Design Evaluation of Draft Policy on Community Colleges

Evaluation No: RFP51/2014

Twenty Five Page Summary Report

Prepared for DPME/DHET

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Design Evaluation of Draft Policy on Community Colleges

Summary Report

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Acronyms and Abbreviations

AET	**Adult Education and Training**
CETC	**Community Education and Training Centres**
CWPs	**Community Works Programmes**
DHET	**Department of Higher Education and training**
DPME	**Department of Planning, Monitoring and Evaluation**
EPWP	**Extended Public Works Programme**
GETC	**General Education and Training Certificate**
HR	**Human Resources**
ICT	**Information Communication Technology**
NASCA	**National Senior Certificate for Adults**
NEETS	**Not Employed, in Education or Training**
NQF	**National Qualifications Framework**
PCC	**Policy on Community Colleges**
RPL	**Recognition of Prior Learning**
Saide	**South African Institute for Distance Education**
SAIVET	**South African Institute for Vocational Education and Training**
SAQA	**South African Qualifications Authority**
SETA	**Sector Education and Training Authority**
TOC	**Theory of Change**
TOR	**Terms of Reference**

TVET   **Technical and Vocational Education and Training**

1.Background

1.1 Current Policy

Despite extensive discussion on the possibility of Community Colleges in the early nineties, neither the White Paper on Education and Training (1995) nor the initial Further Education and Training Act no 16 of 2006 contained any reference to the introduction of community colleges.

Recently the Department of Higher Education and Training (DHET) amended existing legislation in the form of the Further Education and Training Colleges Amendment Act, No. 1 of 2013 – to provide for the creation of the new Community Colleges, out of existing Adult Education and Training (AET) Centres – the provincial adult learning centres (PALCs). It stipulates that a fully-fledged Community College should be stable, well-governed and have an appropriate capacity so as to well respond to community needs.

The White Paper for Post-school Education and Training[1] (DHET, 2013) acknowledges that educational opportunities for adults and post-school youth have been insufficient, and their quality has generally been poor. It notes that the existing AET system fails to meet the needs of adults and youth: to gain labour-market and sustainable livelihood- skills; for opportunities to complete Adult Basic Education and Training (ABET) or Senior Secondary- Certificates; and for learning for general self-improvement or cultural and community development. The following are salient points drawn from the White Paper (DHET, 2013: pages 20-24) which provide a rationale for the establishment of a new institutional form.

A new system of Community Colleges to be established to meet the needs of 3.4 million youth between the ages of 14- 24 that are not in employment, education or training (NEETs). Government has target to grow enrolment in this educational sub-sector from the current 265 000 in public adult learning centres - PALCs to 1 million by 2030. It is intended that these new community colleges will be multi-campus institutions which group together a number of existing PALCs, not only for youth, but also for adults who did not complete their schooling or who never attended school. They will be provided with adequate infrastructure and a critical mass of full-time staff. Though they will be public institutions they will be able to enter into partnerships with community-owned, private or church run education and training centres.

It is envisaged that during an initial pilot phase a community college will be established in each province. A range of formal and non-formal programmes will be offered. These include the General Education and Training Certificate (GETC for adults), Senior Certificate, and National Senior Certificate for Adults (NASCA) as well as vocational, skill-development and occupational programmes funded by Sector Education and Training Authorities (SETAs) and various departments such as EPWP (Extended Public Works Programme) CWPs (Community Works Programmes) CDW, and CHW.

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[1] The ToR refers to the Green Paper on Post-School Education and Training. This has subsequently been revised, approved and released as a White Paper at the end of 2013.

Issues around articulation are stressed. Linkages to Technical, Vocation Education and Training (TVET) colleges need to be formalized. In addition, in the medium term, the community colleges are expected to promote articulation by providing for university access via Higher Certificates and Diplomas. They are also expected to offer university bridging courses. This therefore means that the Community Colleges would be playing an overlapping role between the colleges sub-sector and higher education institutions.

Furthermore, learner support and career guidance services are to be established and the National Youth Development Agency is to set up Youth Advisory centres.

The White Paper (DHET, 2013) further highlights the importance of ensuring that the community colleges select suitable and qualified adult educators as staff and that new staff must be so trained and old staff retrained. It is planned that Universities – and TVET colleges where appropriate – will be supported to develop capacity to train adult educators. University-based adult-education units could become hubs for training adult educators and promoting articulation in the post school sector, as well as becoming nuclei for research on the sector. The importance of a long term plan must be developed including for the phased expansion and improvement of infrastructure; and a new unit that will be responsible for supporting the establishment of the new community colleges - the South African Institute for Vocational and Continuing Education and Training (SAIVCET) will be created. Its key responsibilities will be programme and materials development, educator professional development and monitoring and evaluation in colleges – both community and TVET colleges.

The Community Education and Training Centres (CETC) Task Team, convened during 2011, also produced a report which has made some contribution to policy within DHET which has relevance to the introduction of community colleges[2]. The report focusses on creating new pathways for youth and adults who are marginalised from the current education system and, are not in educational institutions and are often unable to participate meaningfully in the labour market due to the lack of appropriate skills and training. The CETC Task Team Report contains proposals for:

i)   The creation of a network of community learning centres; and

ii)   A new and differentiated college sector which includes the introduction of community colleges.

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[2] Report of the Task Team on Community Education and Training Centres (DHET, 2012).

1.2 The purpose of the Policy on Community Colleges

The PCC has two stated purposes:

1. The *shift of the control and management of the Public Adult Learning Centres (PALCs) from the provinces to DHET - the so called 'function shift'* - so that they can continue to operate and are transformed over time to a more effective means of operation where they are linked to district level community colleges.
2. *The creation of an entirely new institutional form -*"the community college" closely linked to local and interest communities, and to pilot some at a limited number of sites (the Consultant's emphasis).

Overall, the purpose of the PCC is to be a systemic intervention which will create an enabling environment for promoting adult education initiatives. It is a mechanism for phased strengthening, coordination, integration and expansion of current practice that exist in the Adult Education and Training (AET) system.

1.3 Purpose of the evaluation

The main purpose of the evaluation is to assess the relevance and appropriateness of the PCC, with a particular focus on its fitness for purpose, its internal and external coherence and its readiness to be implemented.

The evaluation TOR also require the Consultant to assess the robustness of the underlying Theory of Change and to develop an explicit Theory of Change and Logical Framework matrix for the establishment of community colleges retrospectively as they had not been prepared by DHET.

Aspects such as the extent to which the policy is aligned to other pieces of legislation; ascertaining whether sufficient consultation took place; analysing responsiveness to identified needs; and exploring measurability and readiness to be implemented also formed part of the brief.

The readiness of the Policy to be implemented relates specifically to readiness for operationalization.

The following aspects of the TOR are pertinent:

> The service provider will be expected to produce a coherent policy implementability assessment, and a related policy identification fiche, including Governance (function), Implementation model and strategy, Funding Arrangements (budget), Establishment (HR at national, provincial and provincial levels), and Implementation Schedule (including transitional arrangements).

> Implementation refers to policy implementation. The design evaluation is intended to provide information about the PCC's implementability to (1) the DHET, which may decide to modify the policy to improve its implementability; (2) any other stakeholders to provide comment and feedback on the PCC before its approval, in order to anticipate potential problems in implementation.

Other key aspects addressed in the evaluation include the legal framework in which the community colleges will operate; the underpinning financial model; determining human resource capacity and

mechanisms for ensuring appropriate human resource provisioning, especially educators; infrastructure requirements; governance and management structures; curriculum and student support systems and articulations mechanisms – particularly in relation to technical and vocational education and training colleges (TVET Colleges).

It was intended that the findings of the evaluation should feed directly into the policy refinement process. Due to the delay in gazetting the draft PCC (it was initial due to be released for public comment in July 2014, however, it was finally only gazetted in November 2014) the findings and recommendations of the design evaluation report were validated at a stakeholder workshop in March 2015, just shortly before the already legislated function shift came into effect on 1 April 2015. Despite the short time timeframe between the March 19 stakeholder workshop and 1 April, the DHET was able to engage with recommendations and implement key refinements to the policy.

1.4 Overall approach to the evaluation

A *Design Evaluation* approach was specified in the TOR. In particular, this approach entails careful examination of the beginning steps of the policy process including the rationale for and purpose of the policy.

As the policy was still in draft form and not finalised and no implementation had taken place, it was, as stated above, deemed to be a good opportunity to evaluate the policy design process with the view to strengthening it if necessary. This being the first instance of a policy design evaluation on South Africa it was hoped that, going forward, this would serve as a model for the policy design process in South Africa.

It was also agreed that a public consultation process would run parallel to the Design Evaluation. The results from both processes would serve to directly inform the policy refinement process.

The TOR were also specific about the requirement that a Theory of Change and Logframe Matrix be prepared as part of the evaluation and that these would server to frame the evaluation process. Typically, the Theory of Change and Logframe are developed *before* the policy/ programme is evaluated. Therefor it must be noted that retrospective development of the Theory of Change and Logframe has led to some disjuncture. This is further elaborated in the findings and recommendations sections of this report below.

Also as highlighted above, another disjuncture has been created by the fact that the Further Education and Training Colleges Amendment Act (No 1 of 2013) which gives legislative effect to the function shift (i.e. the shift of the PALCs from provincial administration to national DHET) had already been gazetted and was planned for implementation on 1 April 2015.

It is not normal sequence of events to have an Act precede policy.

2. Evaluation Design

2.1 Method

Guided by the main features of design evaluation, the approach focused on the consistency and coherence of the policy being evaluated. Key lines of investigation were pursued:

1. A review and analysis of international literature on Community Colleges. This provided information on policy and an opportunity for comparative analysis and distillation of key lessons.

2. A review and analysis of relevant South African policies. The ToR included an extensive list of key legislation and policy documents which formed part of the review. Relevant draft policies gazetted after the ToR had been issues were also reviewed, e.g.: The Social Inclusion (DHET, 2014), Qualifications in Higher Education for Adult Education and Training Educators and Community Education and Training College Lecturers (DHET, 2014) the National Youth Policy (DHET, 2015) and most recently, the Continuing Education and Training Colleges Act 2006 Establishment of Public Colleges (DHET: 16 March 2015).

3. In collaboration with the DPME and DHET, a Theory of Change and Logical Framework Matrix was developed as part of the evaluation as this had not been done by DHET prior to developing the draft PCC.

    The literature and policy review and the underpinning logic made explicit in the development of the Theory of Change process helped to foster an in-depth understanding of the processes and layers of complexity involved in operationalizing and implementation of the draft PCC. These two evaluation activities also served to frame and identify a range of useful interview questions for use with selected respondents.

4. Information gathering through individual and focus group interviews with key respondents from DHET, the South African Treasury and the Auditor General's office provided a rich understanding of implementation context and issues which helped to support the policy evaluation and, in particular, the feasibility of implementation.

5. A qualitative analysis of the draft PCC was undertaken in terms of the four overarching evaluation questions highlighted in the ToR:

    a. Is the PCC internally coherent, and is it aligned with other relevant pieces of legislation? The PCC's underpinning assumptions, evidence basis, and its internal and external coherence were also interrogated.

    b. Is the PCC's Theory of Change (Logic) appropriate, and is it sufficiently robust to address the problems that have been identified in the policy?

    c. To what extent is the PCC measurable, and therefore capable of being evaluated in the future?

    d. To what extent is the PCC ready to be implemented? That is, is there sufficient evidence that the resources and capabilities required to implement the policy, are in place and are as well as its congruence with the theory of change, which was developed as part of

the evaluation was assesses.

6. Three presentation of the findings and recommendations of the evaluation were undertaken. The first, to a stakeholder validation workshop; the second, to senior DHET officials; and the third, to the DPME/DHET Steering Committee meeting.

7. Inputs form these processes were used to finalise the evaluation report.

8. In line with the ToR requirements that the Consultant also prepared a policy fiche. Exemplar fiche/templates including the European Union fiche/template provided by DPME and the Unesco Institute for Lifelong Learning templates for policy and implementation analysis template were reviewed and adapted to fit the purpose of the design evaluation.

2.2 Instruments

Nine qualitative instruments were developed. These were based on a combination of core questions that are similar for all respondent groups and a set of questions that are specific to the role played by each respondent/group.

The qualitative approach used in the interview process is underpinned by a developmental evaluation methodology advocated by Michael Quinn Pattern[3] .

The policy evaluation question schedules were generated from the following:

1. The TOR;
2. Literature and policy review;
3. The logic of the Theory of Change; and
4. Categories of data in the European Union fiche / template provided by the DPME and the Unesco Institute for Lifelong Learning templates for policy and implementation analysis template.

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[3] Dr Michael Quinn Patton, 2011 *Developmental Evaluation: Applying Complexity Concepts to Enhance Innovation and Use.* London: Guilford Press.

3. Literature Review

3.1 Introduction

This review of literature on community colleges and equivalent institutions looks at their purpose, their conception and policies relating to them, their institutional design and their implementation. It is in five parts:

3.1.1   Rationale for systems for meeting the educational needs of youth and adults
3.1.2   What is a "community college"?
3.1.3   Development of and variability in community college system design
3.1.4   Common implementation characteristics of community colleges
3.1.5   Impact of community colleges and new policy directions

The literature considered focussed on what could be seen as useful in the development of a **new and effective system of adult education/lifelong learning** which has the characteristics of having the necessary flexibility, multiple access points, dedicated institutions and strong differentiation to meet the multiple needs of adults and youth. In compiling this review, use was made of the substantial international literature review compiled by the Ministerial Task Team on Community Education and Training Centres (Department of Higher Education and Training, 2012a). Given that the purpose and context of that literature review is very similar to this one, some of its key findings have been cited where appropriate.

In addition, the sources for the Task Team review were re-examined for the purposes of this review.[4] Furthermore, a wide variety of other printed and internet sources were consulted. The list of references attests to the range. The voluminous literature on the North American community college systems somewhat dominates the discourse. Wherever possible information from other countries is cited.

It needs to be recognised that, in many countries, community colleges and other further education institutions developed organically over a long period of time and not by policy directive and subsequent implementation plan. Nowadays actual state policies relating to these institutions mainly revolve around funding (and accountability measures relating to that funding).

3.2 Implications of findings from the literature review

Key implications for the establishment of a community college sub-system in South Africa are distilled from the international literature and review of relevant South African policies below.

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[4] It looked broadly at the policy and contextual frameworks and environments that inform and impact on adult and youth education and their institutional settings. It focussed on developments the United States of America, the Scandinavian countries and South Korea (among the highly developed countries), Brazil, Russia, India, and China (the so-called BRIC countries) and on Botswana, Cuba and Venezuela (as developing countries).

1. **Rationale for establishing the community college sub-system**

The White Paper on Post-School Education and Training (DHET, 2013) places unprecedented emphasis on the importance of a new institutional type to cater for the needs of an ever growing NEETs group as well as those who were systematically denied all but the most basic education opportunities under the apartheid system. It signals an intention to move beyond the aspirational notions of the right to lifelong learning, found in constitutional and other documents towards the acceptance of a comprehensive system of lifelong learning that recognises the fundamental importance of ensuring that all citizens need to be empowered to participate fully in social and economic life of the country. The draft PCC needs to build on the White Paper (DHET, 2013) by giving practical expression to these intentions to systematically create a robust system of lifelong learning, and thus move beyond symbolic support for the system.

2. **Conceptualisation: What is a community college?**

Community colleges (and equivalent FET institutions) generally have a **clear institutional position** in the post-school and higher education systems in the more developed countries where they are post-school institutions (where compulsory schooling generally reaches 12th grade) offering formal higher education qualifications (even though some may provide an adult basic education equivalent to grade 12 for remediation purposes or provide support programmes in English and Mathematics).

The White Paper (DHET, 2013, p22) outlined some of the programmes that might be expected in the community college sector. These include general, vocational and skills development programmes and non-formal programmes. The draft PCC thus needs to create an imagination of the range of programmes that community colleges may offer and how these programmes will articulate to programmes offered by other institutional types in the country. It also needs to provide an enabling framework for active participation of the community in determining the wide range of programmes offered, including those of particular relevance to that community.

3. **Development and variability of community college system design**

The international evidence is clear that a variety of institutional forms, funded and governed in a variety of ways, can be used to deliver post school education and training (at Adult Basic Education, Further Education and Training and the lower reaches of Higher Education) that would meet the South African requirements of redress, social justice and economic development. Some countries have a solid single institutional model (the North American Community College), other have a flexible variety (such as India). South Africa could obviously learn much from, and benefit from the resources of, these countries.

What is important is that the White Paper (DHET, 2013) recognises that a *new* institutional type is to be developed, so whatever is implemented needs to cater for the wide range of educational needs of the target group, that are not catered for by the TVET and other existing Colleges and University sectors. In particular the institutional

model, including its governance arrangements, need to be tailor-made for the purposes to be served and not to simply replicate arrangements in place for existing sectors.

4. **Common implementation characteristics of community colleges**

The *demographic data* reinforces what are the main strengths of community colleges – **low cost**, easy or **open access** and **local**. These are what advances the case for community colleges as a means to reach people disadvantaged by poverty and inadequate schooling. The draft PCC needs to ensure that it reinforces the characteristics that enable access to poorer communities, but that it is also cognisant of the systematic effort that will be required to ensure reasonable success rates amongst those that enrol.

The draft PCC needs to make clear its stance on access conditions to community colleges and to the various programmes offered. The policy needs to address the enormous challenges required in terms of placement test developments and remediation instruction that are needed to make open access real rather than a false mirage. Given the international evidence that even well-resourced community colleges and further education institutions in rich countries struggle with underprepared students, the issue of underprepared students must be confronted in the new South African community college policy as well as the cost of capacitating and running developmental programmes factored in.

Access: In places such as North America and the United Kingdom further education was originally very much a bottom up development, done by local government and districts. South Africa's nationally driven highly centralised new policy described in the White Paper (DHET, 2013) is somewhat at odds with this and strategies to encourage strong local community partnerships will be required.

Articulation: The emphasis on articulation is evident. In South Africa, in spite of the National Qualifications Framework, transfer and articulation between further education institutions and universities has been poor. The issue of transfers of credits between community colleges and TVET colleges would also need to receive serious attention.

Governance: Given that the 2013 White Paper requires the creation of an institutional form new to South Africa, drawing appropriately from the North American and European experiences and modes of governance would seem wise rather than imitating the arrangements in place in South Africa for a rather different TVET College system.

Student funding: Any funding formula needs to be consistently responsive to the varying demands for different types of programmes. A careful balance needs to be reached between funding enrolments and funding completion. The draft PCC is fortunately supported by the establishment of a Task Team to give detailed consideration to the various issues. However, the Task Team needs to be careful not to replicate funding models developed for very different segments of the post school sector, namely the university and the TVET college systems. (It should be noted that the current funding model for AET is clearly problematic, resulting in two provinces reporting expenditure of around R10 000 per part-time student per annum, while two

provinces reported around R8000 and 5 provinces around R4000[5](Auditor General Report on Adult Education and Training programme of DHET, 2014).)

Staffing: Practitioner development has also not grown but actually declined because of the dismantling by university administrations of the modest infrastructure of adult education departments at universities and the threats of closure of the Higher Certificate programmes run by some of them (the legacy of which was crucial for the staffing of the Kha Ri Gude literacy campaign).

Creating a community college system in South Africa will thus be beset with a severe educator capacity problem. The PCC will need to have robust intentions and plans for how to create a vibrant cadre of adult and community education educators. The appropriate balance between part- and full-time staff will require serious attention.

Reliable data for planning and monitoring: Clearly the almost total data incapacity of the current adult education and training system in the PALCs is a huge problem that will have to be overcome in the setting up of an accountable community college system. Furthermore, the Auditor General (p.4, 2014) made clear that the DHET Directorate was conducting little of the monitoring expected of it. Finally the two quality assurance agencies tasked with quality assurance of the system, Umalusi and the QCTO, have not been active in the adult education field in South Africa and will need to develop the necessary capacity.

In conclusion, the above list is a useful summary of the kinds of issues which the PCC process needs to address over the next five years. The development of a Community College Association of some kind should be encouraged.

4. Theory of Change and Logical Framework Matrix

4.1 Introduction

The formulation of an explicit Theory of Change and the development of a Logical Framework Matrix, are typically key component processes inherent to programme and policy planning and implementation.

The Theory of Change charts a pathway that will be followed to achieve the overarching objective, namely the establishment of the community college sub-system, while the development of the Logical Framework Matrix assists programme implementers to identify the steps and activities

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[5] One should however be sceptical about these figures, given the unreliability of headcounts of students.

involved in achieving a specific outcome.

As stated above, both the Theory of Change and the Logical Frameworks Matrix were developed as part of the evaluation in collaboration with the DPME and DHET. The participation by DHET and the provincial education AET officials in this developmental process was viewed as key, as it is critical that DHET owns the Theory of Change and the Logframe and that buy-in is secured from the outset.

4.2 Theory of Change and Logframe process

A workshop to develop an explicit Theory of Change and Logistical Framework Matrix was held in Johannesburg in October 2014 with participation from DPME, DHET and provincial education AET officials.

In line with established steps in the process of preparing a Theory of Change, a number of activities and analysis activities were conducted. These include:

1. Conceptualising a vision of the new institutional form – the community college
2. A stakeholder analysis – identifying different groups that have some kind of vested interest in the proposed establishment of the community colleges, beneficiaries and project partners;
3. A problem analysis was undertaken and a problem tree was developed in which the negative and deficient aspects of the existing situation, including the root causes of these problems were identified.
4. The proposed solutions and pathways to solutions were expressed in the form of an objectives tree which was also developed in the workshop. The "cause and effect" relationships between the problems and solutions were then articulated with the negative situations described in the problem analysis converted into positive achievements described in the objective analysis.
5. The outcomes of the objectives analysis were then used as the basis for developing a high level Logical Framework Matrix in which key activities towards establishing the community college sub-system were specified.

A vision for community colleges
Key characteristics of community colleges that were articulated by the workshop participants included that **the policy** for Community colleges should be directly aligned with vision and goals for the country and developed with full stakeholder participation. Community colleges are conceptualised as a **decentralised**, **network of learning centres** which are in **easy access** of all communities. Much emphasis was placed on the importance of the community colleges being **responsive** to the community and its challenges. It was envisaged that a **wide range of programmes** should be offered. These may be national or local (responsive to community needs); **formal, non-formal or informal.** Programme offerings should be supported by good **quality learning materials** – a focus on resource –based learning approaches was promoted. The importance of **well qualified**, knowledgeable and motivated **educators** was stressed; and the colleges need to **well- resourced** with a stress on access to information communication technologies (**ICTs**) including computers and ubiquitous free Wi-Fi; and **good physical infrastructure.**

In conclusion, the ethos of community colleges was visualised as being, vibrant, engaging, a learning enabling, happy centre with many young people and adults around working on their own and in groups but not in straight rows like in traditional classrooms.

Problem analysis

Significant scale of unemployed youth and adults with low educational attainment: The White Paper (DHET, 2013) documents that 3.2 million youth in South Africa between the ages of 15-24 years of age are not in employment, education or training (NEETs). Additionally, the Task Team Report (DHET, 2012:16)[6] states that there are nearly 7 million adults between the ages of 15 and 55 with less than Grade 7 and a further 11 million who had lower than Grade 9 in 2001

South Africa is therefore faced with the problem of a huge portion of the society that has neither the requisite skills needed to participate in the job market nor sufficient literacy competencies to engage in meaningful independent, lifelong learning. Low educational attainment results in youth and adults being ill prepared to proceed further with education and training opportunities and also impact negatively on family, community and social interaction in general.

Current AET provision dysfunctional: To date, the only form of adult education and training provided for this target group has been through the provincial Public Adult Learning Centres (PALCs). The dysfunction of the AET sub-system and the poor provision through the PALCs is however, well documented. Key issues included, insufficient resources, inadequate staffing, weak infrastructure and poor articulation (White Paper, DHET, 2013). Further detail in this regard is contained in the Auditor General's Report based on the country-wide audit of Adult Education and Training in 2011 – 2012 (Auditor –General, 2014).[7] The audit report highlights numerous weaknesses. These include a lack of monitoring and evaluation of the performance of PALCs by the National Directorate since 2009. The absence of measures to track, monitor, correct and report on the extent and effect of the underqualified educators in the system is also highlighted in the report. The report further notes that the underqualified educators struggled to interpret the curriculum, leading to learners not receiving quality education (Ibid 2014:5).[8] Various infrastructure problems are also noted in the Auditor General's report. Of the 110 sites visited, 26% had no access to toilet facilities; in 54% of the centres, centre managers did not have a designated office space; and in 45% of the centres there was no security in the centres (Ibid 2014:8).[9] In 91% of the centres, there was no equipment like

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[6] Department of Higher Education and Training (2012) Task Team Report on Community Colleges

[7] Auditor General, (2014) Discussion Extract of the management report of the Auditor General of South Africa on the performance audit of the Adult Education and Training Programme at the Department of Higher Education and Training

[8] Auditor-General, (2014)

[9] Auditor General, (2014) Discussion Extract of the management report of the Auditor General of South Africa on the performance audit of the Adult Education and Training Programme at the Department of Higher Education and Training

computers, photocopiers and telephones to enable the centres to operate effectively (Ibid 2014:8)[10]. The Auditor General' report also shows that the DHET education and management information system (EMIS) Unit was only able to collect very limited data on PALCs and that additionally the data had not been verified and was unreliable. This has had a negative impact on any attempts at proper planning as actual enrolment figures are not known.

TVET College model as default for AET. In many ways, Adult Education and Training has been modelled on TVET provision. To date, DHET has failed to articulate a clear distinction regarding both purpose and function of the TVET and the AET institutions, whereas in fact, they are very different in both focus and by nature. The target groups vary significantly in size; the nature of infrastructural needs are very different; as are the programme and management and governance needs. This has also resulted in inappropriate conditions of service for AET educators which in turn has led to poor morale and a significant number of posts left vacant.

*AET provision not political priority since 1994: S*ince 1994, it appears that political priority has been given to schooling and university education at the expense of community and adult education and training. This has resulted in scanty resources being allocated for community and adult education and training and the decimation of the once vibrant adult education units at universities. The resultant effect has been general lack of qualified staff in adult education. PALCs have operated without core permanent staff and without sufficient suitable learning materials.

This lack of priority on community and adult education and training also resulted in the side-lining of Provincial Adult Education Directorates and poor resourcing of the National Adult Education and Training Directorate. The Auditor-General's report notes that concurrent functions for Adult Education and Training (AET) were not performed because the Department lacked clear guidance on the concurrent function for national and provincial education departments as well as capacity and funding (Auditor-General, 2014).[11]
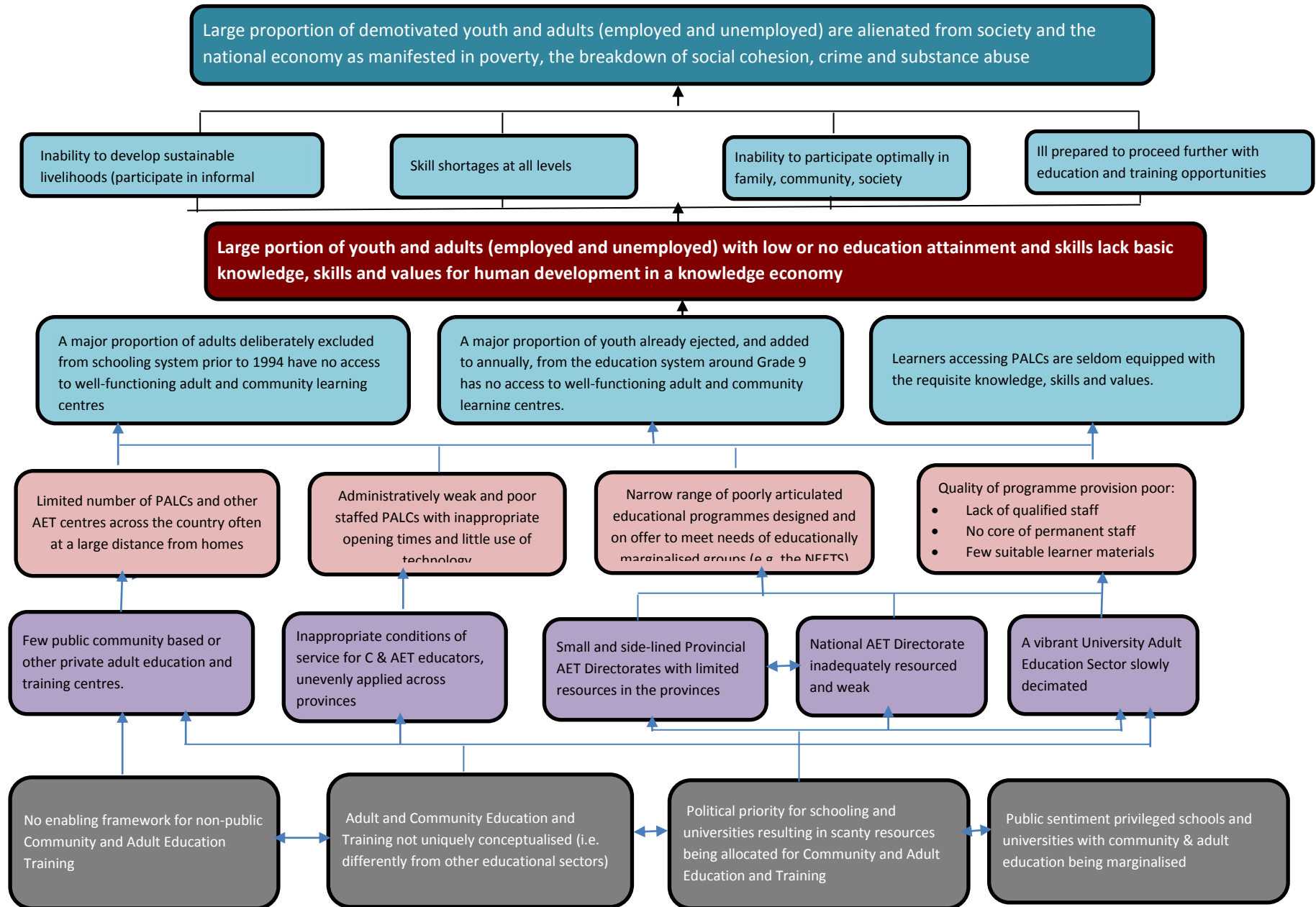
In summary, the scale of the problem is enormous and the current system of AET provision through the PALCs) which are intended in the draft PCC to form the base on which the new community colleges are to be established, is dysfunctional. See problem analysis on the chart below.

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[10] Auditor-General, (2014)

[11] Auditor- General (2014)

Problem Analysis

Large proportion of demotivated youth and adults (employed and unemployed) are alienated from society and the national economy as manifested in poverty, the breakdown of social cohesion, crime and substance abuse

- Inability to develop sustainable livelihoods (participate in informal
- Skill shortages at all levels
- Inability to participate optimally in family, community, society
- Ill prepared to proceed further with education and training opportunities

Large portion of youth and adults (employed and unemployed) with low or no education attainment and skills lack basic knowledge, skills and values for human development in a knowledge economy

- A major proportion of adults deliberately excluded from schooling system prior to 1994 have no access to well-functioning adult and community learning centres

- A major proportion of youth already ejected, and added to annually, from the education system around Grade 9 has no access to well-functioning adult and community learning centres.

- Learners accessing PALCs are seldom equipped with the requisite knowledge, skills and values.

- Limited number of PALCs and other AET centres across the country often at a large distance from homes

- Administratively weak and poor staffed PALCs with inappropriate opening times and little use of technology

- Narrow range of poorly articulated educational programmes designed and on offer to meet needs of educationally marginalised groups (e.g. the NEETS)

- Quality of programme provision poor:
  - Lack of qualified staff
  - No core of permanent staff
  - Few suitable learner materials

- Few public community based or other private adult education and training centres.

- Inappropriate conditions of service for C & AET educators, unevenly applied across provinces

- Small and side-lined Provincial AET Directorates with limited resources in the provinces

- National AET Directorate inadequately resourced and weak

- A vibrant University Adult Education Sector slowly decimated

- No enabling framework for non-public Community and Adult Education Training

- Adult and Community Education and Training not uniquely conceptualised (i.e. differently from other educational sectors)

- Political priority for schooling and universities resulting in scanty resources being allocated for Community and Adult Education and Training

- Public sentiment privileged schools and universities with community & adult education being marginalised

Objective analysis

The newly crafted Policy on Community Colleges is meant to address the endemic problem of too many youth and adults who are alienated from society and the economy due to lack of sufficient education and skills. As articulated in the problem statement, this is a big social problem that is manifested in general poverty, the breakdown of social cohesion and various forms of crime. Whilst it is acknowledged that education alone cannot solve this problem, it certainly has great potential to alleviate the problem by making people employable and creating greater social consciousness in them. In our analysis of possibilities for addressing the problem highlighted above, we concur with the argument presented in the White Paper for Post-School Education and Training (DHET, 2013) that the education and training system must find ways to cater to the needs of the millions of adults and youth who are unemployed, poorly educated and not studying.[12] Education and training must address the enormous developmental challenges of poverty, inequality and unemployment.[13] In order to do this, a new type of institution has to be developed and supported, one that can offer a diverse range of possibilities to people for whom vocational and technical colleges and universities are not desirable or possible.[14] Such an institution should be community-based in order to be responsive enough to the needs of the community. It should embrace the concept of lifelong learning, recognising that learning takes place throughout a person's life and in many forms.[15]

We premise our objective analysis on several fundamental assumptions all of which revolve around the potential of education as an enabler for social development and of a community-based institution as the best strategy for empowering the majority of the marginalised youth and adults in the society. The first assumption which is informed by the South African constitution and has dominated the discourse of adult education and training in South Africa is that education is a fundamental human right without which it is not possible to exercise other human rights. The second assumption is that education and human resource development play a critical role in economic and social development.

The response to the problem statement identified in the problem analysis phase became the Purpose Statement which was articulated as follows: *Increasing proportions of educationally marginalised youth and adults are equipped with basic functional literacies, and the knowledge, skills and values for human development in a knowledge economy.* This is shown in the Objective Analysis chart on the page below.

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[12] Department of Higher Education and Training (2013) White Paper on Post-School Education and Training

[13] Department of Higher Education and Training (2014) National Policy on Community Colleges

[14] Department of Higher Education and Training (2013:20) White Paper on Post-School Education and Training

[15] Department of Higher Education and Training (2013:20) White Paper on Post-School Education and Training

Inputs to achieve the purpose

In order to achieve this purpose, a number of inputs are necessary which should result in the ley outputs necessary for the purpose to be achieved. Three fundamental inputs were identified: a thorough conceptualisation of community colleges and their associated learning centres, substantially increased allocation of resources to the sector, and mechanisms in place to change the public perception of community and adult education. These are summarised in the bottom three blocks on the Objectives Analysis chart and are elaborated upon below.

More detailed activities

Building on these fundamental inputs, a number of more detailed necessary activities were identified. These are summarised on the second row from the bottom in the Objectives Analysis chart and are elaborated below.

Outputs[16]

The activities described above will result in appropriate outputs being realised at the next higher level as shown in the objectives analysis. These outputs include pilot community colleges and their associated community and adult education and training centres, a network of public and non-public community colleges and associated community and adult education and training centres with appropriate opening times, a wide range of high quality programmes that are well articulated being offered, appropriate assessment and examination systems, and a core of permanent full-time adult educators supported by part-time staff where appropriate. These outputs are summarised immediately below the Purpose Statement on the Objectives Analysis are described below.

Before rolling out community colleges widely, there is need for the DHET to have good understanding of what it takes to do so. As the White Paper (DHET, 2013) points out, the introduction of community colleges will take a phased approach, and will be preceded by a pilot process (which itself needs its own plan) to help inform further development of the concept and also inform the development of a long-term plan and its roll-out throughout the country.[17] The pilot process will also facilitate the final rationalisation of governance and management structures. As community colleges develop, it is essential that they establish learner support services focusing on areas such as career and programme advice, counselling and guidance, orientation, extra-curricular activities, financial aid, labour market information, community information and links with placement agencies. The DHET will collaborate with the National Youth Development Agency and other relevant

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[16] We note that in the literature on logframe development, the term outputs is used interchangeably with result areas. In this report, we draw from the example given in guidelines provided by the DPME: European Integration Office (2011) Guide to the Logical Framework Approach, Government of the Republic of Serbia, Belgrade. In these guidelines, **outputs** instead of **results** or **result areas** is used. This will be further clarified in the logframe

[17] Department of Higher Education and Training (2013:23) White Paper for Post-School Education and Training

agencies to ensure the establishment of Youth Advisory Centres and contact points at community colleges.[18]

The outputs described above will make community and adult education and training colleges more attractive and relevant to the needs of those who need them. As a result, increasing proportions of previously educationally marginalised groups will be equipped with basic functional literacy, the knowledge, skills and values they need for human development in a knowledge-based economy. The White Paper (DHET, 2013) gives a target headcount enrolment of one million by 2030 for community colleges, as compared to the estimated 265 000 in the PALCs in 2011.[19]

[18] Department of Higher Education and Training (2013:23) White Paper for Post-School Education and Training

[19] Department of Higher Education and Training (2013:iii) White Paper on Post-School Education and Training

Objectives Analysis

Large numbers of youth and adults (unemployed and employed) who did not benefit adequately from the education system are engaged constructively in society and contribute meaningfully to the economy and social cohesion

Increased ability to develop sustainable livelihoods

Equipped for formal semi-skilled/skilled employment and for self-employment

Increased ability to participate meaningfully in family, community and society

Well prepared to proceed further with education and training opportunities (NQF 1 to 5 and NFE) and in lifelong learning

Increasing proportions of adults deliberately excluded from schooling system prior to 1994 & youth ejected from the education system at Grade 9 post 1994 are equipped with basic functional literacies, the knowledge, skills and values for human development in a knowledge-based economy. (1 million by 2030)

Pilot community colleges and associate C &AET centres established in each province providing easy access to previously marginalised groups using ICT for effective functioning

A network of public and non-public community colleges with associated C & AET centres in place providing easy access to previously marginalised groups using ICT for effective functioning

Well governed and administered and well-staffed C & AET centres with appropriate opening times in place

Wide range of articulated programmes including vocational, skills development, non-formal and community oriented programmes designed and offered.

Assessment and examination system in place (for emerging national programmes)

A core of permanent full-time adult educators in place. (Supported by part-time staff where appropriate).

Non-public community and adult learning centres established and enabled (especially church and CBOs)

An appropriate set of conditions of service established (including staff qualifications) for the newly conceptualised community college sector and evenly applied

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A streamlined and effective Provincial Directorate within DHET in place having absorbed provincial AET staff.

National Community College Chief Directorate or Branch established and resourced to engage productively with a range of partners, to disseminate the value proposition of C &AET and to oversee governance and

National body established to facilitate the design of relevant & articulated programmes & associated learning materials

Umalusi and QCTO capacitated to quality assure emerging national programmes

A small number of vibrant university post-school centres established and nurtured for research and training (R & D NGOS encouraged)

Community Colleges and associated Community Learning Centres fully conceptualised to take account of the unique purpose and features of the sector, and to provide for both public and non-public adult education and training

Substantially increased allocation of resources to the community and adult education sector

Value proposition of community and adult education and training developed and widely disseminated to change public perception

5. Design Evaluation

5.1 Introduction

Four key questions, derived from the evaluation terms of reference, frame the design evaluation. These are:

1. Is the Policy on Community Colleges internally coherent, and is it aligned with other relevant pieces of legislation?

2. Is the Policy on Community Colleges' theory of change (logic) appropriate, and is it sufficiently robust to address the problems of youth and adults that have been identified in the policy?

3. To what extent is the Policy on Community Colleges measurable, and therefore capable of being evaluated in the future?

4. To what extent is the Policy on Community Colleges ready to be implemented? That is, is there sufficient evidence that the resources and capabilities required to implement the policy, are in place and are adequate to address the scale of the policy challenge? How can the Policy on Community Colleges be improved?

These four evaluation questions are answered in relation to the underlying theory of change (above), key findings in the literature review (above), and findings from focus group and individual interviews conducted with key informants.

5.2 Findings related to evaluation questions

5.2.1 Question 1: Is the Draft Policy on Community Colleges internally coherent, and is it aligned with other relevant pieces of legislation?

This first question relates to the need to examine the soundness of the underlying logic or rationale that informed the necessity to design the Policy on Community Colleges (PCC). In other words, it raises the issue of policy purpose. Sub-questions arising from the key question relate to whether the draft PCC reads well, whether proper processes were followed in identifying policy gaps, what processes were undertaken to identify adult and youth education and training needs, and whether thorough consultation with sector stakeholders was undertaken? Alignment with existing policy and legislation as well as UN agreements also need to be tested.

To answer this question and its related sub-components, the design of the draft PCC is evaluated and the findings are presented below.

Does the policy read well?

At face value the draft PCC is written clearly, in plain English and is well set out. Closer examination of the PCC, does however, reveal a number of content gaps and conceptual weaknesses which are discussed below.

Is there necessity for the policy?

Section 1: Background and Context (draft PCC pages 3 – 7) provides a cogent analysis of why a policy on community colleges is needed.

The problem analysis includes an overview of the current socio-economic contextual challenges. Significant developmental challenges such as poverty and unemployment are highlighted. Gender, race and class inequalities are also emphasised. The problem of *"the millions of adults and youth who are unemployed, poorly educated and not studying"* (youth, not in education and not in employment - NEETS) articulated in the White Paper for Post School Education and Training (DHET, 2013)[20] is quoted in the draft PCC. The significant numbers of adults (in particular those marginalised by the apartheid educations system) who have not completed schooling are not explicitly mentioned. However, the issue of second-chance learning opportunities for out of school youth and adults is highlighted in the draft PCC.

The draft PCC concludes that the challenges identified above point to the necessity for a policy on community and adult education and training and the establishment of appropriate institutions for such provision. However, given that the White Paper (DHET, 2013) and the FET Amendment Act (DHET, 2013) have already provided for such institutions, the PCC needs to go further than these documents and produce the *framework fo*r the development of community colleges, which takes into account the different components required for the successful implementation of community colleges.

Was an appropriate needs identification done?

While a general case has been made in the PCC regarding needs of both the NEETs and the millions of adults and youth who have not properly benefitted from general education, there is no evidence in the policy that a detailed needs identification process has been undertaken.

Thus overall it was found that a more thorough needs analysis is required.

Extent of policy consultations with sector stakeholders
The draft PCC is silent on the issues of stakeholder consultation and stakeholder interviews. Workshops and interviews with key respondents conducted by the Consultant as part of the design evaluation reflect little or no evidence of stakeholder engagement.

Purpose and underlying logic of the draft PCC

Logic of the shift of PALCs from provincial competence to exclusive DHET competence

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[20] White Paper on PSET, DHET October 2013, p 20

Section 1: Background and Context (draft PCC: Pages 3-7) quotes the White Paper on Post School Education and Training (DHET, 2013) in relation to the use of PALCs as the basis for transforming AET provision. Echoing the White Paper's acknowledgement of the problems of the current PALCs, the draft PCC recognises that the PALCs are the only public institution that are widely enough distributed to support AET provision.

> "Despite their weakness, the PALCs are currently the only public institutions with a wide distribution around the country and which provide for adults and post school youth who are not catered for in by colleges and universities."(Draft PCC, p4)

Other than citing Section 25 (2) (b) of the Further Education and Training Colleges Amendment Act, 2013 (Act No.1 of 2013), no rationale for the proposed function shift is provided in the draft PCC.

The Consultant's policy and legislation review conducted for the design evaluation points to the splitting up of the previous national Department of Education (DoE) in 2009 as providing the underlying rationale for the proposed function shift. The Presidential Proclamation which gave effect to this split resulted in the restructuring of the education landscape. The responsibility for schooling fell under the auspices of the Department of Basic Education while all post school institutions and functions including the AET function (and the technical and vocational education and training [TVET] colleges) became the responsibility of DHET.

The vision of a co-ordinated post school system comprising universities, TVET colleges and provision for youth and adults of a wide range of educational opportunities provides the logic for the establishment and management by DHET of the PALCs.

The logic of the creation of a new institutional form

Section 7 of the draft PCC refers to legislation for the creation of the Community College in as the Further Education and Training Colleges Amendment Act, (2013). Paragraph 7.1 (draft PCC: p 9) states that:

> As soon as the responsibility for the PALCs shifts from provincial education departments to the DHET, the current PALCs will be deemed to be Community Colleges in terms of section 25 (2) (b) of the Further Education and Training Colleges Amendment Act, 2013 (Act No.1 of 2013). Immediately this takes place, they will all be merged into nine provincially-based Colleges, to be known as Interim Community Colleges (ICCs).

As highlighted above, the oddity of this legislation is that aside from the brief, but important, section on community colleges in the White Paper (DHET, 2013), the legislation was promulgated before there was any detailed policy on community colleges.

Although the draft PCC notes that the White Paper (DHET, 2013) insists that a "*new type of institution has to be built and supported; one that can offer a diverse range of possibilities to people for whom vocational and technical colleges and universities are not possible*", it is not apparent in the rest of the draft PCC that a "new type" of institution is in fact provided for or that substantial accommodation is made for a "*a

diverse range of possibilities" (Draft PCC: p4: Section 1.6). Though the draft policy outlines a set of principles (Section 2, discussed above) on which the PCC is founded, these principles are not evident in the specifics of the policy regarding the creation of the community colleges.

The draft PCC provides little substance on what the envisaged new institutional form would be. The draft PCC simply replicates an existing TVET College model without much imaginative thought on the nature of a community college with associated community learning centres. The focus in the White Paper (DHET, 2013) on '*community'* with colleges conceptualised as being "*located in communities and contributing to local needs and development, building social agency and social cohesion*" (White Paper: p22) seems to have been lost in the draft PCC.

This is particularly concerning, given the interview with the Minister's Adviser in which he articulated a distinction between the two institutional types. In the interview it was stated that the key stakeholders for TVET Colleges are industry and other business, whereas for community colleges the range of stakeholder was wider. Equally the target group for community colleges was seen as far wider than for TVET Colleges. It was stated that TVET Colleges aim largely at learners who have completed Grade 12 while the community colleges are intended to cater for a much more diverse group of youth and adults, including those who have not completed their general education (Grade 9) as well as those who have completed Grade 9 but wish to complete Grade 12.

The Minister's Adviser also stressed the importance of the community colleges being responsive to the community with regards to curriculum offerings and governance structures. The principle of community colleges being in close proximity and therefore within easy access to youth and adult learners' homes was also emphasised as a distinction.

However, while these may have been intended distinctions, they are not articulated in the draft PCC, rather, the TVET College is held up a model to be emulated.

Thus, with respect to the two purposes of the draft PCC discussed above (function shift and establishment of a new institutional form), the logic underpinning both follows automatically from the Further Education and Training Colleges Amendment Act, 2013 and to this extent it is logical. However, this Act was passed without prior policy, that legislation preceded policy is in and of itself problematic. No rationale for either the function shift or for the establishment of the Community Colleges is provided in the draft PCC. Furthermore, no guidelines are provided in either case for the management of either of these processes.

The draft PCC does not elaborate on the purpose and form of community colleges beyond that contained in the White Paper on Post-School Education and Training (DHET, 2013). Moreover, it does not elaborate on the unique character of community colleges. This, together with the lack of a clearly articulated "ethos and mission" (Draft PCC Section 1.17: p6) and the tendency to use the TVET College model as a default, could undermine the focus and potential efficacy of Community Colleges.

The lack of any detail pertaining to the resourcing and the management of the function shift and the establishment of the community colleges is a significant omission.

Alignment with relevant policies and legislation is weak. A number of related policies are listed but

linkages are not made in the draft PCC. There are also a number of policies, including the Draft Policy on Qualifications in Higher Education for Adult Education and Training Educators and Community Education and Training College Lecturers (DHET, 2014) the Draft Social Inclusion Policy Framework for Post-school Education and Training (DHET, 2014) and the Draft National Youth Policy (Government Gazette No 38393, 2015) and that are not mentioned at all. The draft PCC is principally aligned with the Unesco Education for All goals or the 2030 Sustainable Development Goals, but this is not articulated in the draft policy.

5.2.2 Is the draft policy's theory of change (logic) appropriate, and is it sufficiently robust to address the problems of youth and adults that have been identified in the policy?

No explicit Theory of Change had been developed for the draft PPC. However when reflecting on the implicit Theory of Change underpinning the White Paper and the draft PCC, it is clear that there is a significant disjuncture between the draft PCC and the White Paper on Post-school Education and Training (2013). In the White Paper, a much more creative, diverse and contextually relevant system is envisaged. Community Colleges with Community Learning Centres and partner sites in a decentralised and network type system responsive to local needs is proposed.

The retrospective Theory of Change developed by the Consultant drew extensively on the White Paper and identified a range of components necessary for the development of community college that are omitted entirely in the draft PCC.

In conclusion, the answer to the question therefore has to be that the draft PCC's implicit theory of change is not appropriate and sufficiently robust to address the needs of the identified youth and adults.

5.2.3 To what extent is the draft PCC measurable and therefore capable of being evaluated in the future?

To what extent is policy delivery of the draft PCC in the future measurable, as presently defined?

The lack of detail related to targets, timelines and quality criteria, leads to the conclusion that the draft PCC as currently constructed is not measurement or evaluation friendly. Specific targets and detailed indicators are not provided, except in the case of all the provincial AET staff being absorbed into the national department.

While the figures quoted in the White Paper (2013) related to the envisaged increase in enrolments to approximately 1 million in 2030 make it clear that the potential target group is extremely large, no targets for enrolment in Community Colleges or graduate targets are provided in the draft PCC.

In addition there are a number of silences in the draft PCC on resource allocation and capacity: does DHET have the resources to implement the proposed policy, in terms of staff, skills, money, training, expertise? Is DHET able to offer the necessary support in terms of facilities, equipment, and other support available for the proposed policy? Clearly then, there are no indicators developed in these respects and therefore no means of measuring whether the targets are met.

Apart from the requirement, that Community Colleges submit prescribed data to the DHET, which relates to policy implementation compliance, there is no reference to any process related to a review or evaluation process related to the draft PCC.

The lack of any discussion on data collection and on the current need to building an effective data system for the AET sub-system within DHET is an important omission.

Which stakeholders contribute to the results of the policy, what are their contributions and what are the implication of these for policy coordination and programme delivery?

As the Theory of Change shows, all the stakeholders mentioned in this section (the quality councils, the South African Institute for Vocational and Continuing Education and Training, Universities and TVET Colleges and the SETAs) play a key role in contributing to the policy success.

The implication of having such a necessarily broad stakeholder base, is the need for the DHET to play a strong coordination and management role to ensure coherence. It is for this reason that one of the key outputs of the draft PCC Theory of Change is the establishment of a national Chief Directorate or branch and regional AET directorates with the mandate and capacity to engage productively with a range of partners. Unless the national and regional directorates are fully functional, the positive results of the draft PCC will be impossible.

5.2.4 To what extent is the draft PCC ready to be implemented?

A close analysis of the draft PCC has shown that there is only a legalistic framework for managing the shift of the provincial AET centres to the control of DHET (the so called 'function shift'), and not even the broadest plan. Equally there is only a legalistic framework for establishing the community colleges, and only a broad plan for piloting them. No framework nor guidelines for establishing community learning centres that are associated with the community colleges were evident.

There is also no mention made of departmental agencies or units that will be tasked with the design and development of programme offerings and learning and teaching support materials. No guidance is provided on any of the related programme provision processes in the draft PCC. The draft PCC is also silent on the matter of educator qualifications and professional development. There is no mention of an education information management system (EMIS) which is key for planning, monitoring and management and most importantly, there is no mention of how this new institutional type will be resourced.

Given the silence and/or weak articulation in the draft PCC of all the above mentioned components of the proposed community college sub-system, it can be argued that the draft policy is not ready to be implemented.

Furthermore, it is also not clear, to what extent the DHET has the drive and planning capability to achieve the policy. Interviews revealed that DHET officials (in the Adult Education and Training Directorate and in the people responsible for the function shift) do not own the policy. Other DHET officials interviewed either generally knew little about the policy, though they approved of the White Paper (DHET, 2013) perspective (and as seen in the Principles in Section 2.1). Equally, provincial AET officials interviewed complained of not having been adequately consulted regarding the draft PCC.

6. Conclusions and Recommendations

The policy, as it stands serves two main purposes. One purpose is the function shift of the public adult learning centres, previously managed by the provincial departments of education, to the oversight of the Department of Higher Education. The second is the initiation of a new institutional form of education and training provision, the community college (and its associated community learning centres). It is clear from the analysis documented in our report that neither purpose is adequately served by the draft policy document.

6.1 Conclusions and recommendations in respect of function shift

Whilst it is acknowledged that the PALC system is largely dysfunctional (as noted in the draft Policy, the White Paper (DHET, 2013), and the Report of the Auditor General (2014)) there is little in the Draft policy that indicates a detailed plan or process to improve the situation to ensure that these centres become functional.

We conclude as follows:

6.1.1   The plan to nominally consolidate PALCs into one community college may actually replicate all the problems of the past system, particularly in the larger provinces where little district or local support was given to these centres.

6.1.2   The model may actually disadvantage those PALCs that in certain provinces are functioning well and are supported by district or regional officials.

6.1.3   The lack of any estimation of budget requirements in the draft policy document, allied with the known past experience of the difficulties in the re-allocation of money previously given to the provincial departments of education (after the closing of the teacher training colleges and the shift of the FET colleges to national), suggests the likelihood of a shortage of funding and other resources to do anything by way of improving functionality.

6.1.4   The lack of buy-in to the function shift proposal from the officials who were previously in the provincial adult education and training directorates or units is potentially disruptive. In particular their scepticism about the amalgamated PALCs being designated as a community college must be ameliorated.

6.1.5   The concept of a new institutional form of community colleges being associated in the public mind with what is in effect simply the old dysfunctional PALC model renamed will severely undermine the potential of an inspirational educational development.

Recommendation 1

1.1 Ideally PALCs should remain as PALCs under Regional offices but the FET Amendment Acts (2013) and the (November 2014) Government Gazette 38158 preclude this. Accordingly, there needs to be a differentiated conceptualization of how the merged PALCs are meant to operate in different provincial contexts. It is known for example that Gauteng AET is administratively more successful than other provinces and has a fairly large AET staff.

> 1.2 A more comprehensive policy and plan must be developed that deals with the ongoing (even if only interim) existence and support of youth and adult learners at the old PALC sites. Key outcome, performance indicators, and sectoral coordination structures must be detailed. This is not to be confused with the policy and plan for the new institutional form of community colleges.
>
> 1.3 The name "Interim community college" is inappropriate and misleading. An alternative should be found.

6.2 Conclusions and recommendations for a new institutional form

In respect of the **setting up of a new community college system**, we conclude as follows:

6.2.1 That although the draft Policy provides some details on many of the aspects needed to set up a community college system, there is insufficient information supplied about most of them. The policy value-add of the PCC is, therefore, unclear and the description of the new institutional type (form) in South African education and how it is to be built is inadequate and, at points, entirely lacking.

6.2.2 That what is proposed in relation to the setup of the pilot colleges (as well as the PALC conglomerate colleges) slavishly follows the TVET legislation and does not appear to meet the principles (set forth in section 2 of the draft PCC) nor reflect the vision in the White Paper (DHET, 2013) and the Task Team report (2012) of a decentralised system close to learners.

6.2.3 That the Task Team report notion of a local network of community learning centres supported by community college has been totally inverted to one of a centralised community college modelled on a TVET college which may have some satellites. This is extremely problematic given the need for community colleges to be easily accessible to youth and adults.

6.2.4 That the draft Policy gives no attention to the key concept of community learning centres, except to say that their heads must be appointed by the Minister. This latter proposal seems highly over-centralised and cumbersome and appears to bypass the community college Councils as governing bodies). It also appears that little attention has been given to the examination of the community learning centres and how they could be supported and networked effectively.

6.2.5 That the minimal consultation in preparation for the draft PCC that has taken place to elaborate on the broad conception of community colleges contained in the White Paper (DHET, 2013) proposals will jeopardise the potential of this new institutional form.

6.2.6 That the need for the DHET to establish a significant internal structure (such as a Branch) to handle the applied conceptualisation and, coordination building of this whole new sector has not been adequately prioritised. Given the seriousness of the Auditor General's report on AET, this is a grave shortcoming.

6.2.7 That the apparent lack of attention to the financing of the new system is hazardous.

6.2.8 Given that new programmes, curriculum and materials development will be crucial to improve the provision for youth and adult learners, that the absence of any proposal of an appropriate mechanism to facilitate the development of these crucial elements, is extremely

serious.

Recommendation 2

Therefore we recommend that a more substantive and imaginative policy be developed that deals with the creation and sustainable continuation of a new institutional form of provision of adult and youth education in decentralised community learning centres supported by community colleges, and with the requisite resources, programmes, curricula, materials and educators and trainers. This policy process should commence with the development of a set of guidelines for the pilot community colleges, including the notion that they should incorporate a number of local community learning centres (PALCs, PALC satellites or NGO Centres).

On the basis of this comprehensive policy for community colleges, the current legislation (Further Education and Training Colleges Amendment Act of 2013) must be reviewed and amended where appropriate to ensure that the unique character of community colleges as articulated by the White Paper (DHET, 2013) and the comments of the Minister's Advisor, drives the governance, management, staffing, and funding arrangements for the sector. This is in contrast to the current situation, where the legislation was developed in advance of the policy.

We note that this recommendation should in no way interfere with initiation of genuine pilots of community colleges.

2.1 Given the recommendation above, the new internal DG Task Team which we understand has been established to develop a comprehensive policy for community colleges is welcomed and is encouraged to embark upon a broad consultation process, especially with civil society.

2.2 DHET will need to establish a significant internal structure (such as a Branch) to be responsible for the applied conceptualisation and building of this whole new sector and to ensure that the crucial SAIVCET functions are made operational, especially in regard to programme and materials development.

2.3 A detailed project plan, with an accompanying monitoring and evaluation framework for the pilot implementation should be developed before implementation to ensure deliverables and timeframes are clear and that lessons can be extracted and documented to inform the full implementation of the new community college system.