement is needed around this issue.

Despite the efforts of the QCs to clarify their terminology, a few concepts are open to wide interpretation. It seems that the terms "occupational" and "vocational" mean different things to different officials. Questions such as what constitutes an occupation, and how it is distinct from a profession are unanswered. Agreement on the distinction between these three concepts is necessary as it affects the way qualifications are designed across sub-frameworks. However it also needs to be acknowledged that this is an area of intense theoretical debate and contestation. Many educationalists believe passionately that a broad vocationally orientated qualification is needed and that actual training in an occupation occurs in a workplace. Others believe that, provided the "occupation" is defined broadly the advantages of acquiring an occupational competence (for example an electrician qualification) are very great. 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 take the policy process forward.

Different sub-frameworks make use of different qualification types, which distinguishes qualifications at the same level, but such a system can still be confusing to navigate for those who are not intimately familiar with the design and operation of the NQF's qualification design and its organisational structures.

6.4 Conclusion in relation to coherence

Overall, the findings from this evaluation point to broad agreement on NQF Act's objectives amongst most stakeholders compared to two decades ago when the SAQA Act was promulgated. The essential compromise is that three sub-systems are able to operate within three sub-frameworks, overseen by a coordinating structure that holds a unified NQF together. It is complex and messy, but it is something that the majority of stakeholders can live and work with. That said, there are different views and understandings of the NQF that have existed for many years, including serious disagreements and views on how best to progress. It is not surprising that these differing views have emerged within the DHET. The differences have to be worked with and some agreements need to be brokered. In practice that has not happened and so no common approach has emerged. This has resulted in the lack of a common departmental position on the framework that can be clearly articulated to stakeholders. Having said that, the Ministry and Department have emphasised the partnership approach and have encouraged the stakeholders to discuss things at the level

of interface with the clients or beneficiaries. This has resulted in some accommodations and agreements that at a practical level enables implementation. E&T institutions have adopted a pragmatic view of the Act. Some objectives are more important than others depending on the context they face and their needs.

While there appears to be a reasonable amount of vertical integration in terms of higher education policy, there is a clear lack of coherence and clarity in the occupational and vocational training sectors. While the White Paper on Post-School Education and Training (PSET) helped frame the 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. This in turn impacts on the quality councils and the role that they are expected to play in relation to TVET colleges. It is becoming clear that the QCTO and the SETAs will play an important quality assurance role in the delivery of occupational programmes. Meanwhile, Umalusi still quality assures the NC(V) and certain NATED exams. Simultaneously the Department of Basic Education (DBE) is developing a "three stream" approach which also creates vocational and occupational pathways at equivalent levels of the NQF.

These policy processes do not appear to be meaningfully aligned, which delays and undermines the achievement of the NQF's objectives. These issues extent beyond the NQF, and can for the most part not be resolved by NQF bodies, but it is critically important for the Ministers to provide clarity on the future of vocational and occupational training in the public sector.

An analysis of horizontal alignment relative to a number of objective criteria for good policymaking reveals that while most NQF policies clearly state their objectives, target audience(s) and their alignment to other policies, they fall short in a number respects. Most notably, they often 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.

7　FINDINGS: EFFICIENCY

Typical approaches to efficiency analysis examine how a policy and its interventions are organised, delivered and compares this information with what was achieved. The efficiency criterion also considers the relationship between the resources used in an intervention and the outputs generated. The intention behind this analysis is to assess how efficiencies in the execution of a policy can be improved and where appropriate how the interventions can be simplified. The section that follows answers the following evaluation question from the Terms of Reference.

EQ3: To what extent has the implementation of the NQF Act been efficient?

7.1　System of collaboration

In complex systems, collaboration allows stakeholders to identify problems and agree on solutions and goals jointly. It creates productive working relationships and enhances the efficiency of a system (Buffardi, 2016). The NQF Act introduces an innovative mechanism to encourage and promote collaboration across the NQF system.

The system of collaboration is designed to "guide the mutual relations of SAQA and the Quality Councils, namely the Council on Higher Education (CHE), Umalusi and the Quality Council for Trades and Occupations (QCTO), in such a manner as to promote constructive cooperation". This system sets out the underlying principles for collaboration and establishes the collaboration structures, levels and procedures. It also outlines the process for resolving disputes (South African Qualifications Authority, 2013).

7.1.1　NQF Forum

Drawing on the lessons learnt under the SAQA Act, the system of collaboration creates several structures to make implementation work better and more efficiently. The NQF Forum is one such structure. It consists of the M:HET, Director General of Higher Education and Training (DG: HET) and the chairpersons and CEOs of the NQF bodies. The NQF Forum provides a platform for engagement between the M:HET, DHET and NQF bodies to discuss strategic matters relating to the NQF. It is, therefore, worrying that the NQF Forum has not met since 2012. While it is understandable that members of the NQF Forum have full and busy schedules, it is nonetheless strange that the executive authority of the NQF has not been able to convene one meeting of the structure in five years. The lack of engagement between the M:HET, DG: HET and NQF bodies might suggest that there is a more fundamental issue at play. Some interviewees have even suggested that this lack of engagement might reflect the fact that the department does not see NQF as a 'priority' in a PSET system that is under continuous pressure to expand access and funding.

7.1.2 CEO's Committee

Another structure created through the system of collaboration is the CEO's Committee. This structure consists of the CEOs of SAQA and the QCs and meets on a quarterly basis. Based on our review of the minutes, the CEO's Committee is functional and meets regularly. The minutes of the CEO's Committee show that it has become an important structure in managing the development and risks in the implementation of the NQF Act.

To a large extent, the CEO's Committee does well in handling issues that relate directly to the implementation of the NQF Act and operations of the different bodies. It uses a tracking grid to monitor progress on the main action items emerging from the discussions of the committee. In many respects, the CEO's Committee attempts to be a mechanism for the NQF bodies to hold each other accountable for the main milestones and deliverables in their implementation plan, although there is little evidence of meaningful consequence management or accountability when targets are not met. It also serves a point of contact between the CEOs of the NQF bodies and other key stakeholders within the DHET and DBE. The NQF Directorate which represents the DHET attends most of the CEOs meeting and acts as a liaison between the NQF bodies and other branches in the department.

According to some interviewees, the CEO's Committee focuses on operational issues within the NQF. Several questioned whether the committee deals with substantive issues around the NQF, suggesting that it currently narrowly focusses on bureaucratic process management.

One of the DHET senior managers also argued that SAQA is good at managing the day-to-day implementation of policy and legislation, but not at innovating within the parameters created by the Act. This, along with SAQA lacking teeth (which most government respondents commented on) has created the perception that SAQA is weak. The proposed changes to the Act that are being discussed in DHET would address this issue by ensuring that all communication on NQF matters between the QCs and the Minister must go through SAQA. However, QCs are concerned that such an arrangement will (i) limit their access to the Minister, particularly in instances, where there are disagreements between themselves and SAQA, and (ii) result in the bureaucratisation of the system and thus unwittingly make it less efficient.

7.1.3 Inter-departmental NQF Steering Committee

The inter-departmental NQF Steering Committee, as the name suggests, consists of the officials from the DHET and Department of Basic Education (DBE). This committee coordinates the responsibilities between the two departments and provides advice to the NQF Forum (South African Qualifications Authority, 2013). While the Steering Committee meets regularly, its effectiveness in dealing with critical matters that influence the

achievement of the NQF's objectives is questionable. In particular, critical NQF issues regarding the role of the DBE or the ownership of the GFETQSF have not been resolved. To illustrate this point, this evaluation uses three examples of policy uncertainty that has not yet been resolved by the committee.

First, since the promulgation of the NQF Act, there have been major differences in the way in which the DHET and DBE view Umalusi's role as a QC. On the one hand, some officials in the DBE regard Umalusi's role primarily as a moderation and certification body for the NSC, NC(V) and other GFET qualifications. On the other hand, officials in the DHET argue that Umalusi's role as a QC is much wider and that it should be assuring the quality of schooling across basic education.

Second, and linked to the issue of the role of Umalusi is the contestation around the ownership of the GFETQSF. No decision has been made as to whether ownership of the sub-framework lies with the DBE, as the institution that sets the curriculum and exams, or Umalusi as the QC.

Lastly, the funding flows and reporting lines are anomalous within a public finance system that is built on the premise that "funding follows the function". Currently, the DBE funds Umalusi to perform functions relating to its role as the certification and moderation body. However, Umalusi reports to the DHET as a QC but does not receive any funding from the department. Thus, most of the functions performed by Umalusi under the NQF Act are not funded. As a result, this division between the reporting lines and funding flows gives rise to unfunded mandates that continue to place Umalusi under financial stress, even while its overall income has increased.

In the nine years since the passing of the NQF Act, and the four years since the publication of the system of collaboration, there has been little or no progress in resolving these issues. Nonetheless, this finding supports the assertions by some that parts of the NQF system are slow when it comes to making critical decisions.

The inter-departmental NQF Steering Committee is not necessarily expected or able to directly resolve the many substantial cross-cutting issues with which is expected to engage, but is expected to facilitate the resolution of these issues. This suggests that additional or alternative structures or mechanisms might be required to expedite and clarify the resolution of such issues.

7.2 Regulatory functions: 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

M:HET later extended SAQA's regulatory powers to include the verification of local qualifications. Over and above this remit from the M:HET, the Minister of Public Service and Administration also asked SAQA to verify the qualifications of public service employees to reduce the risk of fraud (Department of Higher Education and Training, 2014).[9] This section examines the efficiency of these three regulatory functions: registration, evaluation and verification.

7.2.1 Registration of qualifications and part qualifications

In the E&T system, a registered qualification is one that has been quality-assured by a QC and reviewed by SAQA to ensure that it meets the criteria for registration. Thus, in the NQF system, registration addresses the information asymmetry between providers and learners by assuring them that a qualification has met certain standards. In many ways, the SAQA ID has now become a mark of quality in the E&T system.

As Figure 9 shows, the number of qualifications registered grew on average by about 7% per year between 2009/10 and 2015/16. 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.

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. On the contrary, the development of unit standards or part qualifications as they are called under the NQF Act has come to a standstill. 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 QCTO argue that the focus is on full qualifications, as these better address the employers; who are seen to prefer learners with a broader set of skills.

While the HEQSF has traditionally focused on whole qualifications, some public HEIs mentioned that they were not quite sure what a part-qualification means in the sub-framework. There appears to be some confusion as to why the HEQSF differs from SAQA's policy on the registration of qualifications and part-qualifications. This misunderstanding can simply be clarified through a communique that explains why the policies differ and the rationale for the HEQSF's focus on full qualifications. Fundamentally, the HEQSF's focus on

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[9] There is some dispute as to whether the verification function should sit with SAQA, or only the QCs; as discussed in section 7.2.2 below

whole qualifications allows HEIs the flexibility to structure their curricula as they see fit, and takes into account the practical implications and resources needed to extend accreditation to part-qualifications.

Until recently, there was some confusion as to whether a short course should now be registered as a part-qualification under the NQF Act. To some extent, the CHE has addressed this question in their *Good Practice Guide for the Quality Management of Short Courses offered Outside of the Higher Education Qualifications Sub-Framework.* As the guide notes:

> *Universities and private higher education institutions are engaged in offering short courses that do not lead to qualifications or part qualifications on the Higher Education Qualifications Sub-Framework (HEQSF). These courses serve different developmental purposes to the participants. To the institutions themselves, the offering of such short courses provides an avenue for community or societal engagement and income generation. The income generation imperative, it would appear, is in ascendancy, given the resource constrained environment in which institutions have to operate (Council on Higher Education, 2016).*

Although this guidance clarifies the fact that short-courses fall outside the HEQSF, no further information is available to guide the development of part qualifications in the HEQSF.

A similar problem emerges in qualitative interviews with stakeholders in the OQSF, SDPs and professional bodies report that there is little information on what makes up a part-qualification in the sub-framework. Interviewees were uncertain whether a part qualification in the OQSF would have to include workplace training. Many argued that it might not make sense for part qualifications always to have a workplace training component if the purpose of the part-qualification was to help workers refresh the theoretical knowledge needed for their jobs. Similarly, some professional bodies reported that they had put the development of part qualifications on hold until such time there is more guidance from the QCs on this matter.

Figure 9: Number of qualifications and part qualifications registered, 2009/10-2015/16
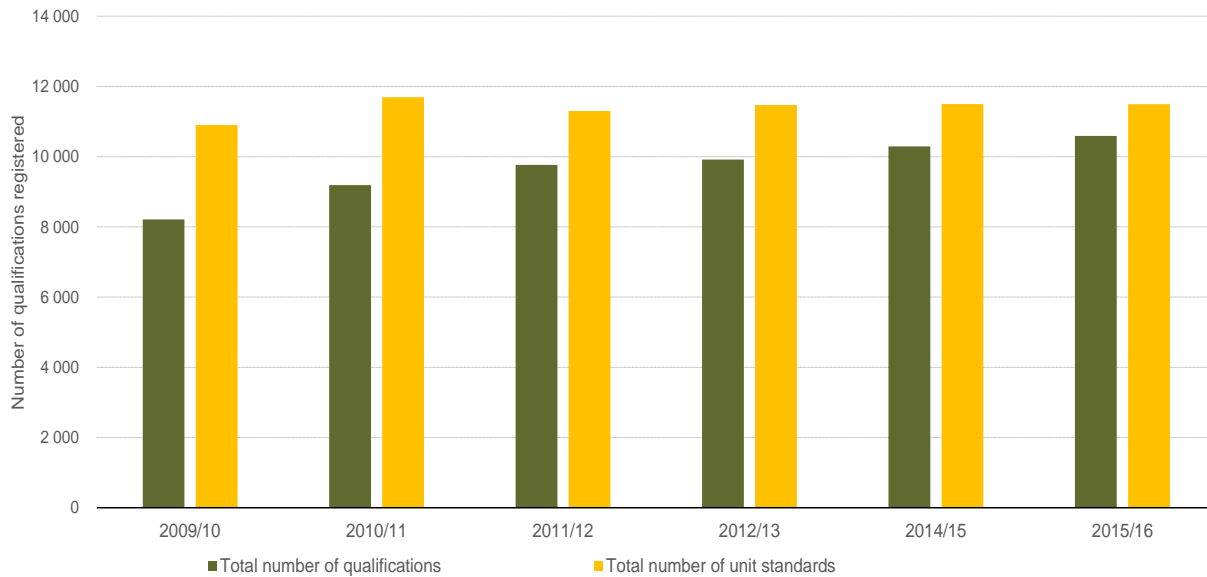
Source: NRLD Comprehensive Reports

Figure 10 depicts the majority of new qualifications registered onto the NQF fall under the HEQSF. This trend is expected to continue over the next five years. Indeed, the number of qualifications registered is expected to rise rapidly driven by two factors. As the December 2019 deadline nears, public HEIs and private HEIs will be expected to stop registering learners on non-aligned HEQSF qualifications (the so-called "Category C" qualifications) and teach them out. As HEIs seek to replace these programmes, the demand for programme accreditation will rise between 2017/18 and 2021/2022. This will then increase the number of qualifications recommended for registration.

Figure 10: Number of new qualifications by sub-framework
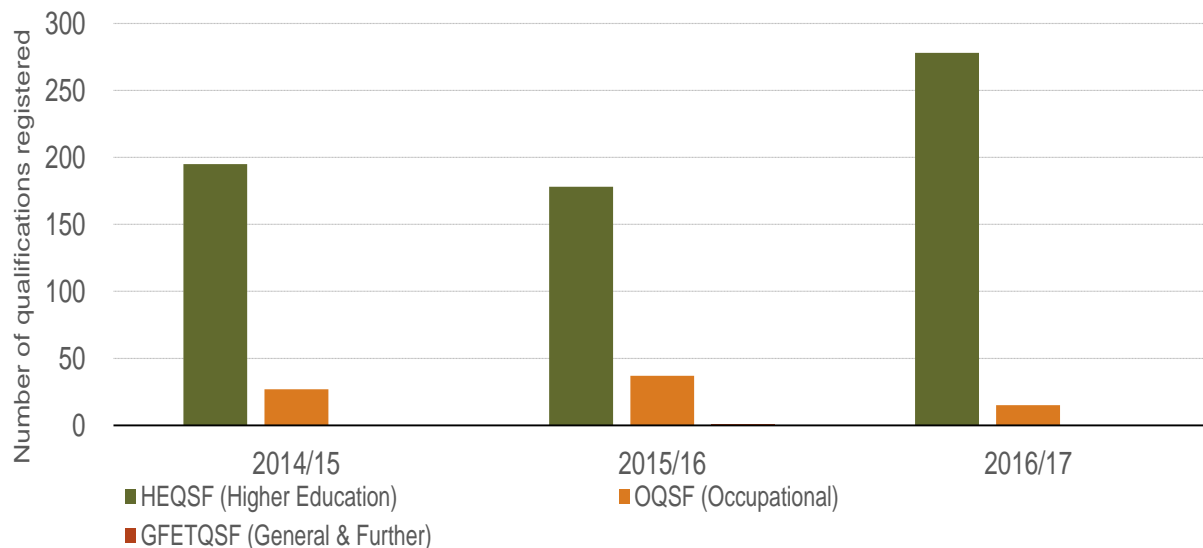
Source: NLRD Comprehensive Reports

Before a qualification can be registered, it must adhere to the *Policy and Criteria for the Registration of Qualifications and Part Qualifications on the National Qualifications Framework.* Registration can only happen once a QC has recommended and submitted the qualification to SAQA. In the CHE's case, the Council accredits a learning programme and not a qualification (Council on Higher Education, 2012b). Whereas a qualification consists of learning outcomes intended to provide learners with applied competence and a basis for further learning that is assessed against exit level outcomes, a learning programme outlines the processes and learning experiences that lead to the qualification (South African Qualifications Authority, 2016).

Seemingly, many interviewees in HEIs do not make the distinction between accreditation and the registration process. This has given rise to the perception that SAQA's processes duplicate those of the CHE and delay registration. When asked on average how long it takes for the qualification to be registered, survey respondents provided a range of timeframes. About half of the public HEIs surveyed reported that the registration process took between three and six months. This estimate is in line with SAQA's own reported turnaround time of about an average of five months to register a qualification.[10]

Private HEIs report that the registration process takes considerable time. 12 of the 23 private HEIs surveyed said that it took longer than six months for SAQA to register their

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[10] Responses to the evaluation's team data request

qualification. While it is not uncommon for the performance of regulators to receive a biased response from regulated entities, these results are nevertheless concerning.

Figure 11: Survey: On average, how long does it take for a qualification to be registered by SAQA?
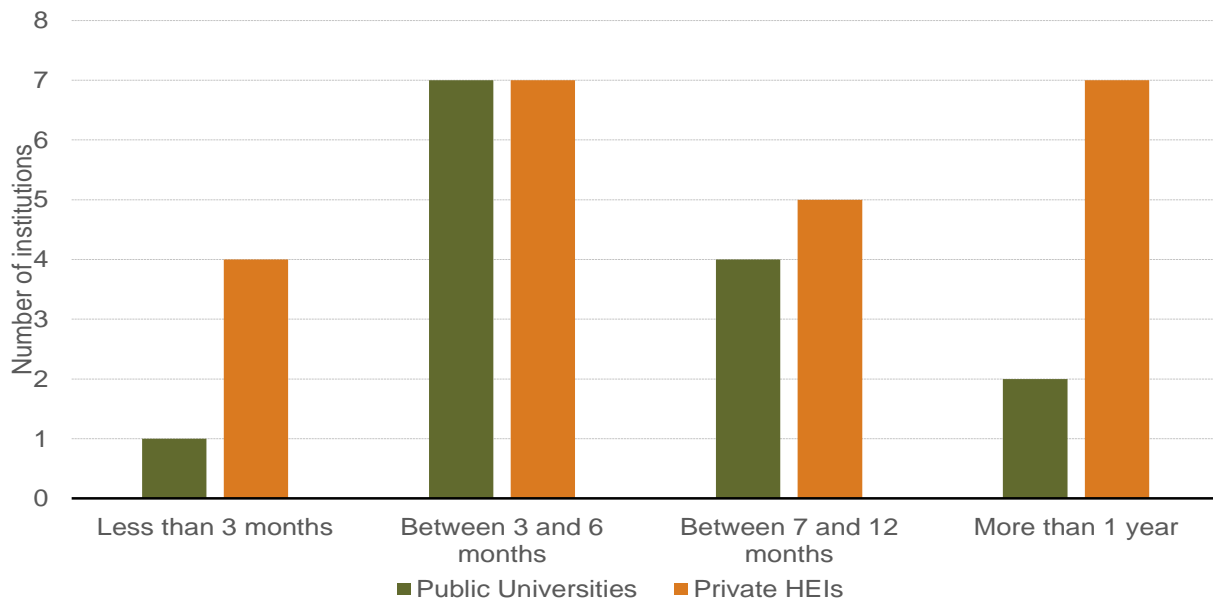
Source: HEQSF provider survey

The problem arises when some of the qualifications submitted to SAQA by the QCs do not comply with the *Policy and Criteria for the Registration of Qualifications and Part Qualifications on the National Qualifications Framework.* One way to measure the scale of the problem is to examine the number of qualifications referred back to the QCs by SAQA. While this information is not available for the entire evaluation period, the evaluation team received the information for 2016/17. In that year, about 31 out of the 278 qualifications that were eventually registered (11%) was referred back to the CHE compared to 4 out the 15 qualifications (26%) for the QCTO.

While there are valid reasons as to why a qualification is sent back to the QCs, some officials within QCs thought that SAQA was "second-guessing" their recommendation. Whatever the reason, this problem needs to be addressed as a matter of urgency to avoid further delays in the registration process.

7.2.2   Verification of qualifications

Just after the passing of the NQF Act, the public service was hit by several high-profile scandals when the state employed civil servants with fraudulent qualifications. 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. This increase in requests for verification can be seen in Table 10. Between 2009/10 and 2015/16, the number of requests for verification grew by 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%.

Table 10: Number of requests for verification and misrepresentations recorded

Financial year	Number of requests for verification	Number of misrepresentations recorded	Percentage of misrepresentations recorded
2009/10	6 522	3	0.0%
2010/11	9 639	47	0.5%
2011/12	10 439	37	0.4%
2012/13	13 702	76	0.6%
2013/14	22 980	62	0.3%
2014/15	36 833	106	0.3%
2015/16	47 799	92	0.2%
Total	**147 914**	**423**	**0.3%**

Source: SAQA

There were two contrasting views on the verification function. Some interviewees recognised the benefits of having a central point for employers to verify the learning achievements of their current and future employees. In their view, the verification function was an appropriate use of the information contained in the NLRD. Others questioned the legality of having the verification function performed by SAQA. As SAQA does not issue the certificates it verifies, these officials argue this function usurps the authority of the issuing institution.

7.2.3 Evaluation of foreign qualifications

The evaluation of foreign qualifications ties in with the Section 5(b) of the NQF Act that seeks to facilitate access to, mobility, and progression within education, training and career paths. It achieves this by evaluating foreign qualifications to locate them on the NQF. The evaluation process thus allows foreigners to work and study in South Africa. At the same time, it gives confidence to South Africans studying overseas that there is a system to recognise their qualifications when they return. The foreign qualification evaluation function supports broader economic goals in helping the country to access scarce and critical skills, particularly in cases where the E&T system is not producing the required skills set. Hence, companies and government can "import" these skills knowing that they will be recognised in South Africa.

Foreign qualification evaluation involves two distinct processes:

- **Verification**: This process involves checking that institutions which have issued the award have a valid or recognised status and the right to issue the qualification in their national system. As part of the verification process, SAQA will verify the authenticity of the award and accompanying documents.
- **Comparison**: During this process, SAQA compares the foreign qualification, its structure and learning outcomes with a similar South African qualification to locate it within the South African NQF. This process is a simpler process if the country has its own qualifications framework. But, in cases where there is no qualifications framework, SAQA collects information on the learning outcomes and structure of the qualification until it has enough information to make a decision.

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. Statistics on the average time taken to evaluate foreign qualifications were not available for the entire evaluation period. However 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.

Going forward, the changes to the immigration laws and economic conditions will continue to influence the demand for foreign evaluation qualifications. For example, in 2014, the Immigration Amendment Act (2014) introduced a provision that required all applications for a critical skills visa to be accompanied by the proof an evaluation by SAQA (DLA Cliffe Dekker Hofmeyer Attorneys, 2014). Immigrants now wishing to apply for a critical skills visa must submit the certificate of foreign qualification evaluation along with their application.

Figure 12: Number of foreign qualifications evaluated per year, 2009/10 – 2015/16
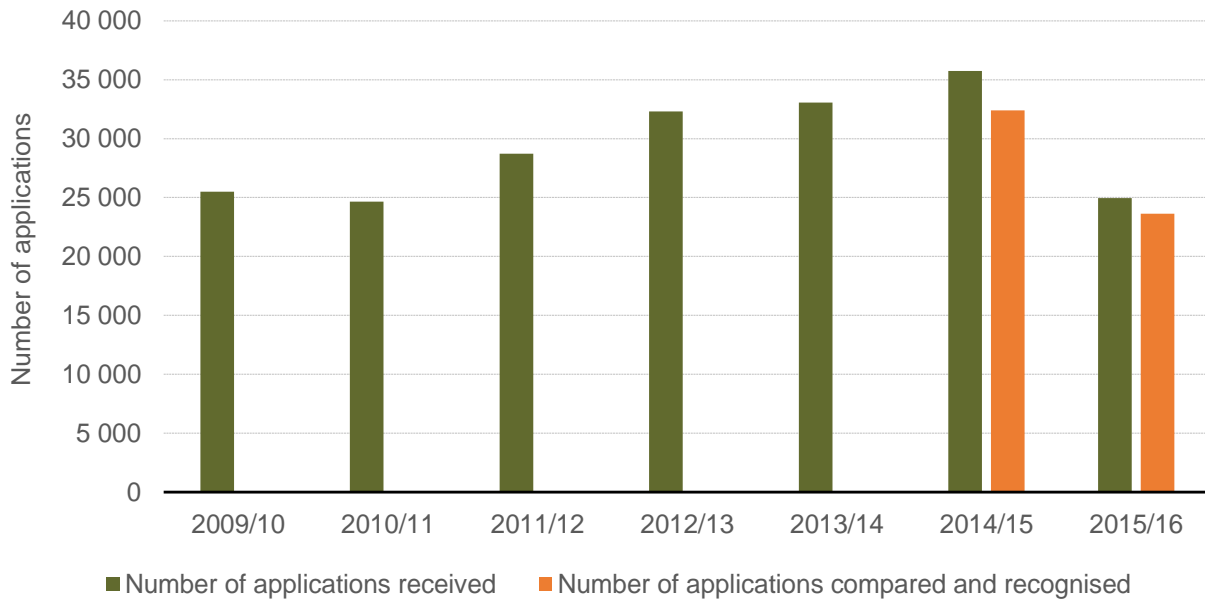
7.2.4 Recognition of professional bodies and registration of designations

In a departure from the SAQA Act, the NQF Act clarifies the role of professional bodies in the E&T system. The Act requires SAQA to recognise professional bodies and register their designations. This regulatory framework was introduced in response to the growing perception (at the time the Act was being drafted) that professional bodies had become "gatekeepers" to professions, creating barriers that were contrary to the NQF's principles of access, progression and mobility.

The *Policy and Criteria for Recognising a Professional Body and Registering a Professional Designation for the National Qualifications Framework, Act 67 of 2008* came into effect in November 2012. This policy places several obligations and restrictions on professional bodies to ensure that they maintain the integrity of their role and status and refrain from exclusionary practices.

Since the promulgation of the Act, SAQA has recognised and registered a growing number of professional bodies and designations. This trend is very much in line with the intent of the Act which seeks to include professional bodies in the regulatory scheme. While the number of professional bodies recognised by SAQA grows moderately, the number of professional designations registered with SAQA has increased more rapidly, rising from 260 in 2014/15 to 343 in 2016/17. Put differently, by 2016/17 each professional body had registered on average four designations.

While the registration of professional designations is an important mechanism to achieve the NQF's goals of professionalising career paths, a university official argues that professional bodies are using designations to expand their membership and raise their revenues. He cautioned that the proliferation of professional designations would eventually carve out certain professions and occupations, and create barriers to entry for learners and employees, who cannot afford the money for membership fees.

Figure 13: Number of professional bodies recognised and designations registered

One of the policy's aims is to limit the proliferation of professional bodies within the same community of practice. This restriction has a limited impact on the HEQSF where HEIs develop their learning programmes, sometimes in collaboration with a professional body. The situation is however rather different in the OQSF, where professional bodies can be designed as DQPs and AQPs for an Organising Framework for Occupations (OFO) category. For example, a professional body might take responsibility for nurses or for plumbers. In the meantime, the OQSF has indicated that it will only acknowledge one professional body as a DQP for each OFO category.

This decision has become problematic in broad fields such as accounting where more than one professional body exists and have been recognised by SAQA. In interviews with these non-statutory bodies, they argued that if this rule is applied strictly, it will exclude some professional bodies from participating in the development of occupational qualifications. They argue that they do not have much incentive to take part in qualifications development process if they are not recognised as a DQP. Whether the QCTO agrees or not with their

argument, it does, however, need to provide some clarity on how many DQPs and AQPs it will allow in each OFO category.

The evaluation team surveyed professional bodies to understand their experience with the registration of professional designations. Eight of the 11 professional bodies that had registered a designation found the entire process easy and had no issues. One of the three professional bodies which found the process difficult noted that there was not enough guidance on the registration process.

Table 11: Registration of professional designations

Number of respondents	Difficult	Easy	Very easy
The registration process for professional designations	3	5	3

Source: Professional bodies survey

7.3 Management and maintenance of the NLRD

Section 13(1) Act requires SAQA to "maintain a national learners' records database comprising of registers of national qualifications, part qualifications, learner achievements, recognised professional bodies, professional designations and associated information". The NLRD is a major source of information within the E&T system. In many respects, its name, the "National Learners' Records Database" is somewhat misleading as the database contains much than simply records of learner achievements.

Information flows

The NLRD draws on and consolidates information from many sources as depicted in Figure 14. To establish the register of qualifications and part qualifications, SAQA captures registered qualifications onto the NLRD. The record of learner achievements draws on information from various information systems. The Higher Education Management Information System (HEMIS) records the details of each learner who enrols and graduates from the public HEIs. Every year, HEMIS submits information that is cleaned and checked to the NLRD. On the other hand, private HEIs submit their information to the NLRD through the Higher Education Quality Committee Information System (HEQCIS) administered by SAQA on behalf of the HEQC. By combining information from HEMIS and HEQCIS, the NLRD is effectively the most comprehensive source of information on the HE sector.

The NLRD still receives most of its information on OQSF qualifications from the SETAs, who remain responsible for administering "legacy" qualifications. The QCTO does not have an information management system yet, but it collates learner records for the new occupational qualifications (manually) and submits them to the NLRD. Finally, the NLRD receives information on professional bodies and their designations from SAQA once the recognition and registration process is completed.

Figure 14: Information flows into the NLRD

National Learners' Record Database

Register of qualifications and part-qualifications

Learner achievements

Professional bodies and designations

SAQA captures registered qualification onto NLRD

SAQA registers qualification

QCs submit the qualification for registration. SAQA makes decision on whether to register

CHE | QCTO | Umalusi

Cleans and validates learner achievements data and uploads to NLRD

Cleans and validates learner achievements data and uploads to NLRD

DHET (HEMIS)

SAQA (HEQCIS)

Delegates function of submitting learner achievements to DHET

Contracts with SAQA to administer the HEQCIS which collects records from private HEIs

CHE

Cleans and validates learner achievements data and uploads to NLRD

Submits information learner achievement for new occupational qualifications

Cleans and validates learner achievements and uploads to NLRD

Umalusi | QCTO | SETAs

Public Universities

Private HEIs

Public and Private Schools, TVET colleges, SDPs

SDPs and TVET colleges

SAQA captures recognized PB and registered PD onto NLRD

SAQA approves application

Applies for the recognition of a PB and registration of PD

Professional bodies

Source: DNA Economics based on interviews with SAQA and website information
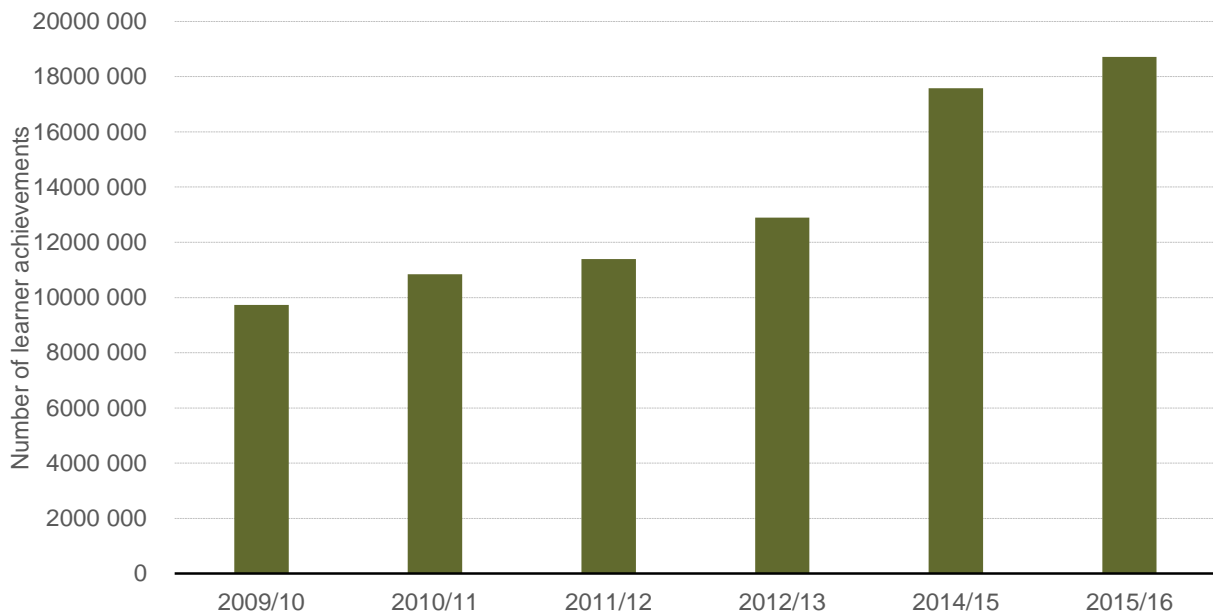
Learner records

Between 2009/10 and 2015/16, the NLRD doubled in size, with the number of learner achievements recorded increasing from 9.7 to 18.7 million (see Figure 15). Most of this increase took place between 2014/15 and 2015/16 and can be ascribed to efforts by SAQA to collect historical data on learner achievements from the now-merged technikons. Hence, SAQA has done well in its efforts to upgrade and maintain the NLRD.

Nevertheless, a database such as the NLRD is only as good as the data it receives. An analysis of the NLRD reveals that data for the N4 to N6 qualifications is missing. This makes it impossible to trace the number of learners that have an NC(V) Level 4 or N3 and then went on to complete N4 to N6, for example. At the same time, it underestimates the total number of learner achievements in the country.

The analysis also reveals that there are about 843 101 learners that have higher education qualifications but could not be matched to an SC/NSC. While this number might include international students and others that enter university with NQF Level 4 equivalent qualification, it also confirms a more fundamental data failure in the management of learner

records within the E&T system. Interviewed officials in SAQA suggest that this problem may have arisen because Umalusi struggled to collect ID numbers for all SC/NSC learners. In some cases, there were valid reasons; for example, some learners could not get an ID number from Department of Home Affairs because their parents did not register them at birth. In other instances, the problem was the result of data capture errors or inconsistent cleaning procedures. Umalusi, in response, has pointed out that the requirement for learners writing the NSC to have a valid ID number only came into effect in 2015. Before then, all learners needed was an exam number and their birth date. As a consequence of these data challenges, the NLRD underestimates the number of learners who transition from NSC/SC to a HEQSF qualification.

Figure 15: Number of learner achievements recorded in the NLRD

Source: NLRD reports from SAQA

The NLRD has been in existence since 1999 but experienced a major crash in 2004, when much of the database was rebuilt from scratch. While there were major problems and delays with the uploading of learner records in the earlier years of the NLRD, qualitative interviews suggest that many of these problems have been resolved.

To test this finding from the qualitative interviews, the survey asked respondents from various institutions about their experience with uploading learner records. When interpreting this data, it is worth remembering that education and training providers interact with different databases and organisations (see Figure 14). When asked how easy or difficult it was to upload learner records, at least half of all respondents said that the process was easy or very easy. Nonetheless, about 35% of private HEIs and 36% of public HEIs were less

positive about the process and found it difficult. Interestingly, only 26% of SDPs said that they found the process difficult. This might suggest that some of the data issues between SETAs and SDPs have been ironed out and that SAQA's efforts in creating the dedicated internal capacity to deal with the SETAs are paying off.

Table 12: On a scale of 1 to 4, how difficult is compliance with the requirements in terms of maintenance and submission of learner records?

Response	Private SDP	Public universities	Private HEIs	Public TVET	Private TVET
Don't know	0%	0%	13%	0%	0%
Very difficult	9%	14%	17%	4%	10%
Difficult	17%	21%	17%	21%	19%
Easy	35%	43%	39%	54%	43%
Very easy	39%	21%	13%	21%	29%

Source: GFETQSF, HEQSF and OQSF provider survey

7.4 Funding and resourcing of SAQA and the DHET

7.4.1 SAQA

From the analysis described above, it is clear that the SAQA's workload has increased substantially over the evaluation period driven by an increase in the demand for its regulatory services. Other factors that affect the organisation's workload is the expansion of the NLRD and the additional responsibilities placed on SAQA by the Minister. 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. In 2014/15, for the first time in the seven-year period, SAQA's spending exceeded its income, causing the organisation to draw on its reserves (see Figure 16). The combined effect of lower revenues and higher spending has placed the organisation under considerable financial strain. 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.

SAQA derives its income from three sources of funding: fees for services (such as foreign qualification evaluations and verifications), government grants and other minor sources of income. Revenue from regulatory services has grown on average by 14% per year between 2009/10 and 2015/16. In 2015/16, fee income account for about a third of total revenue.

The government grant, on the other hand, has risen at a slower rate of 4% on average per annum. This average annual growth rate, however, masks the large swings in the government subsidies between 2013/14 and 2015/16 when the grant allocated to SAQA fell by 40.8% (R37.7 million). While this sharp decline in state funding comes at a time when

the government is under severe financial pressure, the sheer scale of the cut is worrying. It's also unclear whether the DHET took into account the implications of such as a drastic cut on the implementation of the Act.

As a result of these budgetary cuts, SAQA finds itself in an unsustainable financial position. Its expenditure cannot continue to exceed revenue. To address the situation, the DHET must adopt one of two courses of action. First, the department can make sufficient funding available to cover the shortfall in funding experienced by SAQA on its current responsibilities and provide additional financing of any new mandates given to the organisation. Second, if that is not possible, the DHET must adopt a pragmatic approach. In other words, it must review the responsibilities entrusted to SAQA, narrow the scope of their work and revisit the targets to ensure that they are achievable. This might involve prioritising the actions and milestones and focusing on those that can be achieved within available resources.

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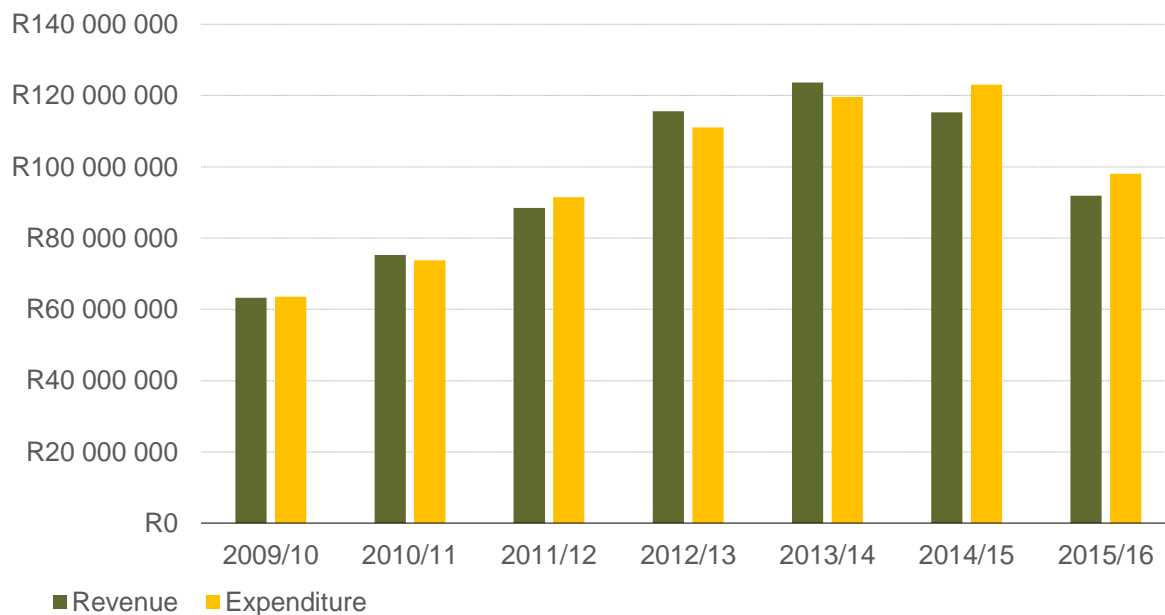
Source: SAQA's Annual Reports

7.4.2 DHET (NQF Directorate)

The NQF Directorate is a dedicated unit in the DHET that was established to provide support to the Minister on NQF matters; which can be described as coordination of policy development, planning and coordination of policy implementation and monitoring and reporting. At its inception, the role of the NQF Directorate was not clearly defined within the NQF system.

The Directorate defines its role in terms of supporting the Minister in his role under the Act and being the operational "arm" of these roles; which the Directorate believes is clearly stipulated in the Act. However, the Minister's is given a very broad, multi-focused mandate in the Act, which can be interpreted and implemented in many different ways. Thus, as the implementation of the NQF Act has gathered pace and the need for the Minister to exercise his or her powers has arisen, the NQF's Directorate's role has evolved and grown. This has led to the perception amongst several interviewees that the role of the NQF Directorate is unclear.

Several interviewees acknowledged that the NQF Directorate plays an important role in the implementation of the Act. It supports the Minister in monitoring the implementation of the NQF Act and helps the Minister hold the NQF bodies accountable for the achievement or non-achievement of the NQF's objectives. However, interviewed officials also recognise that the role of the NQF Directorate is made harder by a complicated system of reporting, and by the fact that it has not been given enough standing and resources within the department to carry out this role.

Moreover, the NQF Directorate is "unofficially" playing the role of an Ombud, with its staff being called in to address complaints on matters such as access, articulation, progression and RPL. In addition, despite having a lean staff complement, the DHET has assigned the role of the national RPL coordination mechanism, created by the *Recognition of Prior Learning Coordination Policy* to the NQF Directorate in the interim. Some interviewees indicated that the coordination policy contains several implementation responsibilities such as the recognition of RPL centres, which should have been assigned to SAQA. This reinforces their view that there is not enough clarity around the role of the NQF Directorate.

A minority of interviewees said that it was not necessary to have an NQF Directorate within the DHET. These interviewed officials felt that SAQA should ideally coordinate the implementation of the NQF and liaise with the DG: HET and M:HET. Their preferred approach is therefore to merge the NQF Directorate and SAQA, and retain a single and central point of contact between the DHET and NQF bodies.

Both of these arguments have their strengths and weaknesses. In the evaluation team's view the NQF Directorate is an essential structure and should remain in the DHET. The value of the NQF Directorate lies in its ability to maintain a wide-ranging perspective of the NQF system, and monitor and oversee the achievement of the NQF's objectives on behalf of the executive authority. However the Directorate does not appear to have the positional status to be able to coordinate and broker agreement between the divergent departments and views (bearing in mind that there are quite serious differences in both historical experiences of the NQF institutions and future vision).

Ultimately many of the challenges have to be addressed at DG and Minister level, but the key role of coordination on NQF matters relates to the achievement of a common approach across branches, and is an areas where the NQF Directorate can play and important role. Ultimately, the DHET should clarify the role and responsibilities of the NQF Directorate and its functions in terms of supporting the Minister in discharging his or her responsibilities in terms of the Act. Once the functions are made clear, then the DHET must consider where to best locate the NQF Directorate and what resources it needs to deliver on its mandate.

7.5 HEQSF: Sub-framework, qualifications and quality assurance

7.5.1 Background

Higher education has been subject to numerous waves of policy and regulatory reforms over the last two decades. In 1997, the *Education White Paper* set the goal of transforming higher education into a single, coordinated and equitable system (Council on Higher Education, 2016). Nearly all of the subsequent policy reforms seek to achieve this intended transformation. In the 2000s, the policy reforms were put in effect through a series of mergers between different types of institutions which swept across higher education and transformed its landscape, in the process creating three new types of HEIs: UoTs, comprehensive universities and traditional universities. While the structures had been merged, many of these institutions found themselves offering qualifications across different qualifications frameworks including:

- Qualifications Structure for Universities in South Africa – NATED Report 116.
- General Policy for Technikon Instructional Programmes – NATED Report 150.
- Formal Technikon Instructional Programmes in the RSA – NATED Report 151.
- Qualifications Framework for Schooling in Norms and Standards for Educators.

These qualifications frameworks were designed for specific institutional types and not higher education in its entirety. Technikons had their own qualifications frameworks and assessment body. In a similar way, public HEIs had formed their own qualifications framework, and had substantial autonomy over how they designed, delivered and awarded qualifications.

The fragmentation in higher education limited the opportunities for articulation and progression in higher education, especially between technikons and universities. Following these mergers, universities found themselves with many qualifications registered on different qualifications frameworks, with inconsistent names and referencing.

At the time of its publication in 2007, the HEQF was a much-needed policy response to these fragmented qualifications frameworks. Its main objective was to integrate the different

qualifications frameworks across higher education to promote progression and articulation. In addition, to its integration objectives, the HEQF was also meant to simplify the architecture of qualifications and create a consistent referencing and naming system.

The implementation of the HEQF began in January 2009, and all new programmes had to conform to the sub-framework from this date. The re-alignment of existing qualifications began in 2011. To start the re-alignment process, public HEIs and private HEIs were asked to group their programmes into three categories (Council on Higher Education, 2010):

- **Category A** includes programmes that required minimal change.
- **Category B** contained programmes that required less than 50% changes to the curricula.
- **Category C** referred to those programmes that required more than a 50% change in the curricula.

For the Category C programmes, it made sense to teach them out, rather than to spend substantial time, effort and resources on re-curriculating these programmes to align them to HEQSF.

When the NQF Act was came into effect in 2009, the implementation of the HEQF had already begun, giving higher education a running start in the implementation of the Act. By the time the HEQSF was published in 2013, the HEQF has already completed the alignment of Category A programmes and was on track to complete the process for Category B programme in 2014/15 (see Table 1).

When, the HEQF was initially published, best-guess estimates suggested that there were between 8 000 and 20 000 qualifications in higher education. In 2011/12, the CHE confirmed that about 12 000 programmes needed to be re-aligned (Council on Higher Education, 2012a). By 2015/16, there were approximately 8 610 qualifications registered on the HEQSF (South African Qualifications Authority, 2016). Thus, in these intervening four years, the HEQF had successfully rationalised and cut approximately 3300 qualifications in higher education.

Table 13: Milestones in the re-alignment process

	Category A	Category B	Category C
Actual completion of re-alignment	Completed in 2013/14	Completed in 2014/15	Confirmed in 2015/16 Taught out by December 2019

Source: (Council on Higher Education, 2015)

As several interviewees noted a single framework for higher education had several benefits for the sector. It created consistency and coherence in the design and naming of

qualifications amongst HEIs. In contrast to the qualifications frameworks that preceded the HEQF, it was clear and easy-to-understand for HEIs. The simplified approach espoused in the HEQF helped HEIs to re-align their programmes and qualifications reasonably quickly. The process of re-alignment required academics from across HEIs to get involved in the reviewing their qualifications and curriculum and deepened capacity in programme curriculum design across several HEIs. The introduction of credits as a measure of the volume of learning (as opposed to the complexity of learning) helped to harmonise credit values across different types of qualifications. Overall, respondents acknowledge that the introduction of the HEQF and the HEQSF has been a significant learning experience for the university sector and enhanced the credibility and public confidence in higher education qualifications.

7.5.2 Design of the HEQSF

The NQF Act introduced significant changes to the structure and governance. Under the SAQA Act, the CHE was designated as the band EQTA for higher education. In contrast, under the NQF Act, the CHE became a QC and was assigned responsibility for the development and management of the HEQSF.

In many respects, although the CHE's status in the NQF system changed, in practice its functions remained largely the same. Most of its quality assurance functions were already mandated under the Section 5(1) (c) of the Higher Education Act which gave the CHE the power to:

> *To promote quality and quality assurance in higher education through its permanent committee, the Higher Education Quality Committee (HEQC), including auditing the quality assurance mechanisms of, and accrediting programmes offered by, higher education institutions (Council on Higher Education, 2014).*

After five years of implementing the HEQF and in preparation for the publication of the HEQSF, the CHE initiated a review of the HEQF. As part of the review, it called for submissions and representations from stakeholders in higher education. Seven main issues emerged from this review and are briefly summarised below (Council on Higher Education, 2011):

- **Distinction between qualification progression routes:** The HEQF introduced a generic framework that applied to all qualifications and did not acknowledge the different qualification routes in higher education. But during the implementation of the HEQF, the distinction between vocational, professional and general became increasingly important to HEIs as they tried to design qualifications to meet the needs of learners and expectations of the labour market.

- **Work-Integrated Learning (WIL):** Given the pressure to produce graduates that were "work-ready", many HEIs were struggling with the concept of WIL and how it aligned with the traditional pedagogical and qualification design approaches in higher education.
- **Level 5 and 6 qualifications:** While the HEQF introduced a higher and advanced certificate, these qualifications types were still not meeting the need for vocationally-orientated qualifications that would enhance progression within specific professions (such as nursing and engineering). Rather, many commentators argued for the introduction of a 240-credit diploma that addressed the needs of specific professions.
- **Characteristics of Bachelor's qualifications:** Linked to the issue of progression routes, the variants attached to the bachelor's degrees were not sufficiently clear. In particular, there was some confusion around what constitutes a professional bachelor's degree. Specifically, it was unclear whether such a qualification type should always be pitched at NQF Level 8 and carry 480-credits or whether a 360-credit degree could also be seen as a professional qualification.
- **Learning pathways for vocational and professional pathways:** There were concerns as to whether the current learning vocational pathways (i.e. diploma pathways) adequately prepared learners to take on a Masters degree with a research component. It was argued that vocational and professional pathways should converge at lower levels of the NQF to prepare learners for post-graduate studies.
- **CAT in higher education:** Based on experience with their implementation of the HEQF, institutions were uncertain as to how CAT should operate in a qualifications framework with different qualifications types on the same level. Specifically, HEIs wanted to know whether all credits at a particular level were the same, regardless of the qualification type. In other words, was a credit on a diploma equivalent to that of a degree on the same level?
- **Level 9 qualifications:** At post-graduate level, some stakeholders raised concerns about the need for a more flexible range of qualifications types and variants to accommodate the needs of professions and industry that would not place a lot of weight on the research component.

The published HEQSF subsequently addressed many of these concerns but did not fundamentally change the nature and character of the HEQSF from that of its predecessor. Rather the framework was amended to recognise the three broad qualifications routes, clarify the interpretation of qualification types, introduce greater flexibility to deal with the expectations of the labour market and confirm the principles for CAT in higher education. The effect of many of these changes was to create a sub-framework that facilitates articulation, progression and mobility in the HEQSF.

The NQF entrusts the management of the HEQSF to the CHE, and confirms the council's role in quality assurance. In discharging these legislative responsibilities, the CHE performs four important functions including:

- Developing qualifications standards (standards setting)
- Accrediting learning programmes (quality assurance)
- Conducting national reviews of programmes (quality assurance)
- Auditing the quality assurance mechanisms of HEIs.
- Promoting quality and providing guidance

Each of these functions are discussed in the sub-sections below.

7.5.3 Developing qualification standards

The HEQSF assigns the responsibility for standards development in higher education to the CHE. To guide its standards-setting function, the CHE released the Framework for Qualification Standards in 2013. As the framework points out "standards are envisaged as developmental guides for programme design and delivery, rather than as rigid instruments for regulating compliance" (Council on Higher Education, 2013).

As with all its regulatory functions, the CHE has adopted an expert-driven approach, which is generally seen as appropriate for higher education (Council on Higher Education, 2015). This approach is also consistent with use of expert peer groups in programme accreditation and national reviews.

The development of qualifications standards is relatively new in higher education. Qualifications for which standards would be developed were selected because they were of national interest or had been subjected to a national review. So far, five qualification standards have been developed and published for the following qualifications:

- Diploma in Engineering (February 2015)
- Bachelor of Engineering and Bachelor of Science in Engineering (February 2015)
- Bachelor of Social Work (May 2015)
- Bachelor of Laws (May 2015)
- Master of Business Administration (May 2015)[11]

The survey asked respondents from public HEIs about the influence of qualifications standards in higher education. In general, it seems that the idea of qualification standards has gained traction in higher education. Most respondents felt that qualifications standards

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[11] Two additional qualification standards namely the Advanced Diploma in Engineering and Bachelor of Engineering Technology were developed in early 2017, which falls outside the period of review.

will have a significantly positive impact on clarifying the meaning, purpose and distinctiveness of qualification types. These findings were confirmed in qualitative interviews, where respondents thought that going forward qualifications standards would help HEIs develop consistent qualifications in specific disciplines. An added benefit, as one respondent notes, is that qualification standards should contribute to improved articulation in higher education over time.

Table 14: On a scale of 1 to 4, what has been the influence of developing Qualification Standards on each of the following statements?

Statement	Significantly positive impact	Slightly positive	Slightly negative	No Impact
The consistency and coherence of qualification development and design across the higher education system	8	6		
Clarifying the meaning, purpose and distinctiveness of qualification types	10	4		
Provide guidelines on achievements expected for the award of qualifications	7	5	2	
Strengthening public confidence in the value and credibility of higher education qualifications	5	6	3	

7.5.4 Accreditation of programmes

The Higher Education Act makes it obligatory for all HEIs to submit their programmes for accreditation by the HEQC. In higher education, accreditation is a form of regulation that ensures that a programme meets the minimum acceptable criteria. Hence, accreditation safeguards learners from poor-quality qualifications and maintains the public credibility of higher education. The criteria against which programmes are evaluated is set out in the *Criteria for Programme Accreditation* policy revised by the CHE in 2012 but first published in 2004. This policy distinguishes between new and existing programmes, and uses two different sets of criteria for accreditation, as shown in Table 15.

Table 15: Differences in the criteria for the accreditation versus re-accreditation of programmes

Criteria for the accreditation of new programmes	Criteria for the re-accreditation of existing programmes
Programme design	Criteria for programme process
Student recruitment, admission and selection	Programme coordination
Staffing	Academic development for student access
Teaching and learning strategy	Teaching and learning interactions
Student assessment policies and procedures	Student assessment practices
Infrastructure and library resources	Coordination of work-place learning
Programme administrative serves	Delivery of post-graduate programmes
Postgraduate policies, procedures and regulations	Criteria for programme output and impact
	Criteria for programme review

Criteria for the accreditation of new programmes	Criteria for the re-accreditation of existing programmes

The CHE relies on a peer-reviewed model of accreditation, where programme evaluations are carried out by a group of peers that includes experts with the relevant pedagogical and content expertise. This approach works well in higher education, where there are a large number of programmes across a range of fields and disciplines. At the same time, it keeps the cost of accreditation to a minimum for the CHE, which avoids the cost of maintaining a complement of specialists and experts to perform programme evaluations. Ultimately, the accreditation decision is made by the HEQC, the regulatory authority for programme accreditation.

While there are some common criteria between new and existing programmes, there are also differences in how programmes are evaluated. In the case of new programme, the emphasis is on whether the institution is able to design and deliver a programme. Therefore, in order to gain accreditation for a new programme, an HEI must demonstrate that it has:

- conceptualised and designed its programme to meet the needs of learners and the industry,
- suitably qualified and experienced academics to deliver and assess the programme, and
- the infrastructure, resources and support systems to provide the programme (Council on Higher Education, 2012b).

For existing programmes, the criteria emphasise the institution's ability to meet the minimum quality standards and demonstrate continuously improvement in programme delivery. For example, when evaluating an existing programme, the HEQC will examine whether the institution has taken steps to develop the capability of their academic staff to deliver the programme (Council on Higher Education, 2012b).

Between 2009/10 and 2015/16, the HEQC handled 2 199 applications for accreditation and re-accreditation. Over this period, applications for accreditation grew at an average annual rate of 15%. Of the total number of applications, 73% were for the accreditation of new programmes. These trends suggest that the adoption and implementation of the HEQF and HEQSF contributed to a wave of programme development in higher education. The differentiated model in the university also influences the number of new programmes developed by HEIs. Public HEIs, particularly the UoTs and Comprehensive Universities are trying to out their identities and change their PQM to meet their institution's mandate. For instance, a significant proportion of applications for accreditation of doctorates come from UoTs.
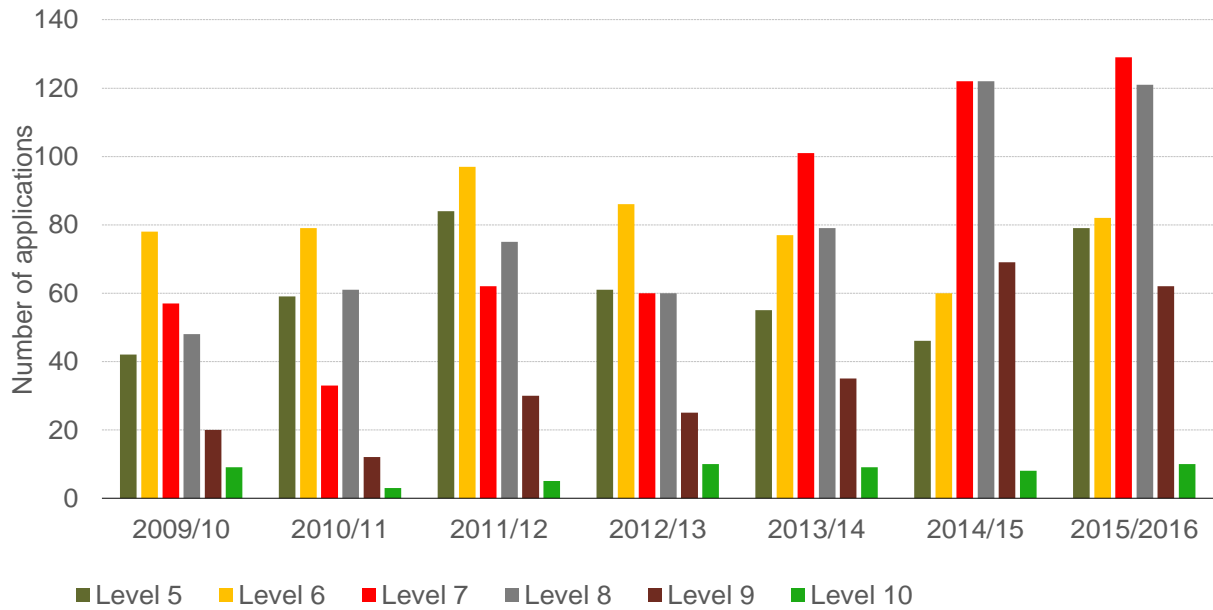
Figure 17: Applications for accreditation and re-accreditation, 2009/10 to 2015/16
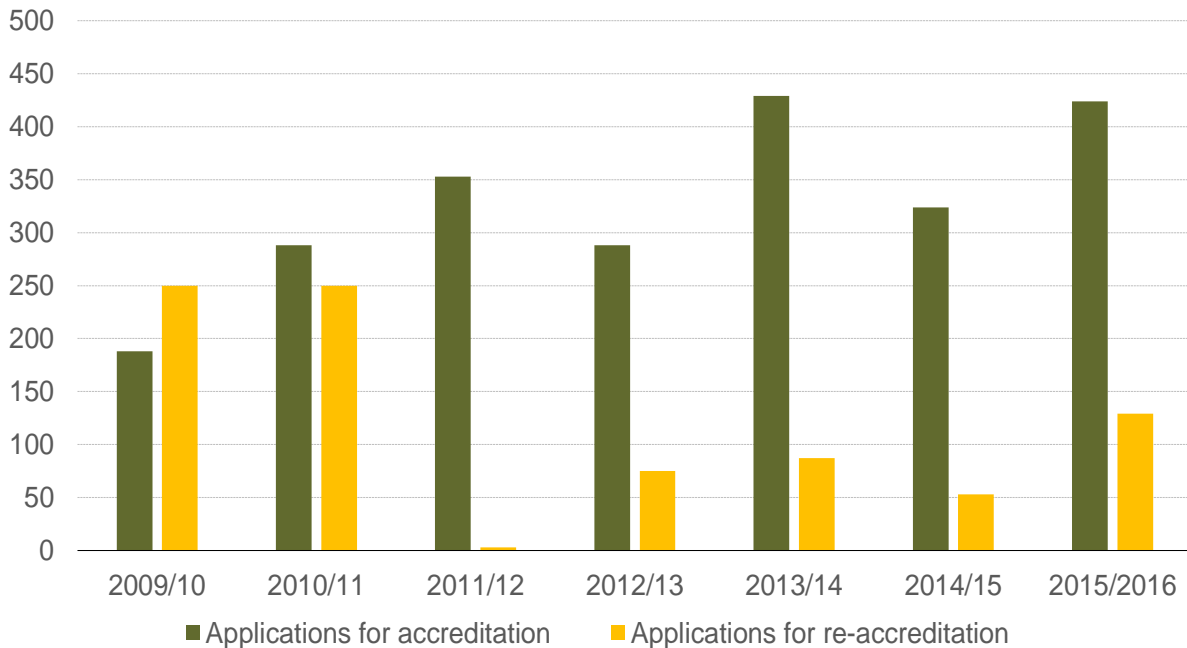
Source: CHE Annual Reports

When broken down by NQF levels, several interesting trends emerge. Firstly, the introduction of the HEQF encouraged an increase in applications for accreditation and re-accreditation of programmes on NQF Levels 5 and 6, as shown in Figure 18 . Interviewed respondents suggest that increase was driven by applications from private HEIs. To confirm this trend, the evaluation team examined all the HEQSF qualifications registered on NQF Level 5 between 2009/10 and 2011/12. It appears that most of the new qualifications registered were for vocationally-orientated programmes in the finance, economics, accounting and hospitality and tourism fields and originated from private HEIs. Secondly, in the later years, the largest share of applications for accreditation and re-accreditation were for programmes located on NQF Levels 7 and 8. Much of this activity was driven by applications from public HEIs.

Figure 18: Applications for accreditation and re-accreditation by NQF Level, 2009/10 to 2015/16

Source: CHE Annual Reports

About of third of all applications for accreditation were not accredited by the HEQC over the evaluation period. That said, the total number of programmes rejected has declined in more recent year (see Figure 19), as public and private HEIs have become more familiar with the programme accreditation criteria and learnt how to improve their applications.

Figure 19: Programme accreditation by HEQC outcome, 2010/11 to 2015/16
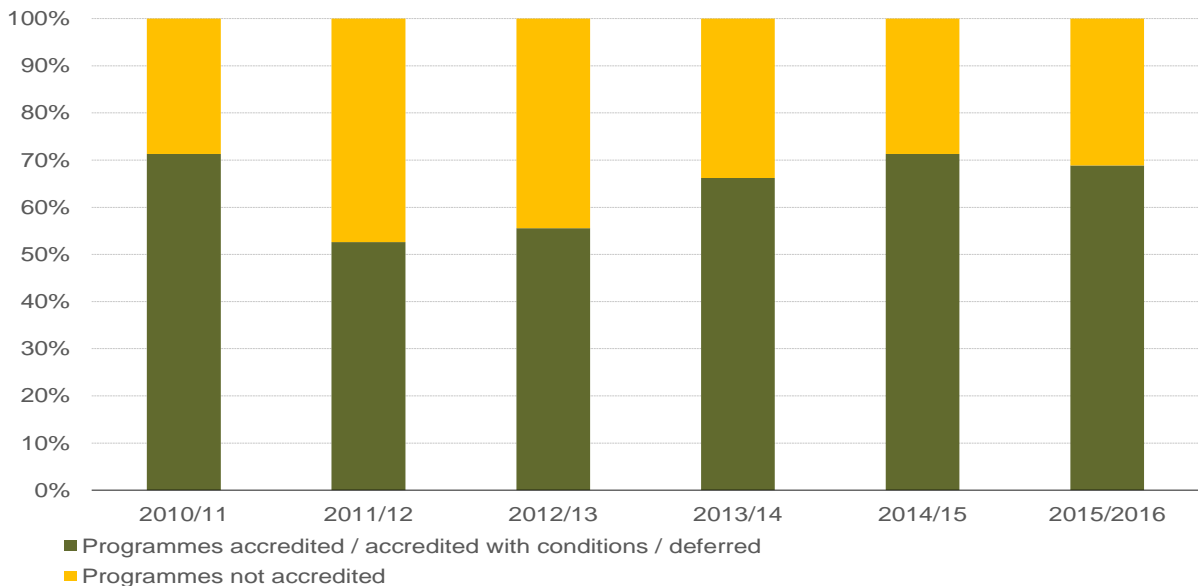
Source: CHE Annual Reports

It also appears that some HEIs make use of consultants to draft their application, particularly in instances where they do not have the internal capacity to develop their programme. Whereas, traditional universities indicated that they had academics with the right teaching experience required to design a programme, the UoTs and comprehensive universities said that faculties tended to rely heavily on the quality assurance office to help them design the programme and prepare the application for accreditation.
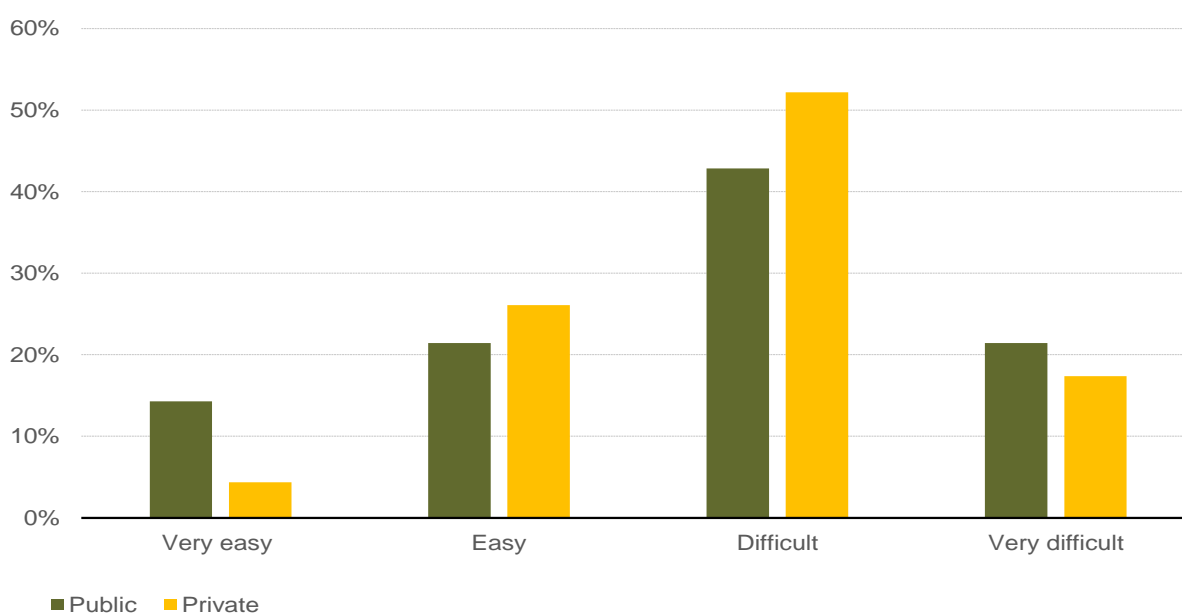
When asked about the ease or difficulty in preparing their programmes for accreditation, the majority of public and private HEIs found the accreditation process difficult. Close to 70% of all private institutions surveyed said that they found it difficult or very difficult to complete accreditation processes.

Figure 20: Ease or difficulty of the accreditation process

The survey confirms that the programme accreditation process has had a positive influence on the internal quality assurance process of public HEIs and private HEIs. Interviewees elaborated on this point and said that their HEIs had either increased the size of their quality assurance units or elevated its status in the university.

Survey respondents expressed frustration at the length of time it takes to receive accreditation for a programme. This was seen as the main challenge in the HEQSF. The majority of public and private HEIs noted that it took on average more than 1 year to get accreditation for their programmes. In qualitative interviews, respondents said that if the

time taken for accreditation and registration was summed up, then institutions waited for close to 18 months to see their programmes registered onto the NQF. Some public HEIs admitted that their internal processes were also slow, and that it could take the university up to 1 year to design a bachelor's degree and get it approved by the senate.

Figure 21: Average length of time taken for accreditation in the HEQSF
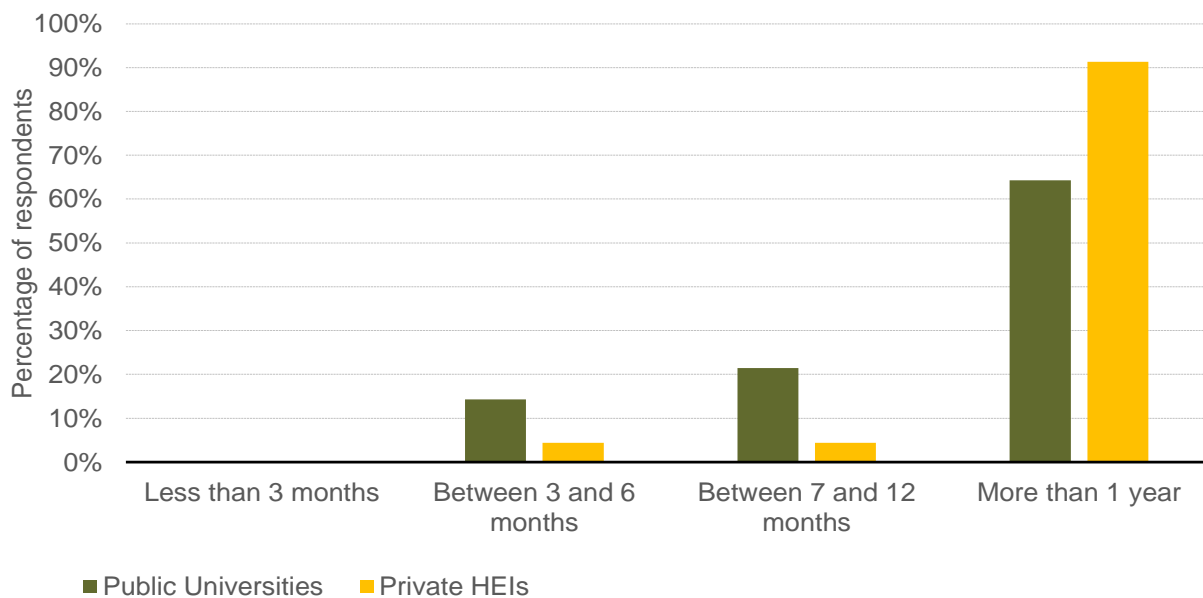
Source: HEQSF survey of public HEIs and private providers

As a Deputy Vice Chancellor (DVC) for teaching and learning indicated in his interview:

> *The time it takes to accredit and register programmes compromises the ability of universities to respond to the needs of industry. By the time, we develop the qualification and get accreditation, industry has moved on.*

It is difficult to isolate the specific reasons for the lengthy accreditation process; however, it seems that there is a combination of factors that influence the accreditation process. One of the main issues is that the volume of applications has grown because of the implementation of the HEQSF and the expansion of private higher education.

It also seems that the CHE and HEQC do not have the capacity to handle these volumes of applications. Some DVCs interviewed mentioned that part of the problem was that the CHE struggled to retain staff in their accreditation unit, pointing to unfilled positions within this directorate. On the other hand, the CHE mentioned that a large number of applications are deferred at the meetings of the HEQC because of missing information and poor quality submissions. This further delayed the accreditation process.

Moreover, as the accreditation process relied on expert reviewers, it was not always easy to find a reviewer to evaluate the application. Often, reviewers were lecturers and heads of departments, who were not available during specific times of the year (e.g. registration and exam times). The CHE's current workflow system does not capture sufficient administrative data to allow us to determine the contribution of each of these factors to the lengthy accreditation process. While it could be an issue of capacity within the CHE, it may also be that a large proportion of applications are deferred because of missing information.

Nevertheless, given the lengthy delays, both public and private HEIs expressed concern about whether they would be able to have new programmes accredited and registered to replace the Category C programmes whose cut-off date for registering a fresh cohort of students onto these programmes is the 31 December 2019.

The role of professional bodies in programme development remains an area of continued uncertainty in the HEQSF. Typically, there are two types of professional bodies: statutory and non-statutory. Some statutory bodies, particularly those that were established by legislation before 2000, are given the power to approve education and training programmes in their discipline. This creates a conflict with the legislative powers conferred on QCs by the NQF Act, and in the case of the CHE, the Higher Education Laws Amendment Act. To resolve some of these conflicts, the CHE and some statutory bodies are working together to develop modalities for collaboration and cooperation to avoid duplicating efforts. Nevertheless, legislative amendments will probably be necessary to resolve the conflicts over the concurrent jurisdiction shared by the statutory bodies and the QCs.

For non-statutory bodies, the situation is somewhat different. These bodies often do not have the legislative power to approve programmes, but have been doing so as a standard industry practice for years. The majority of public HEIs interviewed recognised the valuable role that non-statutory professional bodies play in the development of qualifications. Nevertheless, they complained about the costs imposed by non-statutory bodies on the university. Traditionally, professional bodies have always "approved" certain programmes within HEIs, if such a qualification was a pre-requisite for obtaining the designation.

HEIs report professional bodies use the CHE's criteria as set out in its *Criteria for Programme Accreditation, 2012 policy*, and expand these criteria to include industry-specific requirements. HEIs indicated that they effectively underwent two "accreditation and approval" processes that imposed additional costs in terms of the fees charged by professional bodies and the time spent by faculties on preparing the documentation and addressing questions during site visits.

On a final note, legal challenges to the HEQC's decisions have a profound impact on the efficiency of the CHE and accreditation process. As the accreditation is an administrative decision, it is subject to the Promotion of Administrative Justice Act (No 3 of 2000). The CHE's Annual Report 2015/16 notes a private HEI initiated legal proceedings to set aside the decision of the HEQC on one of its programmes. While the process of preparing the HEQC's legal response took considerable time and resources, these types of legal challenges are important in a regulatory system, because they confirm the power, authority and regulatory process of the regulator.

7.5.5 National reviews

With over 10 000 qualifications located on the HEQSF, it would be a costly exercise to re-accredit a large number of programmes every few years. As such, the HEQSF is built on the premise that programmes remain accredited until such time as there is a national review. While this principle applies to all learning programmes accredited for public HEIs. The situation is different for private HEIs. Their programmes have to undergo re-accreditation every 5 years to maintain their registration status with the DHET.

National reviews adopt a risk-based approach to programme re-accreditation. The selection of programmes for a national review is based on the factors set on in the *Framework for National Review of Higher Education Programmes.* These include:

> *identified areas of national need; significant academic developments within the field or discipline; concerns raised by higher education stakeholders; unwarranted proliferation or paucity of programmes in that particular area; expressed concerns related to current quality of provision in one or more of the programmes leading to the qualification; or any other demonstrably substantive reason (Council on Higher Education, 2015).*

Over the course of the evaluation period, the CHE completed national reviews of the Bachelor of Social Work and Bachelor of Laws programmes. These reviews resulted in the withdrawal of accreditation for programmes in several HEIs. As Table 16 shows Walter Sisulu University and UNISA lost their accreditation for both the Bachelor of Social Work and Bachelor of Laws programmes. Although, several HEIs interviewed questioned the method and approach to national reviews, many respondents thought that these reviews were crucial to maintaining the public credibility of qualifications in higher education.

Table 16: Notice of withdrawal of accreditation

Bachelor of Social Work	Bachelor of Laws
University of Zululand	North West University
Walter Sisulu University	Walter Sisulu University

| University of South Africa[12] | University of South Africa |
| University of Limpopo | University of the Free State |

7.5.6 Institutional audits

By the time the NQF Act came into effect, the CHE had finished the first round of institutional audits and was finalising their reports. During the interviews, several respondents noted that the findings emerging from the institutional audits had helped their HEIs reflect on the quality of the programme offerings. That said, two DVCs mentioned that the institutional audits were thorough and required a lot of time and effort from HEIs. Many institutional audits took place in parallel with the introduction of the HEQF and while other major policy reforms, led by the DHET, were also being implemented. This suggests that the CHE and DHET had not coordinated their policy and quality assurance reforms in any meaningful way to minimise the burden on HEIs.

The institutional audits found that a major area of weakness in higher education related to learning and teaching. Thus, instead of conducting a second round of institutional audits, the CHE changed its approach and opted to develop a quality promotion initiative.

7.5.7 Quality Enhancement Project

The Quality Enhancement Project (QEP), launched in 2014, aims to enhance learning and teaching in order to improve student throughput rates and success. In the first phase of the project, institutions completed self-assessments and developed improvement plans (Council on Higher Education, 2015). At the time of writing, it is too early to tell whether the QEP has been efficiently administered and whether it has achieved its intended outcomes.

7.5.8 Resourcing of the CHE

To put the work of the CHE in context, the organisation is responsible for the HEQSF which has over 10 000 qualifications across 26 public HEIs and 131 private HEIs, which have collectively enrolled approximately 1.2 million learners. To discharge its functions as a QC, the CHE received R49.5 million in revenue in 2015/16, of which R40.8 million was through a grant from the fiscus. Of all the NQF bodies, the CHE receives the lowest allocation.

Between 2009/10 and 2015/16, the CHE's income grew from R36.2 million to R49.5 million at an average annual rate of 6%. Over the same period, its expenditure grew faster, at an annual rate of 8% driven by the rapid growth in applications for accreditation. By 2013/14, its expenditure began to exceed the revenue of the organisation, and has continued in this

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[12] UNISA has since replaced their Bachelor of Social Work with a new learning programme that has been accredited by the CHE.

way for three consecutive years. This situation has severe implications for the performance of the council and threatens the sustainability of the organisation.

Interviews suggest that as a result of these financial challenges, the CHE has lost experienced staff, many of whom have left for the university sector. This has further worsened their capacity constraints and affects in their ability to perform their duties. For instance, several interviewees from public HEIs note that the CHE is sometimes slow to respond to requests for information because they did not have enough staff in their accreditation unit.

In many respects, the CHE faces a similar situation to SAQA, discussed in section 7.4.1. The organisation's ability to discharge its basic legislative functions is compromised by a lack of funding. Thus, for the CHE to regain its financial footing, it must either receive additional funding from the DHET or alternatively consider levying accreditation fees for applications from public HEIs. The option of levying fees is not ideal as many HEIs would see this as an additional burden when they are already under considerable financial strain. Nevertheless, accreditation fees might be one of the few options that is available to the CHE to remain afloat.
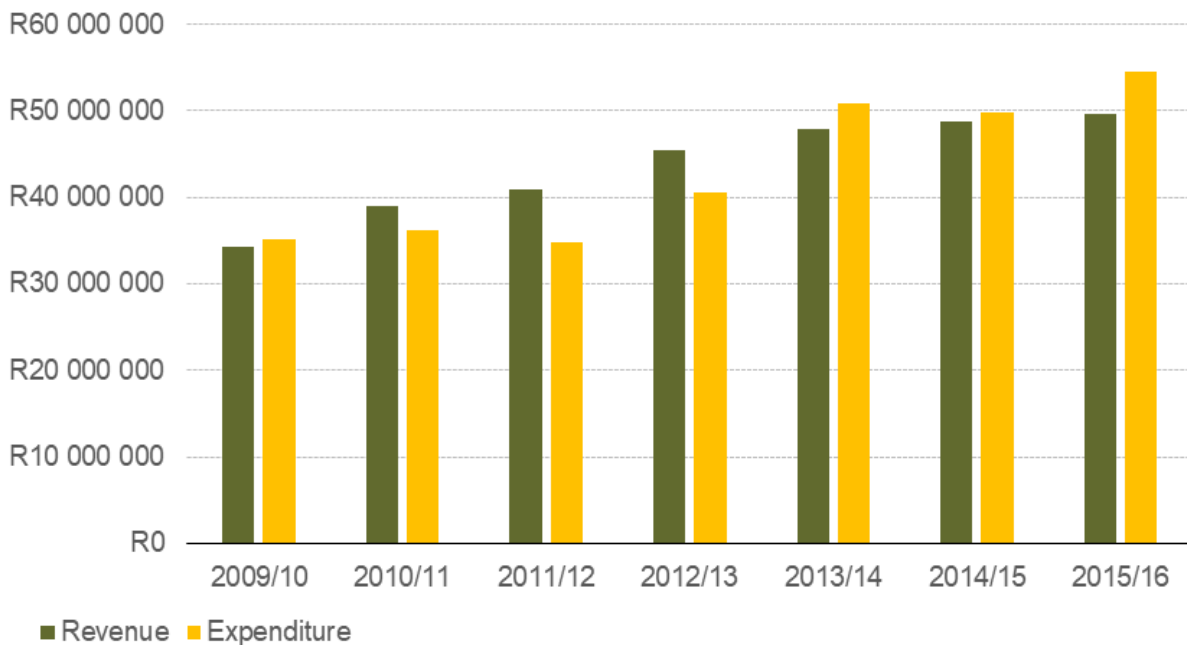
Source: CHE's Annual Reports

7.6 OQSF: Sub-framework, qualifications and quality assurance

Relative to the CHE and Umalusi, the QCTO was established significantly later. And while it was formally established by the amendments to the Skills Development Act in 2008, the QCTO only became fully operational after 2010. The Occupational Qualifications Sub-framework (OQSF) has thus undergone a far greater degree of upheaval than the other sub-frameworks and it is still far from being fully "implemented". The wide range of stakeholders and the uncertainty around their strategic roles and responsibilities can make this a fairly confusing area for those not intimately familiar with it.

This section evaluates the efficiency of implementation, but first contextualises the implementation of the OQSF within the wider E&T system and particularly within the context of the policy instability that exists in this area.

7.6.1 Background

Purpose of the NQF Act in relation to the OQSF

There are two ways of interpreting the NQF Act, what it intended and what it put in place in respect of the Occupational Qualifications (OQ) Sub-framework (OQSF):

- One interpretation is that the Act set up the OQ sub-framework for the first time. Previously there was Umalusi for the general and further education bands and CHE/HEQC for Higher Education. But there was no sub-framework for occupational

qualifications. Many role players in the system believe that occupational qualifications were given a higher status by the establishment of the QCTO and the recognition of occupational qualifications as having their own identity separate from "general", "academic" or "vocational" qualifications.

- Another viewpoint was that SAQA, in its leadership role within the NQF, had been developing an occupationally directed framework, which all sub-systems were being expected to adhere to. The resistance from the GFET and HE sub-systems and the conflict that characterised the so-called "NQF Review" eventually resulted in a compromise, namely that the model promoted by SAQA would be developed into a sub-framework and that the GFET and HE sub-systems would be empowered to retain their different sub-frameworks, and that the three sub-frameworks would be recognised as equal within the NQF.

These viewpoints or narratives are not necessarily in contradiction, but they do capture the ongoing contestation that exists within the system. Whatever the "narrative", the fact is that the NQF Act established the three sub-frameworks, provided for them each being managed by their own QC, and set out a national NQF within which the three sub-frameworks would be able to operate with a level of independence and autonomy.

Establishing an "occupational" sub-system

Whatever the views on the intention and purpose of the NQF Act, it is clear that the NQF Act established a sub-framework called "occupational". There were previously what were called "occupationally-directed" qualifications which in effect were occupational and so there has been no significant change in this, except that the planned new occupational qualifications will have a "practical skill" component, in addition to a knowledge and a work experience component. Most previous/legacy/inherited qualifications also had a workplace component and, in the context of a learnership, this was integrated into the curriculum and programme. However, the planned qualifications will have a workplace component and a practical skill component integrated into the qualification design. Legacy qualifications were "unit standard" based with assessments being done throughout the training process. The new occupational qualifications are curriculum-based and are assessed at the end of the training process through an external integrated summative assessment (EISA).

The occupational qualifications cut across the GFET levels and the HE levels (i.e. all levels from 1 – 8 on the revised NQF). The Department of Labour put in place a process of legislation for the establishment of the Quality Council for Trades and Occupations (QCTO) in 2010, through amendments to the Skills Development Act, and the intention was that the QCTO take on the role of leading the sub-framework in the development of qualifications and the quality assurance of these qualifications. However, there is the opinion within DHET

that the QCTO initially had a very narrow conception of of its role: looking only at accreditation not the functions of qualification development, curriculum development, broader quality assurance and certification. Only in 2014 did the QCTO expand their strategic plan to include full quality assurance of all OQSF qualifications.

Pre-existing issues present in the occupational training system

The key intention during the transition from the SAQA Act to the NQF Act was to centralise responsibility for these functions in the QCTO, where previously they had been with SAQA and delegated to SETA ETQAs. To understand this change it is worth understanding the issues (whether real or perceived) that existed in the workplace training space before the passing of the NQF Act:[13]

1. There was a perception that there was a proliferation of qualifications in the system.
   a. Qualifications were being developed largely at sectoral/SETA level. There is a perception that this was a key driver of the proliferation of qualifications; with many qualifications having very low levels of enrolment
   b. The proliferation of qualifications was seen as reducing the mobility of learners, with qualifications often not being portable across industry sectors.
2. Unit standards had been taken up to a greater extent, but the result was a system that produced a large number of shorter courses that were seen to not produce "enough" learners with a sufficient set of employable skills.
3. There were wide variances in the type and quality of quality assurance systems in the sector. Simultaneously, or perhaps as a result, there were private providers who were providing low quality training and not being sanctioned for it. Therefore, many employers did not have faith in SETA qualifications and QA in the system. The intention was to streamline quality assurance practices under the QCTO.
4. There was a view amongst many stakeholders within the E&T system that although there were very detailed requirements and processes relating to quality assurance, there was limited evidence that actual quality improvements were being achieved. The view was that a very costly set of processes was in place that seemed to allow quality claims by providers that were based more on meeting a "compliance checklist" than having to demonstrate quality provision.

7.6.2 Designing and resourcing the OQSF
Key design principles

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[13] This summarises the main issues expressed by interviewees during semi-structured interviews conducted and should not be seen as exhaustive

The QCTO has developed a model that aims to address these issues by focussing qualification development and quality assurance in the OQSF around a few main principles:

1. Creating trust in OQSF qualifications through centralisation of qualification development, quality assurance and certification and active participation of industry.
2. Reducing proliferation of qualifications; in particular centralisation was expected to enable a central determination of whether a single qualification could be created or amended to cut across sectors or disciplines (where appropriate) and the utilisation of qualifications could be monitored centrally. An initial example was given of the electrician qualification, where some 17 separate (mainly industry or sector based) qualifications were integrated into a single qualification.
3. Ensuring that all OQSF qualifications are consistent and contain 3 elements: knowledge (theory), practical and workplace.
4. Standardising assessment such that all OQSF qualifications include an External Integrated Summative Assessment (EISA). The EISA is to be the focus of quality assurance in the OQSF and is intended to enforce consistency and trust across the system.

Some key DHET officials interviewed agreed with the high level objectives / principles of the OQSF – which can be summarised as to simplify the quality assurance system and to reduce the proliferation of qualifications –they believed that the model selected wasn't at all appropriate to achieving these goals. This will be discussed in more detail below, but it is important to note that many of the disagreements in this area are fundamentally about design and not about implementation as such.

Capacitating and resourcing the QCTO

While Umalusi and the CHE had been in place for some time when the NQF Act was passed, the QCTO had to be newly created. The QCTO was established as a juristic person through the amended Skills Development Act in 2008, and the QCTO council was appointed in 2010. Many key positions were only filled much later when resources became available.

The key reason for the delay in resourcing the QCTO was that the source of funding for the organisation had to be determined and agreed. In 2008 it was expected that the organisation would report to the Department of Labour (DoL), but with the establishment of the DHET in 2009, the funding that was agreed in the DoL for the QCTO was no longer available. As a result, a baseline level of funding was not immediately available. The QCTO was then initially situated within the DHET and only in 2011/12 was it allocated a direct transfer, which amounted to approximately R18m. This amount is said to be significantly lower than the funding levels that had been expected from the DoL. No meaningful costing of the required

work of the QCTO was done in establishing the R18m funding baseline. In the early years of the QCTO several staff members were seconded from the DHET[14] and SAQA to compensate for the lack of capacity and funding in the organisation.

The intended centralisation required that several qualification development and quality assurance functions over time migrate from the SETAs to the QCTO. It was agreed through the SETA Grant Regulations (2012) that a portion of the Skills Development Levy (SDL) would be transferred to the QCTO. To this end, the proportion of the SDL allocated to SETA administration was increased from 10% to 10.5%; with a maximum of 0.5% to be paid by SETAs to the QCTO. This 0.5% figure was also put in place on the basis of a rough approximation of how much SETAs were spending on quality assurance at the time; although inconsistent reporting between SETAs made this very difficult to estimate. At the time many SETAs were funding quality assurance through their discretionary grants, which appears to be why the discretionary grant was reduced to increase the administration proportion and transfer (some of) these funds to the QCTO.

It would have been possible and preferable to "scope" the planned transfer of functions (i.e. determine in detail what the transferred functions will be) and do a costing exercise, but this was not done. The lack of any meaningful costing is a serious weakness. Once a system is agreed and implemented, even though it is well known and understood that it does not have the required funding, it will inevitably have problems (delays and inefficiencies) which will be blamed on "under-funding". However, in the absence of an agreed budget it is difficult to say what the required funding level is to make a judgement on under-funding. One of the biggest risks in the OQ sub-framework is that a system is being established that requires a (as yet un-defined) level of funding and that level may never be reached because other demands within PSET take precedence. Funding may not be found and therefore the system may for ever be regarded as inefficient.

DHET officials who were closely involved in the determination of the 0.5% state that is was also expected to be a transitionary arrangement to enable the under-capacitated QCTO to become operational, and not its strategic level or source of funding. It appears that the level was used largely because funds were not available from the fiscus at the time. Because the funding was seen as transitional, the QCTO was also not fully incorporated into the standard governance structures of levy-receiving institutions. For example while the QCTO's CEO sits on the board of the National Skills Authority (NSA), it did not report to the NSA in the way that, for example, the SETAs or National Skills Fund do.

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[14] Some of which were originally from the Department of Labour.

In practice, the amount received annually by the QCTO has been significantly less than 0.5% of the total levy[15]; although it has been increasing over time as shown in Table 17. In more recent years (that fall beyond the scope of the evaluation) this percentage has moved closer to the full 0.5%. This slow increase reflects the QCTO progressively building some capacity and expanding its activities. Nonetheless, while accurate estimates of the amount of money spent by the SETAs on quality assurance historically is not available, given the scale of these operations it is likely several multiples of 0.5% of the levy. SETAs are still performing many of the same quality assurance functions they traditionally performed – although they are now doing this via a delegation from the QCTO – while the QCTO has set up its new qualifications in parallel, and it is not clear how one system can be fully put in place while the majority of funding for quality assurance still sits in the legacy system.

Table 17: Skills development levy transfer to the QCTO over time

Year	2011/12	2012/13	2013/14	2014/15	2015/16
SDL levy transfer to QCTO (R million)*	R0.0	R0.0	R15.4	R28.5	R40.0
% of total SDL received by the QCTO**	0.00%	0.00%	0.12%	0.20%	0.25%

*Source: *QCTO Annual Reports 2012/13 to 2015/16 and ** DHET (2016) Statistics on Post-School Education and Training*

Figure 23 shows the revenue of the QCTO over time by source. The total revenue has increased substantially since 2013/14 with the introduction and expansion of the levy transfer. It's worth noting that providers in the occupational space do not pay for accreditation by the SETAs – presumably because this is implicitly assumed to be part of the SDL – in contrast to the system put in place by Umalusi. As a result, the QCTO does not have significant funding available beyond its subsidy and levy transfer amount.

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15 It appears that the amount that the QCTO receives is calculated as a percentage of the of levy amount that is transferred to SETAs – which is about 80% of the levy – and not of the total levy amount. It is not clear why this is the case, and hence Table 17 is based on the total levy amount paid by employers.

Figure 23: QCTO Revenue over time (in R'million)
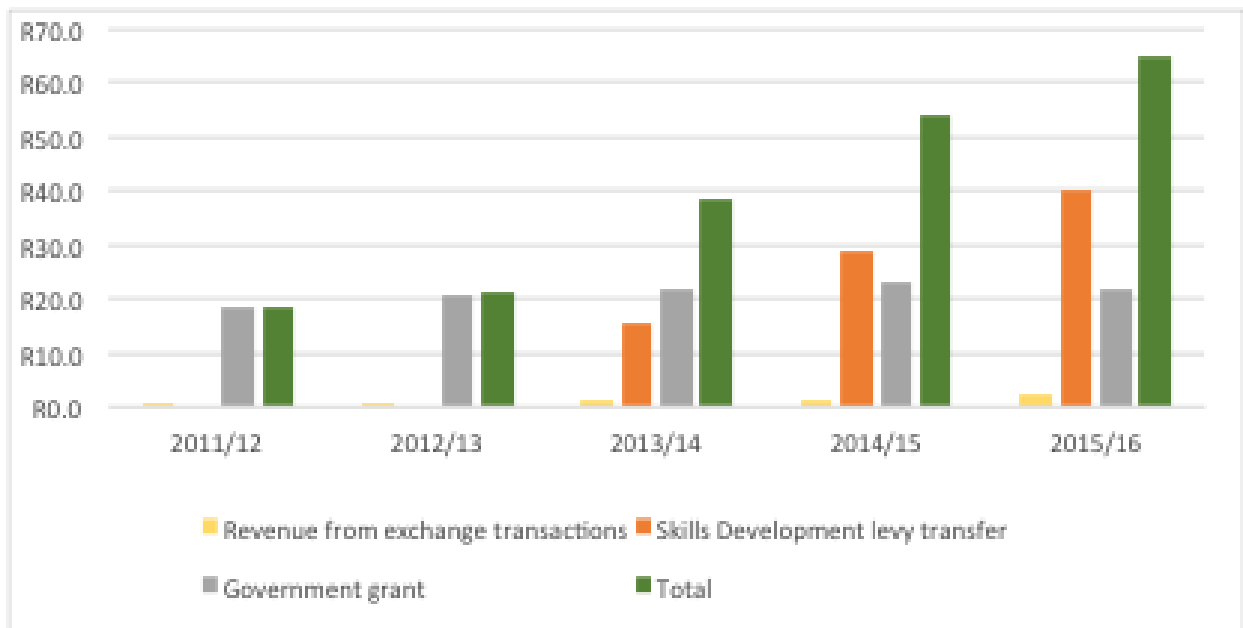
Source: QCTO Annual Reports 2012/13 to 2015/16

Development of a delegated model

Soon after the establishment of the QCTO it decided to delegate the majority of its qualification development and quality assurance functions. . This delegated business model was selected after the creation of a business plan developed in partnership with the GIZ.

SETAs fulfilled the role of Education and Training Quality Assurance organisations (ETQAs) for occupationally-directed programmes developed under the auspices of the SAQA Act (sometimes referred to as "historically registered" or "legacy" qualifications). It appears that the QCTO at first did not see the quality assurance of "legacy" qualifications as its responsibility, so initially SETAs and professional bodies simply continued with these functions; though eventually these functions were formally delegated and through the creation of the delegated role of Quality Assurance Partners (QAPs). These "legacy" qualifications will eventually expire or (in most cases) will be replaced by new occupational qualifications that are aligned to the OQSF.

The majority of the functions for new occupational qualification development was delegated to Development Quality Partners (DQPs). The bulk of quality assurance functions for these new qualifications was delegated to Assessment Quality Partners (AQPs). The majority of DQPs and AQPs are SETAs, since SETAs have closer links with industry and had access to funds to facilitate both qualification development and quality assurance. The majority of

occupational qualifications remained with those SETA ETQAs that had previously had the responsibility for "primary focus" qualifications, i.e. were responsible for the development and quality assurance of occupationally-directed qualifications that SAQA had delegated to the SETA. So, for example a mechanic qualification was in the Primary Focus of the merSETA and when new qualifications were being considered it would be the merSETA acting as a DQP and AQP that would take responsibility on behalf of the QCTO (previously SAQA's role).

Although terminology changed (SETA ETQAs became DQPs and AQPs) some differences were relatively minor. This section briefly explains the changes brought about by the DQP/AQP model according to the typical "steps" in the qualification life cycle:

Step 1: Qualification development

The former SAQA model was to develop a qualification in a stakeholder structure (National Standard Bodies and Standard Generating Bodies used to be responsible) whereas under the new dispensation DQPs (many of them SETA ETQAs) are responsible and create similar stakeholder structures to develop them. This process is facilitated by what has been termed a Qualifications Development Facilitator (QDF).

Step 2: Accreditation of providers to deliver qualifications

The former SAQA model was that providers would seek accreditation from the SETA ETQA that had primary focus. Primary focus was achieved by SAQA delegating the qualification to the SETA (i.e. the merSETA example, above). With the establishment of the QCTO, a system of accreditation via AQPs was put in place. Most of the SETAs adopted the role of AQPs. In other words, the same accreditation process was followed, though it was the QCTO delegating responsibility to SETAs whereas before it had been SAQA.

Part of the accreditation process was previously referred to as "learning programme approval". This was a process whereby a training provider who was "accredited" by one SETA ETQA, could apply to another ETQA to deliver programmes in their "primary focus". The SETA concerned would put the programme through a similar approval process to the process followed to award accreditation. In other words, there would be a set of criteria that a provider would have to meet and once compliant would be able to deliver the programmes.

In the new system SETAs continue to play a leading role in both qualification development and quality assurance..

Over time, as the QCTO has developed greater capacity, the QCTO has taken the accreditation of providers and assessment centres "back" from the AQP; i.e. is no longer delegating this function.

Step 3: Quality assuring assessments

It must be noted that there is a fundamental difference between the approaches to quality assurance of learning in the 3 sub-frameworks. Umalusi's quality assurance focuses on an exam at the end of a programme. After learners go through schooling they take the National Senior Certificate (NSC). When they complete their studies at a TVET college learners take the NC(V) or NATED exams. In occupational qualifications, there are historically no exams but rather assignments and portfolios of evidence developed. In Higher Education, there is a mix of assignments and exams used to assess learning, with a large proportion of the award being given by the lecturer, in a system moderated by other lecturers. So, the very intensive assessment process followed in the OQ sub-framework was quite different to that followed in the two other sub-frameworks. It needs to be acknowledged that the current (SETA) qualifications in the OQSF will remain for some years to come, as the vast majority of those currently entering occupational training are doing so in the historically registered qualifications that require assessment to be done in the historically implemented manner.

A key function of a SETA ETQA had been to manage the assessment processes for learners engaged in qualifications. AQPs have this responsibility for newly created occupational qualifications, although some more fundamental changes to the assessment system also came with this role. The EISA is the core of the assessment model, and effectively replaces "assessment of learning against unit standards", moderation of assessments, and verification of learner achievements. The QCTO's intention is that the EISA create a more substantive form of quality assurance, replacing what are seen as largely compliance processes.

Essentially providers used to assess learning and competence, there was moderation of assessments to ensure even-handedness, and a system of verification would be followed to finally approve the award of a certificate or other qualification or part qualification. In the new occupational qualifications, the skills development provider uses the curriculum to guide them on the stipulated internal assessment criteria and weighting. They also apply the scope of practical skills and applied knowledge as stipulated by the internal assessment criteria. This formative assessment leads to entrance into the EISA.

The EISA is conducted through a combination of written assessment and practical tasks at an accredited assessment centre. The written examination is concluded at an accredited

assessment centre and marked by registered assessors. Practical tasks will also be assessed by registered assessors.

The EISA system is different in some ways to the current practice. In particular it does not allow for unit standards to be assessed independently and for credits to be accumulated towards a qualification. This is a substantial change. Once it is implemented there will not be ongoing (summative) assessments and credit awards during the programme. Instead there will be formative assessments, leading to a learner being classified as ready to be summatively assessed. That summative assessment includes an exam, but also includes assessments of competence that will be similar to an artisan trade test.

Step 4: Awarding and recording of qualifications

The process has been that once assessments have been conducted, moderated and verified, the SETA was required to issue a certificate or other qualification and to record the result on the NLRD managed by SAQA. The QC is now supposed to issue certificates. As before there are concerns over tardiness in issuing certificates (often related to system or administrative weaknesses in SETAs or the DHET) but there is general satisfaction with the NLRD as the repository of information and evidence of qualification attainment by learners.

The table below provides an overview of which functions are (primarily) performed by which body under the different quality assurance models currently in place in the OQSF.

Table 18: Current responsibilities for different quality assurance functions under current OQSF models

Qualifications	Occupational Qualifications	Historically registered quals	NATED N4-N6
QA Function/ Activity	AQP model	QAP model	N4-N6 model
1. Development of Addendum	AQP	N/A	N/A
2. Development of Test Instruments	AQP	N/A	DHET
3. Moderation of Test Instruments	AQP	N/A	DHET
4. Accreditation of Providers (SDPs / colleges)	QCTO	QAP	QCTO
5. Accreditation of Assessment Centres	QCTO	QAP	DHET
6. Monitoring of Providers	QCTO	QAP	DHET
7a. Monitoring of readiness for EISA	QCTO	N/A	N/A
7b. Administer EISA	AQP	N/A	N/A
7c. Monitoring conduct of EISA at assessment centre	QCTO	N/A	N/A
7d. Marking of EISA	AQP	N/A	N/A
7e. Internal moderation of portfolio of evidence	N/A	N/A	N/A
7f. External moderation of assessment	N/A	QAP	DHET
7g. Quality Assurance of moderation process	N/A	QCTO	DHET
8. Resulting	QCTO	QAP	DHET
9. Certification	QCTO	QAP	DHET

The qualification development process in the OQSF involves several different models and can be complicated to understand. To help the reader understand the process involved in developing an occupational qualification, the evaluation team has drafted a case study of one of the first qualifications developed under the OQSF: the Financial Markets Practitioner, which is a level 7 qualification in Appendix 2:. This case study explains the new model for the development and quality assurance of occupational qualifications in detail and raises a number of issues that exist within this model.

Is the model appropriate?

Developing fit-for-purpose qualifications is a lengthy and costly process and so with the limited capacity the QCTO had available in the years after the passing of the NQF Act, and to avoid excessive disruption to the system, it was inevitable that some functions would have to be delegated. However the model of delegation soon became an area dispute between the QCTO and the DHET.

The DHET Skills branch believe that the QCTO initially had a far too narrow view of its own functions, and that the OQSF model that the QCTO were putting in place didn't meet (what they deem to be) its key objectives: simplifying the quality assurance in the system and reducing the proliferation of qualification. They also report that the QCTO did not engage with and implement the model set forth in the business case document that was developed for the QCTO in 2010, which means that different conceptions existed of what the eventual OQSF system should look like.

More generally, it appears that the relationship between the DHET Skills Branch and the QCTO was severely strained during the time that the OQSF was developed. Several interviewees suggested that the OQSF model was developed with limited engagement from the DHET or other stakeholders such as business representatives; with different people putting the blame for this situation in different places.

There continues to be significant disagreement as to both whether the model is appropriate and whether the process used to arrive at it was sufficiently inclusive. The QCTO believes that its model will eventually achieve the important objectives of reducing proliferation (through e.g. the removal of unit standards) and simplification of quality assurance (through the EISA), but some others believe that proliferation and complexity has, if anything, gotten worse as discussed below.

7.6.3 Governance arrangements of the QCTO

The QCTO is governed by a Board. The QCTO's CEO sits on the board of the National Skills Authority (NSA), but the QCTO is not expected by the Skills Development Act to formally report to the NSA as, for example, SETAs are. There is the opinion that, if they are utilising the skills levy, they should not be a member of the NSA, but should account to the NSA.

In fact, the DHET has recently proposed that the QCTO formally account to the NSA and the broader structures of the National Skills Development Strategy (NSDS) IV; and sees this as a key mechanism for coming to a shared position on the role, model and funding of the QCTO. However having the QCTO management be simultaneously accountable to their Board, the NSA and the NQF structures that likely all have different objectives could be quite challenging.

7.6.4 Qualification development in the OQSF

By July 2017, 246 qualifications were approved by the QCTO Council and recommended to SAQA for registration. Table 19 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.

Table 19: 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[16]	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

Perceptions on the qualification development process

Based on the perception of the proliferation of qualifications under the SAQA Act, the main intention was to streamline qualification development with the establishment of the QCTO; i.e. that the QCTO should rationalise the number of qualifications. But, there is a perception by many stakeholders that the model the QCTO are currently using may take us back to a complex plethora of qualifications, as they are developing qualifications at the 6th-digit of

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[16] As at 27 July 2017

the OFO. Interviewed officials from the QCTO have indicated that their model does represent a significant move away from the proliferation of qualifications, largely because there will not be an overlap between qualifications in different SETAs (i.e. there won't be 8 different electrician qualifications) and that the current system will eventually end the proliferation of unit standards completely. The core of the problem seems to be that there was never a clear agreement on what "reducing proliferation of qualifications" actually meant: did it mean reducing the number of qualifications, removing overlaps / duplications or removing unit standards?

While qualification development has been somewhat slow to gain momentum, survey interviewees were typically fairly positive about the processes put in place. Amongst those surveyed the majority reported having a good understanding of the qualification development processes of the QCTO and SETAs (see Table 20 below). Survey respondents also report that the QCTO qualification development process has been largely successful along a number of dimensions, as shown in Table 21.

Table 20: Survey question: *To what extent do you understand the qualification development processes of the QCTO and the SETAs?*

Response	QCTO	SETAs
Not at all understood	3	2
Slightly understood	7	3
Somewhat understood	8	7
Well understood	5	10
Total	**23**	**23**

Source: OQSF respondents to the survey

Table 21: 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	Successful	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

The QCTO appears to have had mixed success in its efforts to inform the sector of the change to the qualification types, as evidenced by survey respondents' familiarity with the

QCTO qualification development process reported in Table 22. Several interviewees suggested that take-up of qualifications could be reduced by a relatively narrow set of stakeholders that are involved in the qualification development process, i.e. if providers and employers are not sufficiently involved in the process there might be resistance to or even simply unawareness of these qualifications that could reduce the provision of these qualifications in practice; particularly in the short term.

Table 22: Survey question: *The QCTO has recently begun developing new curriculum-based occupational qualifications. On a scale of 1 to 4, how familiar are you with these new qualifications?*

Total	Number of responses
Not at all familiar	7
Somewhat familiar	2
Moderately familiar	7
Very familiar	7
Total	23

Source: OQSF respondents to the survey

This view was shared by most respondents in the qualitative interview process. It appears that most interviewees believe that the process and design of qualification development adopted by the QCTO is sound in principle, although various issues where raised with specific aspects of the implementation thereof.

Several of the interviewees stated that while most aspects of the QCTO qualification development process were clear and well documented, it has not been well communicated to the large number of different stakeholders within the occupational training system.

Similarly, many interviewees suggested that most employers, providers and industry bodies have not been involved in the QCTO qualification development processes. There is also a perception that qualifications are still being developed to enable insiders to make money rather than to meet industry needs; although it's not clear how this can be verified.

There also appears to be little or no marketing at QCTO to make it publicly known that new qualifications are now available. This will potentially undermine the take-up of these qualifications when they are rolled out, although it is too early to judge the accuracy of these perceptions. Currently employers and SETAs are still able to make use of legacy qualifications (even where a new qualification exists). They also have not been required to make use of occupational certificate qualifications as they will be when legacy qualifications are phased out and/or aligned to the occupational certificate framework.

However, one of the perhaps unintended consequences of not funding the QCTO to do the work it was mandated to do is that it has had to rely on a partnership approach. There are

clearly a wide range of partnerships with SETAs, industry associations and professional bodies to carry out the functions of qualification development and assessment. These partnerships are formal and can be assessed and measured in terms of their performance. In spite of the criticism of tardiness by stakeholders there is acknowledgement that processes are designed to be more inclusive and there is potentially more buy-in for the new qualifications than there has been in the past. Others feel that, in practice, the range of people involved in qualifications development is still too narrow to develop qualifications that are adequately portable and "generic" in application. They acknowledge the attempts to be more inclusive but believe this could go a lot further.

Interviewees also raised the treatment of part qualifications as a particular issue. It appears that a final position on part qualifications has not been determined, despite a large number of qualifications already having been developed (without part qualifications). The current occupational training space includes a very large number of unit standards, and the standing of part qualifications needs to be clarified.

Some interviewees in the DHET expressed frustration that the QCTO qualification development process did not seem to always consider the training modalities that are likely to be workable in a public TVET college. For example, if the number of credits do not align well to specific duration, for example 1 year, then it could be difficult to accommodate these qualifications within TVET colleges. More generally, it appears that the focus on qualification design is typically not on the public system. Given that most occupational training currently happens in the private system this is reasonable, but it does not necessarily align to plans set out in the PSET White Paper to increase the amount of occupational training in public TVET colleges.

One of the biggest concerns regarding this model was the requirement that all occupational certificate qualifications include all three components (knowledge, practical and workplace). While most interviewees highlighted the importance to move beyond theory-only programmes there were concerns whether requiring all three components for all qualifications was reasonable and practical, particularly in the short term.

Costs of qualification development

The costs and financing of qualification development was also raised by interviewees as an issue. Data shows that the costs and time taken to develop qualifications are significant. The average cost of qualification development to the SETAs (acting as DQPs) was approximately as R400 000 per qualification based on a sample provided by the QCTO. The cost per qualification varies significantly however between R187 000 and R3 000 000. Note

that this does not include the costs that accrue to the QCTO or SAQA; or indeed the many stakeholders that are not directly compensated for their involvement in these processes.

Similarly, the data shows that it takes between 3 and 24 months, with an average of 18 months, for a qualification to be developed by the DQP and finally approved by the QCTO Council. From there it enters the SAQA registration process, at which point it does not necessarily comply with the SAQA requirements and could be returned for amendment.

These variations in cost and time are indicative of the degree of idiosyncrasy inherently present in the occupational sector, but also underlines the lack of standardisation that exists between different DQPs. Since the DQPs administer and fund qualification development themselves, the QCTO also has limited influence on whether the process is efficient from both a cost and timing perspective. Nonetheless, there appears to be a lack of guidelines on the costs that can be incurred by Qualification Development Facilitators.

Are timelines achievable?

To develop a sub-framework and then significantly transform the qualification development and quality assurance systems in this sub-framework was inevitably going to be a lengthy process. However, this process appears to have taken longer than was initially anticipated based on the timelines that were put in place for "historically registered" qualifications (i.e. qualifications not aligned to the OQSF).

Most historically registered qualifications that are currently active expire in July 2018, with the final date for new enrolments typically being July 2019. Based on information provided by the QCTO, 691 of the 940 historically registered qualification (73.5%) still need to be replaced or aligned to the OQSF (as at July 2018).[17] In practice it might be that these qualifications are replaced by significantly less than 691 qualifications,[18] or that the pace of qualification development and alignment could increase, but at a rate of 50 qualifications per annum it would appear that several more years will be required for all qualifications to be replaced and/or aligned to the OQSF.

It is thus likely that a very large number of historically registered qualifications will not have been replaced or re-aligned by the time that they expire. Even where qualifications have been replaced, it is not yet clear whether a sufficient number of providers will have been accredited to present these qualifications or whether sufficient time will be available to

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[17] At the time of writing 52 of these qualifications were already in the process of being re-aligned; i.e. the relevant DQP had already commenced the development of a qualification to replace these qualifications.

[18] A single new qualification can in theory in replace several historical qualifications there, and some qualifications might not have sufficient take-up to require replacement. However there is little evidence that the total number of qualifications will reduce significantly.

ensure work placements for these qualifications, which is a strict requirement for new occupational certificates.

Furthermore, there are currently no part qualifications registered on the OQSF, and this in a system where most learners currently are enrolled in unit standards and don't necessarily complete a full qualification. There is speculation that the OQSF could be adjusted to allow for part qualifications that do not include a workplace component, and while this appears sensible, it could require that some registered qualifications be revised before they receive significant take-up. Pilots of new occupational qualifications in public TVET colleges have only recently commenced, and it's not yet clear whether these qualifications can be taken to scale within these colleges.

The last factor is that, as mentioned previously, many important skills sector stakeholders believe that the qualification model put in place by the QCTO will not remove the proliferation of qualifications as it was expected to do. There seems to be an expectation that the OQSF will have to be revised to change this model, which would mean that all qualifications (new and legacy) would have to be re-aligned to this new OQSF; and this is surely not achievable within the current timeframes.

The combination of these factors could result in a crisis in the OQSF, where the amount of training in the OQSF could suddenly collapse in SETAs where qualifications have not been adequately replaced and systems for new qualifications set up, unless the above deadlines are extended. It is also not clear if funding is available within the SETAs to fund rapid qualification development and alignment, or whether this issue is a sufficient priority, for the deadlines to be met even if the pace of qualification development could be increased.

7.6.5 Quality assurance in the OQSF

There are currently two quality assurance systems running in parallel: the QAP system for historically registered qualifications and the AQP system for new occupational certificate qualifications. While the systems are similar in many ways, they have different terminology and structures. This means that a SETA ETQA is managing historic qualifications and the quality assurance of those qualifications in essentially the same way as they have since 2000, but at the same time they are developing parallel systems required for their role as DQPs and AQPs.

Perceptions on quality assurance in the OQSF

The vast majority of programmes currently being presented are still based on historically registered / "legacy" qualifications; i.e. qualifications not registered as occupational certificates. Indicative evidence from the survey and qualitative interviews with SDPs suggest a relatively positive view of the quality assurance systems being operated by the

SETAs in their delegated role as QAPs. While the efficiency of quality assurance processes is still reported to vary widely between SETAs, results suggest that the systems are generally well understood and (reasonably) effective in improving quality. Table 23 also shows that the time taken to obtain accreditation from the QCTO or SETAs appears to be shorter than under Umalusi, according to SDPs surveyed. These results suggest that the often-maligned SETA QA system has perhaps reached a level of maturity.

Table 23: Survey question: *On average, how long does it take to be accredited (by the following institutions)?*

Time taken to accredit qualifications	By QCTO	By a SETA	By Umalusi
Less than 3 months	0	1	0
Between 3 and 6 months	10	10	5
Between 7 and 12 months	2	3	4
More than 1 year	7	6	8
Total*	19	20	17

Source: OQSF (i.e. SDP) respondents to the survey
* Note that not all SDPs had qualifications accredited by each of these bodies and hence the number respondents varies in each case

The QCTO's occupational certificate qualifications are still relatively new with limited take-up, and hence it is too early to obtain a representative sample of how these programmes are delivered or quality assured. However, interviewed officials are generally positive about the changes being put in place by the QCTO, although the pace of implementation and lack of capacity was raised as a key challenge during several interviews. Many interviewees also expressed relatively limited knowledge about the proposed QCTO model. This is a concern.

A number of specific issues were raised in relation to the model being adopted for occupational certificate qualifications:

- Some question whether SETAs have the capacity to act as AQPs. The EISA model requires SETAs (and in some cases professional bodies) to act effectively as examination bodies which has not historically been their focus
- The level of compliance documentation expected of AQPs was deemed unreasonable by some AQPs interviewed. They state that AQPs have to report extensively to the QCTO, much of which they deem to be just completing compliance documentation. The argument is that if the function has been delegated to experts in the sector / area, why is it necessary to add an additional layer of reporting and bureaucracy? They feel that the QCTO should rather focus on improving areas of risk, rather than holding all AQPS to the same administratively burdensome compliance requirements. The case study presented in Appendix 2: for the Financial Markets Practitioner qualification highlights the costs and challenges that AQPs face in setting up and administering assessments under the OQSF model

- The QCTO's lack of geographic footprint and expertise in the different industries and sectors lead to interviewees questioning whether all this expertise could realistically be housed in a single organisation.

One of the biggest concerns related to uncertainty about the long-term model that the QCTO will put in place, in particular relating to the DQP and AQP functions.

Costs of the new model

The move towards a quality assurance system that centres on the EISA brings with it a number of costs to the AQP. Several interviewees within AQPs questioned the cost effectiveness of the model.

In many ways the new system of assessment is quite similar to that followed for artisans in that a Trade Test (similar in form to an EISA) was conducted and evidence of practical work experience was provided by the individual's log book. So, although the system differs from that followed for unit standard based qualifications, it replicates to a great extent the processes followed historically for apprentices.

Although the system of assessment for artisans is relatively easy to understand, because of its similarity to the historical method of assessment, it is not so easy to envisage the assessment of qualifications that are not for artisans. For example, the assessment of a tax auditor or a farm manager will need to include some form of practical assessment as well as substantial theory. One of the challenges will be the establishment of assessment centres. In the trades there was a serious challenge during the period of expansion of artisan training due to the lack of fully operational and capacitated trade test centres. For example, there were problems in establishing trade test centres for the new auto industry artisans who wanted to qualify in mechatronics. Those wishing to become qualified were forced to be tested as electricians against the electrician trade test (see evaluation of the dual artisan system for SSACI 2017). Establishing a network of assessment centres for all the planned new occupational qualifications will be a huge task, and one that has only just started. Given the history of occupational qualifications there are reservations around investing in such centres. If (as happened in the past) some qualifications only have a small number of enrolments, then why should a provider, industry organisation or professional body invest in creating an assessment centre? A vicious cycle could be created whereby because there is no assessment centre people do not enrol and because people do not enrol no one invests in the centres.

Although it is not possible to evaluate the new approach to assessment and whether implementation is truly in line with the intentions of policy makers, the signs are that a plan is in place to simplify and streamline assessment of learning in the new qualifications. Once

capacity is in place to conduct assessments for non-artisan trade related occupations, it will be possible to examine in more detail whether the intended EISA is a system of assessment that can be applied across all occupations. The detailed plans will be set out in each of the qualifications themselves and the detailed implementation will be via the AQWPs, with SETAs seeking to establish themselves as the partners, but with other institutions such as public and private training providers and professional bodies having the opportunity to apply to play that role as well.

Whether the on-going (i.e. annual) costs of quality assurance under the AQP system will be higher than that under the QAP (i.e. historically registered qualification) system will likely differ by qualification, based on a number of factors:

- For trade qualifications, a trade test has been in place for a long time, which is substantially similar to the EISA and assessment will typically still be done on a one-to-one basis. Hence the cost of the quality assurance process shouldn't theoretically differ substantially
- For qualifications where the EISA essentially takes the form of an examination as it does for many business subjects the assessment system changes more significantly, simplifying the situation somewhat: Instead of having one-on-one external assessment per unit standard you would now have a single standardised exit level assessment in the EISA which several learners could write simultaneously and hence economies of scale could occur, however:
  - There will be significant, essentially fixed, costs to the AQP in setting up the EISA and the item banks associated with it as well as assessment centres (discussed above). There is also significant work involved in developing separate reports and putting in place new standard operating procedures using the new terms and following new guidelines issued by the QCTO
  - For qualifications with high enrolments there could thus be significant cost savings. Where enrolments are low, the fixed costs still remain, potentially making this an expensive form of assessment
- The argument that the new model could reduce costs seems most persuasive for qualifications such as N4 – N6, where there are currently 4 externally assessed examinations for each level (thus 12 in total). The QCTO is currently in the process of restructuring these qualifications to have a single exit level, with one EISA (which might have two parts, for example). This could theoretically significantly reduce the tremendous costs currently undertaken by the DHET on these examinations,

although a large number of other factors will also need to be considered and costed before this claim can be proven.

- The uncertainties around part qualifications is also an issue; if each part qualification needs an EISA (which it currently does) it could be very expensive. As there are currently no part qualifications registered this is not yet an issue, but needs to be considered when finalising the quality assurance model.

- In summary, whether the quality assurance approach focussing on EISAs will be cost effective will probably depend on (a) whether the proliferation of qualifications can be reduced and (b) whether there will be sufficient uptake of qualifications. It is thus too early to determine whether the overall cost of the quality assurance system will rise or fall, but it is worrying that no system-wide costing of this has been done.

The DQP and AQP model as currently implemented is also not the strategic model of the QCTO. The QCTO is expected to further centralise the activities currently undertaken in the SETAs. The QCTO claims that the centralised model will result in economies of scale and streamlining of processes. For example, some of the AQP administrative costs highlighted in the case study presented in Appendix 2: could be reduced.

Others fear that centralisation will make the system even more bureaucratic or less responsive to context or industry-specific issues. Currently quality assurance capacity rests within SETAs and Professional Bodies. The QCTO does not currently have a geographic footprint and it will likely take a long time to create the structures required to support an organisation that has to support a diverse range of learners, qualifications, employers and providers. It is not clear if going through the costly exercise of transferring this capacity to the QCTO will actually result in a better managed system.

Quality assurance summary

It is too early to determine whether the DQP/AQP model will be more effective or efficient than the current QAP model. It is even more unclear whether the future centralised QCTO model will result in efficiency improvements; particularly since the strategic QCTO model is not yet clearly defined and will likely only be finalised when the QCTO receives clarity on its long-term funding model.

It appears that quality assurance models are being developed with limited analysis of their total cost to the system; a statement that also holds true for qualification development. Add to this the lack of a sustainable funding model for the QCTO and the tremendous amount of policy uncertainty in the occupational system more broadly, and it seems likely that the system will remain in a state of severe flux for a long time to come. This situation could

undermine the credibility of the qualifications and learner achievements that result from the occupational training system.

While these issues are inherently complex and difficult to address, an important first step should be to clarify the QCTO implementation model and ensure that its implementation model is costed and aligned to the funding that is available to the system.

A more fundamental problem is that, as mentioned in the qualification development section, key stakeholders do not believe that the OQSF has fundamentally addressed its main objectives; including simplifying the system of quality assurance and making it more effective. These stakeholders believe that the model should be re-worked in collaboration with the wider skills sector.

7.6.6 OQSF summary

There is little evidence to suggest that providers or learners have been significantly disadvantaged by the two systems running in parallel, nor by the time taken for the QCTO in getting new qualifications registered. This seems largely to be the case because legacy qualifications have been allowed to continue.

An examination of learner throughput in occupational qualifications shows that there has been a significant increase in the numbers going through full qualification programmes. So, although the QCTO has not been functioning at optimal levels the primary purpose of the sub-framework – namely providing a learning pathway to occupations – has continued. There is limited evidence of any actual harm done to occupational training during the period from 2008 to 2017. Training has continued and although there are questions raised as to the effectiveness of the some of the programmes, the concerns are not generally about the QCTO and its role.

There is criticism of the system for the slowness of processes, but this is generally viewed as an irritant rather than something that has undermined quality or created deficits within the skills system. However, there is no doubt that inefficiencies have occurred and implementation of the new (QCTO- led) system has been handled in a manner – with insufficient resources and a lack of strategic direction – that was inevitably going to create inefficiencies. The time taken to develop qualifications has been too long and the ability of a SETA to fund the process has become a factor in prioritising qualifications. It may also be a factor in increasing the cost.

The policy intention of the policy makers within DHET (though possibly not the drafters of the NQF Act from the Department of Labour) was to centralise and simplify much of the quality assurance work being done by SETAs (in their ETQAs, DQPs and AQPs) in the QCTO. This has not yet happened. There has been reference to a "soft touch approach" to

accreditation under the QCTO, but what this meant was unclear, and there is no reference to this any longer. It is not clear whether qualification development is more efficient.

The QCTO has been quite effective in putting in place policies, procedures and systems, but delegated most of the functions it now has responsibility for back to the SETAs and, to a lesser extent, professional bodies.

Even eight years after its creation its strategic funding level and model has not been clarified and the cost of fully transferring and maintaining the quality assurance function to the QCTO has up until now not been costed. Indeed many interviewees believe that the OQSF will have to be revised significantly, meaning that much of the work done this far to align qualifications to the OQSF and start to put in place new assessment systems will need to be reworked yet again.

The other problem, in addition to being forced to continue to work through SETAs, is that policy uncertainty was created. Is there a clear policy to centralise QA functions in the QCTO? This remains unclear, and so there are now many stakeholders arguing for the functions to stay with SETAs, with apprehension about the impact of centralisation. Some believe that the best location for quality assurance is in sectors. Others believe it is correct to focus on occupational clusters and this is difficult to achieve in sectors, particularly where sectors are as arbitrarily defined as they are within the 21 SETAs. The silo approach to qualifications is one of the problems that policy makers and stakeholders agree needs to be sorted out. However, the strong sense amongst many stakeholders is "better the devil you know" – the view that even if there have been problems, the system is working and, with no guarantee that things will be better centralised, the feeling is that the functions should stay with SETAs.

The fact that these arguments are now being put forward is evidence of the vacuum that was left by the lack of attention paid to the funding challenge of the QCTO. The 0.5% funding to the QCTO was viewed as a temporary solution and one that left a centrally determined and established structure dependent on sectoral structures that were not certain of a long-term future, and were viewed as having quite serious challenges. It is not surprising that there is uncertainty over the policy intentions of DHET.

The common explanation of the current uncertainty is that quality assurance is in fact just a part of a much wider policy debate – specifically arising from the White Paper on PSET. For example, is it the central role of the TVET colleges to deliver the NC(V) or to offer occupational qualifications that address the direct needs of local industry? This fundamental question has not been resolved. The first draft of PSET WP Implementation Plan has not

been made available to the evaluation team, but interviews conducted suggests that it will not fully address this issue.

Historically, since 2000 at least, the occupational qualification delivery was left largely to employer training departments or private providers. If the public TVET system takes on that role then this will result in major changes that the OQSF and the training system more broadly will need to adjust to. One of the policy challenges will be to develop a sustainable funding model for TVETs for the delivery of occupational qualifications. This means aligning funding from the fiscus (to cover college based training – mainly theory but also practical workshop-based training) and funding from the levy (to cover employer costs and learner/apprentice stipends). Another will be the capacity-building role that the QC or DHET may be required to play in the colleges, if there is to be an expansion of provision of such qualifications.

The QA role of the QCs in relation to public colleges is also being transformed, albeit currently without any basis in policy. Historically public colleges were "deemed to be accredited" by Umalusi and will continue to be unless legislation changes. However, if occupational programmes are their core business in future, and given the requirement for providers to be accredited to deliver occupational qualifications, does that not give the QCTO a significant stake in the colleges? The QCTO is starting to step into an area of quality assurance previously jealously guarded as a function of the Department of Education and now DHET, where the colleges are now located.

Many crucial policy decisions are being made that will have an impact on the role and functioning of the QCTO and it was probably unrealistic to take decisions on function shift (of ETQA functions from the SETAs to the QCTO) outside of the wider PSET WP implementation plan. Perhaps in that context the inefficiencies caused by the functions remaining with SETAs were an acceptable price to pay to enable policy coherence to be achieved. Nonetheless, these policies are yet to be resolved and it appears that the system will continue without a clear mandate for some time to come.

While there is general support for the nature of the new occupational qualifications being developed by the QCTO, it is too early to determine whether they will achieve the intended objectives of the OQSF. A number of assumptions were made in the design of the OQSF that may or may not be found to be sound:

- The decision to align the number of qualifications to be developed to the 6th digit of the OFO codes has potentially resulted in a system that will again have a very large number of qualifications

- In relation to qualification design, making the workplace component a required part of all qualifications and part qualifications is a risk. Doing this makes it difficult for the training provider to control the inputs as they have to rely on employers providing quality work experiences that enable knowledge to be applied, and competence to be gained, across the qualification.

- The workplace component requirement will necessitate a rapid transformation from a system that focusses primarily on short courses and unit standards (with little or no workplace training) to one that requires workplace training across all qualifications. Are employers and SETAs sufficiently aware, engaged and bought into this transformation for it to be possible? Have plans been put in place to fund simulated learning if not? Severe disruptions of a system, without resources or detailed plans to manage such a disruption, could have profound negative and unintended consequences for both providers and learners.

- In relation to the assessment process, retaining and centralising a system that is dependent on the employment of highly skilled and experienced people to conduct site visits and carry out monitoring of the assessments being done is not straightforward. Just as the SETAs battled to get good people to do this work, so will the QCTO have difficulty recruiting and retaining staff in the assessment centres.

- In relation to the overall QA system, creating a system based on the assumption of employer involvement at all stages lead to most public and private providers, as well as SETAs, expressing concern at the difficulty of getting employers to be involved either at national, regional or local level. As a result there is a serious risk in making so much dependent on their cooperation. It seems inevitable that compromises will have to be made that allow either limited/partial involvement of employers or representative intermediaries such as skills development facilitators. Lack of capacity within the QCTO and the DHET means that these conversations do not appear to be happening.

It appears that key stakeholders continue to question these and other assumptions; and it seems likely that the OQSF will have to be revised soon in ways that could completely change the nature and volume of qualification development and quality assurance yet again. Substantial revisions to the OQSF will significantly extend the amount of time before all qualifications can be aligned to this revised sub-framework; meaning that the parallel systems of quality assurance will likely remain in place for a long period of time. In the interim the occupational qualifications system will remain disjointed, confusing and inefficient.

7.7 GFETQSF: Sub-framework, qualifications and quality assurance

7.7.1 Background: Understanding Umalusi's role as a quality council

Umalusi is the quality assurance body in charge of the GFETQSF as defined by the NQF Act 2008. Umalusi was already well established in 2008, having been instituted under the GENFETQA Act of 2001. At its inception it took over the work of South African Certification Council (SAFCERT). Its initial mandate was to democratise end of school cycle examinations and help establish a single schooling and examination system for all. By 2008 the National Senior Certificate (NSC) had replaced the Senior Certificate and established itself as a national exam which the vast majority of public and private schools serving all communities sat at the end of the schooling cycle.

Expanding the role of Umalusi as a QC

By the admission of the senior managers in Umalusi it took them a number of years after the NQF Act was promulgated to fully understand the change in role resultant in moving from being an examination council to being in charge of a qualifications sub-framework. The key moment for Umalusi was when DHET clarified that it is not SAQA but the QCs who should develop the policies and create and prepare qualifications for gazetting. Once the realisation developed of what this allowed a QC to do, Umalusi set about exploring what it could do within its mandate. This included four key functions:

Quality assurance of the curricula

In the context of this almost continuous curriculum revision and amendment within the basic education sector, Umalusi received a request from the Department of Basic Education to quality assure the Curriculum and Assessment Policy Statement (CAPS) for all phases, a task which Umalusi has undertook for all four phases. The research was conducted in 3 parts: Part 1 was a comparison between the National Curriculum Statement and its amended version called the CAPS; Part 2 allowed for the determination of entry level requirements and exit level outcomes for all subjects, and Part 3 compared the South African CAPS with selected international curricula. The research aimed for instance to provide in the comparative study answers to:

- the extent to which the NCS curricula were re-packaged or re-written in the formulation of the CAPS;
- the relative depth and breadth of the content covered in the respective curricula;
- the overall design, structure and coherence of the curricula;
- the level of specification of various aspects of the curricula; and
- the guidance provided by the curricula for the teaching and assessment of the subject.

The research considered ten curriculum dimensions and features such as clear, measurable statements of learning, a foundation on essential learning as represented by subject disciplines and a strong, discipline-based approach to school subjects. The overall curriculum coherence in terms of sequence of the curriculum from one grade to the next, and internal disciplinary principles evident in the sequencing and progression received attention. The research generated a number of reports, including a series titled 'What's in the CAPS package' which explored 15 subject curricula in the FET Phase.

Undertaking research into various aspects of the education system
This research has been presented in various fora, such as the regular seminars jointly mounted with the Centre for Education Policy Development and the University Of Witwatersrand School Of Education, as well as being published in various formats.

Undertaking advocacy work
This has led to the publication of a number of reports, which have been used to try and change thinking and practice in a number of areas of the system. The advocacy effort recently has been particularly focused on pushing for improvements in the schooling system, including questioning the way that public schools are deemed to be accredited without having to go through the Umalusi managed accreditation process that private schools must go through.

Developing qualifications
Umalusi spearhead the development of the NASCA which is a qualification designed specifically for adults that is intended to be equivalent to the National Senior Certificate (NQF Level 4).

Rethinking the role of Umalusi in the public schooling system

Umalusi is also concerned about the fact that it cannot intervene in public schools and colleges the way it can with failing private ones, and is upfront in expressing doubt that the DBE/DHET and provincial departments have the capacity and interest in sorting out such schools and colleges. They feel they need additional powers, beyond those in the NQF Act, to effect those improvements in the public school and college systems. Umalusi claims that with more powers and agreement with SAQA and the Minister that it can use them it could sort out articulation in the GFET subsector, while acknowledging that articulation and equivalence with NSC may have a profound effect on the whole national education system.

The core question that needs to be addressed is whether Umalusi has a mandate to quality assure the whole schooling system – teaching and learning – or should it focus on quality assuring the exit exams from the schooling system. At the same time managers in the DBE speculate about whether Umalusi should be brought in to quality assure the common exams

which are being run across 8 of the provinces in Grades 10 and 11 and in quality assuring the Annual National Assessments (should they be reinstated). This, DBE managers feel, would be much more in line with Umalusi's core mandate than what it is getting involved in.

Finally, Umalusi claims that a core function of a QC – verifying and quality assuring the quality of the qualifications and certificates being handed out – is not being properly devolved from the Ministries to Umalusi. Umalusi managers contend, changes and decisions are made in relation to the NSC and programmes under the NC(V) with no involvement of Umalusi. This seems to come down to differences of view on the role that the QCs should be playing.

7.7.2 Establishing and running the GFET sub-system

The Umalusi management are very much of the view that what Umalusi does is so different to the work of the other QCs and SAQA that neither the SAQA Act nor the NQF Act impacts them very much. Interviewed officials within Umalusi saw the introduction of the NQF Act in 2008 as bringing little change to the functions they were required to perform and the way they work. They regard some of the Act's requirements such as the Policy on RPL as largely irrelevant to the schooling environment, as school-level qualifications do not often lend themselves to RPL. Umalusi is viewed as different in that it has a small number of qualifications and a large number of learners taking the exams for these qualifications.

On the other hand, the managers admit that they probably under-estimated the potential impact of the NQF Act in that they now have a statutory responsibility for reviewing qualifications and so they are now starting the work to do that. It was the lag time between the new Act and realising the full import of the revised responsibilities which led to a hiatus for some years after the new Act was promulgated when Umalusi acted very much as it always had done.

The hiatus by Umalusi in the period from 2008, with few policies or other documents being generated, stopped in 2011 when an avalanche of new documents and policies for the subsector and sub-framework were put in place by Umalusi, as it started to focus on its statutory responsibility for generating policies (and other parts of the revised NQF started to fall in place). However, Umalusi still differentiates itself from the Ministries and other QCs by stating that all its policies are based on research.

### 7.7.3 The resourcing of Umalusi

After the passing of the NQF Act, Umalusi's expanded role in terms of the quality assurance of provisioning, rather than just of assessment was implicit in its new role as quality council

(SAQA, 2012, p. 33). While Umalusi receives the majority of its funding from the DBE, there was some concern in Umalusi that DHET, which provides no funds to the QC, makes demands on it which have financial implications. These unfunded mandates place pressure on Umalusi, and often consume funds earmarked for the quality assurance of the NSC and private providers. In the longer term, if Umalusi is to fully perform its functions as envisaged by the NQF Act, issues of how it is funded and by whom and for what will have to be resolved.

In 2012/13 an agreement was reached with DBE to fund Umalusi through a "top-slice" from the appropriation allocated to Provincial Education Departments (PEDs) rather than through certification fees. Under this funding approach, 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 hence are certified (PMG, 2011).

In many respects, this funding approach has reduced Umalusi's dependency on certification fees from provinces, which provided an inconsistent income stream. As a result, Umalusi has a higher, more predictable and secured income stream, as shown in Figure 26. 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 the 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.

Revenue from Exchange v Non-Exchange Transactions
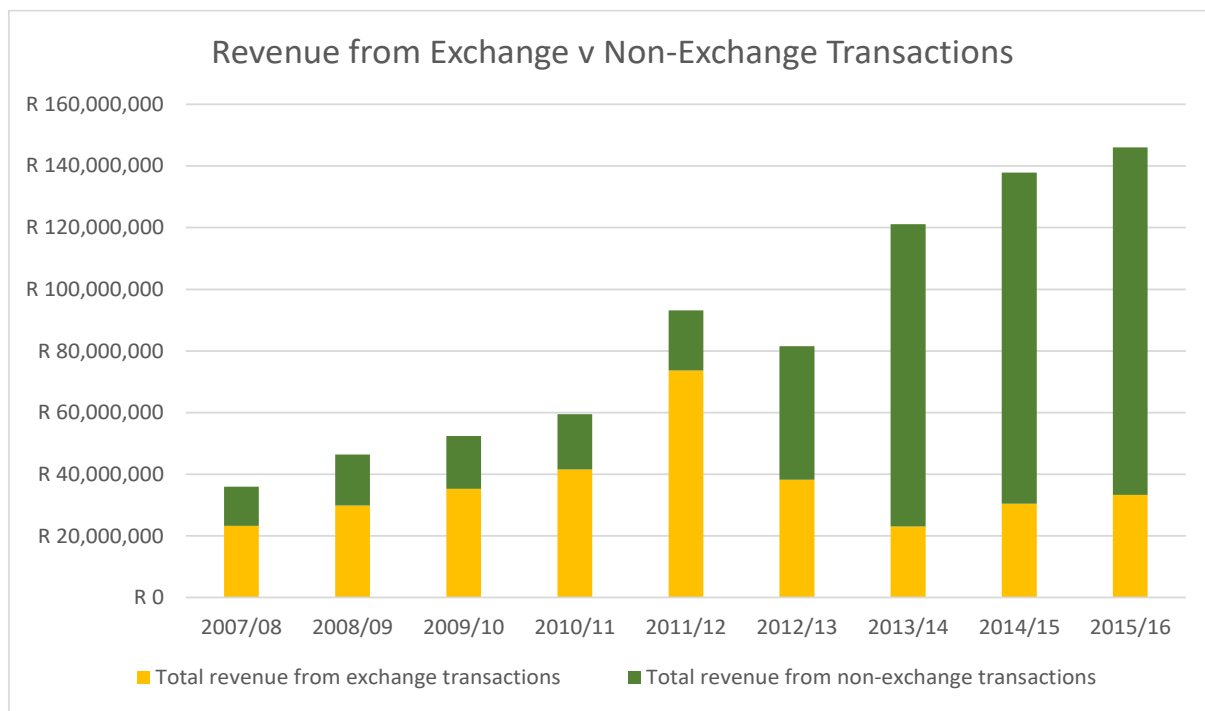
Source: Umalusi Annual Report 2008/09 to 2015/16
Revenue from exchange transactions consist largely of "Certification, verification and accreditation fees" as well a smaller amount of other income and interest investments. Revenue from non-exchange transactions consists primarily of government grants and subsidies.

While the new funding model has several benefits for Umalusi, it is not without its risks. Various interviewed officials in government pointed out that Umalusi's revised funding approach does create a difficult position and one fraught with tension. While Umalusi's funding is now more stable and secure, it is also financially dependent on the DBE, whose activities are subject to its monitoring and quality-assurance efforts. This situation has the potential to create conflicts of interest and soft pedalling on critiquing. While this does not seem to be the case at present and Umalusi has stated that it safeguards its independence, there is always the risk that the funding model might pose a challenge to the regulatory independence of Umalusi in the future.

In addition, the funding formula does not currently attach funding to the learner also leaves some areas badly under-funded, particularly adult education which is not covered by the block grant.

To resolve this situation various Umalusi managers argued for the QC to become a Chapter 9 institution and so receive ring-fenced public funding, in light of its critical role in the quality assurance of the extremely sensitive and high profile NSC exam, which is the backbone of the education system and its credibility both nationally and internationally.

7.7.4 Qualification development in the GFETQSF

The GFETQSF is characterised by fewer qualifications with larger numbers of learners in each qualification than the other sub-frameworks. As a result, this section is able to look in more detail at the specific qualifications in the GFETQSF and the appropriateness of these qualifications relative to the needs of learners in the system. Qualifications are considered in turn within two key areas of the GFETQSF: Adult education and training (AET) and vocational education and training.

Development of Adult Education and training (AET) qualifications

As discussed in section 6.2.4 on articulation in AET, there is a clear lack of suitable qualifications and pathways for adult learners who would like to access a general academic level 4 qualification. In response to this issue, Umalusi undertook the development of a number of qualifications that might fill this gap:

- The General Education and Training Certificate for Adults (GETCA) was developed at NQF level 1 in an attempt replace the GETC: ABET level 4 (i.e. ABET level 4)
- The National Senior Certificate for Adults (NASCA) was developed at NQF level 4 and registered by SAQA (Qualification ID 91672)
- Umalusi also commenced development on the National Independent Certificate (NIC) at levels 2 and 3 of the NQF, but it is the evaluation team's understanding that this was never finalised.

The development of NASCA started in 2008, with NIC development commencing shortly after. Both qualifications were approved by Umalusi in 2010 (Umalusi, Annual Report 2010/11, 2011). The NASCA was eventually registered by SAQA in 2012 and the policy on NASCA was released in 2014. The NASCA is not yet being delivered by any E&T providers, with adult learners still being required to write the Amended Senior Certificate (ASC) examination. It appears that the NIC has not yet been registered by SAQA at the time of writing, but the GETCA has now been registered by SAQA.

A large number of reasons were provided in interviews for the delays in the finalisation and implementation of these qualifications; with reasons differing somewhat depending on the person interviewed. With the NASCA there were a number of issues that delayed finalisation, including its design which includes only four subjects (rather than the seven required in the NSC) and the difficulty in enabling articulation into higher education. More fundamentally, however, these delays appear to be a symptom of the lack of clarity of the ownership of qualifications in the GFETQSF and the general lack of resources available in the Adult / Community Education and Training system.

It appears that many in the DBE were not in favour of the NASCA as conceptualised; mainly due to its lack of portability and articulation. DBE interviewees also claimed that the DBE was not properly consulted in its development by Umalusi. Nevertheless, five years after the registration of the NASCA and at the time of writing, it is concerning that the DHET has not yet provided funding for, or rolled out this qualification.

However, the delays in implementation also result from the general lack of resources and policy clarity for the public Community College system that is overseen by DHET. The PSET White Paper implementation plan is expected to clarify some of the policy issues, but interviews conducted on the issue suggest that the role of the NASCA, and the resourcing of it, are unlikely to be sufficiently clarified.

The delays in developing and implementing these qualifications raises the issue as to who really should "own" qualifications and qualification development in the GFETQSF. It appears that Umalusi developed, registered and gazetted a qualification (the NASCA) without the explicit buy-in from either department; or at least with limited involvement from the departments. The NQF Act does provide Umalusi with the authority to develop qualifications in its role as quality council, but this situation illustrates that such a process requires the continual support of the relevant departments if they are to be implemented in the public E&T system.

The fact that both departments present general qualifications between levels 1 and 4 in the NQF reinforces issues of ownership; since it is not clear what role or authority the DBE has, or should have, in the design of a qualification that is equivalent to its NSC qualification. These issues need to be clarified.

Some interviewees also suggested that the system is probably made more unwieldy by the inclusion of a number of potentially politically driven qualifications (such as ASC and NASCA) in the GFET sub-framework. These tend to lack articulation and are not necessarily based on research and proven need.

Development of vocational qualifications in TVET colleges and schools

The main qualifications for young learners at NQF level 2 to 4 in the public E&T system are the National Senior Certificate, which is primarily presented in schools, and the National Certificate Vocational, primarily presented in public TVET colleges.

The following vocational / TVET qualification development processes are happening in parallel:

- The PSET White Paper Implementation Plan task is being drafted and is expected to clarify the strategic mix of qualifications that are to be presented in TVET colleges. As part of this, it is expected to clarify the DHET's position on the NC(V)'s future in colleges and changes that might be made to the qualification
- Umalusi undertook a review of the NC(V) in 2016 (at the request of the Minister of HET) and published a revised qualification for public comment in May 2017. This review suggested substantial changes to the qualification that would require wide-ranging changes to how it is delivered and assessed
- The QCTO is in the process of "re-constructing" the N4-N6 part-qualification: which entails developing a range of specific occupational certificate qualifications that are expected to replace all N4 to N6 programmes in the medium term. For example, the Bookkeeper qualification (SAQA ID 98959) was recently registered in the expectation for this purpose. It should be noted that N1-N3 falls under Umalusi and is not under review as part of this process
- The DBE is developing a "three stream" model for the NSC that will include an academic, technical vocation and technical occupational stream (DBE, 2016). This will involve, amongst many other things, the recapitalisation of the few technical schools which already exist.

These qualifications all aim to transform vocational and occupational education in the country at the lower levels of the NQF; but the implementation of these processes does not appear to be coordinated in any meaningful way across departments and QCs.

As an example of the lack of coordination: Umalusi reports that neither the PSET White Paper Implementation Plan task team nor the DBE (which is developing a vocational stream) were closely involved in the review and publication of the NC(V). Indeed, it appears that DBE did not input or provide comment on the Umalusi revised NC(V) despite the fact that the revised NC(V) policy proposes that the qualification be presented in schools and contains the line "*it is anticipated that, properly implemented in the national education system in both schools and colleges, the NC(V) will ultimately absorb up to 60% of students in the post-NQF Level 1 environment*".

Several interviewees expressed concern with DBE's three stream schooling model. There is belief in the DBE itself that the DBE top management have no real idea of what they are trying to implement and how it links into the overall system as it is under-conceptualised and not based on evidence and research. As with modularisation and progression the DBE is seeking solutions to the academic nature of the schooling system. It seems that the DBE is taking this forward with minimal internal and external consultation. However, one suggestion from DHET was that the three stream model allows for rethinking the division of responsibilities so that the technical schools offer NC(V) to learners under the age of 23.

This then leaves the TVET colleges and Community Colleges (CCs) to focus on those older than 23. No learner younger than 23 might then be in TVET colleges and CCs – i.e. they would all be in school. The interviewee argued that the focus should be on the services they provide and not the simplicity of responding to just one QC.

There appears to be a fundamental lack of clarity of what the roles of TVET colleges are relative to schools and vice versa. The lack of coordination and coherence in qualification development does not only result in inefficient qualification development processes; it also fundamentally undermines the likelihood that a coherent vocational and occupational E&T system will emerge or that it will be resourced or capacitated appropriately.

This also reinforces the instability and uncertainty that TVET colleges and Community Colleges have to deal with. A typical response from interviewees was that the departments were engaging on the issue of vocational education and that it will likely be a few years before clarity on this area of overlap between the departments is reached. Given that millions of learners are currently facing qualification pathways that do not appear to be providing them with good life opportunities, this degree of uncertainty would appear unacceptable four years after the White Paper on PSET was published.

7.7.5 Quality assurance in the GFETQSF
Quality assurance of public providers

As mentioned in section 7.7.1, Umalusi interviewees believe that quality assurance in public schools and colleges is not sufficiently devolved by the education ministries to Umalusi. Various DHET and DBE managers agree with this analysis to the extent that they argue that the two Ministries are not engaging fully with their role under the NQF Act and do not seem too clear about their roles, which is largely blamed on lack of knowledge and skilled managers with knowledge of the NQF in the respective ministries.

However, these views are not shared by all. In particular, a DBE manager stated that Umalusi does in fact make suggestions of changes to the DBE. "It is a matter of the tail wagging the dog – we are a very exam driven society: the system is driven by pass percentages – everything is judged on that". He went on to assert that "Umalusi is very powerful as its standardisation process determines whether the Minister is seen to be succeeding and raising results or not". He finds it worrying that the Ministry provides an 'Umalusi evidence-based report' each year to explain improvement in teaching and learning in schools and so justify an improvement in NSC results. "Umalusi has a lot of clout as they finally determine pass percentages (in the NSC); so PDEs and the DBE take it very seriously. I think this is very problematic. Why do we need to present evidence – it seems we need to

justify ourselves? If we comply with Umalusi we get the adjustments (to marks) which we need".

There does however appear to be a general perception that the NSC examination process is well managed and quality assured by the DBE and Umalusi. However, the evaluation did not interview representatives from public schools (as per the Terms of Reference of the evaluation), and hence did not consider the quality of the NSC evaluation in detail.

Umalusi is also tasked with the quality assurance of NC(V) and N1-N3 in TVET colleges (with N4-N6 being the responsibility of the QCTO). The survey results in Table 24, indicate that there are mixed views on whether the assessment, moderation and verification for NC(V) and N1-N3 function effectively and efficiently[19]. This range of views was also reflected in qualitative interviews, where most respondents suggested that assessment moderation and verification systems functioned fairly well, but that irregularities are still more common than they should be. This is perhaps to be expected given the degree of instability that the TVET college system has been subjected to.

A particular issue appears to exist within the N1-N3 qualifications in both private and public colleges; where allegations of exam leakages were raised by a number of interviewees. One interviewee suggested that these issues are particularly rife in mining areas where the financial incentives for passing particularly the N2 examination are substantial. Nonetheless, no leakages were reported to Umalusi in the 2015 exam cycle, which makes it difficult to assess the validity or extent of these issues (Umalusi, 2016).

Table 24: Survey: Public TVET college respondents' views: Do you agree with the following statement: "The assessment, moderation and verification systems for this qualification function effectively and efficiently"

	NC(V)	N1-N3	N4-N6
Strongly disagree	0	1	2
Disagree	6	9	3
Neither agree or disagree	5	3	3
Agree	9	9	9
Strongly Agree	4	2	7

Source: Public TVET college survey respondents

Some interviewees expressed the view that Umalusi is trying to straitjacket the NC(V) into being a pale NSC. In particular that the way the QC engages with TVET Colleges encourages them to act more like schools than institutions catering for the needs of adults

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[19] Note that Umalusi not only moderates question papers, marking guidelines and examinations, it also moderates the integrated summative assessments (ISATs) as well as internal continuous assessments (ICASS) which form part of the learner's final grade. It also conducts monitoring of centres' state of readiness, and the writing and marking of exams. Finally, it is responsible for the standardisation and verification of final results.

and the workplace. This is attributed to the managers in the QC who lack experience and understanding of adult education and such vocational programmes as the NC(V).

Quality assurance of private providers

Umalusi is also responsible for the quality assurance of GFETQSF qualifications offered by private providers (schools, colleges and CET centres). Beyond the quality assurance of assessment, Umalusi also performs monitoring and accreditation of private providers.

Several interviewees believed the Umalusi accreditation processes are very time consuming to complete. This is reinforced by survey results (see Table 25), with the largest group of respondents suggesting that accreditation takes on average more than a year.

Table 25: Survey question: *On average, how long does it take for a programme to be accredited?*

Meaning	Number of respondents	Percentage
Less than 3 months	0	0.00%
Between 3 and 6 months	5	29.41%
Between 7 and 12 months	4	23.53%
More than 1 year	8	47.06%
Don't know	0	0.00%
TOTAL	**17**	**100.00%**

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

Despite the time and financial costs of accreditation, a (small) majority of respondents do believe that the Umalusi accreditation process positively contributes to the quality of education and training in their institutions, as shown in Table 26. From qualitative interviews it appears that smaller and less established providers particularly benefit from accreditation since their systems and processes are often not as well established and Umalusi's requirements force formalisation and expansion of these. However, there are some interviewed providers who believe that the amount of resources that need to be allocated towards obtaining accreditation through Umalusi negatively impacts their institutions since it incentivises a focus on compliance rather than on the quality of E&T delivery.

Table 26: Survey question: *What has been the impact of the accreditation process by Umalusi on the quality of education and training delivery in your institution??*

Meaning	Number of respondents	%
Significantly negative impact	6	31.58%
Slightly negative impact	2	10.53%
No impact	0	0.00%
Slightly positive impact	3	15.79%

Significantly positive impact	8	42.11%
Total	**19**	**100.00%**

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

Table 27 provides feedback from the survey related to the monitoring of private providers conducted by Umalusi. The results show broad agreement that the level and amount of monitoring of private providers conducted by Umalusi is sufficient and that this monitoring contributes meaningfully to improving the quality of educational outcomes. However, the majority (11 versus 9) of providers also felt this monitoring was overly burdensome and costly to providers. While these two findings seem to be in contradiction with each other, it seems that the majority of respondents acknowledge the positive impact of the requirements on their institution's efficiency, but find the process costly and time-consuming.

Table 27: Survey question: *On a scale from 1 to 4, please comment on how much you agree with each of the following statements that relate to the monitoring Umalusi conducts of private providers*

	Strongly disagree	Disagree	Agree	Strongly Agree	Don't know
The level and amount of monitoring of private providers conducted by Umalusi is sufficient	2	0	11	7	1
The level and amount of monitoring of private providers conducted by Umalusi is overly burdensome and costly to providers	2	7	5	6	1
The monitoring conducted by Umalusi contributes meaningfully to improving the quality of educational outcomes	1	1	6	13	0

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

While independent schools were not directly interviewed during the evaluation, a number of respondents raised the high costs of accreditation in this area. A recent report (CDE, 2016) estimated the average cost of Umalusi accreditation across a sample of independent schools to be R151 545 to the school; far and away their highest compliance cost. For smaller schools, which are often low fee schools, these costs absorbed more than 5% of their total budgets. It was also estimated that schools spent on average 687 hours (almost 86 person days) on completing Umalusi accreditation; or between 2 to 4 hours per learner.

These costs appear exorbitant when considering the complete absence of accreditation in public schools and colleges; which are "deemed accredited". Umalusi claim that these costs are not unreasonable. They firstly claim that their accreditation fees do not even recover their costs for performing accreditation (i.e. there is not even full cost recovery). Secondly that the accreditation of private schools should not be funded through taxpayers' money; it is a choice made by a provider to create an independent school. Lastly, and more

fundamentally, they claim that this is the mandate Umalusi has been given and a certain level of compliance is required to ensure quality throughout the system.

Interviewed Umalusi officials further believe that rather than reduce regulation in the private system, independent quality assurance is also required in the public system. They state that currently the budget allocated to Umalusi is less than 1% of the total Basic Education budget, which is not a sufficient amount to be spending on independent quality assurance in the absence of effective quality assurance within the public system. The lack of separation of the design and delivery of the curriculum, from the design and management of the exams was highlighted by both Department of Basic Education and Umalusi officials, as a problem. The key issue is that it lays the DBE open to accusations of manipulating the exams to make the education system appear to be performing better than it is. The call was for an independent national exams council to be established, similar to those in many other African and European countries.

The issue of public schools being exempt from any effective form of quality assurance came up regularly in interviews with Umalusi officials and was also noted by some officials from both education departments. The issue is that independent schools, to be able to operate, have to go through a rigorous process conducted by Umalusi. This is in compliance with Section 29 of the Constitution of 1996, which states that for an independent school to legally exist, it cannot discriminate on the basis of race, it has to be registered and must "maintain standards that are not inferior to standards at comparable public educational institutions".

Every independent school must first register with their provincial department of education and then within a year of provincial registration they must apply for accreditation to Umalusi. Umalusi is empowered by section 23(2) of the General and Further Education and Training Quality Assurance Act 58 of 2001 (GENFETQA), to quality assure independent schools. On 29 October 2012, the Minister of Basic Education promulgated regulations approving the "policy for quality assurance of independent schools and the accreditation and monitoring of private assessment bodies". This document has now established the criteria by which independent schools will be measured if they are to be granted accreditation under section 24 of GENFETQA.

Umalusi has a year to conduct an accreditation audit of an independent school after it has provincial registration, and ensure that it is able to deliver the relevant school qualification. If awarded, the accreditation is for an indefinite period. However, each school is subjected to monitoring reviews periodically to ensure continued compliance with quality standards. If they fail to gain accreditation the school has a year to resolve the issues highlighted by Umalusi in its review, before being inspected again.

Independent schools are accredited overall against:

(a) The school's capacity to deliver a qualification and its supporting curriculum/programme; and

(b) The quality of the implementation of such at the required standard.

This is further detailed in the Umalusi policy as four criteria:

1. Leadership, Management and Communication – including the resourcing of the school being adequate for the proposed goals of the school, as well as the school having proper financial and management systems and records, learner records, and management and leadership which creates a conductive learning environment with appropriate policies, strategies and processes in place, as well as ability to consult and communicate effectively with all stakeholders on strategic and management issues.

2. School Ethos – which should be expressed in the school's vision and mission which must be in line with the constitutional values and the specific character of the school, The school must particularly indicate its approaches to safety and discipline.

3. Teaching and Learning – the school must have adequate professional staff and systems to deliver the curriculum and assessment to the required standards and in accordance with policy, while providing appropriate learner support and implementing internal continuous assessment and providing developmental feedback to learners. The school must also have a developmental extra-curricular programme.

4. School Results – the school's exam and assessment results as well as achievement of indicators of success must be comparable or better than those of public schools.

There is concern expressed by the Independent Schools' Association of South Africa (ISASA) that these criteria go well beyond the requirement as expressed in Section 29 of the Constitution. In particular, the association argues that the management and leadership and the teaching and learning criteria do not relate to the constitutional requirements for independent school accreditation, while biennial reviews, which are meant "to ensure improvement and maintenance of standards" (Umalusi 2016) are too onerous and unnecessary for high performing independent schools.

Many of these schools feel that, while this is a useful process, all schools should have to go through the same process in order to operate. They argue it is problematic that a public school is allowed to operate under poor leadership, in substandard buildings, with inadequate safety and teaching cover, producing poor outcomes, without being sanctioned in any way.

Umalusi management is acutely aware of the innate double standard where the government asserts that independent schools cannot operate – and by implication will damage learners – without meeting set criteria, and yet the same government sees no reason to put public schools under similar accountability pressure, even though most children attend such schools. Public schools often perform poorly, all too often protect inadequate teachers from being monitored, and in some cases, pose a real danger to the children who attend them. Umalusi management expressed its readiness to take on the task of monitoring public schools against the same criteria as it uses for accrediting independent schools. To do so interviewees acknowledged that Umalusi would have to take on more staff. There is a clear frustration that the QC is not able to intervene even where a public school is clearly failing to deliver the curriculum effectively and so letting its learners down.

The argument that public schools are held to account through the Integrated Quality Management System (IQMS) has been shown to be fallacious, as the IQMS is all too often self-serving. Educators in these schools assess each other making it very difficult for objective assessments to be provided. Similarly, the Whole School Development (WSD) aspect of the IQMS has never been properly implemented so there is no mechanism to measure the quality and performance of the school as a whole.

Certification

Table 28 provides survey responses on the perceived average length of time it takes for learners to receive their certificates for different qualifications (as reported by both public and private TVET college respondents). This suggests that certification delays are particularly significant for the NC(V) (with the vast majority suggesting certification takes more than a year), as is discussed below. There are also issues for N1 to N6, with these problems seeming most distinct in public colleges.

Table 28: 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

Over time, a significant backlog developed for the certification of the NC(V) qualification. This backlog was the result of a number of issues, mostly process and IT system related. These issues include (DHET, 2015a):

- Seemingly most importantly, the DHET IT system that is used to record examination results for the qualification is not well suited to the NC(V) examination structure. The system, which is administered by the State Information Technology Agency (SITA), was created by adapting the system used for NATED N4 – N6 examinations, which have a much simpler structure
- There is an issue with the results consolidation function in this system. The results uploaded to Umalusi often contain duplicated records or unexplained changes in marks after standardisation and statistical moderation. Umalusi system rejects such records (rightly) and hence certificates cannot be issued in such cases
- Examination centres do not have the capacity to perform data integrity checks before submitting data to the DHET Examinations system. Similarly, there is no DHET pre-testing functionality before data is submitted to Umalusi
- There is a lack of alignment between DHET and Umalusi NC(V) business processes
- SITA technical capacity applied to the system is not sufficient to keep up with DHET demands.

These issues resulted in a substantial backlog in certifications. As of 30 April 2015: 103 195 NC(V) certificates were still outstanding (excluding the November 2014 exam). This affected learners from all prior examinations; i.e. even a small sample (27) of learners who completed NC(V) level 2 in 2007 had not received their certificates eight years later. From this total, 15 099 (15%) certificates were outstanding from the November 2007 to Supplementary 2012 exams and 88 096 (85%) were outstanding from the November 2012 to Supplementary 2014 exams. The issue seems to particularly affect learners that did not pass all seven subjects in a single level of NC(V) in one sitting, and hence require consolidation of results across examinations (DHET, 2015b).

Delays in certification has created significant challenges for learners; complicating their ability to enter subsequent qualification courses or employment. While statements of results can be issued and used, these are not always accepted by employers or even some providers.

The large backlog of certificates is a well-known issue within the system, with Umalusi and the DHET both regularly reporting on the progress on this issue. The SITA, DHET & Umalusi management teams have received a mandate from the DHET Portfolio Committee to work together to resolve the NC(V) certificate backlog. The NC(V) Backlog Elimination Project

"kicked off" on 27 July 2015, and the original targeted timeframe for elimination of the NC(V) Certificate Backlog was six months.

Significant progress has been made in terms of the backlog due to the joint efforts of SITA, the DHET and Umalusi. By June 2017 only 665 certificates were outstanding for all exams before November 2016 (i.e. not including the end of 2016 exam) (DHET, 2017).[20] However, while improvements have been made to the existing examination IT system it remains unsuited to the NC(V). The DHET has obtained permission from Cabinet to contract a software company to replace the existing SITA-administered system. A DHET interviewee confirmed that the new system is currently being piloted and is expected to be fully operational in 2018.

Significant certification backlogs are also experienced with the National N-diploma. The National N-diploma combines N4 to N6 programmes with 18 months' work experiential learning. The certification of the diploma was delegated to the DHET by the QCTO; though QCTO is in the process of removing this delegation as its system capacity is developed.

The system issues experienced with certification for NC(V) also affect N1 to N6, though to a lesser extent and contributes to the diploma backlog. However, the greater issue appears to be that during the resulting stage it is often difficult to verify that the work experience was aligned to the requirements of the specific programme. Seemingly many workplaces take on learners (often as a form of cheap labour) without necessarily placing them into appropriate positions or putting in place systems for learners to obtain the relevant experience. This then creates issues that are often only picked up during the resulting certification process. The process also relies on the honesty and diligence of the employer completing appropriate documentation for each learner. The DHET examinations team reports not having the capacity to deal with the volume of applications received.

The system of how experiential work placements are screened and finally evaluated is being revised in an attempt to address these issues. The QCTO has recently developed screening rubrics for each National N-Diploma programme to standardise the application evaluation process; after which college-based subject specialists will be trained in how to conduct screening. It is expected that the new process will be in place from January 2018 (DHET, 2017).

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[20] SITA was also asked to initiate a completeness check that this (665) number was indeed correct; since there was still some dispute as to the exact number. Some additional records were detected (200), but the process was still on-going at the time of writing.

8 FINDINGS: EFFECTIVENESS

This section of the report examines the effectiveness of the NQF Act. In evaluations, the effectiveness criterion assesses whether the outputs were delivered as planned, and whether these results led to the achievement of the intended outcomes. As shown in the logical framework in Figure 5, for this evaluation, outcomes are divided into two categories: immediate and intermediate outcomes. Immediate outcomes are the changes brought about by public policies on individuals, social structures or the physical environment over a period of three to five years, whereas intermediate outcomes tend to happen over a longer timeframe.

The section responds to the following evaluation question set out in the Terms of Reference.

EQ2: To what extent has the implementation of the NQF Act been effective in achieving its policy goal(s), objectives and intended outcomes?

8.1 Single integrated national framework

The first of the NQF's objectives as outlined in 5(1)(a) of the NQF Act is to create "*a single integrated national framework for learning achievements*". Under the most literal interpretation of this objective, it has been largely achieved:

- The level descriptors were agreed and published in 2012. This was the result of extensive discussions and a degree of compromise was necessary to come to an agreed version sufficiently acceptable to all parties.
- Despite some delays in agreeing the character and scope of the different sub-frameworks, all three sub-frameworks were eventually published by their respective quality councils in 2014.
- Qualifications registration is undertaken by SAQA to ensure that qualifications do not only comply with their sub-framework, but also to the wider requirements of the NQF; e.g. the level descriptors.
- There appears to be a fairly harmonious relationship between the quality councils that is supported through the System of Collaboration
- Extensive processes have been undertaken, and are still underway, to align all qualifications to the sub-frameworks. Deadlines are in place in both the HEQSF and OQSF for the last date of enrolments on qualifications not yet aligned to the sub-frameworks. While this evaluation raises concerns as to the timing and communication of these deadlines, it is clear that a single national framework is emerging through this alignment.

However, a determination of whether the framework is appropriately "integrated" is much less straightforward. The theory of change clarifies such integration through an immediate

outcome of "*robust sub-frameworks within a single integrated NQF*". There is a clear qualitative component to this outcome: There will be different points of view of what constitutes a "robust" sub-framework, and there is inherent tension between integration and the need for sufficiently differentiated sub-frameworks.

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 Figure 25.

Figure 25: Survey question*: In your view, what are the main benefits of the NQF to your institution?*
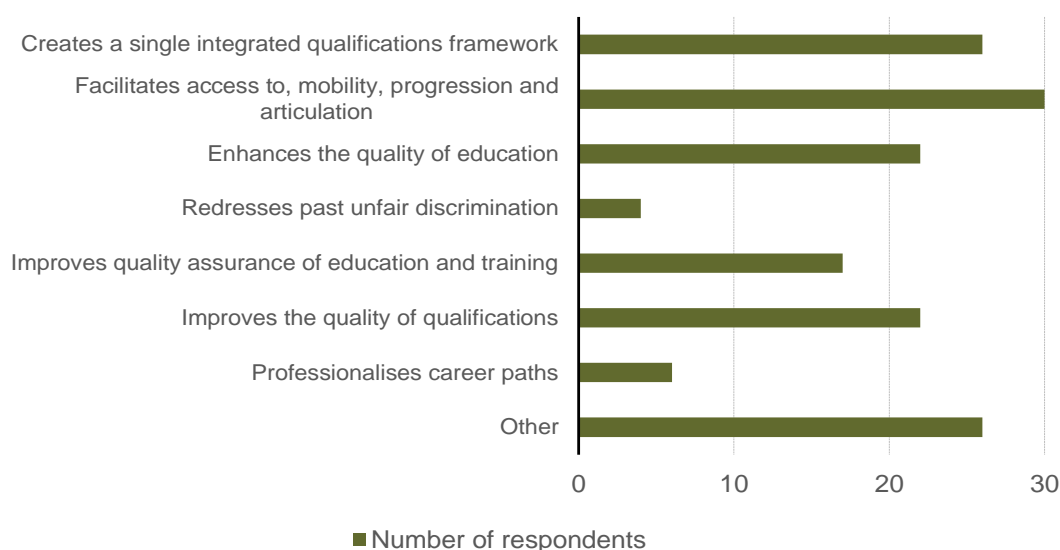
Nonetheless a number of issues were raised in this regard:

- There seems to be a lack of clarity as to the roles of the DHET and the DBE in implementing the Act. While the Act assigns responsibilities to the M:HET, it does not mention the DBE nor does it state what role the departments and their branches have to fulfil within the NQF. The result is that the NQF bodies are generally not well integrated into the policy making and planning of the department, and NQF priorities do not necessarily receive sufficient support from within departments. This situation undermines the NQF and its ability to achieve its objectives.

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[21] 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.

- Some in the DHET are concerned that the QCs are marginalising SAQA as they can develop their own qualifications, policies and regulations and get them published by the Minister. Similarly, QCs are able to provide advice to the Minister directly, without having to agree this advice with SAQA, or even inform SAQA of it. While the QCs generally welcome this situation, the department feels that it is creating problems and is likely to lead to increasingly divergent subsystems. As a result, the DHET is moving to close this loophole, and bolster the powers of SAQA in the revised NQF Act draft.

- There is a constant battle over flexibility and inflexibility with many feeling that the present Act gives QCs too much flexibility which is then creating parallel systems, while the NQF is too inflexible in failing to create space for non-accredited courses, which have value, but are not accorded legitimacy.

- A concern with the way the QCs work is that they tend to see the NQF as an end in itself and not about the learning that goes into a qualification. This has tended towards a ratcheting up of the levels of qualifications, which may be one reason why some of the levels on the 10 level NQF are rarely used (such as level 5). Some argue that having higher levels on your system makes the QC look good, and egos push them up.

- TVET colleges present qualifications that fall under all three sub-frameworks. This requires them to comply with many different quality assurance regimes, including differences between SETAs. Not all colleges have the capacity to deal with this complexity, and this, along with their state funding model, likely contributes to the limited number of occupational and HEQSF qualifications presented. Many interviewees felt that all college programmes should fall under one QC (particularly the QCTO), to simplify processes and allow the QC to comprehensively support quality improvements across the college. However, clarity is required on the strategic resourcing of the QCTO and the programme offering of TVET colleges before such a change could be seriously considered.

- TVET Colleges and SETAs are expected to be working closely together under the Act, but this is not happening to the desired extent (though collaboration is slowly increasing) even though the Act encourages it and creates space for it, unlike pre-2008 when colleges and SETAs fell under different legislation. It appears that that the SETAs are largely working outside the NQF Act and need to be explicitly brought in under it.

- There remain silos between the three sub-frameworks and limited cooperation or clarity where sub-frameworks overlap. For example, when a university wants to present components of an occupational qualification, it has to effectively apply to both the CHE and the QCTO for accreditation; as explained in detail in the case study presented in Appendix 2:. Perhaps as a result, a limited number of such situations

exist. There has been some collaboration and joint work on certain projects, and various Service Level Agreements/Memorandum of Associations have been developed to address specifics. However there remains clearly differentiated approaches across the 3 sub-systems and this can create confusion or inefficiencies in areas where the demarcation is not clear or where there is overlap.

- There does not appear to be an overarching process of determining the demand for qualifications in the economy as a whole and using this information to drive qualification development across sub-frameworks. While initiatives such as the Labour Market Intelligence Programme are in operation these do not yet appear to integrate systemically into the qualification development systems that exist in the departments and quality councils.

8.2 Learner access, portability, progression and articulation

The theory of change (see Section 4.2) lists one of the immediate outcomes as "*Improved learner access, portability, progression and articulation of qualifications*". This section will discuss a number of successes and challenges related to access, portability, progression and articulation in the E&T system. Data from the NLRD and other sources will be used to shed light on this issue, and will be triangulated with the insights gained from the many semi-structured interviews conducted.

While the NQF and the NQF bodies contribute significantly, there are a large number of other factors, initiatives and organisations that play a role in the achievement of the objectives of access, portability, progression and articulation. This section focusses on the degree to which the E&T system is achieving these objectives and does not in general attribute this achievement (or non-achievement) to the NQF or the NQF bodies. Where the NQF or the NQF bodies have been particularly instrumental in or detrimental to the achievement of these objectives, however, this will be highlighted.

This section looks at the progress made in terms of articulation and progression in the different parts of the E&T system in turn. However, it often takes a long time for policies and initiatives to have a significant impact on the rates of articulation and progression observed in the E&T system, and looking simply at observed results is not enough. It is therefore important to discuss the views of interviewees on whether the NQF Act, and its implementation, is creating an enabling environment for improved articulation and progression. This will be covered in sections 8.2.1 to 8.2.2 before sections 8.2.3 to 8.2.6 discuss the schooling, TVET, adult education, university, and occupational E&T systems in turn.

8.2.1 Does the implementation of the NQF Act increase access and mobility within career paths?

As section 7.2.4 shows the number of professional designations registered has increased pointing to the professionalisation of certain career paths. When asked about the benefits of the NQF Act, the majority of professional bodies agreed that the Act has been effective in increasing the number of designations and expanding the range of career paths. About 86.7% of respondents said that the Act had improved the international comparability, implying that this would improve the mobility of learners and workers.

Statement	Significant negative influence	Negative influence	No influence	Positive influence	Significant positive influence
Increasing the number of professional designations			13.3%	60%	26.7%
Expand the range of career paths		6.7%	13.3%	53.3%	26.7%
Improving the international comparability of professional qualifications			13.3%	60%	26.7%
Enhancing the public credibility of professions		6.7%	20%	33.3%	40%

Source: Survey of professional bodies

8.2.2 Does the implementation of the NQF Act enable articulation and progression?

Interviewees reported a number of perceived issues that were present before the passing of the NQF Act that they believed the NQF Act aimed to address. For example:

- Many felt that the SAQA Act had resulted in a complex and inflexible system that, in particular, hindered articulation between (non-school) qualifications at the FET level and the Higher Education level
- SAQA and the ETQA's were seen to have developed their own personas and were not keen to cooperate making articulation and progression difficult
- Many felt that vocational and technical qualifications were not given enough profile and visibility
- More generally, there was a commonly held view that the NQF was significantly to blame for a lack of articulation in the system.

Different perspectives and ideologies appear to have underpinned these views, and hence no change to the NQF could have simultaneously solved these many, sometimes competing, concerns. Indeed, it can be argued that many criticisms were the result of unreasonable expectations for the NQF or a lack of clarity as to what the role of the NQF should be in enabling or implementing articulation. Nonetheless, the NQF Act was deemed necessary to restructure the NQF and its bodies in a way that would better facilitate articulation, progression and mobility.

While a broad spectrum of views exists on the appropriateness of the design of the NQF Act, there appears to be a majority view that the NQF Act has broadly put in place a framework and division of responsibilities that should be able to facilitate portability and progression.

Interviewees also generally are supportive of differentiation between sub-frameworks, with most feeling it appropriately reflects the diverse nature of the E&T system. The feeling is that by creating quality councils that focus on sectors of the E&T system, the NQF should be better able to design qualifications and pathways that are suitable to the needs of different parts of the E&T system and are more suited to the needs to the economy.

Survey respondents were asked about the influence of the NQF Act on learners' abilities to access and progress through the E&T system along five dimensions (1) their ability to move between institutions (2) their ability to progress to other qualifications (3) their ability to make informed choices about qualifications (4) their access to career paths and (5) their opportunities for lifelong learning. As shown in **Table 29**, between 50% and 60% of respondents believed that it the NQF Act had a positive influence and between 15% and 25% believed it had a significantly positive influence. Between 10% and 20% believed there had been no influence, and a small minority (typically under 5%) believed it had a negative or significant negative impact. These results were mirrored in the semi-structured interviews, where again respondents believed that the NQF and NQF Act were playing a positive role, but that this.

Table 29: Survey question: On a scale of 1 to 5, please rate the influence of the NQF Act on the following

	Significant negative influence	Negative influence	No influence	Positive influence	Significant positive influence	Don't know
Influence on learners						
Increased ability to move to other education institutions**	1.5%	7.6%	19.7%	51.5%	16.7%	3.0%
Increased ability to progress to other qualifications**	0.0%	3.0%	18.2%	57.6%	18.2%	3.0%
Informed choices about qualifications	1.0%	1.0%	18.8%	56.4%	20.8%	2.0%
Increased access to career paths	0.0%	4.9%	12.6%	59.2%	21.4%	1.9%
Increased opportunities for lifelong learning	1.0%	2.9%	12.6%	56.3%	25.2%	1.9%

Source: Survey conducted by evaluation team. Note: Results given across all providers in all three sub-frameworks22 except for starred cases
* Only asked to HEQSF providers
** Only asked to OQSF and GFETQSF providers

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[22] Results are not given by type of respondent since a very similar trend was observed across different types of respondents; i.e. across different types of providers.

A risk of having three sub-frameworks is that it could undermine diagonal and horizontal articulation between qualifications in different sub-frameworks. SAQA, supported by the System of Collaboration, is expected to play a key role in coordinating the activities of quality councils and ensuring that articulation and mobility between sub-frameworks is possible. In practice, quality councils have a large amount of autonomy and many interviewees felt that there was insufficient coordination on areas of potential overlap; such as level 5 and 6 qualifications.

8.2.3 TVET Colleges: Lack of efficient and well understood pathways

The White Paper on Post-School Education and Training (DHET D. o., 2013) states that the "*DHET's highest priority is to strengthen and expand the public TVET colleges and turn them into attractive institutions of choice for school leavers*". As a result, a large number of policy initiatives are currently being developed and / or implemented in this area. While the White Paper did provide a degree of strategic direction to the TVET system, there still exists large areas of policy uncertainty. These uncertainties make it difficult to determine whether the public TVET system is fulfilling its expected role in terms of articulation and progression.[23] Nonetheless, this section will look at the current trends in articulation pathways for TVET students and then comment on the NQF's role in facilitating or inhibiting improvements in this area.

Table 30 gives an overview of the number of enrolments per programme, which will be helpful to contextualise the discussion of NC(V) and NATED below.

Table 30: Public TVET College Headcount Enrolments from 2010 to 2014

Year	NC(V)	NATED / Report 191 (N1-N6)	Occupational Qualifications	National Senior Certificate	Other / unspecified	Total
2010	130,039	169,774	23,160	3,916	31,504	**358,393**
2011	124,658	222,754	20,799	1,128	30,934	**400,273**
2012	140,575	359,624	62,456	1,715	93,320	**657,690**
2013	154,960	442,287	19,000	1,693	21,678	**639,618**
2014	166,443	486,933	19,825	428	28,764	**702,383**
2015	165,459	519,464	20,533	996	31,428	**737,880**

Source: DHET Statistics on Post-School Education and Training in South Africa 2010 - 2015

National Certificate Vocational (NC(V))

The NC(V) was introduced to the TVET system in 2007. It was expected that parts of the NATED (Report 191) N1 – N6 programmes would be phased out and that NC(V) would

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23 It is expected that many of the uncertainties on the role of TVET colleges in the PSET and NQF system will clarified through the DHET's ongoing development of a White Paper Implementation Paper; but the plan was not yet available at the time of writing.

become the flagship qualification of the public TVET college system. NC(V) has three exit points at NQF levels two, three and four. It was thus designed to provide a vocationally focussed alternative to the last three years of high school that could be taken up by those that have completed Grade 9.

Data suggests that the NC(V) has not enabled progression and upwards articulation as was intended. It is estimated that only approximately 10% of learners who enrol in NC(V) level 2 are able to complete NC(V) level 4 within 6 years (DNA Economics, 2015). These numbers suggest that many learners find the qualification very challenging; a finding commonly raised in qualitative interviews as well. For this and other reasons, colleges have increasingly been accepting learners on NC(V) level 2 that have already completed Grades 11 and / or 12 in school. Table 31 shows that typically more than a third of learners who completed NC(V) level 2 had already completed NSC. Indeed, 84.2% of NC(V) students in 2014 were older than 20 (with 63.1% being between 20 and 25) (DHET, 2016).

Table 31: 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 previously completed SC/NSC	907	2438	6599	9462	9238	7206	8220	8597	8792
% 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).

As shown in Table 32, of those who complete level 4, only approximate 3% of learners subsequently enrol in a university programme, according to NLRD data.

Table 32: NLRD Analysis: What proportion of learners that completed a National Certificate Vocational (NC(V)) level 4 qualification in a given year subsequently enrolled in a level 5 qualification in a public university?

Description	2009	2010	2011	2012	2013	2014
Number of NC(V) 4 certificants	1014	2587	5612	6512	6840	6930
NC(V) 4 certificants who subsequently enrolled in an NQF L5 qualification	39	102	190	209	211	89
% of NC(V) 4 certificants who subsequently enrolled in an NQF L5 qualification	3.9%	3.9%	3.4%	3.2%	3.1%	1.3%

Source: Analysis of the National Learners Records Database.
Note: Results given by year of completing NC(V) level 4. As an example of how to interpret data: 3.85% of those learners who completed NC(V) level 4 in 2009 subsequently enrolled in a university qualification at NQF level 5

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.[24] This issue goes far beyond the direct control of the NQF, but still affects the NQF's objectives around articulation.

Interviewed TVET college officials acknowledged many of these issues, but also highlighted many positive aspects of NC(V). As shown in Table 33, the vast majority of respondents believed that NC(V) was appropriate to the needs of most learners. In qualitative interviews, respondents frequently highlighted that NC(V)'s combination of technical / vocational programmes alongside fundamentals such as mathematics, languages and life orientation makes it well suited to the needs of most of the learners who enter the TVET system.

Table 33 shows a mixed response from respondents as to whether the qualification is valued and respected by industry, with the majority disagreeing with this statement. Qualitative interviewees suggest that NC(V)'s reputation is improving within industry, although many employers still focus on the N qualifications. Several colleges mentioned that employers who have employed NC(V) graduates often have very good perceptions of graduates, but often such employment only occurs after colleges have forged relationships or partnerships with industry. The qualification does not yet appear to have universal recognition.

Table 33: Survey: Public TVET college respondents' views on key qualifications (number of respondents)

	This qualification is appropriate to the needs and abilities of most learners			The qualification is generally valued and respected by the industry		
	NC(V)	N1-N3	N4-N6	NC(V)	N1-N3	N4-N6
Strongly disagree	2	1	1	3	0	0
Disagree	3	6	6	9	1	7
Neither agree or disagree	3	4	6	5	2	9
Agree	9	11	11	3	13	8
Strongly Agree	7	2	0	4	8	0

Source: GFETQSF survey conducted by evaluation team. Results provided for public TVET College respondents only.

NATED (Report 191) N1 – N6

N1-N6 are registered as part qualifications on the OQSF; with six levels for Engineering Studies (N1-N6) and three levels for Business Studies (N4-N6). N1-N6 form part of the N-diploma which also includes a workplace experience requirement and, for Engineering Studies, a trade test. The NQF level of these six certificates often creates confusion, as it does not directly align to the NQF levels; with even those academic officials interviewed at colleges often not being aware of the correct NQF level for these (part) qualifications; or

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[24] 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.

indeed that they are part qualifications. This largely reflects the legacy nature of the programme, which long pre-dates the NQF. N1 – N6 is thus still valued by most employers, as it is the most commonly known and understood qualification in the area.

N1 - N6 enrolments have increased substantially in public TVET colleges from 169 774 in 2010 to 486 933 in 2014 (see Table 30 above); reflecting a reversal of the earlier intention to phase out part of the programme. Both private and public colleges reported relatively positive perceptions of N1-3 and N4-N6, as reflected in Table 33 above. A number of issues were raised in terms of articulation and progression however. Principal amongst these is that if these programmes are not supported by practical or workplace learning they often do not achieve their intended goals. Even when learners also enrol in the N-diploma, work placements are often not sufficiently structured for learning or not closely related to the area of study.

There are still considerable challenges facing the NATED programmes. Urgent interim interventions are required to improve the curriculum (Umalusi, 2016), teaching and learning and assessment in these programmes, until the new qualifications have been developed and implemented.

The allocation of N1-N3 to Umalusi and N4-N6 to the QCTO seems to have not been well conceived, though it was sensible given organisational capacities at the time. Nonetheless uncertainty over the future of NATED courses and their integration into occupational qualifications has meant that little attention has been paid to their current content. It is interesting to note that even though the programmes are out of date and rarely prepare people for the work of a modern factory, they are nevertheless valued more highly by employers than the NC(V). Attempts to phase them out have been resisted and reversed. So, the argument for updating them is strong, but responsibility is unclear. Again, this is not strictly a QA or QC problem but rather an example of wider policy issues delaying a serious problem being addressed.

Occupational qualifications

A key policy priority is to increase the amount of occupational training being conducted in TVET colleges. Occupational certificates are being developed through the QCTO that are expected to meet this need, but few of these qualifications have significant take-up as of yet. There are currently pilot programmes underway for the implementation of occupational programmes in TVET colleges; and this is supported by initiatives to turn colleges into Centres of Specialisation for specific trades or occupations.

These initiatives are still at a nascent stage, and it's not clear whether they can be successfully implemented en-masse throughout the TVET sector. Workplace training is

(currently) a requirement for occupational certificates. This seems infeasible as a strict requirement for the TVET sector. Given the large number of students currently enrolled in these colleges, it seems unlikely that workplaces could be found for this number of students in the medium term. This could severely jeopardise the ability of learners to access and complete qualifications.

The White Paper calls for a large expansion of enrolments in TVET colleges, from 650 000 in 2013 to 2 500 000 in 2030. In a resource constrained environment, there is a tension between achieving ambitious White Paper enrolment targets and providing high quality occupational directed training programmes, which is a resource-intensive form of training.

Strategic role of TVET college qualifications in the PSET system

More generally, TVET colleges' exact position and role in enabling articulation and progression within the PSET system is still not clear. The White Paper provided a degree of high level direction to the system on what the intended mix of qualifications in the colleges will look like in the medium to long term. However, it is not clear whether TVET colleges will primarily focus on (a revised version of) NC(V) or whether occupational qualifications at slightly higher NQF levels will be the focus.

The White Paper implementation plan is expected to clarify TVET College's mandate. Nonetheless, four years after the release of the White Paper, TVET colleges are still operating without clear direction which severely constrains the system's ability to deliver on the broader objectives of the PSET White Paper and the related objectives described in the NQF Act. While there is general agreement that the E&T system should create more effective and efficient pathways outside of traditional academic streams, it appears that it will be some time before this goal is likely to be achieved in the TVET system. Parity of esteem between vocational and academic qualifications is also unlikely to be achieved given the prevailing level of uncertainty and instability.

8.2.4 Articulation into and between HEIs

The pathway from schooling (through the NSC) to HEIs is well established and understood within the system. Figure 26 shows the number of Senior Certificate and National Senior Certificate graduates per year, and how many of these graduates enrolled in a university qualification at a later point. This shows a steady increase in the proportion of NSC graduates who enrol in HEIs over time (from about 10% for 1995 graduates to about 28% for 2008 graduates). These figures should be treated with some caution. Firstly, data is likely to be more complete for recent years which would contribute to this increase. Secondly, the more recent decline in the percentage who have enrolled is more likely attributable to the shorter number of years since graduation for recent graduates, rather than a true decline in

enrolment rates. Nonetheless, these data suggest an increased ability for school completers to access higher education, as is also reflected in the persistent increases in university enrolment rates since 1995.

Figure 26: Enrolments of (National) Senior Certificate graduates into public HEIs
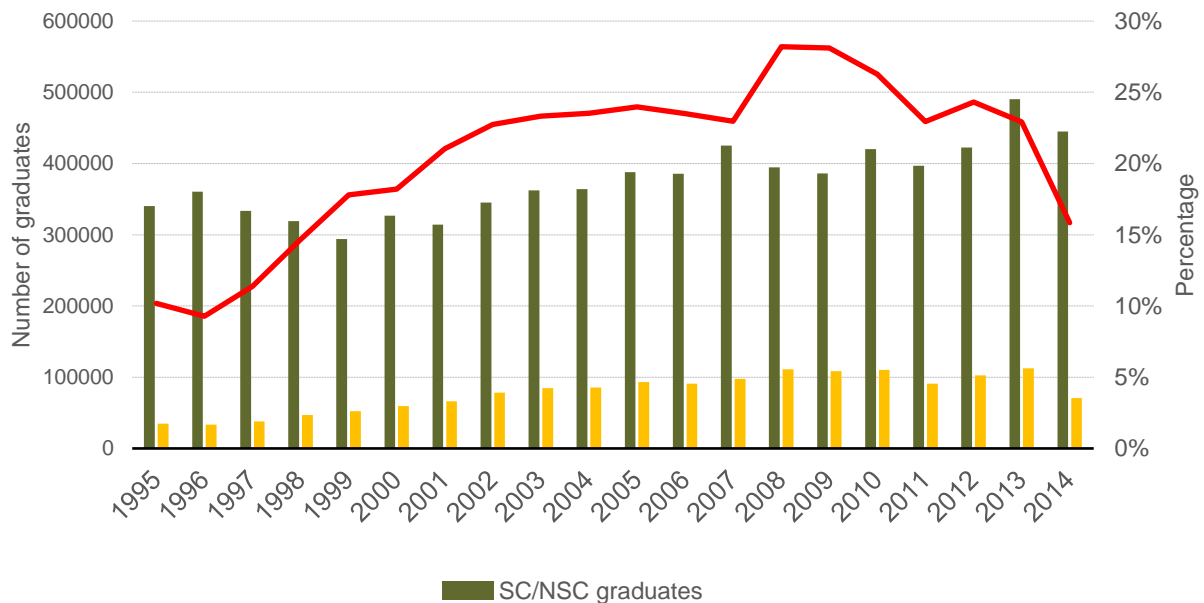
Source: Analysis of National Learners Records Database. Note: Results given by year of completing the SC or NSC. As an example of how to interpret data: 10% proportion of those learners who completed either the SC or NSC in 1995 subsequently enrolled in a university qualification at any NQF level (in any later year)

Other pathways into university

However, other pathways are less well established. As mentioned above, there appears to be relatively limited articulation from the TVET system, or indeed from the OQSF more broadly.

More fundamentally, many interviewees were sceptical as to the degree to which pathways between sub-frameworks at higher levels of the NQF are likely to ever have significant take-up. Particularly, a key area of contestation is whether the system needs to create the knowledge required for entry into an academic (HEQSF) programme within all occupational qualifications. For example, entry into many technical HEQSF programmes requires significant mathematical competencies that are not necessarily inherently necessary for occupational programmes at equivalent levels. Some argue that including these complex mathematical components in an occupational programme for the purpose of enabling diagonal or horizontal articulation to the HEQSF could undermine many students' abilities to complete occupational qualifications that they might otherwise be suited to. Bridging

courses or part qualifications might instead be used to allow articulation for those students who do wish to enter the HEQSF; rather than expecting all qualifications to have built-in direct pathways to the HEQSF.

Level 5 qualifications

There does, however, appear to be an increase in the number of level 5 qualifications, which helps create a greater number of pathways into higher education. Figure 27 below shows the percentage of level 5 qualifications registered by type of HEI between 2009 and 2015. 84% of the qualifications registered on NQF level 5 originate from private HEIs. As mentioned previously, 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 HEIs, which indicates that this is a potential area of future growth. Traditional universities have been less focussed in this space; with interviewed officials suggesting that their focus remains at higher levels of the NQF.

Figure 27: NQF level 5 qualifications first registered between 2009 and 2015 by type of HEI
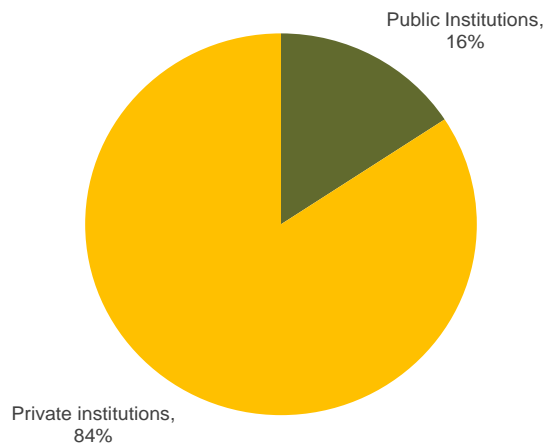
Source: National Learners Records Database

Figure 28 shows that not only have the number of qualifications at level 5 increased, but the number of learner enrolments on Higher Certificates in public HEIs has also shown a significant upward trend from about 4200 in 2009 to about 9000 in 2013.

Figure 28: Number of learner enrolments in Higher Certificates in public HEIs
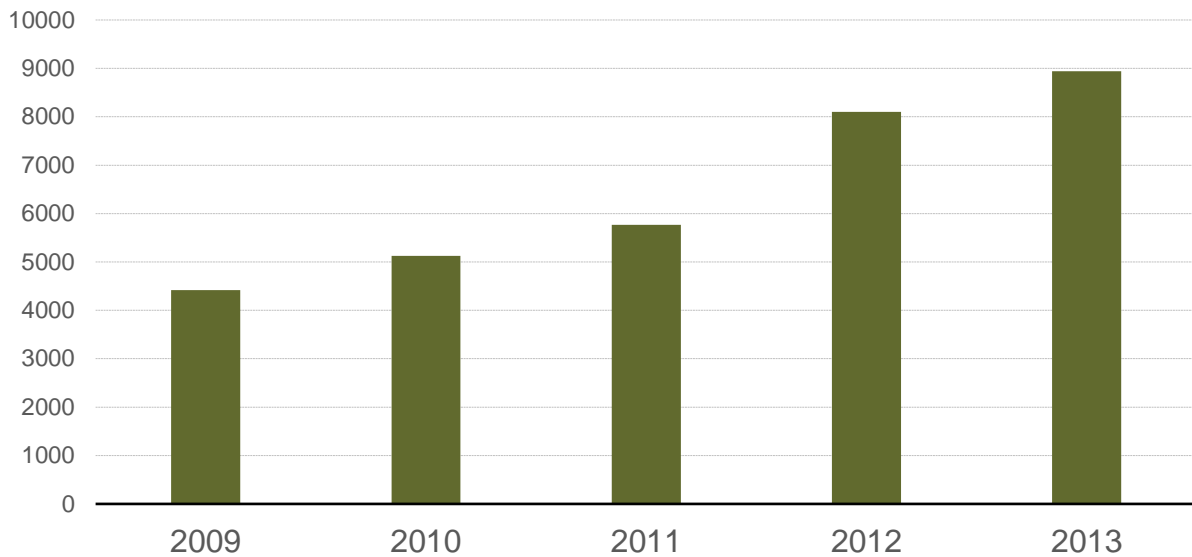
Source: National Learners Records Database

8.2.5   Adult education and training

Adult Education and Training (AET) has been historically underfunded in the E&T system, and most would agree that it has not received sufficient priority for a large number of reasons. A number of interviewees referred to AET as the "step-child" of the E&T system. More recently, the DHET has split the Vocational and Continuing Education Training (VCET) branch into the Community Education Training (CET) branch and the TVET branch to ensure that each area receives sufficient focus. Nonetheless the CET sector, and the community colleges that underpin it, remain under-resourced and policy initiatives and plans to re-define this area are also in their relative infancy.

It is therefore perhaps not surprising that articulation and mobility in this sector falls far short of what is required. Notably, there is not a coherent, funded, pathway in adult basic education that can take someone from NQF 1 to NQF 4 in a way that is suitable to the typical adult learner. In particular, when completing an ABET level 4 programme, a learner receives a certificate at NQF level 1. At this point, the most natural qualification for those who want to obtain a general academic level 4 qualification would be the Amended Senior Certificate (ASC). However, the structure of the ASC is not suitable to an adult learner who cannot study full time, and there is also no appropriate qualifications at levels 2 and 3 to aid in the transition from level 1 to 4. Naturally this also prevents learners from eventually accessing higher education, with interviews reporting that even the ASC is not always accepted by HEIs.

In response to this gap, Umalusi has attempted to develop qualifications specifically aimed at adult learners at these levels. However, as discussed in section 7.7.4 these qualifications have not yet been made operationalised by the education departments. One interviewed provider reported that it increasingly recommends that those passing ABET level 4 should move on to the Occupational Foundational Learning Certificate (FLC) created by the QCTO, as a way to access a level 2 (part) qualification, in the absence of a better alternative. While this is positive in the sense that the FLC has created an alternative pathway, it is still not ideal that learners are being advised to move between sub-frameworks to complete a pathway for which there should in theory be enormous demand in the country.

In practice, most students in (public and private) AET / CET centres focus on ABET programmes, as shown in Table 34 where 67.6% of learners were enrolled in such programmes. The White Paper also calls for Community Colleges (CET centres) to increasingly start offering skills / occupational programmes, which will aim to facilitate entry for students into the workplace and the NQF; but limited progress has been made in this regard. An interviewed community college suggested that while funding is in some cases being provided for skills programmes they still focus primarily on the ASC, as this is where the greatest demand lies for their learners.

Table 34: Number of enrolments in AET colleges in 2014 by type of programme / qualification and provider

Type	ABET Levels 1 to 3	ABET Level 4 (NQF Level 1)	Grade 10 and 11	Grade 12 (NQF Level 4)	Other/ Skills Development	Total
Public	61,355	114,780	1,031	80,214	5,300	262,680
Private	3,461	1,984	34	1,746	335	7,560
Not Declared*	1,931	2,714	30	289	64	5,028
Total	**66,747**	**119,478**	**1,095**	**82 249**	**5 699**	**275,268**
Percentage of total	24.2%	43.4%	0.4%	29.9%	2.1%	100%

Source: DHET Statistics on Post-School Education and Training 2014 (add reference)
* "Not Declared" refers to surveys not indicating whether public or private AET Centres.

8.2.6 Schooling system throughput rates

Data show that only about 37% of learners who complete Grade 9 eventually complete the NSC (Field, 2014). As the Grades 9 to 11 do not provide learners with qualifications on the NQF it is not possible to use NLRD data to trace the pathways of those who leave school before completing the NSC; but it is nonetheless apparent that these low through-put rates fundamentally undermine the achievement of the NQF's objectives for articulation and mobility. This situation is particularly dire when seen alongside the lack of efficient pathways in the TVET and Adult Education sectors discussed above, and the low employment rates for those without an NSC.

This issue has been discussed in depth elsewhere, and its causes go far beyond the NQF, and hence will not be discussed or analysed in detail here. Nonetheless it is important to underline that joined up policy and planning will be required between the education departments and other stakeholders to ensure that the E&T system as a whole meets the needs of learners. The lack of clarity on vocational and occupational training at NQF levels 2 to 4 – as discussed in section 7.7.4 – suggests that education policy is not currently made in a sufficiently coordinated way across departments.

8.2.7 Articulation: Summary

One of the biggest challenges in relation to the NQF has been articulation. Can a qualification obtained for an occupational qualification be used to gain entry to higher level university programmes? Can a person with a level 4 occupational qualification gain entry to a degree programme? Can credits earned in an occupational qualification be counted towards a same level qualification in the GFET or HE sub-framework? These are all questions that are difficult to find answers to. Generally, the view is that at a systemic level the answer is generally "no". An ECD level 4 qualification does not gain entry to a B Ed (foundation phase) programme at a university, and a level 5 occupational qualification would not earn credits towards a Bachelors or Honours degree. However, there are some examples of partnership agreements between providers who deliver occupational qualifications and HEIs – bilateral agreements – whereby credit transfer is being achieved and occupational qualifications are recognised for entry to university programmes.

8.3 Enhanced quality of education and training

The concept of "quality" in education and training can have different meanings for stakeholders in the E&T system. In general, it is often difficult to measure the "quality" of education and training. Some educationalists have tried to measure it objectively using performance metrics such as throughput rates, whereas other measure it subjectively through perception surveys. As we discussed in section 5.2.1, it's nearly impossible to isolate the casual link between the NQF and the quality of education, as numerous other factors influence the quality of education and training, many of which are beyond the NQF's sphere of influence.

It is however possible to use proxy measures to determine whether the quality of education as improved through the implementation of the NQF Act. First, as our analysis reveals, more qualifications have been subject to some form of review, accreditation and registration processes. These processes ensure that the qualification meets the minimum quality standards. The number of qualifications that have been quality assured and registered on the NLRD grew by on average 7% per year between 2009/10 and 2015/16.

Second, there is general agreement that the NQF has an influence on quality. AsFigure 29 shows, most education and training institutions think that the NQF either improves the quality of qualifications, enhances the quality of education or improves quality assurance of education and training. SDPs such as private colleges mentioned quality improvement as one of the main benefits of the NQF.

Figure 29: Benefits of the NQF
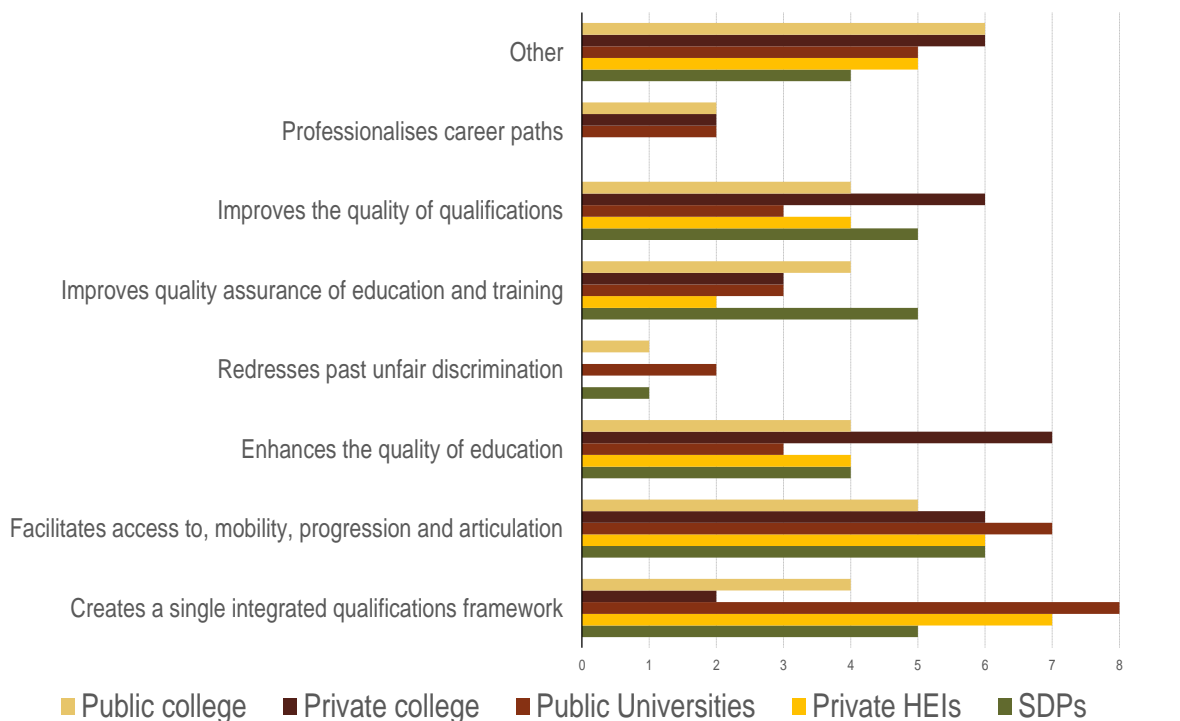
Source: HEQSF, OQSF, GFETQSF provider surveys

8.4 Redress of past unfair discrimination

RPL is one of the main mechanisms through which government seeks to redress past unfair discrimination in education, training and employment. While the RPL has been a government priority since the transition to democracy, many interviewees felt that not enough has been done with regard to the implementation of RPL.

This is despite the fact that South Africa is internationally recognised as one of the thought leaders on RPL methods and practices. Indeed, SAQA has dedicated significant effort to creating awareness about, and disseminating information on RPL. Some of this information has been taken up, and in parts of the E&T system, islands of good RPL practice have emerged (Organisation for Economic and Co-operative Development (OECD) and South African Qualifications Authority (SAQA), 2009).

Simultaneously, the DHET and NQF bodies have established the policy framework for RPL. To ascertain the extent to which providers have implemented RPL, the survey asked providers in the HEQSF, OQSF and GFETQSF to indicate whether they were accepting more, less or about the same proportion of learners on the basis of RPL.

The results present a mixed picture of implementation. In the HEQSF, 46% of providers reported that their intake of learners through RPL had remained largely the same. Although this statistics shows that RPL is gaining traction in public HEIs, the total number of enrolments or credit exemptions achieved through RPL remains low.

On a more positive note, about 38% of institutions reported that they were accepting more learners through RPL into HEQSF qualifications. These are mostly private HEIs, which seem more willing and open to RPL in higher education, as the HEQSF survey reveals. Indeed, one of the main complaints of private HEIs is that the 10% restriction on enrolments through RPL contained in the CHE's policy is an absolute barrier to extending RPL to learners. While the CHE's policy that this restriction is not an absolute limit, most HEIs have interpreted it as such and are limiting enrolments through RPL. Within public HEIs, it seems that learners use RPL to gain access into post-graduate studies, but most HEIs report that the number of learners who apply for RPL is incredibly low.

Table 35: Access through RPL

Survey: Compared to pre-2008, before the enactment of the NQF Act, are you now accepting more, less or about the same proportion of students on the basis of Recognition of Prior Learning (RPL)?			
Statement	HEQSF	OQSF	GFETSF
More	38%	30%	24%
Less	11%	22%	14%
The same	46%	9%	14%
Don't know	5%	4%	24%
Never make use of RPL		35%	24%
Total	100%	100%	100%

Source: HEQSF, OQSF, GFETQSF provider surveys

In the OQSF, about 30% of providers indicated that they were accepting more RPL learners, whereas a worrying 35% did not make use of RPL at all. However, data from the NLRD does suggest that access and credit recognition through RPL is working better in the OQSF. 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 more RPL opportunities. The majority of RPL takes place at NQF Level 4 and is prevalent in the services field, as Figure 30: Learner achievements through RPL illustrates.

Figure 30: Learner achievements through RPL
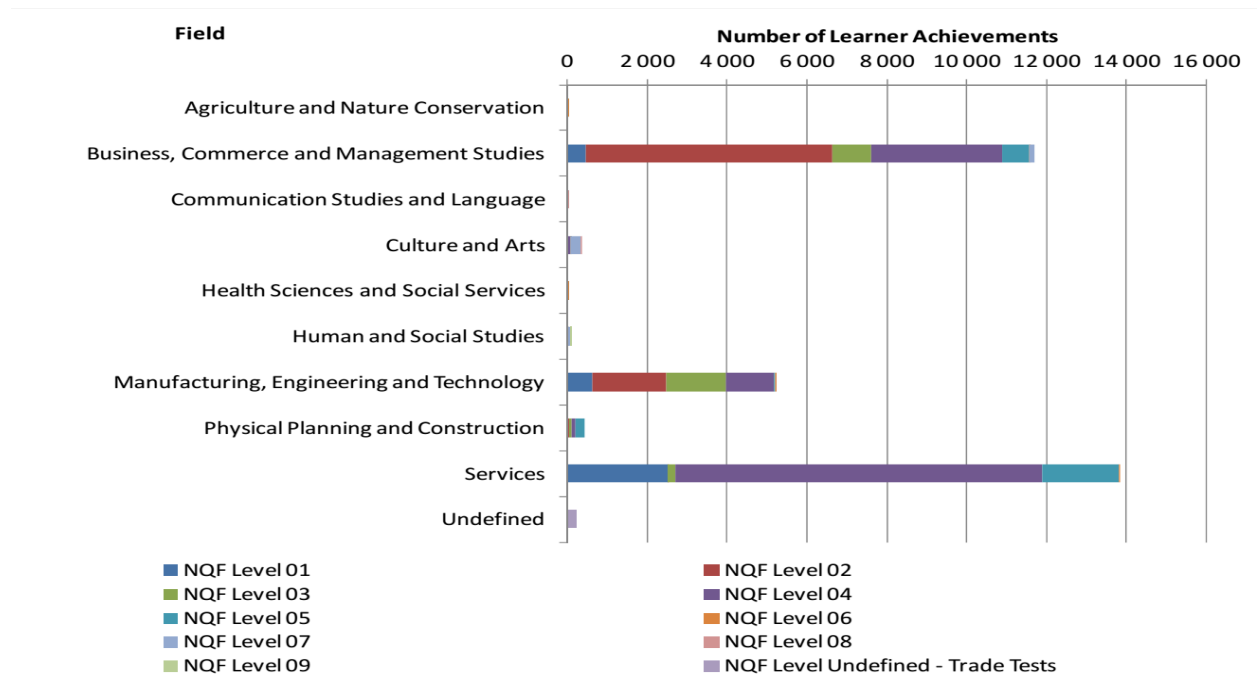
Source: SAQA RPL report

The lack of funding is seen as a major barrier to RPL in public HEIs. However, it seems that private HEIs charge more for RPL assessments, but seem to draw a greater number of applications for RPL. Another explanation is that the private HEIs operate in the lower levels of the HEQSF where there is a greater demand for RPL.

Based on a quick review of RPL fees available online, there is some differences between the fee structure of public and private HEIs. Public HEIs charge a flat assessment fee whereas private HEIs have adopted a cost recovery approach. In other words, they charge an assessment fee and additional fees for each subject or module through which exemptions are awarded through RPL. Table 36 demonstrates how this fee structure works.

Table 36: RPL fee structures across public and private HEIs

Public University 1	Public University 2	Public university 3	Professional Body 1	Professional body 2	Private HEI No 1
RPL Assessment fee: R350	RPL application fee = R350	RPL Assessment = R1700	RPL Assessment fee = R350	RPL Assessment fee = R500-R1000 (whole qualification)	RPL Assessment fee = R440
	RPL assessment fee = R500 per assessment			RPL Assessment fee = R350-R1000 (per module)	RPL Full exemption = R350 per subject
					RPL Conditional exemption =

					R900 per subject

Funding in the OQSF for RPL is less of a problem as many SETAs have been able and willing to finance RPL interventions. Although, the number of learners with achievements through RPL is considerably higher in the OQSF when compared to the HEQSF and GFETQSF, several interviews remained concerned about the slow pace of RPL in the skills space.

9 FINDINGS: EMERGING IMPACT

The NQF Act initiated a significant policy and organizational reform of the South African E&T system and implementation is happening alongside a long list of other reforms, some of which are even more transformative and disruptive. It is thus inevitable that it would take a significant amount of time before the NQF reforms would be fully enacted. Additionally, while it's been almost 10 years since the passing of the NQF Act, many of the key NQF policies were only published between 2013 and 2016. As a result, it is too early to determine whether the NQF is likely to meet its intended impacts. However, a number of interesting trends are apparent which shed some light on the potential direction of travel for the NQF.

Most importantly, the NQF appears to have gained widespread acceptance within the E&T system. Debate appears to have shifted from the fundamental existence or construct of the NQF to more practical discussions on how it should be structured and implemented. This represents significant progress from the early years of the SAQA Act when the NQF was an area of great tension and discord. Whether due to exhaustion over the NQF Review disputes or because the Ministers made a definite decision in 2007 to end the debate, or whether there is actual acceptance, there is a sense of acceptance of the NQF and a focus on making it work. The disagreements have not disappeared entirely but they are not disrupting delivery in the way they were from 2000 to 2008. There are efforts being made to find solutions to practical problems.

What is also emerging is that the reforms introduced by the NQF Act are embedding themselves in many parts of the E&T system. Colleges and HEIs have, for example, hired many people and created units that focus on compliance and alignment. This has created broader understanding of the NQF and its requirements. There is some evidence of partnerships being built to enable articulation and portability between OQSF and GFETQSF institutions, such as colleges, and HEIs within the HEQSF. This seems to be because there is a more collaborative approach emerging that is based on accepting certain university requirements and working with them and helping students to meet these. Similarly, within TVET colleges all programmes (NC(V), NATED and occupational) are now typically under a single Deputy Principal, rather than in separate silos for different qualification types. This is going to help bring the different learning programmes together and produce more coherence and ease of access for learners.

More broadly, however, the E&T system still suffers from high degrees of uncertainty and instability. This holds true across virtually all aspects of the system and is not an NQF specific problem, but it will continue to undermine the NQF if it is not addressed. Particularly in the weaker parts of the system (TVET colleges, community colleges etc.) there is a tremendous need for clarity, direction and stability on a range of topics including funding, programme mix and enrolment targets. In the NQF specifically there is a need for better

guidance, leadership and coordination from the NQF bodies to steer the E&T system towards higher quality and more efficient pathways.

10 CONCLUSIONS AND RECOMMENDATIONS

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. More efficient approaches to implementation together with better policy coherence and role clarity will contribute to enhancing the effectiveness of the Act, and achieving the intended outcomes of the NQF. In this final section of the evaluation, the evaluation team revisits and attempts to respond to the evaluation questions.

EQ1: 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 development of a theory of change begins with an articulation of the outcomes and impacts that the policy is designed to achieve. 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.

Thus, the development of 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 and how exactly the Act tried to solve these problems. In many respects, the NQF Act was attempting simultaneously to resolve both systemic challenges in the broader education and training (E&T) system as well as structure and governance challenges that were more specific to the NQF.

In the end, it appears that the NQF Act was drafted as a compromise solution to resolve both the systemic and structural challenges that were present. As a result, the NQF Act reflects the high-level E&T system objectives to which it is expected to contribute, and assigns responsibilities to the M:HET and NQF bodies for performing certain functions. It is not always clear how the functions assigned to the NQF bodies contribute to the achievement of the objectives of the NQF set out in the Act. In addition, the Act fails to realise the considerable distance between the outputs produced by the NQF bodies in terms of the functions assigned to them and the objectives contained in the Act. The role of key stakeholders such education and training providers and education departments in implementing the Act is overlooked. One of the fundamental assumptions made by the Act is that education and training providers are willing and have the capacity to comply with the extensive policy framework that it directs the NQF bodies to establish.

In general, while some parts of the theory of change underpinning the Act can be mapped logically, there are divergent views on the specific objectives that the NQF seeks to achieve and how these will happen.

Recommendation 1: The DHET, the Department of Basic Education (DBE), SAQA and the quality councils must, as a matter of priority, revise the objectives of the NQF set out in the Act to ensure that they articulate the specific contribution of the NQF to the systemic goals. To do this, the DHET, SAQA and quality councils must consider the following actions:

- **Recommendation 1.1:** SAQA, DHET and the quality councils must create theories of change that clarify how the specific NQF objectives are expected to be achieved. These theories should be developed through cooperation between the NQF bodies and other key stakeholders and experts in these areas. Fundamentally, the intent of this recommendation is to use the theory of change approach (or any other appropriate method) to agree on how the NQF Act will be implemented and its objectives achieved.
- **Recommendation 1.2:** Based on these theories of change, SAQA in collaboration with the DHET, DBE and quality councils, must develop a detailed implementation plan that outlines the key activities, outputs and outcomes that the NQF is expected to achieve over a five-year period. In other words, the implementation plan must also demonstrate what success looks like.
- **Recommendation 1.3:** SAQA, in collaboration with the DHET, DBE and the quality councils, should develop a monitoring and evaluation framework (including indicators and targets) to assess progress in the implementation of the Act and achievement of the NQF objectives. The monitoring and evaluation framework must allow for monitoring to happen throughout implementation with feedback loops that are timed to feed into decision-making processes.

EQ2: 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, the evaluation team felt that it was important to assess the coherence of the policy framework. This analysis was done at three levels:

- **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.

Given the large number of stakeholders involved in the implementation of the NQF Act, it is essential that **internal policy coherence** is achieved. 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. 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 Act is, how it will be implemented and what its theory of change is (or should be).

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[25], is primarily responsible for most aspects of occupational and vocational policy, but the current issues are of such importance to the NQF that they need to be highlighted in this report. While the White Paper on PSET helped to frame 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. Simultaneously the DBE is developing a "three stream" approach which also creates vocational and occupational pathways at equivalent levels on the NQF. These policy processes do not appear to be meaningfully aligned, which delays and undermines the achievement of the NQF's objectives.

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.

As with every technical discipline or specialist area, the NQF Act and its policy framework has developed its own nomenclature that is well understood by those that work with it on a regular basis. However, many interviewees have removed that the complex nomenclature and use of NQF-jargon makes the policies inaccessible to policymakers, education and training providers, learners, employers and the general public.

Recommendation 2: SAQA, after consultation with the DHET and quality councils, must determine the standards and criteria that all policies and guidelines developed under the

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[25] NQF bodies refer to SAQA, CHE, Umalusi and the QCTO.

NQF Act should meet. At a minimum, these standards and criteria must ensure that policies contain:

- A clear and detailed demarcation of roles and responsibilities,
- An analysis of the likely resourcing requirements or how they will be determined, and how resource availability might affect the implementation of the policy,
- Indicators that measure progress and success,
- An approach to monitoring the success of the policy,
- Consequences for not achieving the policy goals, and
- A commitment to writing policy and guidelines in Plain English[26].

Recommendation 3: The DHET, after consultation with SAQA and the quality councils, must:

- Provide clarity on the conceptions/definitions of the different categories of qualifications, namely: Occupational, Vocational, General, Academic and Technical.
- Specify the modes and approaches to delivering and quality assuring these qualifications, i.e. what are the criteria that determine which sub-framework a qualification (type) is assigned to?
- Revise existing legislation governing the work of the quality councils (i.e. the Higher Education Act, Skills Development Act and the GENFETQA Act) to ensure that they are aligned to the NQF Act.[27]
- In relation to the OQSF, provide clear direction on the policy issues that will affect how the QCTO plans its work and structures its operations over the next five years.

EQ3: 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 the 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 regulatory functions including the development of qualifications, accreditation, registration and quality assurance qualifications, in line with the scope of their authority and mandates. In performing these functions, they have had to collaborate on key aspects of implementation and coordinate their actions.

Collaboration, coordination and reporting

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[26] Plain English is a worldwide campaign to eliminate jargon and improve the readability of government documents.
[27] The Higher Education Act was amended in 2016 to improve its alignment to the NQF Act.

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 seeks to enhance coordination and cooperation, thereby ensuring that the implementation of the NQF Act is efficient.

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. In relation to the functioning of each of these structures, this evaluation findings that:

- The CEO Committee meets regularly and its minutes reflect a degree of shared problem solving and planning across the NQF bodies. That being said, some interviewees have however questioned whether the committee deals with substantive issues around the NQF, suggesting that it currently narrowly focusses on bureaucratic process management.
- The NQF Forum is a dedicated platform that allows the M:HET and DG: HET to meet directly with the NQF bodies. However, this forum has not met since 2012, despite the existence of policy issues (mentioned throughout this report) that require Ministerial attention, is concerning.
- The Inter-Departmental NQF Steering Committee, which includes officials from DHET and DBE, is an important structure given the Act's silence on the role of the DBE. However, despite this committee remaining functional, critical NQF issues regarding the role of the DBE or the ownership of the GFETQSF have not yet been resolved eight years after the promulgation of the NQF Act. While the committee is not a decision-making body, the extent to which its recommendations have influenced much-needed policy decisions and reforms is unclear.

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). It is clear that although senior DHET managers have accepted the principles that underpin the NQF Act, they are less sure about how to move forward within the NQF framework.

In recognition of the need for a structure within the department to handle NQF matters, the DHET established the NQF Directorate in 2012. The Directorate's purpose is to provide support and advice to the Minister to help him or her discharge their responsibilities in terms of Act. As the Act confers a set of wide-ranging powers unto the M:HET, the roles and

responsibilities of the NQF Directorate have evolved as the need for the Minister to exercise his or her powers has arisen.

The NQF Directorate is also drawn into responding to *ad hoc* queries sent to the Minister, often by stakeholders who seek to bypass the existing systems and structures established by the NQF Act. As a result of the broad scope of the NQF Directorate's functions, some interviewees were unclear about the exact role of the NQF Directorate.

With the roles and responsibilities of different role-players in the implementation of the NQF Act being unclear in some respects, a web of complicated reporting lines has also 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 M: BE in Umalusi's case. In parallel, SAQA and the quality councils report to different branches within the DHET on their operational and expenditure performance. They 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. For example, there did not appear to be a common understanding of SAQA's monitoring role relative to that of the NQF Directorate or the DHET branches. Additionally, both SAQA and the quality councils report to the Minister, though the channel of reporting is not consistently or optimally applied: recommendations are often not coordinated or even jointly discussed before being made.

Recommendation 4: SAQA, in consultation with the DHET, DBE and quality councils should strengthen the System of Collaboration. In particular, it needs to:

- **Recommendation 4.1:** specify the roles and responsibilities of the NQF Forum, CEO Committee and Inter-Departmental NQF Steering Committee in greater detail. Particular emphasis should be placed on defining the scope and authority for decision of each structure, their accountability and reporting lines.
- **Recommendation 4.2:** ensure that the CEO committee has a dedicated channel to provide inputs into policymaking and engage with the DHET and DBE on policy matters that affect the NQF. This channel will also ensure that the CEO Committee not only manages the NQF implementation processes but also focuses its attention on external factors that impact on the efficiency and effectiveness of the NQF.
- **Recommendation 4.3:** ensure that the NQF Forum is again held on at least an annual basis. For this to happen, SAQA will require the support from the M:HET and DG:HET.

- **Recommendation 4.4:** establish monitoring mechanisms and report on the functioning of the System of Collaboration.

Recommendation 5: As the executive authority responsible for the NQF, the M:HET must ensure that roles, responsibilities and reporting lines are appropriately delineated and clear to all stakeholders. Different tools, including revising the NQF Act itself, should be used to resolve these issues:

- **Recommendation 5.1a:** DBE is a crucial stakeholder in the NQF. Its roles and responsibilities should be specified in the policy framework. Once this is done, the DBE should ensure that the GENFETQA Act and other pieces of legislation in the basic education sector are aligned to the NQF Act.
- **Recommendation 5.1b:** The DBE and Umalusi must clarify who owns the GFETQSF (in terms of, for example, qualification development) and delineate their responsibilities with regard to managing the sub-framework.
- **Recommendation 5.2a:** The roles and responsibilities of the DHET and its branches in implementing the Act should be clarified in the policy framework and presented as detailed policy guidelines in support of the Act.
- **Recommendation 5.2b**: The DHET should clarify and document the role of the NQF Directorate in the policy framework, and if necessary, review its location within the department. Ideally, the NQF Directorate's role should focus on:
  - Supporting the Minister to specify the NQF implementation priorities, and setting measurable indicators and appropriate targets against which the NQF bodies can be held to account.
  - Acting as the crucial link between the DHET's policymaking and planning processes and those of the NQF bodies.
  - Monitoring the achievement or non-achievement of the NQF Act and Ministerial decisions on implementation of NQF policy.
- **Recommendation 5.3:** The DHET and the DBE must clarify in precise detail the reporting lines of the quality councils and SAQA, including who has oversight over these bodies, who is responsible for monitoring, and the channel through which reports and recommendations should be sent.

Generating evidence for policymaking

The NLRD currently holds more than 17 million records of learner achievements and constitutes an essential source of information within the E&T system. While some data gaps and issues still exist, the progress made in updating and maintaining the NLRD is commendable. As such, the NLRD is an important source of evidence for policymaking in the education and training system, but it is also under-utilised, and it has thus far not been meaningfully used to inform policy.

Recommendation 6: SAQA must use the data from the NLRD to track and monitor policy changes and developments across the NQF. The indicators and performance metrics could be defined by the NQF Forum, after consultation with the Inter-Departmental NQF Steering Committee.

Efficiency in the 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. As a result of these and other challenges, it has taken a significant amount of time to set up the design and structures of the OQSF fully. This means that a large proportion of qualifications, developed mainly by SETAs, are not yet aligned to the OQSF, and relatively few newly developed occupational certificate qualifications are yet being presented.

In effect, 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 certificate 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; typically taking the form of an exam at the end of the programme.

The problem is that with two resource-intensive quality assurance systems running alongside each other and the serious budgetary constraints being experienced across government, the likelihood is that the new system will take a long time to develop and the old system may need to be retained indefinitely. A situation has been created where ever-increasing resources are required to sustain two systems with no end in sight.

A significant 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 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 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.

Indeed, the current OQSF may result in hundreds, if not thousands, of qualifications (as was the case before the NQF Act) – depending on what digit of the OFO code is used for classification – and it's not clear that the ultimate quality assurance system will be significantly simpler or more efficient than what it replaced. The QCTO, however, believe that the OQSF, perhaps with slight amendments, will mostly achieve the above-stated objectives once it is implemented as planned and all qualifications have been aligned with 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 the DHET, DBE and NQF bodies) at the outset, has led to a situation where different parties have different views on what the system is trying to achieve.

The importance and significance of these uncertainties and disagreements cannot be understated. They likely require substantial revisions to the OQSF, which in turn will significantly extend the amount of time before all qualifications can be aligned to this revised sub-framework.

Effective coordination between the large number of stakeholders in the skills system and clear policies are required in this area. While there are some encouraging signs of greater cooperation between stakeholders more recently, it is distressing that such fundamental disagreements on objectives and change mechanisms could have persisted for such an extended period; and indeed still exist at the time of writing.

There is currently a proposal to more closely integrate the QCTO's strategies to the National Skills Development Strategy (NSDS) IV and require it to report to the National Skills Authority (NSA) in an attempt to address some of these issues. However, such a change to reporting would require significant legislative amendments to, for example, the Skills Development Act. The QCTO has indicated that this proposal could create overly complex and unclear reporting lines, and potentially undermine its independence as a quality council. Indeed, having the QCTO management be simultaneously accountable to their Board, the NSA and the NQF structures which likely all have different objectives could be quite challenging.

One issue that has been resolved is that SETAs, while losing their role in quality assuring the new qualifications, will retain a role in quality assurance of workplace provision.

However, the nature of such quality assurance has yet to be defined, and there are fears that an overly bureaucratic and demanding set of processes could result in employers not buying into the new qualifications.

Recommendation 7: The DHET must provide clear guidance and direction on the following OQSF-related matters:

- **Recommendation 7.1:** The DHET must review the funding model of the QCTO based on a costed implementation plan that estimates the cost of the organisational capacity needed to implement different options/models.
- **Recommendation 7.2:** The DHET must resolve the future role of the QCTO, vis a vis SETAs on the basis of the cost of different options. Irrespective of whichever option is chosen, the DHET needs to ensure that funding covers the cost of implementation to ensure that the intervention is resourced appropriately.
- **Recommendation 7.3**: The DHET must take reasonable steps to ensure that the final OQSF model is understood and supported by key stakeholders within the skills sector.
- **Recommendation 7.4**: When considering the model for qualifications development, the DHET and QCTO must take into account the diverse nature of the skills development space and its potential implications on the effectiveness of the proposed centralised model of the QCTO. Before these decisions are made, this evaluation recommends that centralised model is carefully considered and costed. Variants of such a model could also be formulated that includes a more pragmatic distribution of powers and functions between the QCTO, SETAs and professional bodies over the short to medium term.

Recommendation 8: The QCTO and DHET must review and reconsider the blanket requirement for a workplace training component in all qualifications and part-qualifications in the OQSF should be reconsidered. This could mean that the definition of occupational qualifications, as stipulated in the Skills Development Act, needs to be reviewed.

Alternatively, if this requirement remains, at a policy level there must be acceptance and clarification that occupational qualifications will be a relatively small proportion of public colleges' programme mix, and that the strict requirement in relation to the workplace component will inevitably mean that some colleges will be unable to offer them and will, therefore, focus programmes such as the NC(V) exclusively.

Efficiency in the implementation of the HEQSF

The HEQF was published in 2007; effectively creating a framework designed for higher education before the passing of the NQF Act. However, a number of 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 eventual 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 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 some statutory bodies share concurrent jurisdiction over the accreditation and "approval" of certain programmes.

It appears that another 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 majority of public and private HEIs surveyed noted that it took on average more than 1 year to get accreditation for their programmes. In qualitative interviews, respondents said that if the time taken for accreditation and registration was summed up, then institutions waited for close to 18 months to see their programmes registered onto the NQF. Respondents also suggested that there is a duplication in some of the processes between the qualification registration and learning programme accreditation in the HEQSF.

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. More generally, 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 increasing volumes of applications and

funding challenges, the current model of programme accreditation where all applications have to undergo accreditation may no longer be viable.

Recommendation 9: While the resourcing challenges faced by the CHE are acknowledged, there remains a need for the CHE to enhance the efficiency of its accreditation processes. The organisation must consider the following recommendations.

- **Recommendation 9.1:** The CHE must review its programme accreditation processes to determine whether there are steps where efficiency improvements are required.
- **Recommendation 9.2:** The CHE must consider alternative models of accreditation including full or partial self-accreditation or delegating part of the accreditation process to professional bodies. These alternatives may require legislative amendments.
- **Recommendation 9.3:** The CHE, in collaboration with the DHET, must develop a framework that provides guidance on the role and responsibilities of statutory professional bodies in qualifications development and quality assurance.
- **Recommendation 9.4:** The CHE and SAQA must review their processes to identify areas of actual and perceived duplication in the accreditation and registration processes. Where needed, the accreditation and registration processes must be re-configured to remove these inefficiencies, and information on the correct procedure shared with HEIs.

Efficiency in the implementation of the GFETQSF

In the period since the promulgation of the NQF Act, Umalusi's has reviewed and expanded its role to fulfil its responsibilities as a quality council. The organisation has widened the scope of its activities across a number of areas; including quality assuring the school curricula, increasing its research and advocacy outputs and developing qualifications in the adult education and training space.

A key concern for Umalusi is the lack of policy clarity on its role, and whether it 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. Umalusi initiated development of adult education qualifications at levels 2 to 4, including the NASCA at level 4, in 2008, 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 basic education sector 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. Serious backlogs in certification of TVET qualifications are seen as a major area of inefficiency in the GFETQSF. These issues appear to be largely the result of weaknesses in the DHET's examination information system, which are being addressed with the cooperation of Umalusi.

A particular problem related to credit transfer was raised in relation to learners who have studied in school to grade 12 and have the NSC, and then go on to study for an NC(V). The common perception is that there is no possibility of carrying credits from the NSC into the NC(V) programme and so a learner going that route will have to do the full NC(V) programme.

The causes of this are unclear, but it would seem that the awarding of credits is not easy and the bureaucratic challenges make it easier for the full programme to be studied. This perception has turned into practice despite the existence of Umalusi's CAT policy that allows for learners to transfer their mathematics and language credits between NSC and NC(V). The impact of this practice is that it creates inefficient learning pathways between the NSC and NC(V) and comes at a cost to the fiscus.

Efficiency in the implementation of the NQF Act

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

Most notably, there appears to be exceptionally high expectations of the NQF structures which are growing as the institutions grow into their roles. Human and financial resources do not match the expectations to the point where core functions are carried out at a slow pace and service standards drop. This is often expressed within the system as under-funding, but in many instances, it could also be viewed as weak policymaking and implementation planning – if a function is developed to deliver a particular model of QA, then it should be costed and funds allocated accordingly. In other words, funding should follow function. 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.

Given the current resource-constrained environment, it would be sensible for NQF bodies also to determine whether (1) any duplications exist within current processes (between the QC processes for recommending qualifications and the SAQA processes for registering qualifications for example). (2) whether teach-out period deadlines[28] are reasonable given the time taken to develop qualifications (see recommendation below) or (3) whether other efficiencies can be found in the system. Implementation plans and models must be achievable within the likely resource envelope, and should not be designed in isolation of funding as sometimes appears to be the case currently.

Quality assurance processes could likely also be made more efficient across all quality councils. The evidence available (policies, procedures, criteria and guidelines published by the three QCs) all point to the use of extensive checklists that require a lot of work by those being quality assured and a lot of evidence to be collected.

In a constrained funding environment, a "risk-based" approach that targets quality assurance efforts and resources to areas of risk might be more efficient. While the quality councils have raised concerns about the equity of risk-based approaches, there are two alternative policy choices.

Quality councils can either continue with the current approaches to quality assurance that are resource-intensive and not proportionate to the risks within the E&T system. Alternatively, they could adopt a "risk-based" approach that focuses on the areas where quality problems exist and persist, and where learners are most at risk, making for more efficient use of their resources. 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 effectiveness of the NQF.

Ultimately, whichever approach to quality assurance is adopted, it must be accompanied by funding. There will inevitably be little accountability in such a system since NQF bodies could rightfully blame non-achievements on a lack of funds while policymakers can keep pointing to "good" policy is just not being implemented.

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[28] "Teach out periods" here refers to the following: Even after a qualification is no longer registered on the NQF, E&T institutions can still accept enrolments on that qualification for a pre-defined period of time after the qualification has expired; and the learners enrolled are given a period of time to complete the qualification. Thus providers do not immediately have to stop enrolling learners when qualification registration expires (and not renewed): there follows a teach-out period which can take a number of years for multi-year programmes.

Recommendation 10: The NQF and, in particular, the quality assurance system has become severely underfunded relative to their mandates and the quality assurance models that have been designed. Funding constraints impede the ability the NQF bodies to carry out their functions and place the quality of education and training at risk. The DHET and DBE should therefore provide appropriate and sufficient resources to these institutions to execute their mandates. If additional funding is not forthcoming, then scope and mandate of these NQF bodies should be aligned to the levels of funding available.

- **Recommendation 10.1:** The DHET should, after consultation with the DBE, SAQA, QCs and other key stakeholders, develop and publish a five-year costed implementation plan that is achievable within available resources. The implementation plan should align with the broader PSET implementation plan, and include:
  - Detailed description of the activities and outputs that will be delivered (aligning to recommendation 1)
  - The roles and responsibilities of different institutions
  - The costs of implementation; not only to the NQF bodies but also to the regulated entities such as education and training providers
  - Approach to monitoring and evaluation.

- **Recommendation 10.2:** As part of developing an implementation plan, QCs should determine whether more cost-effective risk-based approaches to quality assurance could be adopted. Such approaches should prioritise the regulation of high-risk provision rather than adopting a blanket approach. This should particularly be considered in cases where the cost of compliance or enforcement can be high; for example, the regulation of private / independent schools and Skills Development Providers (SDPs). Convenor systems, self-evaluation and peer review systems could all be considered; though their feasibility would differ by context.

Recommendation 11: There is much concern on the looming deadlines on last dates for new enrolments for qualifications that have not been aligned to the HEQSF and OQSF:

- In the HEQSF, given the long lead times involved in developing and accrediting programmes, HEIs and private providers are concerned about their ability to develop new qualifications to replace the ones being taught-out. The DHET and CHE must consider whether an extension of the deadline for new enrolments is necessary and communicate any decision clearly to education and training institutions. One option

they should consider would be for the CHE to give priority to applications for the accreditation of new programmes that replace the older ones.

- In the OQSF it appears likely that a large number of qualifications will not have been replaced or re-aligned to the OQSF by the deadline, given the lack of resources and typical turn-around times to develop qualifications and accredit providers. It also appears likely that the OQSF will have to be revised, which will delay the alignment process further. It is thus likely that there will be no qualifications to present in a number of fields soon after these deadlines. It is also unlikely that sufficient workplaces will be secured for all new qualifications. The DHET and QCTO must consider extending these deadlines and communicate any such change clearly (and well in advance) to education and training institutions. A firm (and non-negotiable) timeframe should be set that is achievable within existing resources.

Recommendation 12: SAQA should establish an NQF-wide workflow system that tracks and monitors applications from the time they are lodged to the time they are registered. Ideally this system should be accessible by members of the public, so that they are aware of the stage at which applications for new qualifications are being processed. Such an open access system, will also avoid duplication since the public would be aware of which qualifications have already been applied for and would ease frustration users experience in planning around NQF processes.

Recommendation 13: The NQF Bodies should put in place a process to discuss and then resolve any actual or perceived duplications in regulation between themselves and Professional Bodies (PBs) during the qualification design and quality assurance processes. This should be coordinated by SAQA, in consultation and cooperation/collaboration with the QCs and PBs, SACPO and USAF.

Recommendation 14: There does not appear to be clarity amongst stakeholders as to what is allowable within the scope of a part qualification in the OQSF. The QC should clarify the nature and scope of part-qualifications.

EQ3: To what extent has the implementation of the NQF Act been effective in achieving its policy goal(s), objectives and intended outcomes?

The creation of a single integrated national framework for learning achievements

The first of the NQF's objectives is the creation of a single, integrated framework for learning achievements. 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 achieved mainly in a literal sense.

However, the creation of a truly "integrated" framework is not straightforward, and some issues remain. These issues principally 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. Different sub-frameworks make use of different qualification types, which distinguishes qualifications at the same level, but such a system can still be confusing to navigate for those who are not intimately familiar with the design and operation of the NQF's qualifications and organisational structures.

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 result of the National Senior Certificate (NSC) examination quality assured by Umalusi. However, the lack of significant independent quality assurance of public schools outside of the examinations system is seen by many as a concern.

The qualification pathways in the TVET college and community college systems are much less effective and efficient. 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. NC(V) graduates also struggle to gain access to HEIs.

This situation is further complicated by the simultaneous processes in the DBE to create vocational and occupational streams in schools. While there is no conceptual issue with having vocational and occupational qualifications in schools and colleges simultaneously, there does not appear to be a commonly agreed conceptual framework for the different roles and contributions of these programmes to the E&T system.

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

The development of the community college (adult education) space is being constrained by the lack of policy guidance and attention from policymakers. There is currently no pathway from NQF level 1 to level 4 that is specially designed for adults, as mentioned earlier. Despite some progress, there also still appears to be an inadequate number of qualifications at level

5 and 6 across both HEIs and TVET colleges, which further limit opportunities for articulation.

Enhanced quality of education and training

The quality assurance system employed in the HEQSF, which 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. However, the articulation between Historically Disadvantaged Universities (HDUs) and Traditional Universities is still seen as difficult for learners from HDUs.

There are different views as to whether these articulation difficulties should be seen as a failure of the NQF or merely an inevitability of a diverse system that is beyond the control of the NQF. Some have called for an ombuds function that could help to reduce any discrimination that exists in the system.

The role of Umalusi within the GFETQSF is a point of dispute for a number of reasons. 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 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 feel that Umalusi is already overstepping its boundaries in activities such as conducting readiness assessments of provincial DOEs and publishing reports that comment on and aim to influence the curriculum.

A major issue related to all quality assurance discussions on schools and colleges is where responsibility lies for quality in the public system. It appears that the QCTO will increasingly have a role in attempting to raise standards in the public TVET colleges through the accreditation and QA processes for occupational qualifications. However, Umalusi continues to have a limited role in quality assurance in public schools beyond examinations. It may be time for the government to consider whether it is not time to create an independent body that has such a responsibility and/or acts as an independent examinations body. This would be a complex policy challenge and a difficult process to achieve, but a review of the NQF legislation may be an opportune time to engage in this.

NATED (Report 191) N1 to N3 qualifications are currently quality assured by Umalusi, while N4 to N6 and the National N-diploma fall under the QCTO. N1 to N6 are part qualifications, with the full qualification (the N-diploma) also requiring experiential work learning. It is not sensible to have the different parts of a qualification with different quality councils, particularly since N4 to N6 is currently being "re-constructed" by the QCTO into new

occupational qualifications, while N1 to N3 is being left unchanged despite its often outdated curricula.

Redress of past unfair discrimination

Recognition of prior learning (RPL) is seen as a critical mechanism to address past unfair discrimination. 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 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. The QCTO has also suggested that the use of RPL will increase as new occupational certificate qualifications that make use of the External Integrated Summative Assessment (EISA) are implemented. 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 the perceived restrictions on the use of admission through RPL (based on an incorrect interpretation of the CHE's policy) were frequently raised as challenges by education and training providers.

Recommendation 15: If RPL is to become a policy reality, the DHET must sustainably fund this priority, possibly intervening to ensure that SETAs ring-fence funds to enable this important transformational goal.

Recommendation 16: The DHET, in collaboration with the NQF bodies, should organise forums or platforms to allow for collaboration between public and private Higher Education Institutions (HEIs), TVET colleges and SDPs to support the design of qualifications that can articulate from an NQF Level 4 to Level 5 across the sub-frameworks. There is no simple solution to this problem, and while amended legislation could be helpful, the focus should be on creating and supporting strengthened relationships between institutions and amending funding models to incentivise qualifications at this level.

Recommendation 17: There is currently no suitable qualification designed for adults who want to obtain a general qualification at levels 2 to 4. In this regard:

- **Recommendation 17.1:** Umalusi, DHET and the DBE must clarify the status of the NASCA in terms of where in the system the qualification is to be offered, how it is to be funded and what upwards articulation possibilities exist for those completing the NASCA.
- **Recommendation 17.2:** The adult education pathway needs to be clarified, publicised and disseminated to education and training providers and the public, with qualification pathways created and explained for those adults who cannot go straight into a level 4 qualification. While it is clear that there is limited funding to offer these

qualifications currently, they should be available to enable the strengthening of this system over time.

- **Recommendation 17.3:** Umalusi and the DBE need to clarify the articulation opportunities for Senior Certificate (Amended).

Recommendation 18: The DBE must provide policy clarity on the following issues.

- **Recommendation 18.1:** There are already discussions underway to establish an independent examinations body for the NSC. This evidence from this evaluation report supports the need for an independent examination body that is distinct from the DBE. Thus, this report recommends that the DBE and give due consideration to this option and assess its feasibility in terms of the legislative provisions and the resourcing requirements.
- **Recommendation 18.2**: The DBE and Umalusi must publish a joint directive that outlines the role of Umalusi in the quality assurance of public schools in the current system and what the bounds are of its responsibilities.

Recommendation 19: Umalusi must transfer the quality-assurance of N1-N3 qualifications to QCTO. This should happen as part of a coherent longer-term plan for these (part-) qualifications to be determined through cooperation between the QCTO, the DHET and other key stakeholders such as private providers and business.

EQ4: 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.

There some evidence that education and training providers have improved their capacity for quality assurance. Moreover, a partnership approach is emerging across the E&T system where education and training providers across different sub-frameworks are working together to expand access, reduce barriers, improve articulation, enable portability and expand the availability of RPL. While it is early to state that the partnerships are achieving long term impact, it is evident that the work being done is achieving some results. Concrete examples have been provided, for example, of learners from TVET colleges, or of workers with occupational qualifications, accessing university programmes.

There is also some sense that the NQF is recognised by employers and learners. Increasingly job adverts (and nearly all national and provincial vacancy announcements) identify the qualification type and its NQF level. Some public HEIs suggested that learners are more aware of the NQF and ask about the registration status of qualifications. These

changes in the behaviour of providers, employers and learners suggests that there are early and tentative evidence of an emerging impact within the E&T system.

Conclusion

This evaluation highlights the considerable progress that has been made in implementing the NQF Act. Much of the policy and regulatory framework has been developed and is now in place. Work on qualifications development has gathered pace across all sub-frameworks. Existing qualifications have been or are undergoing review to ensure that they meet the criteria for registration onto the NQF.

The principles and construct underpinning the NQF is now widely accepted by policymakers and stakeholders across the E&T system. There is also greater awareness of the framework and the NQF bodies that spearhead its implementation amongst education and training providers, workplaces, learners and the general public.

While this progress is encouraging, the implementation of the Act has been slow. It has taken longer than planned to complete the policy framework that supports and informs the implementation of the Act. Part of the problem is that the Act itself sets high-level objectives that are subject to interpretation by various stakeholders in the E&T system. It takes time to achieve consensus in an environment where divergent views exist. Moreover, while the Act establishes a hierarchy of policy layers, it also distributes decision making powers across various bodies, often requiring consultation and agreement before policies can be adopted.

If the decentralised decision-making approach is to work, the DHET, DBE and NQF bodies must find better ways of jointly identifying the problems and agreeing on specific goals and objectives. Having a clear set of objectives will not only improve coordination but also enhance the ability of DHET, DBE and the NQF bodies to implement the Act.

The overall effectiveness of the NQF Act, that is, its ability to translate the outputs of the NQF bodies into outcomes is lessened by the high degree of policy and funding instability and uncertainty present throughout the E&T system. This puts achievement of the NQF's objectives at risk and will continue to do so if key policy questions remain unanswered by the DHET and DBE.

At the same time, in a complex and uncertain policy environment, major reforms to the structure and organisational arrangements established by the NQF Act has the potential to undo many of the improvement and gains made thus far. Thus, the evaluation team does not believe there is a need to fundamentally restructure or change the NQF bodies on the basis of the evidence presented in this report. Rather, the focus should be on improving efficiency in parts of the system and enhancing the effectiveness of the Act.

These improvements are possible through collective and collaborative efforts by stakeholders. For this to happen, there is a need to align legislation with the intentions of policymakers and to put in place mechanisms for ensuring delivery and increasing accountability.

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APPENDIX 1:   CRITERIA FOR GOOD POLICY

Criteria	Description
The policy clearly states the policy goals or objectives.	The document describes the purpose of the policy and sets out clear objectives. Each objective is specific and measurable.
The target audience is clearly identified.	The document recognises that the target audience might be diverse and come from different sectors and groups. To help the reader understand the document, it describes how the policy applies to them.
The roles and responsibilities for policy implementation are clearly stated.	The document identifies the range of different stakeholders and sets out their roles and responsibilities in implementing the policy. Where appropriate, the policy includes clear guidance on areas of joint responsibility between implementers.
The actions / requirements for implementation is clearly stated in the policy.	The policy describes what actions are needed from which stakeholders. Actions provide sufficient guidance to allow implementers to develop their own implementation plans.
The policy identifies the resourcing requirements, and where appropriate determines the cost of implementation.	The policy indicates the resourcing requirements needed for the implementation. If there are any cost drivers that might influence the cost of implementation, these are clearly identified in the policy. Where possible, the policy provides estimates for implementation based on different scenarios. However, if this is not possible, the policy indicates that a costed implementation plan will be developed.
The policy describes the mechanism for monitoring implementation.	Monitoring arrangements should complement the implementation approach. Ideally, the policy should state what will be monitoring, when and by whom.
The policy identifies performance indicators for assessing success.	The policy includes measures of success and targets (if appropriate). Performance measures provide meaningful information on the implementation and overall effectiveness of the policy. Where needed, performance measures for different institutions or implementation levels are created to track the implementation and results of the policy comprehensively.
The policy clearly describes how it changes the pre-existing policy in the relevant area.	The policy outlines any antecedent policy that might have come before, and their standing in the policy framework. Where it is needed the policy framework compares new approaches to that used in the preceding policy to establish any differences in implementation that might help the reader understand the changes.
The policy aligns to the policies of this and other NQF bodies.	The policy informs the reader of any other polices that might be relevant and discusses how it aligns with the.
There is sufficient clarity on the standing of different policies, particularly in cases where policies diverge.	The policy highlights the instances where it diverges from other policies, and outlines the implications of this and other changes for the reader.
The policy is accessible, consistent, written in plain language, and easy to understand.	The policy is written in plain language and is devoid of "jargon". Where technical terms are used, the policy contains a glossary that explains each term.
The consequences of not meeting or implementing the policy are stated.	The likely consequences of not meeting the policy are outlined in the document. This includes stating the legal consequences of failure to implement the policy.

APPENDIX 2: CASE STUDY: DEVELOPMENT OF THE FINANCIAL MARKETS PRACTITIONER QUALIFICATION

This section presents a description of the development and quality assurance of the Financial Markets Practitioner (FMP), Occupational Certificate (SAQA ID 93603) – one of the first qualifications developed under the auspices of the QCTO. This qualification was selected as a brief case study for a number of reasons. Firstly, the entire qualification process from development of the qualification through to the delivery, quality assurance and certification for a cohort of learners has been completed for this qualification. As a result it allows us to look at all the components of the OQSF process as designed and implemented by the QCTO. Secondly, the qualification represents an example where a number of stakeholders came together to develop, deliver and quality assure a qualification. Thirdly, it represents one of the relatively few recently developed occupational qualifications where the knowledge (theoretical) component is delivered through a university. Lastly this case study clearly illustrates the disruptive nature of a dramatic change to the qualification system (such as the institution of the QCTO) and the effect it had on a single qualification.

The evaluation team would like to thank the interviewees for their significant contribution to making this short case study possible.

1. Qualification development process

In 2008 Fasset received a request from the Johannesburg Securities Exchange (JSE) and the South African Institute of Financial Markets (SAIFM) to finance the development of a financial markets learnership. Fasset then commissioned research into the likely demand for such a learnership and an accompanying qualification. The research concluded that there was a need for a qualification that could both allow entry to the financial markets through a learnership and allow those who are already working in the sector without a qualification to obtain one.[29] While financial markets employers at the time were not very familiar with the concept of a learnership, there seemed to be a common agreement that such a training structure could prove valuable to the industry.

In 2009 Fasset applied to the task team that was handling QCTO matters at the time to develop a qualification as a pilot project under the new dispensation. However, because skills development was transferred from the DoL to the DHET it took longer than anticipated for the QCTO to be established and to become operational. At that time Fasset could not get the go-ahead from the task team to continue with the qualification development process.

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[29] https://www.icb.org.za/news/saqa-registers-the-financial-markets-qualification.html

In the last quarter of 2010, while there were still many uncertainties around the QCTO and the time that it would take for it to become fully operational, Fasset decided to proceed with the development of the financial markets qualifications and to register them with SAQA under the old regime. A task team consisting of representatives of the JSE, the South African Institute of Stockbrokers (SAIS, the professional body for stockbrokers), and practicing stockbrokers developed a qualification, which was then submitted in draft format to SAQA before the final cut-off date in October 2010.

After submission of the draft qualification, and as a result of an engagement with SAQA, it became clear that the qualifications would have to be registered through the QCTO. That meant that the prescribed process had to be followed and that the qualification had to be re-conceptualised in the format prescribed by the QCTO.

Following the re-submission of an application to the QCTO for the development of an occupational qualification for the financial markets, Fasset attended a pre-scoping meeting with the QCTO. At the meeting the QCTO indicated that Fasset could continue with the arrangement of the scoping meeting.

The qualification development process commenced with a scoping meeting that was held on 29 June 2011. This meeting was arranged and hosted by Fasset who acted as the QCTO's Development Quality Partner (DQP) for the qualification. At the scoping meeting the following decisions were taken:

- That there is a need for the qualification and that the qualification development process should continue;
- That Fasset would continue as the DQP for the qualification;
- The qualification development facilitator (QDF) and learner QDF were appointed.
- That the South African Institute of Stockbrokers (SAIS) who was the professional body in the stockbroking industry and who was already responsible for the Stockbrokers examinations would become the assessment quality partner (AQP) for the qualification.

The qualification, originally written to satisfy the SAQA requirements, then had to be re-written in the QCTO format. This process started with the development of a draft occupational profile which took place in a working group meeting held on 30 August 2011. The working group consisted of members of SAIS, representatives of stock broking firms, representatives of the asset management components of financial institutions and a representative of the Financial Services Board (FSB).

The curriculum was developed through a series of working group meetings. The working group consisted of members of SAIS who are also lecturers who prepare candidates for the

stock brokers' exam – a qualifying exam that is administered by the SAIS and that leads to the designation "Stock Broker". Some of the working group meetings were also attended by representatives of the JSE and the Financial Services Board (FSB).

The draft qualifications were made available for public comment on Fasset's website on 1 March 2012. At that time there was no clarity on who should take responsibility for publishing the qualifications for public comment. Fasset as AQP did it, but later on SAQA also published the qualifications for public comment.

One of the most challenging aspects of the development of this qualification was the ever-changing environment in which it had to take place and the long-time period over which this process stretched. A period of four years had lapsed since Fasset's receiving of the request for a learnership for the financial markets and the submission of this qualification for registration. It took a long time for the QCTO to become legally established and operational. Meanwhile other avenues to get qualifications registered were closed.

While the qualification was under development, changes were made to the guidelines for facilitators. The facilitators started working with a facilitator guideline document that was released in May 2011. However, a new guideline document was released as late as November 2011 – when most of the curriculum development had already been completed. The release of the new guidelines was not communicated to the facilitators and the existence of the new guidelines was only discovered in March 2012. Some changes were made to the qualification rules of which the facilitators were not informed. This necessitated a substantial re-working of the formulation and presentation of the qualification content. All in all the qualification was re-submitted to the QCTO four times between March 2012 and March 2013 and before it was eventually submitted to SAQA for registration.

The capturing of the qualification in the QCTO data capturing system proved to be extremely challenging and was eventually abandoned. Apart from system problems related to the software and its behaviour on different computers, it was found that the rigid enforcement of certain of the qualification rules caused the production of a document that was difficult to read and that did not provide the sufficient guidance to providers and other readers of the document. The formatting of the document produced by the capturing tool was also not user-friendly. At some stage the QCTO captured the data on the system, but the qualification content was mixed up with that of another qualification. This had to be brought to the QCTO's attention several times before it was eventually corrected.

The qualification was registered by SAQA in 2013 – almost five years after industry identified the need for a qualification and started working to obtain such a qualification.

Occupational certificates all consist of three components / modules: knowledge, practical skills and workplace experience. The University of Johannesburg (UJ) was approached to present the knowledge (theoretical) and practical skills components of the qualification. To be able to certify and obtain state funding for these components, UJ were also required to register this course as a programme on the HEQSF through the usual CHE programme accreditation process. The course was eventually registered as the Advanced Diploma in Financial Markets (SAQA Qual ID 90507) at level 7 on the HEQSF in 2014. UJ started the development of this qualification in 2013 (after registration of the Occupational Certificate in 2013). The first group of students started in February 2015.

The DQP provided UJ with the exit level outcomes that would be expected for the knowledge and practical skills components of the occupational qualification, around which the university course was designed. SAIS also assisted UJ in the recruitment of skilled lecturers for the programme.

At the time of writing, no other universities have applied for accreditation to present the knowledge and practical skills components, although UJ is in process of developing an online version of the programme to expand its geographic reach. A few private providers have shown interest in presenting the programme, but have not yet developed their own programmes. An interviewee suggested that the lack of detailed training materials – and hence the cost of developing these – often dissuade private providers who want to limit the cost of presenting such programmes. Professional bodies often have to take on the role of developing training materials if they want qualifications to be presented more widely. However, their AQP status prohibits them from doing so.

2. Quality assurance of delivery

The South African Institute of Stockbrokers (SAIS) was approved by the QCTO as the Assessment Quality Partner (AQP) for the occupational certificate. The AQP develops qualification assessment specifications during the qualification development process and eventually administers the External Integrated Summative Assessment (EISA) to learners. The QCTO has stated that it aims to "*focus quality assurance on the final integrated summative assessment specified in the curriculum*", and hence the administration of the EISA is the core part of the quality assurance process.[30] SAIS did not initially have the capacity to act as an AQP for this qualification, so contracted a consultant to develop the AQP function for them.

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[30] QCTO (2013) *QCTO Assessment Quality Partner (AQP) Criteria and Guidelines*

The advanced diploma is quality assured (for CHE purposes) in the normal way for an HEQSF qualification.

The QCTO has largely delegated the quality assurance to the AQPs. The interviewed AQP representative however suggested that the process of becoming an AQP was very intensive and that AQPs face a very high reporting burden to the QCTO. The AQP function requires the development of an extensive set of policy and guideline document as well as application forms.

With each EISA an AQP submits a suite of approximately ten reports (depending on the number of papers written). In addition an AQP also submits four quarterly reports as well as an annual report each year – irrespective of the number of EISAs (even if none were conducted) or the number of learners handled. On the 23rd of the last month of each quarter a report has to be submitted. On the 30th of that month a letter apparently needs to be provided to QCTO to say that the report on the 30th is still valid and current.

The QCTO still conducts site visits of the accredited programme provider, as part of its delegation model. In this case, a site visit was conducted at UJ for the FMP qualification. However, in practice both the AQP representative and UJ representative interviewed were not sure what the value of this visit was. Interviewees thought it strange that a large respected publicly funded university would have to be subject to a site visit to deliver this type of knowledge based qualification. The CHE doesn't conduct site visits for every CHE-accredited programme (including this one). The AQP was not invited or informed about the site visit, and interviewees were not convinced that the QCTO had the internal expertise, in the absence of AQP experts, to conduct a useful and valuable assessment in terms of a financial markets qualification.

The QCTO also sent two officials to observe the administration of the EISA assessment for the programme. It is not clear what value this process is expected to add when the QCTO had delegated the AQP authority to experts in the area (SAIS) who have a track record of administering professional examinations.

The first EISA rendered poor results and the AQP had to conduct a supplementary exam. Before certification could take place the AQP had to submit a total of 27 documents to the QCTO. The EISA process is described by an interviewee as an "*unbelievably labour intensive*" process.

As the number of programmes quality assured by AQPs is expected to increase rapidly in the coming years, the costs of such direct monitoring by the QCTO could become substantial and it the QCTO should consider whether this represents a cost-effective model of delegation. The administrative burden placed on AQPs seem disproportionate compared to

universities which face far less direct monitoring of their quality assurance by the CHE (at the level of each programme) than AQPs face from the QCTO. The question should also be asked whether the excessive reporting and all the administrative procedures imposed on the AQPs truly ensure quality while other critical aspects of quality assurance (i.e. the accreditation of providers) is taken away from the AQPs and is handled by the QCTO staff who have no subject matter expertise.

3. Student outcomes

The UJ programme is currently in its third year of presenting the Advanced Diploma in Financial Markets. In the first year they enrolled approximately 35 students on the course, of which eight were part of a learnership. Seven learners proceeded to the EISA, of which only 3 eventually passed the occupational certificate in this first cohort. In the second year only a single learner passed the EISA. In the current (2017) cohort, UJ has approximately 70 students on the advanced diploma, eight of which are also completing the learnership. The knowledge component has thus obtained significant numbers, although the occupational certificate has not (yet).

An interesting feature of occupational certificates in the university system is that the knowledge component usually results in a distinct qualification, like the Advanced Diploma in this case (as CHE accreditation is required for funding). For occupational certificates outside the university system – presented by, say, a private skills development provider – the learner only receives a qualification after they have completed all three components and then finally passed the EISA.

It's worth emphasising that the "theory-only" option will not provide a distinct qualification and certificate for occupational certificates that are not also offered as accredited programmes through the CHE. So while learnership students in this case would at least obtain a certificate if they complete the university course, the theory component of most occupational certificates will not result in any certificate; meaning that learners will frequently end up without anything in a similar situation. A particular concern would be if the workplace does not provide the necessary skills to complete the EISA, but the lack of a certificate prevents the learner entry to other employment options.

Conversely, if the assumption is that the practical and workplace components are intrinsically important (as the standard QCTO model seems to imply) there is a risk that the FMP occupational qualification seen holistically does not achieve its original goal since only a few advanced diploma learners are enrolled on a learnership and complete the occupational certificate. It could be argued that the existence of a CHE accredited diploma does not incentivise the learnership option as much as would otherwise be the case.