

THE NATIONAL QUALIFICATIONS FRAME WORK

Richard Jewison

**Issues in Education Policy
Number 1**

Centre for Education Policy Development

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Preface

The series *Issues in Education Policy* consists of a number of booklets on key issues in education and training policy in South Africa. Each booklet deals with one such issue and aims to give the reader, in plain English, an overview of the topic and its implications for various stakeholders.

The intended readership includes a wide range of people with an interest in the education and training system – members of Parliament or of provincial legislatures, teachers, trade unionists, employers, student and community activists, education department officials, journalists, governors of educational institutions, members of local or provincial education and training councils, and interested members of the general public.

Each booklet gives an outline of the issue that it deals with, explains its importance and why it is contentious or divisive (where that is the case). It summarises current policy and its development – for example, why certain policies were made in the first place and under what circumstances, what the experience of implementing the policies has been, what their supporters and detractors have to say about them, and the main findings of research and policy evaluations. There is also a list of further reading.

After having read this booklet, readers should have a basic understanding of the topic. They should be able to understand more complex material on the issue, participate in public debates and assess new policy initiatives.

John Pampallis
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Abbreviations and Acronyms

ABET	Adult Basic Education and Training
ANC	African National Congress
ASGI-SA	Accelerated and Shared Growth Initiative for South Africa
CEPD	Centre for Education Policy Development
CHE	Council on Higher Education
DoE	Department of Education
DoL	Department of Labour
ECD	Early Childhood Development
ETD	Education, training and development
ETDP	Education, training and development practice
ETQA	Education and Training Quality Assurance (body)
EU	European Union
FET	Further education and training
FETC	Further Education and Training Certificate
GENFETQA	General and Further Education and Training Quality Assurance (Act) (2001)
GET	General education and training
GETC	General Education and Training Certificate
GNU	Government of National Unity
HE	Higher education
HEQC	Higher Education Quality Committee
HEQF	Higher Education Qualifications Framework
HET	Higher education and training
HR	Human resources
HRD	Human resources development

JIPSA	Joint Initiative for Priority Skills Acquisition
MOU	Memorandum of Understanding
NEDLAC	National Economic Development and Labour Council
NEPI	National Education Policy Initiative
NGO	Non-governmental organisation
NPM	New Public Management
NQF	National Qualifications Framework
NSA	National Skills Authority
NSB	National Standards Body
NSDS	National Skills Development Strategy
NSF	National Skills Fund
OBE	Outcomes-based education
OD ETD	Occupationally directed education, training and development
OFO	Organising Framework for Occupations
PAYE	Pay As You Earn
QA	Quality assurance
QC	Qualification and Quality Assurance Council
QCTO	Quality Council for Trades and Occupations
RPL	Recognition of prior learning
SAQA	South African Qualifications Authority
SARS	South African Revenue Service
SDA	Skills Development Act (1998)
SDLA	Skills Development Levies Act (1999)
SETA	Sector Education and Training Authority
SGB	Standards Generating Body
TOP QC	Trade, Occupation and Professional Practice Qualifications and Quality Assurance Council
Umalusi	Umalusi: Council for Quality Assurance in General and Further Education and Training

Introduction

The aim of the National Qualifications Framework (NQF) is to accommodate all recognised qualifications in South Africa – those taught at school or university, as well as those acquired through on-the-job training. It is based on concepts that are widely supported internationally, and is a crucial component of the government's post-apartheid reform strategy for the country's education and training system.

In apartheid South Africa, the education system was designed to produce a racially skewed labour market. Once apartheid was defeated, stakeholders such as students, teachers, employers, unions, education academics and community representatives were determined to ensure the development of a free, democratic and more equal society.

Certain principles guided the development of education and training policy in South Africa after 1994. These included the need for quality, equity, improved access, redress, portability of qualifications, and recognition of prior learning – all to be achievable within a unified system of integrated education and training. The NQF was established as one of the cornerstones of a radical new policy.

This booklet first sets out the historical background to the NQF in South Africa. It goes on to explain what the NQF is, how it works and how it relates to the wider system of education and training. It then looks at how the policy has been implemented, and surveys some problems associated with the NQF. After this, the booklet examines several critiques of the NQF. Finally, it looks at what might lie in store for the NQF in the future.

Readers should be aware that, as with so many other issues these days, the world of the NQF is filled with many concepts and organisations – each with its own jargon, title and abbreviation. I have tried to present this reality as painlessly as possible, and there is a list of abbreviations and acronyms at the beginning of this booklet. Furthermore, in addressing complex issues in such a brief manner, some short-cuts have been taken. Because issues have been simplified, it is inevitable that not all details have been presented. Therefore, a short reading list is provided for those who want to dig deeper into the issues.

The education and training system in South Africa is facing ongoing challenges. As has become clear during the last ten years, policy implementation does not always follow the path that policy makers intend. Stakeholders shape implementation, either deliberately or unconsciously. It is hoped that this booklet will help to increase awareness and contribute to an improved level of debate on the NQF and its implementation.

Historical Background

The National Qualifications Framework has its origins in the labour movement of the early 1970s. The struggle to transform the South African education system ran parallel to worker struggles to end the intense exploitation of apartheid capitalism.

Bantu Education ensured that black people were only taught enough to become unskilled workers. White people, on the other hand, were better educated, and were able to become skilled in many fields. The differentiated education provided to different racial groupings was designed to ensure that senior positions in the workforce went to whites and the lowest-paid positions to black Africans. Often whites had the paper qualifications that enabled them to take skilled jobs, whereas many black workers had skills learned through experience but had no formal qualifications. The whole education and training system was designed to maintain the inequality of apartheid.

During the 1970s the children of Soweto and other townships rose up against the enforced use of Afrikaans as the language of teaching in schools. At the same time, workers and their unions were fighting for bargaining rights, removal of racial job segregation and access to quality training. These struggles resulted in a common understanding of – and a high degree of unity around – the importance of education transformation to the national programme of reconstruction and development.

There was overwhelming agreement within the African National Congress (ANC) and among other sections of the liberation movement, including organisations of education stakeholders, on three issues:

- The inequalities created by apartheid were very deep, and equality could only come about through a completely transformed system

of education and training.

- Transformation of education would take time because the education cycle is long and because the benefits of good education accrue over a lifetime.
- As a matter of urgency, some immediate steps had to be taken to achieve redress.

Other than the Constitution itself, probably no other issue received the attention given to education and training by educators, trade unions, community structures and student bodies. Throughout the 1980s and in the period leading up to the 1994 elections, there was a groundswell of popular determination to break with the past and build a new future for children of all ages, as well as for adults who had been badly disadvantaged by the apartheid education system. Equality, access and redress became guiding principles, deeply embedded within the struggle for transformation.

This groundswell found expression in a number of structures that researched, debated and formulated policy that could be implemented by the anticipated ANC government. One of the critical committees was the National Education Policy Initiative (NEPI), which brought together the work of various education and training stakeholders. Working groups were formed and discussion papers produced. The ANC participated in these various structures. In 1993 the ANC established the Centre for Education Policy Development (CEPD) to formalise the work and prepare it to be developed into party policy.

In January 1994 the ANC published *A Policy Framework for Education and Training*; it became known as the “Yellow Book” because of the colour of the cover. This was followed shortly afterwards by a paper developed by a working group of labour and business representatives – *Discussion Document on a National Training Strategy Initiative*. Later that same year the ANC published its *Implementation Plan for Education and Training*. These three documents became the basis of ANC policy on education and training before and after the 1994 elections. They clearly set out the ANC’s commitment to an integrated education and training system, with a single qualifications framework that would put in place the “outcomes” of an outcomes-based education and training system. The new system would be built around a structure known as a National Qualifications Framework.

An important decision was that there should be a combined Ministry of Education and Training. It would drive the implementation of a new, unified system that would break down the distinction between learning that was formally acquired at schools and universities, and on-the-job or occupational learning. In practice, however, two ministries were created when the Government of National Unity (GNU) took power after the 1994 elections. The Ministry of Education took responsibility for the formal education system and the Ministry of Labour took responsibility for work-related training. The two Departments created structures for joint work, including work on the NQF. However, the division of responsibilities between two ministries and the building of two departments working independently of each other was an important divergence from earlier policy.

Soon after the 1994 elections the government published the documents that laid the foundations of the NQF. These included the South African Qualifications Authority Bill (which became law in 1995), and the White Paper on Education and Training (1995). The establishment of the South African Qualifications Authority (SAQA) was seen as a crucial step towards the establishment of a National Qualifications Framework. The Minister of Education appointed SAQA Board members in May 1996, and SAQA's first meeting was held in August of that year. In 1998, work began on developing new qualifications.

By 1997 the NQF had moved from being an idealistic policy born out of struggle, to a key component of policy implementation. If a government's seriousness about a policy can be measured by referring to legislation passed, institutional structures created and resources allocated, then the governments of 1994 and 1999 must be seen as extremely serious in relation to the NQF. There is clear and unambiguous legislation, there are powerful institutional structures, and enormous resources have been allocated. While some have expressed concern that SAQA has been under-funded, and that political and departmental disputes have reduced the momentum of change, it is evident that the commitment of government has been at a very high level.

The NQF Today

What is the NQF?

The NQF is the framework within which all nationally recognised qualifications and unit standards are registered and made available. It is an institutional framework for ensuring that there are qualifications available to meet the individual, social and economic needs of the nation. Only qualifications that have been registered by the South African Qualifications Authority are recognised.

What are the principles of the NQF?

The apartheid education system was fragmented along racial and ethnic lines, access was restricted at all levels, and there was a lack of democratic control and accountability. In order to ensure that these challenges were addressed in the new system, a set of principles were developed that would underpin policy. These principles were set out in the ANC's *Policy Framework for Education and Training*, and included:

- a central role for the state in the provision of education and training;
- a role for education and training in a comprehensive reconstruction and development programme;
- provision of incentives to ensure that employers train their workers;
- democratic participation of stakeholders;
- provision for redress for previously disadvantaged groups;
- horizontal and vertical mobility, and access between different types of education and training;
- setting national standards for certifying learning, including prior learning;
- education to support the development of democracy and democratic culture.

These principles have informed the development of all policy, including the NQF.

What are the aims of the NQF?

The principles outlined above were developed and refined, and finally found expression in the various laws that emerged from the policy discussions.

The South African Qualifications Authority Act states that the purpose of the NQF is to:

- create an integrated national framework for learning achievements;
- facilitate access to, and mobility and progression within, education, training and career paths;
- enhance the quality of education and training;
- accelerate the redress of past unfair discrimination in education, training and employment opportunities; and thereby
- contribute to the full personal development of each learner and to the social and economic development of the nation at large.

What are qualifications and unit standards?

A qualification is the evidence that a learner has achieved a certain level of competence. It may take the form of a certificate, a diploma, or a degree. It is a form of currency, or exchange, between an individual and an employer, or between an individual and an education and training provider. It describes the level of knowledge and skills that a person has to offer in the labour market, or in applying for ongoing education and training.

Unit standards are the building blocks of each qualification. Each one consists of a particular “package” of information or skills. A learner or worker will complete programmes to earn a specified number of unit standards in order to gain a particular qualification. Unit standards, and details about them, are listed on the SAQA website. The best way to understand unit standards is to find and read ones that are relevant to your field of work or study.

Each unit standard is worth a certain number of credits, with each credit requiring ten notional learning hours to achieve. Unit standards can vary from two or three credits to over twenty credits. A qualification normally requires around 120 credits (or 1200 notional learning hours), which is approximately

the amount of learning an average person can do in a year of study. Because these notional hours are an average, the time requirements are flexible; however, in general terms a diploma of 240 credits is considered to be a two-year programme of full-time study and a 480-credit Bachelors degree takes four years of full-time study.

“Notional hours” refers to the amount of time that an average student would need to do the work. Notional learning time does not only refer to the time spent sitting in a classroom. It includes time spent reading, researching, writing assignments and practicing the theory. It also includes past work experience that is relevant to the programme.

The development of qualifications and unit standards is not the same as curriculum development and programme delivery. In fact, a feature of the South African NQF is that qualifications and unit standards are developed independently of curriculum and programmes. Once a qualification has been designed and registered on the NQF, any provider of education and training can use it to develop curriculum and programmes. These programmes must meet certain quality assurance criteria set down by SAQA.

The NQF is built on the principle of outcomes-based education (OBE). All education resulting in the award of a qualification, or credits towards one, has to be based on predetermined outcomes. The outcomes describe the learner’s competence after completing a programme. Competence is measured by assessing a person’s knowledge, understanding and skills in a particular subject or occupational area.

What are NQF levels?

The NQF consists of ten levels.¹ Level 1 is the equivalent of the General Education and Training (GET) Band of the schooling system – that is, the end of Grade 9. It is also the level achieved by an adult learner qualifying in Adult Basic Education and Training (ABET). NQF levels 2 to 4 are the Further Education and Training (FET) levels. Level 4 is the equivalent of the Senior Certificate awarded on completing Matric, and is also where many of the trade

¹ Earlier versions of the NQF had eight levels. Previously a Bachelors degree was at level 6 and all post-graduate qualifications were at levels 7 and 8. This was considered to be too restrictive. Now Bachelors degrees are at level 7, and there are three post-graduate levels. So the extension of the NQF to ten levels has affected mainly the higher levels.

and occupation qualifications are located. It is the level of learning required to enter higher education or skills-based training. Level 7 is the level of a first degree (a Bachelors degree) at university, and Levels 8 to 10 are post-graduate levels. Table 1 describes the different qualification types at the different levels and the typical learning routes across the system.

It was intended to produce level descriptors for each NQF level. Level descriptors communicate the value of a qualification achieved at the different levels, regardless of how the qualification was obtained. So, for example, if a person has a “level 4 qualification” – whether it is work-related or a Senior Certificate achieved through the schooling system – it is understood as being at a level equivalent to that required to enter higher education. The intention is to achieve parity of value of different qualifications at the same level, and so to enable portability. Parity means that things have the same value (to a prospective employer or to an education and training institution); portability means that a qualification earned in a workplace training environment has value in the formal system, and vice-versa. In practice, however, level descriptors have not been agreed. SAQA has found it difficult to develop descriptors that are appropriate to both institutional qualifications and those designed to meet occupational needs.

What are SETAs?

Sector Education and Training Authorities (SETAs) are structures responsible for skills development. Each SETA is responsible for a particular sector. For example, there is a SETA for the mining sector (Mining Qualifications Authority), one for the construction sector (Construction Education and Training Authority), one for the finance sector, local government, health and so on. There are twenty-three SETAs in total.

In addition to co-ordinating skills development within their sectors, SETAs also function as Education and Training Quality Assurance bodies (ETQAs) (see the next sub-section). All SETAs are ETQAs, but not all ETQAs are SETAs.

The section further on in this booklet on the legislative framework of the NQF explains how SETAs fit into the overall structure of skills development.

Table 1: The National Qualifications Framework (2008)

Higher Education and Training Band					
NQF Level	Examples of Qualifications		Learning Routes to the Qualifications		
10	Doctorate		Universities; universities of technology (formerly technikons)		
9	Masters degree		Universities; universities of technology (formerly technikons)		
8	Post-graduate diploma Honours degree		Universities; universities of technology (formerly technikons)		
7	Bachelors degree Professional qualification		Universities; universities of technology (formerly technikons)		
6	Diploma Advanced Certificate		Universities; universities of technology (formerly technikons)		
5	Higher Certificate		Universities; public FET colleges; NGOs		
Further Education and Training Band					
4	Senior Certificate Adult National Senior Certificate Senior Certificate (Vocational)	Secondary schools	Public and private FET colleges	Employer/ provider programmes	
3	Occupationally directed qualifications	Secondary schools	Public and private FET colleges	Employer/ provider programmes	
2	Occupationally directed qualifications	Secondary schools	Public and private FET colleges	Employer/ provider programmes	
General Education and Training Band					
1	Senior phase	ABET Level 4	Primary and secondary schools, Grades 7-9	Public, private and NGO ABET centres	Employer/ provider programmes
	Intermediate phase	ABET Levels 2-3	Primary schools, Grades 4-6	Public, private and NGO ABET centres	Employer/ provider programmes
	Foundation phase	ABET Level 1	Primary schools, Grades 1-3	Public, private and NGO ABET centres	Employer/ provider programmes

What are ETQAs?

The South African Qualifications Authority is responsible for developing and managing the NQF. SAQA accredits Education and Training Quality Assurance bodies.² ETQAs are based on education bands (general education, further education, higher education), on professional or occupational fields of learning (medicine, accountancy, etc.), and on economic or industrial sectors (mining, agriculture, services, construction, etc.). They monitor quality of provision and manage the awarding of credits and qualifications.

Monitoring quality – or quality assurance – refers to the process of accrediting institutions, approving or accrediting programmes, establishing and monitoring assessment systems, and verifying the outcomes of assessments (that is, learner achievements). Different ETQAs have adopted variations of these functions. For example, in higher education, the Higher Education Quality Committee (HEQC) – the Band ETQA for higher education – carries out institutional audits and accredits programmes. On the other hand, in the Sector Education and Training Authorities, ETQAs accredit providers and approve programmes. However, the basic approach of checking institutional capacity and programme content is the same.

SAQA monitors and oversees the whole system and intervenes when problems occur. Problems can emerge with the qualification itself, with the delegation of a qualification to an ETQA, with overlapping or unclear accountability for a qualification, with the assessment system, or with the quality of provision in a particular field of learning. Whenever a problem occurs, it is the responsibility of SAQA to find a solution and support its implementation. This can involve actions such as establishing a process to review the qualification or providing advice and support to the relevant ETQA.

How are qualifications and unit standards developed?

After it was established in 1995, SAQA developed a template or model for the development of qualifications and unit standards. Each qualification or unit standard must specify certain things:

² There are two exceptions. Umalusi and the Higher Education Quality Committee are statutory bodies – that is, they arise from specific legislation – and are deemed to be accredited by the legislation that formed them.

- fundamental, core and elective learning outcomes (fundamental outcomes relate to basic numeracy, literacy, communication skills and life skills; core outcomes refer to the main knowledge and skills required for a particular area of work or study; electives are modules that deal with specialist topics in which some learners may be interested);
- critical cross-field outcomes (generic skills that learners and students need, such as problem solving skills);
- a description of learning that has to be in place (what learners or workers have to know before entering a programme);
- the assessment criteria that will be used to conduct assessment and award credits.

Qualifications must also be “fit for purpose” – in other words, the purpose of the qualification must be stated and the qualification must fulfil that purpose or need.

In 1996, a process was put in place to develop new qualifications and unit standards. SAQA divided the work into twelve learning fields, each of which was overseen by a National Standards Body (NSB). Within each of these broad learning areas, a number of Standard Generating Bodies (SGBs) were established. Both these types of bodies were made up of stakeholder representatives who were responsible for the development of the qualifications and unit standards using the guidelines and templates designed by SAQA. So, for example, representatives from electrical employers, unions, providers and professional bodies worked together to develop the learning outcomes of electrical qualifications at different levels. These structures have now been phased out because of a perceived over-reliance on stakeholders, inadequate involvement of educational experts, and high costs.

In the ten years from 1996 to 2006, some 800 qualifications and 10 000 unit standards were developed and registered by SAQA. In addition, some 8 000 existing qualifications were written up in the SAQA format and submitted to the SAQA Board for “interim registration”. It was intended that each of these “heritage” or “provider” qualifications would be reviewed by the stakeholder SGBs, but few have been through this process; they now have the same status as those that were developed in Standard Generating Bodies.

Each qualification is reviewed after three years. However, if qualifications have not been used during those three years for the development of programmes, they are not reviewed. They remain on the database as recognised qualifications so as to not disadvantage learners who have participated in programmes based on them, but will not normally be used for the development of new programmes.

Policy and Legislative Framework of the NQF

The National Qualifications Framework can be defined narrowly as the framework of qualifications developed by SAQA and registered on the SAQA database. However, it has become understood more broadly as the system adopted in South Africa to achieve an integrated approach to education and training. When discussing the NQF, there is an understanding that, although the central pillar is SAQA, the implementation framework consists of a range of institutions, relationships, and legislative and regulatory provisions. In addition to the South African Qualifications Act (1995), there is the Skills Development Act (1998), the Skills Development Levies Act (1999), the General and Further Education and Training Quality Assurance Act (2001), and the Higher Education Act (1997). Each part of this legislative framework is discussed below.

In addition, some important policies inform the implementation of the legislation. These include:

- the National Human Resources Development (HRD) Strategy, which is led by the Department of Education and describes national needs in relation to HRD;
- the National Skills Development Strategy (NSDS), which sets out the overall strategy for achieving increased skills levels;
- the Accelerated and Shared Growth Initiative for South Africa (ASGI-SA), the government's economic growth strategy which identifies a number of challenges in relation to economic growth, an important one being skills and qualifications; and
- the Joint Initiative for Priority Skills Acquisition (JIPSA), which focuses on key skills that are considered to be scarce or critical in relation to the goals of ASGI-SA.

The legislative framework, the various policies and proposals that emerge from them, and a range of economic and industrial strategy interventions all have an impact. It is not the purpose of this booklet to address all of them in detail. However, in order to better understand NQF implementation it is necessary to outline the key roles of some of the legislation and structures, and in particular how these structures contribute to, or impact on, NQF implementation.

Skills Development Act

The Skills Development Act (SDA) of 1998 is the key piece of legislation in relation to skills development. The Act sets out the overall framework within which Sector Education and Training Authorities operate, and specifies the roles of the National Skills Authority (NSA) and the National Skills Fund (NSF). The SETAs are the implementation structures for skills development in the formal economy, while the National Skills Fund provides funds for training for the unemployed and other disadvantaged groups. Both the SETAs and the National Skills Fund conduct their work within a policy framework determined by the National Skills Authority, which also advises the Minister of Labour on skills development.

While the main focus of SETAs is the co-ordination of skills development within their respective economic sectors, they were given another important role that links directly to NQF implementation. They are accredited by SAQA as Education and Training Quality Assurance bodies. SETAs quality assure qualifications and unit standards in their areas of “primary focus” – that is, the qualifications that SAQA delegates to them. So, for example, the quality assurance of programmes aligned to bricklaying or carpentry qualifications is delegated to the Construction SETA, which must ensure that all accredited training meets approved standards.

The main functions of SETA ETQAs are:

- accrediting providers of education and training;
- evaluating and approving programmes;
- establishing assessment and moderation processes;
- validating learner achievements; and
- awarding credits.

Where there is overlap between the primary focus of two ETQAs, then they are required to develop Memorandums of Understanding (MOUs) to clarify how the overlaps can be addressed. For example, in Early Childhood Development (ECD) programmes there is some overlap between Umalusi, which is the ETQA for formal general and further education (schools and colleges), and the ETDP SETA, which is the SETA ETQA for certain ECD qualifications provided by FET colleges and other providers outside of the scope of Umalusi. So there is an overlap of responsibilities. In cases where a non-governmental organisation (NGO) or private provider runs ECD programmes, it is clear that the ETDP SETA is responsible for conducting quality assurance. However, if a public FET college delivers programmes for such qualifications, then Umalusi is the ETQA that quality assures the provider (the FET college), while the ETDP SETA quality assures the qualification. In this latter situation, who is responsible for quality assuring programme delivery and assessment, and how? There should be a Memorandum of Understanding between Umalusi and the ETDP SETA to resolve the problem and clarify responsibilities. Such MOUs have been very difficult to negotiate and implement. This is an example of a common problem, and one that has created tensions throughout the system.

Skills Development Levies Act

The Skills Development Levies Act (SDLA) of 1999 established the system of levy financing to fund skills development. A levy of 1% of an employer's payroll is collected from employers by the South African Revenue Service (SARS); employers complete levy forms in the same way that they complete returns for PAYE. Each employer is registered as a member of a particular SETA. The funds collected by SARS are passed to the Department of Labour, and then distributed to the SETAs. Twenty per cent of the levy paid by employers goes to the National Skills Fund for training people outside of the formal economy.

The public sector is exempt from the levy. However, government departments and state entities that are funded 80% or more from the fiscus are required to spend 1% of payroll on skills development, and report to their SETA on spending. One-tenth of that 1% must be given to the relevant SETA to support administrative costs. So although government departments do not have to pay the levy paid by private employers, they do contribute significantly to the capacity of SETAs to carry out their functions.

The levy is important because it provides funding for skills development outside of the system of general taxation. While public education is funded from taxation, skills development is funded from the levy, which provides more than R5 billion per year.

It should be noted that although SAQA receives some funding from taxation via the Department of Education, it has had to rely heavily on donor funds, including significant amounts from the European Union (EU). This is because of the very high cost of designing and reviewing qualifications. As the level of donor funding has declined, SAQA has sought funding from SETAs for the process. This means that SETAs have started to play a significant role in the development and ongoing implementation of the NQF.

General and Further Education and Training Quality Assurance Act

As was mentioned above, there is a separate ETQA – Umalusi – for formal general and further education and training in the country's schools and colleges. The General and Further Education and Training Quality Assurance (GENFETQA) Act (2001) established Umalusi. Umalusi is best known for its role in quality assuring the Matric examination, but it has a much wider role. The GENFETQA Act provides for Umalusi to quality assure the entire general and further education system, though each function has to be assigned to it by the Minister of Education. Currently Umalusi quality assures the Senior Certificate (and from December 2008 the new National Senior Certificate) at the end of Grade 12, ABET level 4, certain traditional trades training provided in FET colleges, and National Certificate (Vocational) courses offered by FET colleges. Umalusi also accredits private or independent examining bodies and quality assures independent schools.

The intention of the NQF was to establish a system for developing and approving qualifications across the education and training system, from schools and colleges to workplace training. In practice, the qualifications for GET and FET have been developed by the Department of Education and quality assured by Umalusi. The role of SAQA in general and further education is limited to formally registering the qualification on the NQF, and maintaining a database of students and their achievements. Even the exam results are provided through Umalusi, so there is a clear separation of responsibilities.

Higher Education Act

The qualifications given by universities and other institutions providing higher education are developed by the institutions themselves, They are quality assured by the Higher Education Quality Committee (HEQC) of the Council on Higher Education (CHE). This responsibility is allocated under the Higher Education Act of 1997. For some years, while the CHE and HEQC were being built, it was believed that SAQA should play a role in higher education. Some 8 000 university-provided qualifications were reformatted into the SAQA template and approved as “interim” qualifications by the SAQA Board. However, they never went through the NSB or SGB process, and universities have retained the right to develop their own qualifications.

The HEQC processes for quality assurance differ from those adopted by SAQA. SAQA deals with accreditation of providers and programme approval, whereas the HEQC audits higher education institutions and accredits programmes. Universities have not adopted qualifications based on unit standards, and instead have maintained modular-based “whole qualifications”. The distinction between modules and unit standards is not a simple one, and the debate over this has become symbolic of wider pedagogical and philosophical differences. Broadly, modules are an integral part of both the qualification and its curriculum and programme. Unit standards, on the other hand, are separate from the curriculum and programme, which are developed independently by providers to achieve the unit standard outcomes. While it would have been technically a simple process to transform university qualifications into ones based on unit standards, the likely impact was seen as contrary to the goals of the university sector, and the work was not done.

It should be noted that the intention of the NQF was to provide a single set of qualifications designed in a common format across the higher education, professional and work-related fields of learning. As has already been stated, it was intended that a qualification registered on the NQF would be separate from curriculum and programmes, and could be accessed by all higher education providers. In practice, however, qualifications accredited by the HEQC contain institution-specific curriculum that can only be provided by the institution that developed those qualifications. Although there are higher education qualifications, including some professional qualifications, that are quality assured by SETAs, it is generally the case that higher education

qualifications are not developed within the SAQA system, but simply registered by SAQA.

In 2007 the Higher Education Act was amended. There is now a Higher Education Qualifications Framework (HEQF), which sets out the requirements for qualifications from level 5 to level 10 on the NQF. Some of the terminology is similar to that used by SAQA, but it is a clear departure from the single-framework NQF. There will be further amendments to take account of the 2007 joint agreement between the Department of Education and the Department of Labour.

Evaluations of NQF Implementation

It is generally agreed among stakeholders that there are serious problems emerging from NQF implementation. However, there is still overwhelming support for the principles and goals of the NQF as part of the broader transformation of the education and training system. It is interesting to note that few of the critiques of the NQF challenge its purpose, values and principles. Rather, argument tends to focus on how the NQF has been implemented.

The entrenchment of a common set of principles is positive because it enables debates on the way forward to be conducted within a common framework of understanding. So, for example, no one believes that South Africa should return to a system that provides different sets of qualifications to different racial groups; all stakeholders understand that non-racialism is non-negotiable. However, there is also a negative side to this, because it is difficult to criticise some aspects of implementation without encroaching on the principles. For example, it is difficult to argue against developing a common set of level descriptors that relate to both university qualifications and work-related qualifications (a strongly held view among some academics) without challenging the principle of a common set of national standards. Similarly, it is difficult to criticise the role of stakeholders without challenging the principle of stakeholder engagement. This is not to suggest that the principles are wrong, but it is important to acknowledge that they place constraints on achieving agreed and practical adjustments when they do become necessary.

Studies by SAQA

SAQA has conducted studies on the implementation and impact of the NQF, the most recent in 2005. This study measured NQF impact using seventeen indicators, grouped into the following focal areas:

- the extent to which qualifications address the education and training needs of learners and of South African society;
- the extent to which the delivery of learning programmes addresses the education and training needs of learners and of South African society;
- the extent to which quality assurance arrangements enhance the effectiveness of education and training; and
- the extent to which the NQF has had a wider social, economic and political impact in building a culture of lifelong learning.

SAQA found that some positive impact had been achieved. The NQF had become an accepted pillar of transformation, general awareness about the NQF and its role in setting standards for education and training had increased, and linkages were being made between the NQF and other government strategies. However, in looking at the key goals of access, equity, portability, quality and integration, the NQF was found to have had either moderate, minimal or mixed impact. In general, there seemed to be support for the standard-setting and quality assurance systems and processes, but at the same time there was serious criticism of the way they were being implemented. Stakeholders were concerned about the following aspects:

- the poor relationship between the Department of Education and the Department of Labour;
- lack of Memorandums of Understanding between overlapping parts of the system;
- lack of buy-in by some institutions;
- a continuing lack of “parity of esteem” between qualifications acquired through formal education and qualifications acquired through workplace training;
- confusion and complexity in the system;
- slowness of implementation of the recognition of prior learning; and
- lack of trust.

SAQA has been generally positive about the impact of the NQF, but has acknowledged these implementation challenges. It has expressed concern about the disagreements between the Department of Labour and the Department of Education, and about the lack of commitment in parts of government and by other stakeholders. It has also drawn attention to funding challenges, and stated that there would be greater impact if funding was improved.

SAQA has attempted to deal with the identified challenges. It has intervened to speed up certain processes (such as turnaround time for registering a qualification) and to improve aspects of the quality assurance system. SAQA has also conducted or commissioned additional research – for example, on uptake of certain qualifications – and these reports are posted on the SAQA website.

Studies by the Department of Education and the Department of Labour

Two reports have been produced by teams mandated by the Ministries of Education and Labour.

An inter-departmental study team was established in 2001. Its mandate was to recommend ways in which NQF implementation could be streamlined and accelerated. The team received many submissions. Its report was published in 2002 – *Report of the Study Team on the Implementation of the National Qualifications Framework*. The report noted widespread criticisms of the NQF including the slowness of the system in achieving redress and access, the overly complex nature of the structures, the overlap and confusion over roles, and the proliferation of bodies responsible for standard setting. Inadequate funding and reliance on unpaid stakeholders was criticised. Tensions were evident between the Department of Labour and its institutions (the SETAs) on the one hand, and the Department of Education and its institutions (Umalusi, HEQC, CHE, and the departmental units responsible for curriculum) on the other.

The study team reaffirmed support for the NQF, for the integration of education and training, and for the stakeholder-driven approach. However, it recommended greater streamlining and simplification, a distinction between stakeholder representation and technical expertise in qualification design, and

that standard setting and quality assurance be brought together in a single body. A number of detailed recommendations were made including the extension of the NQF to ten levels. The team also recommended that standard setting should be formally given to SETA ETQAs and Band ETQAs, as well as the Department of Education and the Department of Labour. It also recommended a move towards a three-pillar structure in which formal schooling, higher education, and vocational or professional education would each have their own approaches to NQF implementation.

The two Departments examined the recommendations and in 2003 produced the *Interdependent National Qualifications Framework: Consultative Document*. This document reaffirmed support for the NQF. It restated some of the criticisms made in the study team's report, but rejected some of the key findings and recommendations. Whereas the initial approach of the two Departments, and of the study team report of 2002, was to try to integrate (or blur the distinctions between) institutional learning and occupational programmes, the 2003 Consultative Document believed it was better to acknowledge the distinction and allow for it. The Consultative Document suggested that there should be three distinct learning pathways – institutionally based programmes (universities, colleges and schools), occupational context-based training (employer-oriented), and general vocational or career-focused training (something in between the two).

A central recommendation was that there should be three Qualification and Quality Assurance Councils. Two of them would be similar to the existing Umalusi and HEQC, responsible for formal GET, FET, and higher education and training. A new Trade, Occupation and Professional Practice Qualifications and Quality Assurance Council (TOP QC) would be formed to focus on work-related programmes outside the formal education system. This would allow the three sub-systems of the education and training system to work independently but in a manner that would enable SAQA to maintain its overall responsibility for the NQF.

There were many responses to the Consultative Document. However, due mainly to ongoing differences between the Departments of Education and Labour, there were no final recommendations until 2007. In September of that year, the Ministers of Education and Labour took a Memorandum concerning implementation proposals to Cabinet. The proposals were agreed as the basis

for ongoing NQF implementation, and are discussed later in this booklet (see section “Where now for the NQF?”).

An academic critique

There have been many criticisms of the NQF in academic circles. Probably the most comprehensive summary of these criticisms is contained in the doctoral thesis of Stephanie Allais, Head of Research at Umalusi. This thesis draws on the widespread academic critique that exists in South Africa and internationally in relation to qualifications frameworks. Allais looks at the countries that influenced South Africa – Australia, New Zealand, Germany, England, Ireland and Scotland – and draws on research from these countries, as well as from South African studies.

The criticisms in South African research and academic papers are often linked to a general critique of the skills development system, and in particular the widespread criticism of the performance of SETAs. These criticisms have been supported by studies conducted for JIPSA and NEDLAC. (JIPSA is the Joint Initiative for Priority Skills Acquisition, based in the office of the Deputy President as part of ASGI-SA. NEDLAC is the National Economic Development and Labour Council, a tripartite body – comprising representatives of government, labour and business – that helped to establish consensus on skills development before legislation was enacted in the 1990s.) There is a generally accepted view that the entire system is complex, bureaucratic, difficult to access, wasteful of resources, often managed by people who do not have the required skills, and whose accountability mechanisms are generally not working. Such criticisms can appear to be criticisms of the NQF, but in fact they relate to the wider skills development system.

The important contribution of the Allais thesis is that it separates specific concerns about the NQF itself from the general critique of SETAs and skills development implementation. Allais regards the NQF – and indeed qualifications frameworks generally – as a flawed concept. She challenges the idea that the NQF can be a driver of transformation, and suggests that the implementation challenges experienced are not so much the fault of poor implementation or design errors, but stem from the adoption of the NQF itself.

A particular criticism she makes is that the main focus of South African education policy has been on using outcomes to drive the transformation of education and training. She argues that in general, but particularly in a developing country context, better results are achieved through focusing on building institutional capacity. In order to achieve high-quality education and training, it is not so much external standard setting, monitoring and quality assurance that are needed but rather quality teaching practice and sound internal self-regulation by institutions.

Allais describes the various qualifications frameworks around the world as being very different, with some being built on existing education, training and development (ETD) practice (such as in Scotland) and others being used to radically change the way things are done (such as in England, New Zealand and South Africa). Some are narrowly focused on workplace learning and others have attempted to encompass the entire education and training system. She also notes that some NQFs are enabling rather than prescriptive. In other words, some NQFs are more like a guide, whereas others set out in detail what is required for qualifications to be recognised, and rules are rigidly enforced. She points out that the levels of conflict are higher in those countries that have adopted a prescriptive and system-wide approach. Much greater consensus is reached where the goals of the NQF are more modest and more narrowly focused on workplace skills, as is the case in many developing countries.

The South African NQF is described as very ambitious, broad in its scope, and quite prescriptive in the way that it lays down rules for standard setting, accreditation of providers, approval of learning programmes and assessment of learners against the approved standards. Allais suggests that this will inevitably result in contestation. She believes that the only reason why the contestation is not greater in South Africa is the perception that opposition to the NQF is seen as an attempt to undermine the national agenda for transformation. This results in disagreements not being properly debated, and a false consensus that implementation, rather than the policy itself, is the problem.

Allais is a critic of unit standards as units of learning. This is an important critique, as the inter-departmental study team report of 2002, the Consultative Document of 2003, and the final Cabinet Memo of 2007 all seek to minimise the importance of the argument between the SAQA unit-standards-based

approach to qualification design and the traditional university approach of whole qualifications. The argument has eventually been settled by allowing both types of qualification and suggesting that both are suitable in their context. Allais criticises the breaking down of learning into small, piecemeal and often illogical bits, and gives many examples of unit standards that are of very dubious quality. She argues that learning does not follow a mechanistic and simple sequence, but that it is like scaffolding, with individuals reaching increasingly complex levels of knowledge and understanding as they develop during a programme of study. Unit standards create an impression that learning can be achieved in discrete components, and this is wrong, both in the context of institutional-based learning and work-related skills.

She also criticises the assumption that underpins the NQF, namely that national qualifications, once achieved by learners anywhere in the country and in whatever institutional or work setting, will have the same value. Allais argues that this is simply not realistic. Qualifications have a social currency, with learners, employers and providers placing their own interpretation on the value of a qualification and the institution where it is awarded. The NQF is simply not able to achieve the “parity of esteem” that many supporters of integration of education and training seek.

The above is only a brief and selective summary of some of the views expressed by Allais. Together, the arguments amount to a charge that the current NQF will inevitably fail in its intentions, however its implementation is modified.

Key Areas of Policy Debate

Debates on the NQF are not easy to follow, because of the genuine difficulty that exists in separating the NQF from the wider skills development landscape. Criticism tends to be focused on the complexity and bureaucracy of the system as a whole. Disentangling the issues related specifically to the NQF is a challenge. It is the intention of this section to focus specifically on the NQF, while referring where appropriate to the wider systemic issues that inevitably arise.

It is possible to debate the NQF at a number of levels and within various frameworks. In evaluating the debates, it is necessary to acknowledge that there are different discourses. While there is some agreement among NQF

stakeholders on the problems, there is less agreement on the causes. There are also different levels of debate around how to discuss the causes of the implementation challenges. Because of these conceptual misunderstandings, there is a tendency for people to talk past each other, sometimes understanding a position but rejecting it out of hand, and sometimes not really understanding the framework being used in the discussion.

The purpose of this section is not to describe all the debates in detail, but to set out the broad areas of debate in a manner that enables participation at different levels. The three main levels of debate can be summarised as follows:

- Proposition 1: **The NQF is basically sound**, and the challenge is to speed up and consolidate implementation. The debate assumes that there is agreement on the NQF and focuses on how to make it work better.
- Proposition 2: **There are design problems with the NQF** as it has been developed in South Africa. The implementation challenges are so great that they require a change in the way that the NQF is designed. The debate does not challenge the NQF itself, but focuses on its scope and flexibility (or lack of it).
- Proposition 3: **The NQF is a fundamentally flawed policy**. This discourse suggests that, because there are so many implementation problems, we cannot simply agree that the NQF is a sound policy or that it should be adapted. It must be rejected in favour of a strategy more appropriate to the challenges facing South Africa.

These three propositions are examined below in more detail.

Proposition 1: The NQF is basically sound.

In a number of SAQA annual reports and evaluations, the NQF is described as working well, with increasing levels of commitment among stakeholders and role-players. It is described as an essential and acknowledged part of a transforming education and training system. There are many who agree, particularly those who are key stakeholders in the skills development community – the Department of Labour, SETAs, private providers, trade unions and employers.

Those who hold this opinion are not complacent, however. They see various problems of implementation in the NQF:

- Access is improving but at too slow a pace.
- Recognition of prior learning has been slow to take root.
- Portability between different learning routes remains problematic.
- There has been limited buy-in from higher education institutions.
- Many qualifications have not been used.
- The number of people accessing programmes aligned to the new qualifications are not as high as would be expected.
- The system is too complex.

The following reasons are given to explain the slowness of uptake and implementation:

- The system is young and needs more time.
- There has been resistance in some sections of the education and training system, and political will is required to overcome that resistance.
- SAQA has been poorly funded by the state and relies on external funding. Much more could be done with additional funds.
- There have been implementation blockages due to incapacity in some parts of the system. SETAs are having particular problems, and are causing much of the unhappiness with the system as a whole.
- There have been “turf wars” between the Department of Education and the Department of Labour, and these have undermined the implementation of the NQF.

In this type of discussion there is considerable energy and commitment from the stakeholders to debate how these problems can be addressed and overcome. Those engaged in this debate believe that it is crucial to allow the system more time. The review of the NQF in 2001 is seen as irresponsible, because there had not been enough time for the system to evolve. Even ten years on, this is a limited period in relation to turning around an entire system. Of course there are problems and these must be addressed, but one cannot “throw out the baby with the bathwater”. The challenge is to address the implementation problems and deal with resistance where it occurs.

Many stakeholders support this analysis. At the same time, some of them are critical of SAQA and its management of the NQF. They believe that some of the problems could have been avoided. Criticisms of SAQA include:

- SAQA has been quite rigid in its approach to quality assurance and standard setting.
- More co-operation could have been achieved with a more flexible and accommodating approach.
- SAQA has accredited SETAs as ETQAs but then allowed poor performance to go unchallenged.
- There has been too much defensiveness, with SAQA perceived as defending its sphere of influence rather than engaging with genuine criticisms and concerns.

The important thing to note about this type of debate is that it assumes that the NQF itself is a correct policy approach by government, and that the problems are essentially about implementation. Implementation requires commitment and funding, and although SAQA can be justly criticised on occasion, this should not be a reason for undermining the important work that it has done and that has achieved major changes in a once-fragmented and racist system. SAQA and the NQF should be credited with major achievements, and their status and powers should be clarified and strengthened.

Proposition 2: There are design problems in the NQF.

Many providers and other stakeholders believe strongly in the NQF and SAQA processes, but acknowledge that there are serious design problems. The 2003 Consultative Document stated that the big debate around “full qualifications” versus “unit-standard-based qualifications” was in fact a reflection of a much deeper divide. It is worth looking at some of the serious challenges that the Consultative Document tried to address. They include the following:

- **The rejection of uniform standard-setting processes.** The policy set down by SAQA – that all qualifications should go through National Standards Bodies and should conform to a certain format and rules – was contrary to the approach of universities. Universities all over the world have traditionally seen qualifications as being unique to an institution, and made up of interlinked modules rather than stand-alone unit standards. Thus higher education

overwhelmingly rejected the SAQA requirements. The underlying philosophical reasons are set out in the Consultative Document. The Department of Education has accepted and supported the position of higher education institutions, and there is now agreement between the Department of Education and the Department of Labour that universities may develop their own standard-setting processes, with quality assurance provided by the Higher Education Quality Committee.

- **Concern over the evolving education, training and development market.**

An initial concern was that SETA and NSF funds were being used to drive a particular training agenda, and that this impacted negatively on reforms of FET provision by the Department of Education. The 2006-2010 National Skills Development Strategy seeks to allocate funds directly to FET colleges as a way of giving some control to the formal education sector over the spending of levy income. So measures have been taken to control or influence the market and to involve the state sector in that market. However, there is still concern that the market – which is very much part of NQF design – is having an unintended negative impact on education and training. For example, when a SETA or the National Skills Fund allocates money to a particular area of training, this affects supply and demand. If demand is artificially inflated, this will result initially in supply at much inflated prices, which will only fall when supply capability increases. In other words, serious inflationary costs are built into the system as it is currently designed. There is much disagreement on how, if at all, the state should intervene in this market.

- **Criticism of the structures and institutions for quality assurance.** SETAs have been subjected to intense public criticisms that have reinforced the views of some who are critical of the NQF. In particular, there evolved a serious distrust of the SETA ETQAs among Department of Education stakeholders, including Umalusi and the Higher Education Quality Committee. They believed that the ETQAs lacked competent people, that they were implementing a crude form of quality assurance, and that they were helping to foster a major expansion of private providers. It is difficult to separate these criticisms from those made of SAQA and the NQF because the overall system is so inter-connected.

- **A belief that education and training are different.** While there is support for the NQF in principle, there are fundamental disagreements between those

involved in formal institutional education and those involved in occupationally directed training. Agreement has not been achieved in relation to level descriptors, qualification design, separation of qualifications from curriculum, assessment criteria, accreditation processes, and so on. Underpinning these disagreements are two very different approaches to education and training.

Those involved in formal education promote the value of education for education's sake. They argue that a sound education will enable improved quality of life, whether that is measured in terms of economic, cultural, citizenship or other indicators. The needs of the labour market are seen as important, but not as the driving force of programmes.

Those engaged with skills-related training, on the other hand, understand the need for broad educational development, and so support the inclusion of fundamental learning in skills programmes. However, their driving imperative is to equip workers and potential employees to meet the needs of the labour market.

Sometimes the differences between these two views are exaggerated. Many involved in education work hard to make the institutional education programmes more relevant to the needs of employers, and many workplace trainers believe passionately in the critical cross-field outcomes and the fundamental learning associated with skills training. However, the differences are there, and the aspiration of integrating education and training seems now like a very idealistic goal that is unlikely to be achieved in the near future.

This discourse is a very difficult one, and requires a combination of commitment, patience and pragmatism. Those engaging in this debate accept that there are some serious flaws in the conceptualisation of the NQF as it has been developed in South Africa. They acknowledge that maintaining a rigid position could jeopardise the entire education and training transformation project. There is acceptance that the system needs to be redesigned in order to keep transformation on track and broadly in line with the principles and goals set in the 1990s. A thorough reading of the Study Team Report of 2002, the Consultative Document of 2003 and the Cabinet Memo of 2007 provides many examples of deep divisions that have been addressed by pragmatic agreement that different parts of the system will develop independently and

differently. There is a sense that more areas of disagreement will emerge in the future and that these will be addressed in the same pragmatic way – through dialogue and respect for differences. The solution is seen to be one NQF, but with three independent approaches and institutional structures.

Proposition 3: The NQF is a fundamentally flawed policy.

In a chapter of Cloete and Wissink's book, *Improving Public Policy*, Petrus Brynard (2000) analyses thinking around policy implementation and suggests that effective policy implementation involves five variables, which he describes as the 5Cs – content, context, commitment, clients and coalitions.

Much of this booklet so far has addressed the last four Cs. The *context* within which NQF policy was developed was one of struggle against apartheid, where issues of access and redress dominated the debates. The context of implementation has been marked by a change of emphasis towards poverty reduction and job creation. The *commitment* of some stakeholders has been at a very high level, but that of others has been questioned. *Clients* – providers, SETAs, learners, employers, and the unemployed (through political pressure on government) – have helped shape policy implementation. A market has been created that has not necessarily done what was expected. *Coalitions* have emerged, some of which have helped shift policy implementation away from what was planned. Some coalitions have shaped a market that has developed its own momentum, and some have sought to separate parts of the education system from the NQF.

In this section we turn to *content*. Can NQF policy achieve what it intends to achieve? Is it – in the words of unit-standard design – fit for purpose? The following is a summary of some of the key themes that have emerged; they suggest a need to start afresh rather than continuing to adjust a system that is fundamentally flawed.

- One of the key points put forward by the supporters of this proposition is that the NQF aspires to achieve things that it cannot do. Claims that the NQF can bring about improved access, quality and redress are unrealistic. In motivating for the NQF, policy makers quoted extensively from the successes of qualifications frameworks in other countries. However, an analysis of these NQFs conducted by Allais (2007) indicates that many of them were not as

comprehensive as the one South Africa has adopted. Where they were (such as in the UK and New Zealand), they have been so contested that they have all but collapsed. In many countries the NQF is seen merely as a useful way of understanding the hierarchy of qualifications and facilitating discussions among educators. As such, they do not attract the criticism that the South African NQF receives.

- The emphasis on outcomes-based education is criticised by some, particularly in the context of an inherited system that was in crisis. OBE and the NQF separate the outcomes (qualifications and unit standards) from the inputs (curriculum, programmes, teaching and learning, and institutional capacity). It is expected that providers, funders and learners will create a market in which resources can be mobilised to achieve the NQF outcomes. In a developing country context, the capacity of those providing the inputs is low, and so the results tend to be poor. No matter how good the standards that are set, and no matter how effective the quality assurance mechanisms, the quality of education and training is not likely to be high. Thus it follows that the government should focus attention on institutional capacity rather than on outcomes. The outcomes will improve if the quality of the inputs (particularly teaching) improves.

- Allais (2007) describes the NQF as part of a neo-liberal approach to education and training. A traditional public-administration approach depends on state institutions like schools and colleges to produce quality education and training in line with policies determined by government. The neo-liberal response to this is called New Public Management (NPM). In this approach, policy is separated from delivery – providers account for delivery through contracts awarded by government (in South Africa's case, the Department of Labour) or parastatal organisations (SETAs). The idea is that the increased choice this supposedly generates for the consumer forces the market to deliver quality education products. The monopoly of education departments is broken down, which is supposed to bring about more competition and accountability.

The claim is that the NQF contributes to the implementation of neo-liberal, market-driven approaches to education. The breaking down of qualifications into unit standards means that consumers can pick and chose what to study, and providers can offer shorter courses that are more directly responsive to employer needs. The market is supposed to respond to the resources available

and to the demand for programmes. Because employers have a big say in the programmes selected by their employees, an employer-driven market is created. Employers exert pressure for training that is more closely aligned to the needs of industry. They want resources to be channelled to scarce and critical skills rather than to programmes that do not meet such needs. So the focus of the system changes from developing the general levels of education to developing specific, economically beneficial skills.

- There are philosophical concerns as well. Education theory describes various approaches to education as “epistemological”. It is argued that there are two competing and mutually exclusive epistemologies. One sees the learner as self-directed, aware, able to manage studying, and the educator’s role being to stimulate, promote and nurture creativity and learning. The other epistemology is economically driven. Its focus is on competence to achieve an externally determined outcome, and the role of the educator is to bring the learner to the required level of competence. Those criticising the current NQF, and its emphasis on unit standards with narrow and occupationally directed outcomes, believe that education and training standards are being sacrificed to meet narrow economic goals. They argue that this approach is not only wrong for the education system, but that it is also wrong for skills-related training. Because of the narrow focus on skills related to a specific work context, workers are being disadvantaged, because they will not have the broader educational foundations required to meet the changing needs of the labour market.

The above is a very brief summary of some of the criticism levelled at the NQF and its associated structures and funding arrangements. There are more, and more complex, arguments in favour of a complete review of thinking around education and training reform.

What is important in these arguments is the insight they provide into the debates that often become over-simplified for the benefit of the wider public. There is no doubt that the existence of this debate creates a level of discomfort. For many it will be seen as challenging the basic principles and goals set by the ANC-aligned movement to transform the apartheid education system. However, the issues are important, and it is helpful for stakeholders to have a basic understanding and to be able to consider them when engaging practically with NQF implementation challenges.

Where Now for the NQF?

The three propositions outlined in the previous section are intended to assist the reader to develop an understanding of the various types of arguments that exist within the NQF stakeholder community. All of them have had an impact on policy and policy implementation. So what exactly is the current status and possible future of the NQF?

In 2007 a new framework was agreed between the Ministries of Education and Labour that addresses several of the problems associated with the NQF. The joint statement approved by Cabinet in September 2007 formally sets out what has for some time formed the basis of planning in the Departments of Education and Labour and is now informing NQF implementation. This is being gradually implemented.

Three Qualification and Quality Assurance Councils (QCs) will assume all the responsibilities of quality assurance – (1) the Higher Education Quality Committee (HEQC), (2) the Council for Quality Assurance in General and Further Education and Training (Umalusi), and (3) the Quality Council for Trades and Occupations (QCTO). Broadly, the HEQC and Umalusi will continue as they have evolved, with some small changes. Work has started on the development of the new QCTO, and draft legislation in this regard was published in February 2008.

The intention is to clarify and centralise responsibility for quality assurance. The three QCs will be responsible for all aspects of quality assurance, from qualification design through to institutional and programme accreditation, as well as quality assurance of programmes and learner achievements. Some of the implementation functions may be delegated to SETAs by the three QCs, but responsibility will be at QC level. In order to implement this change in the NQF, the Skills Development Act (as well as other laws) will have to be amended.

While it will take some years before the new QCTO becomes fully operational, from 2010 the new NQF institutional arrangements will be in place and the quality assurance role of SETAs will be changed significantly.

It is clear that what is starting to emerge is a revised NQF that has a number of features that are different to those intended and planned. These include:

- Standards-setting and quality-assurance arrangements in the formal education system will be different to those for workplace-based or occupationally directed training.
- There will be three qualifications sub-frameworks (one each for general and further education, higher education, and trades and occupations), with three different sets of rules for their development, implementation and management.
- There will be a move away from integration to working towards linkages between the different sub-systems in order to find ways of improving access, portability, and the currency or value of the different qualifications.

There has been an acceptance that, as it evolves, the NQF will no longer be the unified structure that was planned in the 1990s. The integration of education and training – with access and automatic portability of qualifications across the different learning routes – is no longer believed to be practical. With the establishment of the HEQC and Umalusi, a different approach has already been adopted in the formal higher, further and general education bands to the one adopted by SETA ETQAs for skills development. It is likely that the development of the planned Quality Council for Trades and Occupations will make more distinct the differences that have emerged.

Many of those who support the NQF, and who have exerted themselves to make it work, will see the emerging changes in a very negative light. Some will regard the principles and purpose of the NQF as being irrevocably undermined. Some will argue for reversing some of the *de facto* changes that have occurred without genuine public debate and consensus. However, many NQF stakeholders will see the changes currently under way as pragmatic adjustments to a system that had deep flaws and that was based on some incorrect assumptions. Even if the assumptions were correct in 1994, they would argue that conditions have changed and that the NQF needs to adjust to the new environment. Those who challenge the NQF as a policy will maintain their view that the reforms are simply covering the cracks in a flawed structure.

Conclusion

With just over ten years of experience of NQF implementation, it may not yet be possible to properly measure progress in relation to impact. However, a number of conclusions can be drawn from this brief analysis of the NQF and its implementation.

Firstly, there is a high level of unity around the principles and aims of the NQF. The heated debates on implementation should not obscure this key advance. No one wants to turn back the clock to the situation that existed before 1994. Equity, access and redress remain key to our understanding of a transformed education and training system. Goals of greater equity, portability, improved quality and access are firmly embedded and will inform all future policy debates.

Secondly, there is a growing understanding that policy implementation is a complicated matter. There are numerous examples of excellent-looking policy that that has had no impact at all because implementation challenges were not understood by policy makers when they formulated the policy. Many lessons can be learned from the implementation of the NQF, and stakeholders have managed to engage with some of them. Although there has been a high level of contestation, workable solutions are being found.

Thirdly, South Africa is not alone in battling with education and training reform. Our history of apartheid divisions may be unique, but the challenge of raising standards and improving access are universal. Borrowing policy from abroad, possibly without adequate critical evaluation, may not have been sensible, but there are many lessons that can be learned from international experiences.

It is hoped that this booklet will help inform debate and encourage constructive contestation on the best approaches to transforming the country's education and training system.

Further Reading

Books and reports

African National Congress (ANC). 1994 (2003). *A Policy Framework for Education and Training*. Johannesburg: Centre for Education Policy Development.

Allais, Stephanie. 2007. *The Rise and Fall of the NQF*. Unpublished doctoral thesis, University of the Witwatersrand, Johannesburg.

Brynard, Petrus. 2000. Policy Implementation. In *Improving Public Policy*, edited by F. Cloete and H. Wissink. Paarl: Van Schaik.

Departments of Education and Labour. 2002. *Report of the Study Team on the Implementation of the National Qualifications Framework*. Pretoria: Departments of Education and Labour.

Departments of Education and Labour. 2003. *An Interdependent National Qualifications Framework: Consultative Document*. Pretoria: Departments of Education and Labour.

South African Qualifications Authority (SAQA). 2005. *National Qualifications Framework Impact Study Report No 2 – Establishing a Benchmark against which to Measure the Progress of the NQF*. Pretoria: SAQA.

Legislation and White Papers

General and Further Education and Training Quality Assurance Act, Act 58 of 2001.

Higher Education Act, Act 101 of 1997.

Skills Development Act, Act 97 of 1998.

Skills Development Levies Act, Act 9 of 1999.

South African Qualifications Authority Act, Act 58 of 1995.

White Paper on Education and Training. 1995. *Education and Training in a Democratic South Africa: First Steps to Develop a New System*. Government Gazette, 357(16312).

Websites

www.cepd.org.za	Centre for Education Policy Development
www.che.ac.za	Council on Higher Education
www.doe.gov.za	Department of Education
www.dol.gov.za	Department of Labour
www.info.gov.za	South African government information website
www.saqa.org.za	South African Qualifications Authority
www.umalusi.org.za	Umalusi (Council for Quality Assurance in General and Further Education and Training)

This is one of a series of booklets on key issues in education and training policy in South Africa. Each booklet deals with one such issue and aims to give the reader, in plain English, an informed overview of the topic and its implications for various stakeholders.

The intended readership includes a wide range of people with an interest in the education and training system – members of Parliament or of provincial legislatures, teachers, trade unionists, employers, student and community activists, education department officials, journalists, governors of educational institutions, members of local or provincial education and training councils, and interested members of the general public.

Issues in Education Policy, Number 1 The National Qualifications Framework

The aim of the National Qualifications Framework (NQF) is to accommodate all recognised qualifications in South Africa – those taught at school or university, as well as those acquired through on-the-job training. Its supporters have promoted it as a system that can advance the cause of quality, equity, improved access, redress, portability of qualifications, and recognition of prior learning. However, the NQF has also been criticised as being incapable of achieving these aims.

This booklet first sets out the historical background to the NQF in South Africa. It goes on to explain what the NQF is, how it works and how it relates to the wider system of education and training. It then looks at how the policy has been implemented, and surveys some problems associated with the NQF. After this, the booklet examines several critiques of the NQF. Finally, it looks at what might lie in store for the NQF in the future.

