



## POLICY BRIEF:

# IMPLEMENTATION EVALUATION OF THE NATIONAL QUALIFICATIONS FRAMEWORK ACT, 2008



## 1. Background

Soon after the transition to democracy, the South African government made the decision to put in place a National Qualifications Framework (NQF) through the promulgation of the South African Qualifications Authority (SAQA) Act (No. 58 of 1995). This was intended to create a single framework for qualifications and learning achievements. A review of the implementation of the NQF, commissioned in 2002, identified several issues of concern. After an extensive period of negotiations, the Ministers of Education

and Labour published a joint statement in 2007, which set out the perceived challenges in the system and recommended significant design and organisational changes. As a result, the SAQA Act was repealed in its entirety and replaced by the NQF Act (No. 67 of 2008).

The NQF is a comprehensive system for the classification, registration, publication and articulation of quality-assured national qualifications. The NQF was established to

1

create a single integrated national framework for learning achievements

2

facilitate access to, 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

The NQF Act broadly retained the objectives of the SAQA Act, but attempted to establish a more differentiated NQF through the creation of three integrated sub-frameworks to be coordinated by SAQA and managed by three quality councils, i.e. the Council on Higher Education (CHE), the Quality Council for Trades and Occupations (QCTO) and the Quality Council for General Education and Training (Umalusi). These councils have established a reasonably robust policy framework to guide the implementation of the Act.

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

## 2. Evaluation of the National Qualifications Framework Act, 2008

The purpose of this evaluation was to provide an independent and objective examination of the implementation of the NQF Act, including its associated policies and regulations, relative to its goals and objectives. The evaluation also sought/aimed to identify the successes and challenges in the implementation of the Act, and offers recommendations to improve future implementation. The evaluation covered the financial year period of 2009/10 to 2015/16, and was guided by the following questions and associated evaluation criteria:

- To assess the relevance and appropriateness of NQFA in respect of: (1) Fitness for purpose, (2) Internal and external coherence, and (3) Implementability;
- 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?



### 3. Approach and methodology

The evaluation was conducted in the 2016/17 financial year, using a mixed methods approach, to draw out detailed insights into the implementation of the NQF Act. The evaluation used data and information from the following sources: Literature and document review, a

telephonic survey of 122 education and training (E&T) institutions and professional bodies, as well as more than 100 semi-structured interviews and focus-groups, and a review of the information systems and data.

### 4. Key Findings

Overall, the evaluation found that there had been significant progress in implementing the NQF Act. The Department of Higher Education and Training (DHET), SAQA and the three quality councils: CHE, QCTO and Umalusi; had established a reasonably robust policy framework to guide the implementation of the Act. At the same time, the NQF bodies consisting of SAQA and the quality councils had made progress in

re-aligning older qualifications, registering new qualifications, accrediting education and training (E&T) providers, and establishing and maintaining the National Learners Records Database (NLRD). The evaluation noted that despite the progress related above on the implementation of the NQF, challenges remained. The following weaknesses were highlighted in the evaluation:

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#### *Relevance and appropriateness*

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The NQF Act was attempting to resolve both systemic challenges in the broader E&T system, as well as structural and governance challenges more specific to the NQF. Systemic challenges included the difficulties of having a single framework for a diverse system, multiple qualifications and disagreements about definitions and terminology. Structural issues largely revolved around the power relations between SAQA, and tensions between the Departments of Education (DoE's) and the Departments of Labour (DoL's), who had differing points of view on the NQF. The NQF Act design focuses on structural issues and does not clarify which systemic issues within the

broader E&T system it intended to address. In addition, while the Act clarifies the roles and responsibilities of the NQF bodies, it (and related documents) does not provide any clarity on the roles of other stakeholders, such as E&T providers. The implementation of the NQF Act using three sub frameworks was thus complex and led to working in "silos". While the re-aligning of older qualifications, registering new qualifications & accrediting providers to offer qualifications, has been done successfully; there is non-alignment of scope and mandate of NQF bodies to funding. This is due to the absence of financial and human resources to support implementation.

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#### *Coherence*

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The NQF is commonly accepted as an essential part of the E&T system, with relatively few voicing fundamental disagreements regarding the NQF. However, significant disagreements

on what the theory of change of the NQF is (or should be) persist through the system, notably, as mentioned in the evaluation, amongst senior managers within the DHET.

While there appears to be a reasonable amount of vertical integration in terms of the broader higher education policy, there is a lack of vertical coherence and clarity in the occupational and vocational training sectors. This includes issues such as the lack of clear definitions of vocational qualifications, as well as the uncertainty of the strategic qualification offering and pathways in TVET colleges.

An analysis of NQF policies relative to a number of objective criteria for good policymaking, found that while most NQF policies clearly state their objectives, target audience(s) and their alignment to other policies; they do not provide sufficient information on resourcing requirements, roles and responsibilities, how policy success will be measured or the consequences of not achieving policy goals.

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### *Efficiency*

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A **system of collaboration** was developed by SAQA to manage the relationships between the NQF bodies, and the agreed solutions to NQF challenges. Nonetheless, while a reasonable

level of shared problem solving is present in the system, a key concern remained around the apparent lack of engagement from senior DHET officials in the NQF system.

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### *Effectiveness*

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The first of the NQF's objectives is the creation of a single, integrated framework for learning achievement. However, a truly "integrated" framework is not straightforward. A number of issues remain, for instance, with the existence of silos between the different sub-frameworks, along with challenges experienced in areas of overlap. In terms of **articulation and progression**, the qualification pathways from school to university is well established, while pathways into and out of TVET colleges are

much less effective and efficient. However, the achievement of articulated objectives go well beyond the direct control of the NQF bodies. For instance, in the TVET system, the National Certificate (Vocational) (NC(V)) has not created an efficient pathway for learners leaving Grade 9, as originally intended. This is evident by the unanticipated large number of national Senior Certificate (NSC) (level 4) learners entering this level

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### *Emerging impact*

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The evaluation found that despite an extended period of significant policy reform, it was too early to tell whether the NQF will achieve its intended impact. What did emerge from the analysis is that the reforms introduced by the NQF Act had embedded themselves in parts of the E&T system. A frequently observed example was the development of working partnerships

between providers located within different sub-frameworks, where efforts were being made to expand access, reduce barriers, improve articulation, enable portability and expand the availability of Recognition of Prior Learning (RPL). Importantly, the NQF appears to have gained widespread acceptance within the E&T system.

## 4. Key Recommendations

### Legislation and policy

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



### Institutional arrangements, coordination and integration

The Minister for Higher Education and Training (M: HET) must review the roles, responsibilities and reporting lines within the NQF system. This includes clarifying the lines of accountability, responsibility and reporting obligations of SAQA and the QCs. In addition, the roles and responsibilities of the different branches of DHET and the DBE as a whole in the system, should be agreed upon and clearly specified. Evaluation framework should be developed before implementation of pilots, to ensure lessons can be extracted and

documented to inform rollout of the Community College system.

### Programmes, Accreditation and Qualifications

The DHET must provide guidance on the areas of policy certainty within the Post school education and training (PSET) that affect the implementation of the NQF Act. This is particularly important with respect to the Occupational Qualifications Sub-Framework (OQSF), where policy uncertainty occurs with: 1) the types of qualifications offered by TVET colleges; 2) the structure of occupational qualifications; 3) the definitional distinction between occupation and vocational qualifications, and 4) the role of the QCTO. These policy uncertainties continue to impede upon the implementation of the sub-framework.

### Monitoring and Evaluation (M&E)

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



## Human Resources and Capacity Development

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

## Funding

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

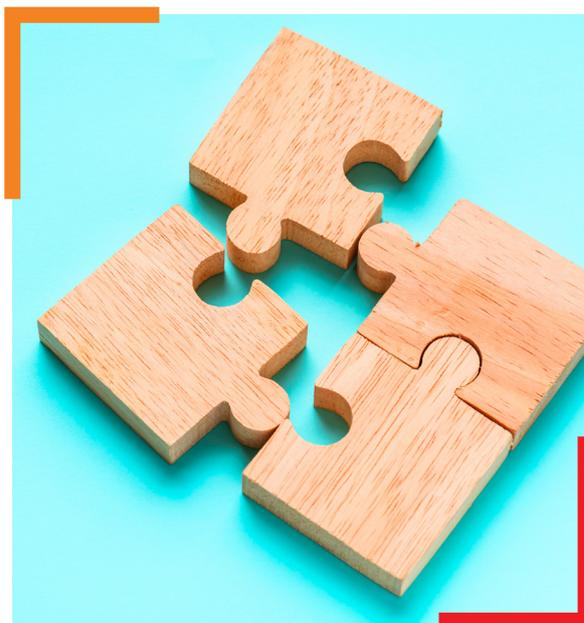
## 6. Policy implications and direction

The NQFA evaluation highlighted the considerable progress that had been made in implementing the NQF Act. However, it also emphasised that much more still needed to be done to improve the efficiency of implementation.

The NQF is commonly accepted as an essential part of the E&T system, with relatively few voicing fundamental disagreements regarding the NQF. However, significant disagreements on what the Theory of Change and underlying logical framework of the NQF is (or should be) persist through the system. This is what needs to be addressed for a successful implementation of the NQF.

Given that the NQF Act was introduced prior to the establishment of DHET, it would furthermore be sensible for the Act to be reviewed. The purpose of a review is to clarify certain policy reservations, which include but are not limited to: (1) unnecessary duplication in the system, (2) gaps that should be addressed; and (3) provide additional momentum to certain objectives, such as RPL and Articulation that have not been

achieved to the level expected by stakeholders. Without destabilising the system with unnecessary fundamental structural changes, a revised NQF Act could reinforce the current partnership approach. Results would be seen and institutions strengthened if the identified challenges in the evaluation of the NQF Act were addressed.



In accordance with the development of the NQF Bill, the DHET prepared a Consultative Paper on Proposed Amendments to the National Qualifications Framework Act, 2008 (Act No. 67 of 2008) as amended for public comment. This Consultative Paper brings together the recommendations made to amend the NQF Act

in the Implementation Evaluation of the NQF Act, 2008 Report (2018); the Department of Higher Education and Training's NQF Improvement Plan (2018); and the White Paper for Post-School Education and Training (2014). The following issues are addressed in the Consultative Paper that substantiates amendments to the NQF Act:



The Consultative Paper serves as a basis for the amendment NQF Act. A revised NQF Act is expected to better support the implementation of the NQF, strengthen institutions implementing

the NQF, and address challenges experienced in the qualifications and quality assurance regime in South Africa.

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## Disclaimer

This policy brief is drawn from the evaluation findings and recommendations. It does not necessarily represent the views of the departments concerned.