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EDITORIAL

While 1998 saw an emphasis on the establishment of National Standards Bodies (NSBs) and much progress towards the recognition and establishment of Standards Generating Bodies (SGBs) - in sum, an emphasis on standards setting - SAQA's strategic focus for 1999 will be extended to quality assurance (QA). It is perhaps apt, therefore, that this issue of the *Bulletin*, which was to have preceded the edition (2.2) documenting the progress of various institutions which have made significant strides in operationalizing the National Qualifications Framework (NQF), should appear at the beginning of "the year of QA".

Notwithstanding last year's emphasis on standards setting, however, considerable progress has been made by the Quality Assurance division (QAD) of SAQA in delineating the terms of reference for the formulation of policy around the accreditation of Education and Training Quality Assurance bodies (ETQAs) and providers, and assessment. This edition of the *Bulletin* registers that progress.

The first article is an adaptation of the manual drafted by QAD for organizations seeking ETQA accreditation, and is the culmination of several months' work on the design of a quality system for the NQF and on the drafting of a set of criteria for the accreditation of ETQAs. As the article demonstrates, the logic of the unfolding process is clear: from SAQA Act (RSA, 1995) to Education and Training Quality Assurance Bodies Regulations, 1998 (ETQA Regulations; RSA, 1998) to "Criteria and Guidelines: ETQAs", the state, through SAQA, has laid a strong foundation for the transformation of education and training underscored not only by a rigorous legislative process but by a commitment to seeing that legislation translated into practice. If quality is to become the hallmark of education and training provision in South Africa, providers will themselves have to embrace the criteria for assuring that quality: hence the importance of this article as a working document for aspirant ETQAs and providers alike.

The second article, which arises out of a workshop on assessment held on 30 September 1998, constitutes the first phase of the drafting of an assessment system for the NQF. Coming amidst increasing cries for a review of the matriculation certificate, the article underlines, through its focus on learner readiness as the sole criterion for good assessment practice, the need for an assessment system geared to the learning pathway of the learner rather than the dictates of institutional timetabling. However daunting the task of amending a rigid summatively-oriented "examination" system, the unequivocal need for continuous, formative assessment will make that task unavoidable.

Finally, a word about the appearance of future editions of this publication. In 1999 the *SAQA Bulletin* will appear quarterly, at the end of March, June, September, and November – initially on the SAQA web-site only, and from the June edition onwards, in hard copy also.

Works Cited

RSA (1995)."South African Qualifications Authority Act (Act No. 58 of 1995)."
Government Gazette No. 1521 (4 October). Pretoria: Government Printer.

RSA (1998). "Regulations under the South African Qualifications Authority Act, 1995 (Act No. 58 of 1995)."
Government Gazette No. 19231 (8 September). Pretoria: Government Printer.

THE STATUS OF ARTICLES IN THIS BULLETIN

The first article in this *Bulletin*, "Criteria and Guidelines: ETQAs", now in its third draft, is a working document which the Authority will accord policy status following its subjection to a process of public comment.

The second, "Assessment in an Outcomes Based Education and Training System: An Overview", is, similarly, a working document, in its first draft.

SAQA reasserts its statement in previous issues of the *Bulletin* that only those parts of the text clearly flagged as decisions or summaries of decisions by the Authority should be seen as reflecting SAQA policy.

CRITERIA AND GUIDELINES: EDUCATION AND TRAINING QUALITY ASSURANCE BODIES (ETQAs)

by Gail Elliott, Head, Quality Assurance Division, SAQA

Section One: Overview and Introduction

History and Purpose of the Criteria and Guidelines for ETQAs

This explanatory paper concerns itself with the *quality assurance* development and implementation functions of the South African Qualifications Authority (SAQA) as specified in the "South African Qualifications Authority Act (Act No. 58 of 1995)" (RSA, 1995). This Act and the gazetted "Education and Training Quality Assurance Bodies Regulations, 1998" (ETQA Regulations; RSA, 1998a) provide the enabling and regulatory framework for implementing the quality assurance systems and processes required by the NQF. It is within this enabling and regulatory framework that the current Criteria and Guidelines are situated. These have been developed through a SAQA-led participatory stakeholder and public input and review process with full regard for the powers, functions and responsibilities (formal and informal) that education and training bodies have. Such bodies include

- statutory and non-statutory quality assurance, accreditation and/or certification bodies for specific and general forms of education and training (learning); and
- public and private institutions or providers of specific and general forms of education and training (learning).

The particular purpose of these Criteria and Guidelines is to enable the implementation of SAQA quality assurance and accreditation functions within this transitional phase of developing the NQF.

It must be noted that a process approach to implementation has driven the development of the Criteria and Guidelines. The ETQA accreditation model adopted by SAQA is based on a phased-in, transformational approach which accommodates the quality assurance requirements for qualifications currently registered as national qualifications and which moves towards the implementation of quality assurance processes for an outcomes-based and integrated approach towards education and training. The transformation model is also grounded in the necessity to

- accommodate historically and statutorily separate stakeholders in the education and training system; and
- build on the strengths and benefits of these structures and systems within current and future imperatives for lifelong learning through an NQF.

Developing the Criteria and Guidelines

The Criteria and Guidelines for ETQAs were developed by SAQA to accompany the gazetted ETQA Regulations for quality assurance. The first draft was presented in August 1998 to a national workshop on quality assurance for ETQAs and providers to which potential SAQA-accredited ETQA and assessment agency bodies were invited.

A second draft was then compiled to reflect the inputs of the Authority stakeholder representatives and other identified quality assurance stakeholders. This draft was presented at a second national workshop, where the focus included the requirements of the NQF assessment system for ETQAs and providers.

Inputs from these processes have been included in this third draft. Attempts to ensure the inclusivity of the document development process and to accommodate stakeholder concerns have included allowing some stakeholders to reserve comment until such time as their sectors or bodies have been through the documents at decision-making levels within their own structures. SAQA is sure that possible ETQA, examining and moderating bodies will find that the Regulations are sufficiently flexible to accommodate a variety of quality assurance activities without being overly prescriptive or intrusive.

It should be noted that this third draft has taken a different format from drafts 1 and 2. It has been developed as an explanatory manual, with descriptive style and tone predominating especially over legalistic and inaccessible language.

Once the Authority has decided on the suitability of the final draft for public comment, the document will be placed in the public arena; the public will be invited to submit written comment, and participate in public hearings, on its contents, whereafter it will be formally adopted as SAQA policy.

The Design of the Criteria and Guidelines

The document is designed as an explanatory manual for education and training bodies wishing to apply for accreditation under the provisions of the SAQA Act. It is a guide for ETQA and Provider bodies to evaluate what they need to have in place to be accredited and puts forward a number of possibilities for such bodies within the ETQA Regulations. It also acts a basis for the development of detailed criteria and guidelines that ETQAs will have to put in place in order to evaluate and accredit providers.

Users are urged to use the Criteria and Guidelines as a "living document" - to add comments and notes, and to insert copies of international, national, sectoral and/or organizational quality statements, policies, procedures and practices, where appropriate and applicable.

The second section outlines SAQA's quality assurance function within the concept of a total quality system for the maintenance and continual improvement of education and training standards and qualifications registered on the NQF. This section is intended to assist users in identifying those elements of their quality assurance and/or management policies and procedures that have a necessary relationship with the accreditation requirements of the NQF. Where appropriate, these have been located against known sectoral education and training system requirements.

Highlighting the SAQA-related structures and systems is also intended to assist users in understanding the separation of the two primary implementation functions of the NQF, namely, standards setting and quality assurance and, critically, how these are linked to ensure a mutually beneficial relationship between the functions of the NQF.

The third section details the Criteria and Requirements for the accreditation of ETQAs. The format for this section locates each accreditation requirement against the SAQA Regulation from which it is drawn. Where appropriate, sectoral requirements have been incorporated. This section is intended to assist users to identify the policies, procedures and practices which they are required to have in order to be accredited for the delivery, assessment and/or accreditation of learning achievements and learning provision as ETQAs or providers.

- Users could add copies of their quality management policies, procedures and practices to this section, as applicable. It may also be useful to reflect the contractual relationships that the user is committed to for the delivery, assessment and/or accreditation of learning and learning achievements.
- ETQAs could add information to assist constituent providers in obtaining accreditation, as applicable to their sphere of operations.

The fourth section details the SAQA accreditation applications process and is intended to assist ETQAs, principally, in developing and finalizing their applications for accreditation in this transitional phase. While there are no specific formats (or forms) which ETQAs are required to complete, it is suggested that ETQA applicants use the headings as detailed in this document, especially in the third section, as guides to developing their detailed applications. SAQA staff will be able to assist ETQAs through developing check lists and categories for essential and required information and for checking the completeness of all applications.

Conventions and Abbreviations

Please note that for the purposes of this document, *Criteria* principally refers to and includes the statutory provisions of the SAQA Act as well as the ETQA Regulations.

A list of the most common abbreviations and acronyms used in these Criteria and Guidelines appears below. Finally, "Appendix A: Definition of Terms" reproduces the definitions of SAQA terms used in the gazetted ETQA Regulations.

Acronyms Used in This Document

ABET   Adult Basic Education and Training

CHE   Council on Higher Education

CTP   Committee of Technikon Principals

ECD   Early Childhood Development

ETQA   Education and Training Quality Assurance body

FET   Further Education and Training

GET   General Education and Training

HEQC   Higher Education Quality Committee (of the CHE)

HET   Higher Education and Training

ISO   International Standards

ITB   Industry Training Board

NQF   National Qualifications Framework (also "the Framework")

NSB   National Standards Body

NTB   National Training Board

OBET   Outcomes Based Education and Training

QA   Quality Assurance

QMS   Quality Management System

QPU   Quality Promotions Unit (of SAUVCA)

RPL   Recognition of Prior Learning

SAQA   South African Qualifications Authority (also "the Authority")

SAUVCA South African Universities Vice Chancellors' Association

SETA   Sector Education and Training Authority

SERTEC Certification Council for Technikon Education

SGB   Standards Generating Body

Section Two: A Total Quality System for the NQF

Understanding Quality and Quality Assurance in Respect of the NQF

This section looks at the quality spiral embedded within the NQF and how this holistic approach to quality is reflected in the structures, systems and processes related to its implementation.

Objectives and Principles

The SAQA Act sets the basis for a common understanding of *quality* within the context of the NQF and its agency for overseeing the development and implementation of the NQF, SAQA. The Act provides the opening definition for a statement of the *quality mission* of the NQF. Specifically, section 2 states

The objectives of the National Qualifications Framework are to —

(a) create an integrated national framework for learning achievements;

(b) facilitate access to, and mobility and progression within, education, training and career paths;

(c) enhance the quality of education and training;

(d) accelerate the redress of past unfair discrimination in education, training and employment opportunities; and thereby

(e) contribute to the full personal development of each learner and the social and economic development of the nation at large.

In essence, these objectives encapsulate a number of key principles that underpin the NQF: integration, access, mobility, progression, quality, redress, and development (of the self and others).

These and related principles were defined in the *National Training Strategy Initiative* document (NTB, 1994) as:

Principle	Definition
Integration	… form part of a system of human resources development which provides for the establishment of a unifying approach to education and training
Relevance	… be and remain responsive to national development needs
Credibility	… have national and international value and acceptance
Coherence	… work within a consistent framework of principles and certification
Flexibility	… allow for multiple pathways to the same learning ends
Standards	… be expressed in terms of a nationally agreed framework and internationally acceptable outcomes
Legitimacy	… provide for the participation of all national stakeholders in the planning and co-ordination of standards and qualifications
Access	… provide ease of entry to appropriate levels of education and training for all prospective learners in a manner which facilitates progression
Articulation	… provide for learners, on successful completion of accredited prerequisites, to move between components of the delivery system
Progression	… ensure that the framework of qualifications permits individuals to move through the levels of national qualifications via different appropriate combinations of the components of the delivery system
Portability	… enable learners to transfer their credits or qualifications from one learning institution and/or employer to another
Recognition of Prior	… through assessment, give credit to learning which has already been acquired

Learning	in different ways, e.g., through life experience
Guidance of Learners	… provide for the counselling of learners by specially trained individuals who meet nationally recognized standards for educators and trainers

In sum, it is these objectives, and the principles embedded in them, that constitute the *quality indicators* for the national outcomes and requirements of the NQF.

Every standard and qualification registered on the NQF will, in the final analysis, have been evaluated against these objectives and principles to ensure that they meet the criteria for an integrated lifelong learning system. In the same way, the basis on which learning and learning assessments is provided will also be evaluated according to these objectives and principles. In short, it is the implementation of these that provides for national and international confidence in the standards and qualifications — registered, provided and achieved.

The NQF Quality Spiral

The total quality system for the NQF and its enabling structures takes its starting point from the separation of standards setting and quality assurance functions specified in section 5 of the Act. This states that the Authority shall:

(1)(a) (i) oversee the development of the National Qualifications Framework; and

(ii) formulate and publish policies and criteria for --

(aa) the registration of bodies responsible for establishing education and training standards or qualifications; and

(bb) the accreditation of bodies responsible for monitoring and auditing achievements in terms of such standards or qualifications;

(1)(b) oversee the implementation of the National Qualifications Framework; including --

(i) the registration or accreditation of bodies referred to in paragraph (a) and the assignment of functions to them;

(ii) the registration of national standards and qualifications;
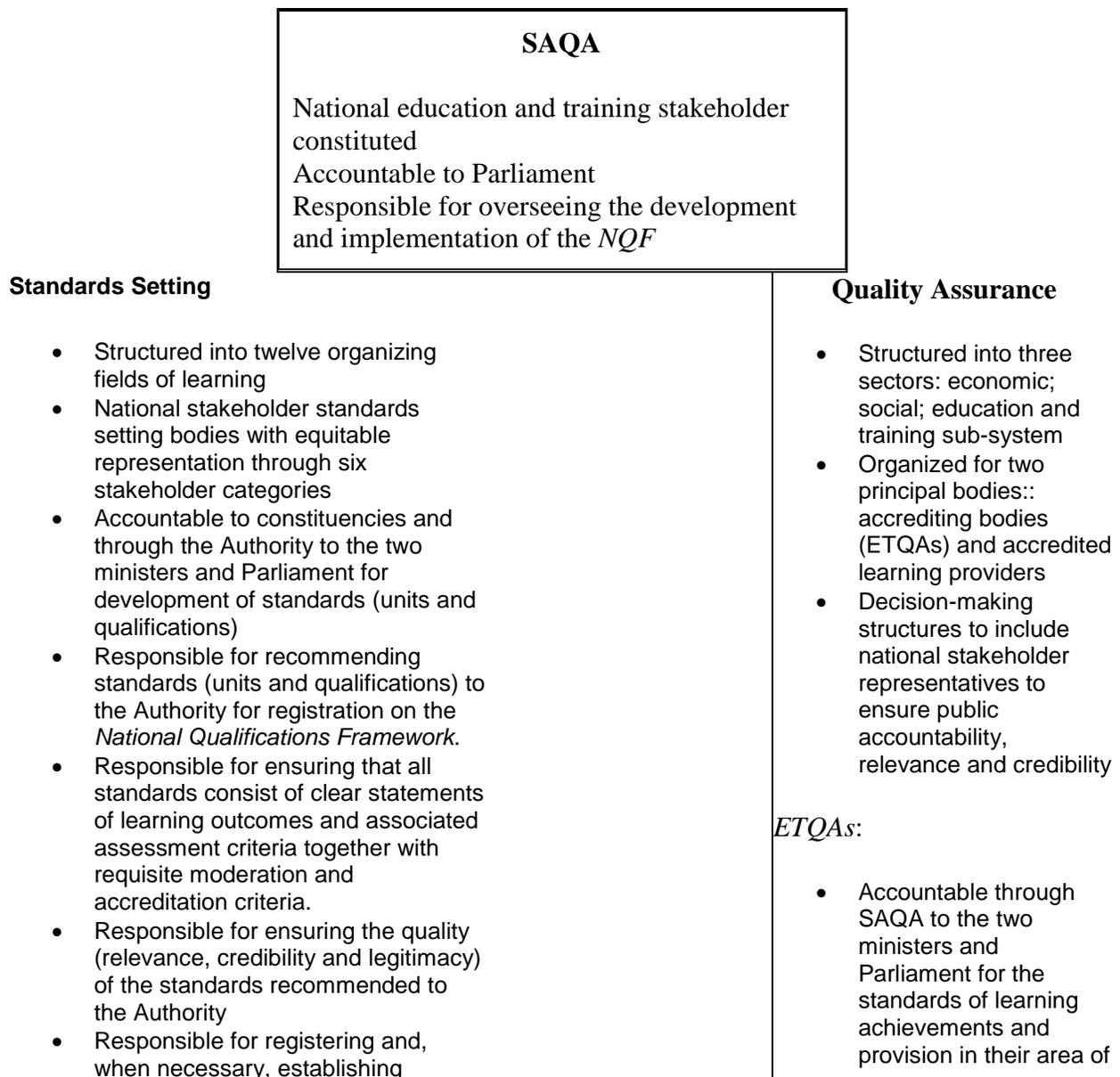
(iii) steps to ensure compliance with provisions for accreditation; and

(iv) steps to ensure that standards and registered qualifications are internationally comparable;

(1)(c) advise the Minister on matters affecting the registration of standards and qualifications.

Implicit in SAQA's implementation of the quality system is the understanding that quality assurance and quality management are not things or products; rather quality is a process. The quality system captured below demonstrates the inclusion in the SAQA implementation framework of products and processes in a system of linkages and feedback loops.

The outline of NQF structures and systems below captures the dynamic relations between the separate functions of standards setting and quality assurance. In essence, the quality process is seen to begin with standards setting and the registration of standards and qualifications on the NQF. Once registered, ETQAs can then be accredited to monitor and audit the provision and achievement of specified standards and/or qualifications. Evaluation and reporting requirements for accredited bodies (ETQAs and providers) provide a direct and dynamic feedback mechanism to standards setting, ensuring the continual improvement of the standards and qualifications registered on the NQF.

SAQA

National education and training stakeholder constituted
Accountable to Parliament
Responsible for overseeing the development and implementation of the *NQF*

Standards Setting

- Structured into twelve organizing fields of learning
- National stakeholder standards setting bodies with equitable representation through six stakeholder categories
- Accountable to constituencies and through the Authority to the two ministers and Parliament for development of standards (units and qualifications)
- Responsible for recommending standards (units and qualifications) to the Authority for registration on the *National Qualifications Framework*.
- Responsible for ensuring that all standards consist of clear statements of learning outcomes and associated assessment criteria together with requisite moderation and accreditation criteria.
- Responsible for ensuring the quality (relevance, credibility and legitimacy) of the standards recommended to the Authority
- Responsible for registering and, when necessary, establishing

Quality Assurance

- Structured into three sectors: economic; social; education and training sub-system
- Organized for two principal bodies:: accrediting bodies (ETQAs) and accredited learning providers
- Decision-making structures to include national stakeholder representatives to ensure public accountability, relevance and credibility

ETQAs:

- Accountable through SAQA to the two ministers and Parliament for the standards of learning achievements and provision in their area of

standards generating bodies
- Responsible for ensuring the review of registered standards and the development of standards setting processes where and when necessary.

primary focus.
- Responsible for assuring the quality of learning achievements within a specified context for registered standards (units and qualifications) chiefly through

a. registration of assessors;
b. accreditation of providers; and
c. quality management system

Providers:

- Accountable to ETQA — through primary focus — for management, development and delivery of learning programmes and services for which they are accredited
- Responsible for ensuring the quality of the learning experience according to the requirements of the registered standards and qualifications
- Responsible for recording, researching and reporting the outcomes and impact of their learning programmes and services

Moderating bodies:

- Appointed by SAQA according to NSB recommendations
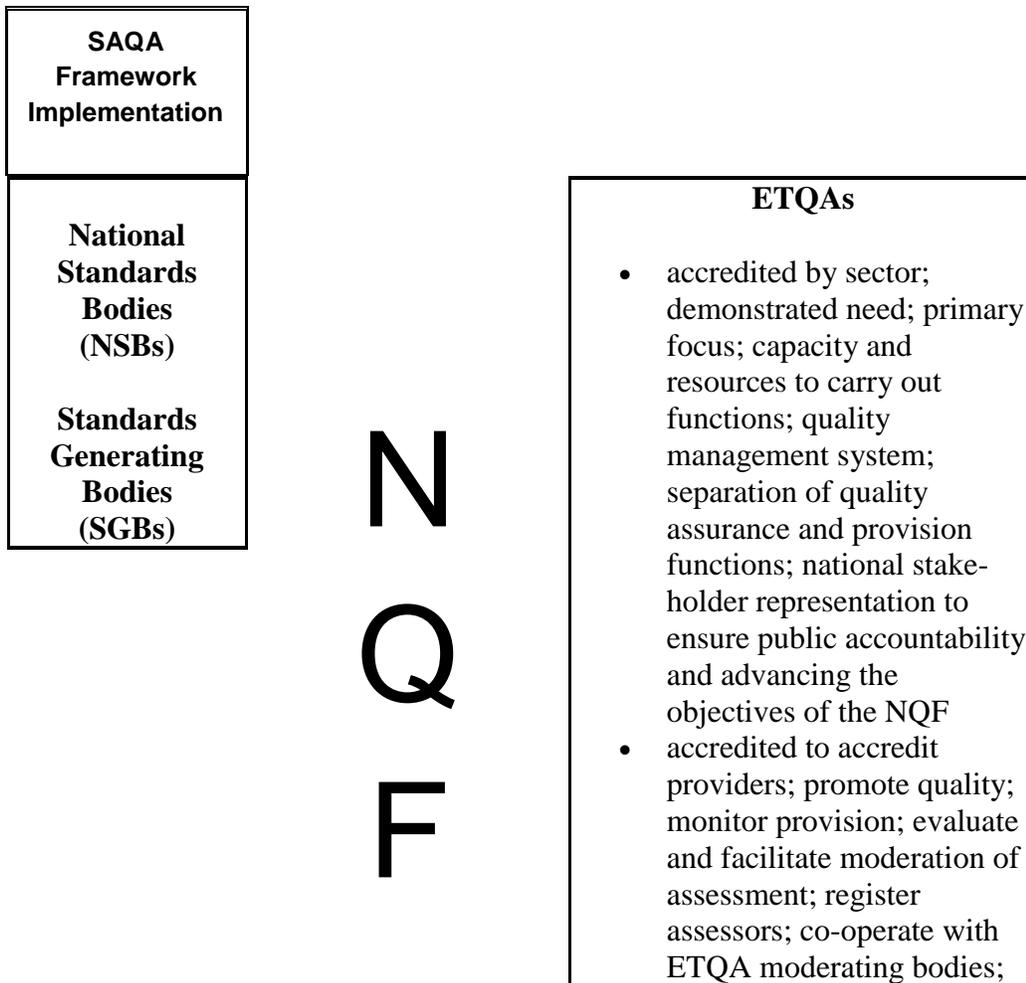- Responsible for ensuing that assessment of registered outcomes is fair, valid and reliable across the *NQF*

Quality Assurance and Accreditation

The previous outline of the quality system for the NQF makes visible the holistic quality management system that is required for SAQA to realize its objective to enhance the quality of education and training.

The outline below focuses on the structures and processes that are required for the quality assurance system associated with the NQF. It is this outline that speaks directly to the continuum of quality assurance and quality management activities required for the accreditation, monitoring and auditing of ETQAs and providers. Furthermore, it is this quality assurance system that talks directly to the assessment of learners and learning achievements.

In quality terms this cycle can be said to include all the critical points in the quality process:

- *the product or outcome awards; achievement of standards or qualifications; accreditation*
- *the inputs learning provision; programmes; learning and learner resources; life or experiential learning*
- *the process the quality of the learning and assessment interactions; the quality of the monitoring and auditing interactions.*

SAQA Framework Implementation

National Standards Bodies (NSBs)

Standards Generating Bodies (SGBs)

N
Q
F

ETQAs

- accredited by sector; demonstrated need; primary focus; capacity and resources to carry out functions; quality management system; separation of quality assurance and provision functions; national stake-holder representation to ensure public accountability; and advancing the objectives of the NQF
- accredited to accredit providers; promote quality; monitor provision; evaluate and facilitate moderation of assessment; register assessors; co-operate with ETQA moderating bodies;

recommend new, or modifications to, standards and qualifications to NSBs; maintain a SAQA-acceptable data base; submit reports to the Authority; and any other SAQA-assigned functions

Providers

- accredited by one ETQA; shared primary focus; quality management system; ability to develop, deliver and evaluate learning programmes for specified registered standards or qualifications; financial, administrative and physical resources; policies and practices for staffing; learner services; assessment management; reporting; and ability to achieve desired outcomes using available resources and according to ETQA procedures

Provisional accreditation

- granted for an agreed, limited period of time according to an agreed programme of development to enable full accreditation criteria to be met, provided that the interests of learners are protected

Learners

Linking Standards Setting and Quality Assurance Together in the Quality System

The central mechanism which allows the Standards Setting and Quality Assurance processes to act together to ensure the quality of standards and qualifications registered and achieved is the form in which these are registered on the NQF. The form in which standards and qualifications are described and registered has to enable all the learning delivery, assessment and certification structures and processes to implement the outcomes and requirements developed through standards generating and NSBs.

Critical elements for quality assurance will be the assessment, moderation and accreditation criteria developed for each standard and qualification. ETQAs will have to conduct their assurance of learning achievements in accordance with these criteria and ensure that they are able to interface with standards setting processes in an unambiguous and clear manner.

As the diagrammatic representations indicate, the channel for communication between standards setting and quality assurance processes is through the Authority. In practice this will mean that ETQAs will make their submissions to NSBs via SAQA. This will ensure that SAQA is able to co-ordinate and integrate the information across the bodies. This is especially critical in view of the fact that the fields of learning around which NSBs and SGBs are constructed are different from the sectors within which ETQAs are accredited.

Section Three: Quality Assurance for the NQF

Criteria and Guidelines for the Accreditation of ETQAs

The specification of criteria by which SAQA will implement the accreditation of ETQAs and providers is bounded by the statutory requirements captured in section 5 of the Act:

5(2) The Authority shall pursue the objectives of the National Qualifications Framework as provided in section 2 and execute the functions of the Authority as provided in sub-section 5(1) - -

(a) after consultation and in co-operation with the departments of state, statutory bodies, companies, bodies and institutions responsible for education, training and the certification of standards which will be affected by the National Qualifications Framework; and

(b) with due regard for the respective competence of Parliament and the provincial legislatures in terms of section 126 of the Constitution, and the rights, powers and functions of the governing bodies of a university or universities and a technikon or technikons as provided in any Act of Parliament.

Additional requirements that impact on the current implementation phase are reflected in the Act as transitional or interim arrangements in section 15 as:

15(1) Any body established by law which performs functions similar to those of the Authority as provided in section 5 shall continue to perform such functions until the body is abolished or its functions are changed by law.

15(2) No body contemplated in sub-section 15(1) shall be abolished nor shall the functions of any such body be changed until the Authority and the body have jointly examined the implications of such abolition or change and the implementation of the National Qualifications Framework and made recommendations to the Minister.

From Act to Regulation

In order to pursue its objectives and execute its functions, SAQA is required to accredit bodies responsible for monitoring and auditing the provision and achievement of NQF registered standards and qualifications.

Section 14 of the Act provides for the Authority to

14(a) make regulations relating to any matter which by this Act is required or permitted to be prescribed.

Using this provision, and sections 5 and 15 of the Act, SAQA has gazetted the ETQA Regulations, which, in sum, specify that

(a) there shall be bodies responsible for monitoring and auditing achievements in terms of the standards or qualifications registered on the NQF

(b) such bodies shall be accredited and their activities monitored to determine and demonstrate compliance with SAQA requirements

(c) such bodies shall be established under relevant legislation and accredited by SAQA with due regard for the Constitution, Parliamentary and provincial powers and in consultation with national education and training stakeholder representatives; and

(d) such bodies shall be accredited with due regard for any accreditation functions shared with other and current statutory bodies in the education and training system.

The ETQA Regulations are captured below as they relate to specific aspects of the quality assurance system and the criteria and guidelines for accreditation of the quality assurance

bodies to which they apply — mainly ETQAs and providers, but including examining and moderating bodies.

Criteria for the Accreditation of ETQAs

Accreditation is defined in the ETQA Regulations as

the certification, usually for a particular period of time, of a person, a body or an institution as having the capacity to fulfil a particular function in the quality assurance system set up by the South African Qualifications Authority in terms of the Act.

The ETQA Regulations provide for SAQA to accredit Education and Training Quality Assurance bodies (ETQAs), who, in turn, are responsible for the accreditation of constituent providers.

SAQA, it must be noted again, is only able to accredit an organization (or group of organizations) as an ETQA. It may not establish an organization for such purposes. Critically, SAQA must make development support services available to all ETQA applicants. In this particular phase of implementation of the NQF, SAQA is committed to extending this service to emerging organizations that wish to apply for ETQA accreditation. Moreover, it must be noted that in this particular phase of implementation of the NQF, SAQA is also committed to facilitating communication and sharing information amongst ETQA applicants.

Some of the specific Criteria outlined below cannot yet be illustrated with models or examples. These will emerge during the course of this implementation phase. For example, there is no model of an ETQA accreditation application that can be included in the document at this stage. In order to be able to begin evaluating ETQA applications from January 1999, SAQA has therefore adopted a flexible approach to the form that the application for accreditation takes. The approach simply requires that organizations develop their applications under the generic Criteria headings outlined below, and according to the procedures for submitting applications outlined in Section Three.

It must be remembered that the Act requires SAQA to put these ETQA Regulations into operation in consultation with bodies that have similar powers and functions. It is not intended that SAQA requirements for ETQA accreditation will interfere with or interrupt the execution of statutory quality assurance functions that the ETQA body is responsible for under the requirements of its own Act.

In the current implementation phase, an operational principle for ensuring coherence across ETQAs while ensuring flexibility in application has emerged. This principle takes its starting point from an outcomes-based approach and sets broad guidelines which are then contextualized as appropriate to the organizations' establishment, goals and functioning. This will allow SAQA to carry out its responsibilities in respect of accrediting ETQAs and ensuring the quality of learning provision and assessment without interfering in the statutory powers, functions and obligations of statutory bodies.

Identified ETQA Sector

Paragraph 2 of the ETQA Regulations specifies that

(1) Education and Training Quality Assurance Bodies shall be accredited in each sector by the Authority for the purpose of monitoring and auditing achievements in terms of national standards or qualifications, and to which specific functions relating to the monitoring and auditing of national standards or qualifications shall be assigned in terms of section 5(1)(b)(i) of the Act [and that]

(3) An organisation or group of organisations seeking accreditation as an Education and Training Quality Assurance Body shall be established in one of the following sectors:

(a) A social sector;

(b) An economic sectors; or

(c) An education and training sub-system sector.

To date, a range of possible ETQAs have been identified that fall into two of these sectors, namely, economic and education and training sub-system.

In respect of education and training sub-system sector ETQAs, the dominant model that has emerged is that of one ETQA for each band of levels on the NQF. This model was adopted in the "Higher Education Act" (RSA, 1997), which provides for quality assurance and management functions under a Higher Education Quality Committee (HEQC), established as a standing committee of the Council on Higher Education (CHE). The CHE will be accredited as the education and training sub-system sector ETQA for monitoring and auditing the delivery and assessment of standards and qualifications registered at NQF levels 5 to 8, the Higher Education and Training Band.

It is envisaged that the Further Education and Training Band (FETB) will, similarly, have an ETQA formed by the Department of Education (DoE), and that the Skills Development Act will establish a number of Sector Education and Training Authorities (SETAs), which will also function as ETQAs for specific economic sectors. According to the emerging model, SETAs are one of two kinds of economic sector bodies which may apply for accreditation. Registered with the Department of Labour, SETAs will assist in the transformation of the Industry Training Boards currently accredited by that Department.

The other kind of economic sector bodies which may apply for accreditation are professional bodies[1] (both statutory and voluntary) established under various Acts and pieces of legislation that have (had) accreditation and quality assurance responsibilities. Such professional bodies may apply for accreditation as economic sector ETQAs for standards and qualifications at particular levels related to the particular profession. Examples of such bodies include the Engineering Council of South Africa (ECSA), the Pharmacy Council, the South African Institute for Chartered Accountants, a provincial Bar Association, the Nursing Council, and the like.

A Model for Implementing ETQA Accreditation from January 1999

The model which currently makes most operational sense for implementation in this first phase of ETQA accreditation takes its starting points from the following pragmatic realities:

- *SAQA accredits ETQAs.*
- *ETQAs can be accredited in one of three sectors for a particular set of NQF qualifications and standards.*
- *Those bodies which currently have legal or statutory accreditation, assessment and quality assurance functions will be the first focus for accreditation evaluations, and this will be against existing national qualifications recorded on the interim database.*
- *This first phase of accreditation will build on what exists and on practices that will be in place until at least 2000.*
- *This first phase also takes into account the fact that most of the professional bodies have direct statutory powers for accreditation which they have indicated they wish to retain.*
- *Discussions with professional bodies and the Department of Labour indicate support for the broad outlines of the model. Moreover, indications are that there could be support for the model amongst some of the stakeholders and role-players in higher education and training and in potential SETAs (for example, the Mining Qualifications Authority Memorandum of Understanding with Professional Associations).*

Essentially the proposed model accepts that there will be some duplication in the award of standards and qualifications across ETQAs and that the central issue to be addressed is the relationships between and amongst different kinds of ETQAs. The following diagram indicates the two sectors in which we know that ETQAs will be accredited – the economic sector, and the education and training subsystem sector - and the presumed qualifications and standards for which each will be responsible.

Education and training sub-system sector ETQAs	NQF		Economic sector ETQAs	
Council on Higher Education and its standing committee: the Higher Education Quality Committee *Possibilities: SERTEC, QPU*	*8*	Doctoral and research	Professional bodies such as statutory councils and board	
	7	Masters		
	6	First degrees & Honours		
	5	Higher certificates and some first degree		
National Board for Further Education and Training (NBFET), with the possibility of a Further Education and Training Quality Assurance Body (FETQA)	*4*	Further Education and Training Certificate		SETAs with ETQA line functions
	3			
	2			
A General Education and	*1*	General Education		

Training Quality Assurance body (GETQA) established by the DoE to cater primarily for schooling in the General Education and Training Band, with the possibility of a separate ETQA for ABET		and Training Certificate made up through schooling or adult basic education and training	

In addition to the overlaps between each education and training sub-system and economic sector ETQAs, there are also overlaps between the two dominant forms of economic sector ETQAs.

For example, some of the statutory health councils have indicated that they want or have powers over the accreditation of providers and the certification of learners at levels below the equivalent of level 5 on the NQF. Moreover, the Department of Labour has indicated that some SETAs would want ETQA functions assigned at least to level 5 on the NQF.

The lens for the implementation model for this phase is to build on international and local models which distinguish between institutional and programme evaluations and accreditation and add the dimensions of formative qualifications and of separating out single and multi-purpose providers. The last two are, in fact, further dimensions of the notion of primary focus.

The model starts by holding that the integration of institutional and programme audits and evaluations is critical to the quality improvement spiral. However, this integration can be achieved in a number of ways without it having to rest in a single body. That is, this integration can be reached through a combination of structured relations and practices appropriate to the particular qualification (or standard) and to the institution or provider.

All multi-purpose providers would have to be accredited by the relevant education and training sub-system sector ETQA, for example, the Council on Higher Education. SAQA would expect the primary focus for such multi-purpose providers to be formative education and training across a spectrum of learning pathways. (Please note this includes Masters and PhD research degrees).

All single purpose providers would then be accredited by an appropriate economic sector ETQA, for example, ECSA, or a mining SETA. Here SAQA would expect the primary focus of such single purpose providers to be education and training within a specific or particular learning pathway, necessitating a one-to-one correspondence with the primary focus of the ETQA. (This approach is in keeping with the extension of accreditation sections in the ETQA Regulations [RSA, 1998a].)

The education and training sub-system sector ETQA would then be responsible for all general and formative qualifications. For example, the CHE would have responsibility for all general formative and non-professional degrees — BSc; BA; BCom. And the sub-system sector ETQA would have responsibility for all multi-purpose institution provisioning. The relevant economic sector ETQA would have responsibility for all professional or occupational qualifications and

standards - that is, all qualifications linked to occupational or professional practice - and for the quality assurance of single purpose providers.

For education and training sub-system sector ETQAs, in the case of specialised (occupational or profession-specific) qualifications and standards, the model calls for the education and training sub-system sector ETQA to focus on formative qualifications and institutional audits and for the economic sector ETQA to focus on the programme audit. Moreover, it calls for the two ETQAs to have a contractual arrangement in which these activities are undertaken by both through a joint team or effort. Linking the two evaluations would also reduce the frequency with which a single department or faculty would have to undergo an audit or evaluation process.

In the case of the economic sector ETQAs, the model recommends that the education and training sub-system sector ETQA have a similar contractual arrangement whereby the education and training sub-system sector ETQA would team up with the economic sector ETQA to accredit sole providers. Current practice is such that evaluation and audit teams comprise a range of expertise and interests to be represented in the evaluation (institutional and programme, internal and external).

The proposed model is in some senses the formalisation of these arrangements.

Having identified itself within one of these ETQA sectors, the organization (group of organizations) is then required to demonstrate to SAQA that it is able to meet the following criteria for accreditation (Section 3 of the ETQA Regulations). Each element of these Criteria is elaborated below - including the functions of ETQAs as outlined in section 9 of the ETQA Regulations.

Justifiable Need

3(2)(a) there is a need for an Education and Training Quality Assurance Body to be established in the sector in which it wishes to function

In order to be able to accredit an ETQA, the Authority must be persuaded of the necessity for that particular ETQA. The organization applying for accreditation is therefore required to demonstrate that it is necessary and, hence justifiable, to establish such an ETQA within the identified sector.

Some of the evidence that would fit within this category could be drawn from evidence prepared for the purposes of meeting other ETQA accreditation criteria, for example, primary focus and/or minimal duplication and/or advancing the objectives of the NQF. Other evidence could include:

- *the legislation under which the organization seeking accreditation has been established*
- *the range and type of quality assurance and accreditation activities the organization has responsibility for*
- *the particular national or international accreditation relationships the organization has in operation*
- *the current and projected numbers of constituent providers and learners who would be affected by the accreditation of the organization as an ETQA*

- *a unique and descriptive name for the ETQA; and*
- *an overview of how the organization as an ETQA would advance the objectives of the NQF.*

Primary Focus

3(2)(b) it has a primary focus for its quality assurance activities based upon its association with the identified sector and the identified mission of that sector

where "primary focus" is defined in the ETQA Regulations as "that activity or objective within the sector upon which an organisation or body concentrates its efforts" and includes the NQF registered standards and qualifications that would be quality assured by such an accredited ETQA.

In its application, the organization needs therefore to indicate both the sector and the standards or qualifications for which it wishes to be accredited. In specifying this, the organization should state the activities or objectives within the sector on which it will concentrate its efforts — that is, the primary focus for learning and learning achievements that it will audit and monitor.

It should be noted that the primary focus for an ETQA is based upon the association of the ETQA applicant with the sector for accreditation and the identified mission of that sector. This ensures that the NQF principles of coherence and relevance are reflected in the accreditation of ETQAs.

For example, the Higher Education Act specifies the purpose and objectives of higher education for knowledge production and national development, generally as well as for the individual. The Mines Health and Safety Act specifies the purpose and objectives of the Mining Qualifications Authority in respect of broadly similar purposes and goals and adds detail specific to the particular economic sector.

In addition to this information regarding the identified mission of the organization or body, information regarding the standards and qualifications for which accreditation is being sought could include:

1. *the NQF band(s) and level(s) of primary focus*
2. *the specific standards and qualifications which it wants to have responsibility for*
3. *the relation of the band(s) and level(s) to a coherent, progressive pattern of registered standards or qualifications within learning pathways*
4. *the relation of the standards or qualifications to articulation and portability within the identified pathway, other providers or ETQAs, and other pathways; and*
5. *the area of learning.*

The organization should also specify which of the twelve organizing fields (and sub-fields) are included in its primary focus. For some there may be only one organizing field, while for others there may be multiple learning fields in the focus.

Minimum Duplication

3(2)(c) it has not duplicated the functions or parts of the functions of an existing Education and Training Quality Assurance Body unless the Authority deems such duplication or partial duplication necessary

An operational principle of maximum coherence, minimum duplication has been adopted by SAQA for evaluating ETQA applications and allocating NQF standards and qualifications, as part of the primary focus submission to ETQAs.

Given the overlap of legislative and other powers and responsibilities of the potential ETQA bodies identified for the education and training sub-system and economic ETQA sectors, there is an obvious partial duplication of functions across these bodies. At operational level SAQA has accepted that accreditation of ETQAs — certainly for this phase of implementation — makes duplication or partial duplication necessary: for example, the overlap between an education and training sub-system sector ETQA, such as the CHE (through its permanent committee, the HEQC), and a professional council, such as the Engineering Council of South Africa, registered as an economic sector ETQA having jurisdiction over the same standards or qualifications.

A model for minimizing duplication of functions and activities at operational level has been proposed. This model builds on the perceived strengths of current quality assurance activities and processes between learning institutions and professional councils, amongst others. A variant of this model would be that the HEQC would focus on institutional quality assurance activities, while sector-specific ETQAs, such as professional councils, would focus on the quality assurance of the learning programmes.

Capacity and Functions

3(2)(d) it has the capacity to perform the functions assigned to it by the Authority

This sub-section details the primary functions of ETQAs, as stated in section 9 of the Regulations. Organizations wishing to be accredited should ensure that they have the resources, structures and systems to perform and maintain these functions for the period and the standards and qualifications for which they wish to be accredited.

In the establishment phase, it is not envisaged that ETQAs would have to have all these capacities immediately present or "on-site".

In addition to the fact that the ETQAs may delegate selected functions to a constituent provider or other body with the prior approval of the Authority (section 9(2)(b)), the ETQA would be free to enter into contractual relations for the out-sourcing of functions and/or services. SAQA's prerequisites would be that the contracted party or agency have the capacity to meet the requirements for performing the out-sourced function for the determined period; the ETQA would, however, retain accountability for the provision and the quality of these functions and services. Such contractual arrangements would obviously have to be included in any submission to SAQA, which would retain its statutory right to evaluate and reviews such a party or agency, if and when necessary.

9(1) An Education and Training Quality Assurance Body shall --

(a) accredit constituent providers for specific standards or qualifications registered on the National Qualifications Framework;

(b) promote quality amongst constituent providers;

(c) monitor provision by constituent providers;

(d) evaluate assessment and facilitation of moderation amongst constituent providers;

(e) register constituent assessors for specified registered standards or qualifications in terms of the criteria established for this purpose;

(f) take responsibility for the certification of constituent learners;

(g) co-operate with the relevant body or bodies appointed to moderate across Education and Training Quality Assurance Bodies including but not limited to, moderating the quality assurance on specific standards or qualifications for which one or more Education and Training Quality Assurance Bodies are accredited;

(h) recommend new standards or qualifications to National Standards Bodies for consideration, or modifications to existing standards or qualifications to National Standards Bodies for consideration;

(i) maintain a data-base acceptable to the Authority;

(j) submit reports to the Authority in accordance with the requirements of the Authority; and

(k) perform such other functions as may from time-to-time be assigned to it by the Authority.

These functions are clustered below as: (i) ETQA focus and accreditation of constituent providers; (ii) quality promotion; (iii) monitoring, assessment and moderation; (iv) certification; and (v) reporting and recommending.

<u>*Accreditation of Constituent Providers*</u>

As previously indicated, ETQAs will be accredited to quality assure specified standards and qualifications at particular levels on the NQF, ensuring that these have an identifiable, logical and justifiable relationship to one another.

The ETQA (new and review applicant) will be expected to show evidence that it has the capacity to accredit the potential numbers of providers and learners that may access those providers for the period concerned and for all standards and qualifications for which they wish to be accredited. This necessitates the ETQA having institutional and programme quality assurance

mechanisms in place as well as an ongoing mechanism for accessing national and international developments in respect of both of these.

ETQAs may apply to be accredited for standards and qualifications other than those considered to be within the primary focus. If justifiable and the ETQA is able to meet the accreditation requirements for such additional accreditation to the same specifications as for primary focus accreditation, an extension of accreditation may be granted (section 5). In such instances, the ETQA would have to indicate its acceptance, in writing, of the right of SAQA to appoint moderating bodies as a check against possible "standards drift" across one or more ETQAs granted the same standards or qualifications.

Moderating bodies will principally be appointed in accordance with the criteria stated in the standards or qualifications recommended by NSBs to SAQA for approval and registration on the NQF. The appointment and functions of moderating bodies are detailed in the Regulations in Chapter 5, especially sections 18 and 20.

One set of possible relations that emerges from this primary focus for accreditation of constituent providers concerns providers who wish to offer standards or qualifications that are part of the primary focus of a different ETQA. In this instance, the accrediting ETQA could form a contractual arrangement with the relevant ETQA on the provider's behalf and, in this way, ensure an extension of accreditation for the provider. Alternatively, the ETQA could apply for an extension of its own accreditation.

<u>*Quality Promotion*</u>

Each ETQA is required to furnish evidence of a strategy for marketing the primary focus, levels, standards and qualifications for which it has been accredited, and quality improvements in respect of these. This strategy should demonstrate how these will advance the objectives of the NQF and improve the quality of learning experiences and learning achievements.

Such a promotions strategy should be visibly and appropriately directed at constituent providers, different learner audiences, communities, constituencies, stakeholder bodies and other relevant sectors (national and international) for, amongst others, the purposes of

- *raising awareness of the objectives and principles of lifelong learning and quality education and training amongst constituent providers*
- *raising awareness of the necessity for and improvements in quality assurance processes and procedures*
- *informing general and specific groupings of developments in the sector, standards and qualifications, and the relationship of these to further or higher learning and to social and economic developments*
- *informing constituent and potential learners of NQF registered standards and qualifications available to them via accredited constituent providers and other relations (e.g., extension of accreditation arrangements); and*
- *generating funds and public support for the ETQA.*
- *Quality promotion services. As part of this function, ETQAs will be required to give evidence of the policies and procedures they have for ensuring that they are able to provide support and development assistance to their constituent providers and learners.*

- Section 16 of the ETQA Regulations provides for the provisional accreditation of a constituent provider. This provision places the onus on the ETQA to ensure that it has the necessary procedures and sufficient resources to assist such constituent providers to meet the requirements for full accreditation.

Monitoring, Assessing and Moderating

In respect of monitoring, ETQAs will be required to demonstrate continuing self-evaluation and assessment developmental approaches to improving the quality of learning provision and the review of learning provision. This monitoring of the ETQA will be conducted through a variety of mechanisms appropriate to the sector and sphere of operations of the ETQA. Such mechanisms could include multi-sectoral, national and even international review workshops or meetings, board or panel reviews, as well as reviews and surveys with constituent providers to ensure that improvements are continually sought and implemented.

Quality Management Systems. The ETQA Regulations (RSA, 1998a) require all ETQAs and providers to have in place a quality management system which includes policies, procedures, and review mechanisms for quality assurance. Included among these are policies, procedures, and mechanisms for the management of assessment - both internal and external.

Policies and procedures for the registration of assessors. ETQAs are required to evaluate the assessment policies and procedures of constituent providers and ensure the management and monitoring thereof. The universal assessment principles of fairness, validity and reliability form the foundation for assessment policy and evaluation for accreditation processes and procedures. ETQAs will be required to demonstrate the capacity, at ETQA and constituent provider levels, to implement an assessment management system that is part of the quality assurance cycle. The system should focus on maintaining the integrity of assessments and achievements against the standards and qualifications registered on the NQF and for which the ETQA is accredited.

ETQAs are also responsible for the registration of assessors. This register will ensure that the ETQA and its constituent providers have a pool of competent assessors to draw on for the period of accreditation according to the assessment requirements associated with the primary focus of the ETQA.

When applying for an extension of accreditation, the ETQA will be required to agree with SAQA, related ETQAs and possible moderating bodies where assessors will be drawn from and for which standards and qualifications.

In short, assessors will be registered at ETQA level according to the assessment requirements associated with the primary focus, NQF level, and standards or qualifications and their associated criteria for assessment, moderation or accreditation. In respect of ETQA powers to devolve functions to constituent providers and others, assessors could also be registered at provider level, where the provider would be accountable to the ETQA for assessments and achievements.

In accordance with the objectives and principles of the NQF, policies and procedures for the Recognition of Prior Learning (RPL) will also be the responsibility of the ETQA. Accordingly,

"assessors" includes all practitioners who will be responsible for the assessment of achievement of learning outcomes.

In this respect, it must be borne in mind that SAQA is committed to the notion of a practitioner-assessor. The education, training and development (ETD) practitioner is thus viewed as being both learning facilitator and assessor. Furthermore, this notion of ETD practitioner allows for the inclusion of other persons in the assessment process, for example, work-place supervisors, managers or team leaders, and colleagues or peers. The management of their assessments can then be included in the overall management and maintenance of the ETQA's broader assessment system.

Policies and procedures for moderation. Moderating bodies will be appointed to moderate the assessment of particular standards or qualifications to ensure that there is no standards drift between and across ETQAs and their constituent providers. Appointments will also have to take into account the current moderating powers and responsibilities of professional bodies. The practice of using external or international moderating bodies will be encouraged in order to assist in maintaining the integrity of the standards and qualifications as well as for international benchmarking purposes.

Moderating bodies will be appointed to ensure that the assessment of learning outcomes described in the standards or qualifications registered on the NQF is fair, valid and reliable. As with assessors, moderating bodies should be suitably qualified and registered to moderate in the context of specific qualifications or standards.

Certification

In addition to record keeping and data-base facilities, ETQAs will have the responsibility for issuing certificates of accreditation and certification to learning providers and for learner achievements, though they may devolve certification functions to constituent providers. The ETQA would, in this event, be responsible for ensuring the maintenance and integrity of the certification and awards process.

All ETQAs and constituent providers will be required to display their SAQA and ETQA accreditation status in public view. This ensures that constituent providers, constituent learners and other users are visibly assured of the legal and statutory status of the organization or body.

One of the proposals emerging in this regard and for this particular phase of implementation is that the ETQA accreditation certificate should state the sector, primary focus, levels, standards and qualifications for which the ETQA is accredited. A similar certificate would be appropriate for constituent providers, and would need to include moderation or other functional criteria included in the granting of the accreditation status.

ETQAs will have jurisdiction over the issuing of certificates of award and achievement to constituent learners. Such certificates should be designed to reflect the unique names of the registered standards and qualifications and such awards information required by SAQA and the established statutory body.

Especially in the current phase of implementation, it is desirable to have the following information on the certificate: SAQA logo - to represent national recognition of the standard or qualification; the logo of the ETQA; information about the Provider[2]; and then details of the learning achievement (standard or qualification achieved, unique classificatory information, etc.) and uniquely identifying details of the learner.

Please note that the SAQA system currently focuses on two related types of certification: a learner record for the issuing of all credits (i.e., achievement of unit standards and qualifications); and a certificate for the full qualification. ETQAs will have to propose manageable processes and procedures for their constituent providers and learners, with due regard for conventions emerging in the new education and training system and for national coherence and articulation purposes. One of the operating rules-of-thumb thus far to emerge is the plea that the system not be drowned under metric tons of paper. Nor should the system become a certificate paper-chase.

Resources

3(2)(e) it has sufficient resources to be viable for the duration of the period of accreditation

The ETQA will be required to demonstrate that it has the human, financial and information resources available to it for the period of accreditation, and in addition that these resources will meet the necessary requirements for the effective and efficient maintenance and improvement of the standards and qualifications that it is accredited to quality assure.

Moreover, ETQAs will have to indicate that they have the material and equipment resources necessary for them to be able to carry out their functions effectively and efficiently. These requirements will depend on the particular ETQA and the needs of its constituent providers and learners.

Human Resources

The organization will have to provide details of its staffing policies and procedures, including recruitment, selection, appointment, promotion and termination. Sufficient and suitably qualified staff (full-time or contractual) will have to be shown to be available to ensure the quality of the learning experience and achievement of the specified standards and qualifications.

Evidence of policies and procedures for staff development and staff development opportunities will be required. These policies and procedures should allow both for the needs of the organization as well as individual and professional development requirements to be met.

For this phase of implementation, and especially against the national establishment of an outcomes-based system, the following staff policies and procedures should be available at ETQA and/or constituent provider level:

- *procedures to identify the relevant and requisite qualification[3] requirements, with specific guidelines for the standards and qualifications of those involved in assessment and moderation activities of learner achievements*

- *procedures to identify the relevant and requisite qualification requirements, with specific guidelines for the standards and qualifications of those involved in quality management, evaluation, and audit and review activities; and*
- *a staff education, training, development and review system.*

An ETQA body will be assumed to be constituted and operating in terms of all relevant constitutional, labour, employment, health and safety and other applicable legislation. Information and evidence of such may be requested by SAQA. ETQAs will be responsible for ensuring that constituent providers have similar measures in place to comply with constitutional and other legislative requirements. Critically, ETQAs will monitor constituent providers for discriminatory and unfair practices. The ETQA will be responsible for ensuring that the agents it appoints carry out their activities in a similar fashion.

All constituent providers and learners must be eligible to benefit from the services the ETQA will provide. Measures to ensure that all services of ETQAs — direct and through appointed or delegated agents — and of constituent providers are provided fairly and equitably should be reflected in all policies and procedures.

Financial Resources

10(1) An Education and Training Quality Assurance Body seeking to reach agreement with the Authority on charges to be raised or waived under the powers delegated to the Education and Training Quality Assurance Body by the Authority, shall produce a business plan indicating the objectives to be achieved in the period under review which shall normally be three years, and which shall include a financial budget.

10(2) The business plan contemplated in subregulation (1) shall indicate the proposed charges to be raised or waived and the effect of such proposals on the achievement of the objectives of the National Qualifications Framework with particular reference to facilitating access to, and mobility and progression within education, training and career paths.

This Regulation requires ETQAs to provide appropriate evidence of adequate business planning, including financial planning, for the period of accreditation. This business plan should provide details of the financial viability and income-generating strategy of, including charges that will be raised or waived by, the ETQA.

To meet the requirements for ensuring all constituent learners of a quality learning experience and learning achievements, business and financial planning is required to cover the three-year period for which an ETQA is accredited. Given that constituent providers are accredited by the ETQA for a five-year period, these plans will be required to reflect the projected viability of the ETQA over a five-year period.

In order to ensure accountability and responsibility, the ETQA will be required to demonstrate that financial management and auditing systems and policies are in place and are open to scrutiny. In addition to submitting a financial budget within the business plan, the ETQA is required to undergo annual audits of financial statements, the outcomes of which will be communicated to SAQA.

Information Resources and Systems

As evident in the functions above, there are at least three information resource and reporting requirements that ETQAs have to take into account in their applications for accreditation. Principal amongst these is the requirement for a data-base acceptable to the Authority and the implicit requirement for acceptable data-base management and maintenance policies and procedures. In keeping with the principle of coherent yet flexible implementation of the ETQA Regulations, SAQA's requirements for such a database are principally concerned with the

- *capacity of the database to store all the requisite information for the period of accreditation, including indications of projected constituent provider and learner demand*
- *procedures and policies to maintain the integrity of the data-base; and*
- *procedures and policies to maintain the rights to privacy concerning learner and provider information, in accordance also with the provisions of the Constitution.*

The data-base and information system should include the following categories for storage, retrieval, reporting and operating requirements:

- *all SAQA-required ETQA information, policies and procedures*
- *all accredited NQF standards and qualifications and related NSB information, including moderation and accreditation criteria*
- *ETQAs and examining or moderating bodies appointed or accredited for the same standards and qualifications*
- *details of constituent assessors and moderating bodies, including any additional professional development or review criteria*
- *details of constituent providers, including certificates of accreditation, and annual records of quality audits, evaluations and reviews of providers*
- *learner records (all ETQAs are required to maintain records on constituent learners from the date of registration by the learner with the constituent provider); and*
- *details of all certificates awarded to learners on achievement of the NQF standards or qualifications.*

At this stage of the implementation process, it is expected that the data-base should be able to support at least three broad reporting requirements to SAQA:

- *reports of learner achievements of standards and qualifications. For purposes of such reports it will be necessary for ETQAs to maintain records on the numbers of learners in relation to the standards and qualifications they enrol for, and on the achievements of learners in attaining those standards and qualifications*
- *standard of learning achievements. ETQAs are required to make recommendations to NSBs on standards and qualifications, both existing and new. This requires that ETQAs check, for example, the appropriateness of assessment criteria to learning outcomes as specified in the NQF standards and qualifications. ETQAs should also be able to demonstrate tracer information on qualifying learners, such as access to employment or career paths or further or higher learning; and*
- *relevance and appropriateness of the standards and qualifications. ETQAs should be able to report on standards and qualifications in respect of sectoral or community impacts - for example, if there is an increasing, decreasing or lack of demand for (or take up of) standards and qualifications; and if there are demands for new or improved standards and qualifications by constituent providers, constituent learners or significant sectoral or constituency demands.*

The information storage and retrieval system should be acceptable to the Authority and accessible to staff, learners, SAQA personnel, personnel from relevant moderating bodies, and external review and evaluation personnel. Accessibility should include due regard for the right to privacy and the requirements for securing particular levels and types of information.

In establishing criteria for acceptable information storage and retrieval systems, the following will apply:

- *flexibility in combination of methods and tools*
- *coherence in reporting through a common format, including meetings, formal reports and evaluations; and*
- *management of information, including security of information and rights to privacy.*

Information dissemination, liaison and networking. An information dissemination system acceptable to the Authority is a related requirement. ETQAs will be responsible for ensuring timeous communication flows with constituent providers, SAQA, the relevant ETQA moderating bodies, national stakeholder representatives, NSBs, and any other structure or body required in terms of their accreditation.

An ETQA needs to provide evidence of policies and procedures for liaison with the Authority, constituent providers, relevant ETQAs and NSBs for carrying out its functions and for the function of recommending new, or amendments to, standards or qualifications. In addition, it should show evidence of national stakeholder representation at decision-making level and networking relations at other levels to ensure on-going relevance and appropriateness of all quality assurance functions and responsibilities. Moreover, evidence of liaison and co-operation with the moderation body or bodies appointed to moderate across ETQAs for standards and qualifications is also required.

Liaison with the Authority is necessary to provide feedback to inform it inter alia about the maintenance and development of quality assurance mechanisms, and about finances. Liaison will be conducted through regular contact, visits and meetings, and through the submission of regular reports to SAQA and report feedback from the Authority.

Quality Management System

3(2)(f) it has a quality management system which includes but is not limited to —

(i) quality management policies which define the quality which the Education and Training Quality Assurance Body wishes to achieve;

(ii) quality management procedures which enable the Education and Training Quality Assurance Body to practice its defined quality management policies; and

(iii) review mechanisms which ensure that the quality management policies and procedures defined are applied and remain effective

In short, the organization must be able to demonstrate that it has a quality management system which includes quality management policies and procedures and review mechanisms to ensure that the degree of excellence specified is achieved.

The degree of excellence specified should be indicated and reflected in the mission statement of the ETQA body. The SAQA understanding of the quality "mission statement" of the ETQA and of its constituent providers relates to the ETQA's quality objectives for the standards and qualifications it is accredited to assure. This statement should reflect both learning and sectoral or even national human resources development goals. Thus, for example, the Higher Education Act specifies the purpose and objectives of higher education. Any ETQA wishing to be accredited for higher education and training NQF registered standards and qualifications would be required to reflect at least these objectives in its own quality mission statement.

In respect of quality management systems, ETQAs will be required to demonstrate that they have the capacity to monitor and manage equally and equitably across all constituent providers and to ensure the same for constituent learners.

Moreover, the information concerning the ETQA's quality management system will need to specify and show evidence of the processes and procedures for implementing, maintaining, monitoring and evaluating the quality of assessments for learning achievements and the quality of learning programmes and services. Evidence of the adequacy of the organization's administrative system for implementing the necessary quality management processes and procedures will also be required.

In respect of quality assurance functions and capacities, the ETQA body will be required to accept and demonstrate capacity for the following:

- *an internal quality assurance mechanism*
- *competency requirements of assessors*
- *moderation requirements*
- *an assessment system*
- *measures taken to ensure the integrity and security of internal and external assessment*
- *adequate storage mechanisms (all assessment and assessment responses should be stored for a period of three years for the purpose of quality audits by the moderating bodies and the Authority); and*
- *the nature and duration of assessment.*

It is also a requirement of the ETQA that the quality management system specify and show evidence of the quality checks for the assessment system, including meeting the requirements for the registration of assessment, moderation and evaluation practices and personnel. The specifications for the assessment system by ETQAs should also indicate the numbers and types of current and possible future assessment activities and related personnel requirements. Evidence of contractual or other arrangements for ensuring the reliable availability of such personnel should be made available to SAQA.

Separation of Assurance and Provision Functions

3(2)(g) the function of external quality assurance is separate from and independent of the function of provision of education and training

The SAQA Act quite clearly separates the functions of standards setting and quality assurance. Within the quality system, the functions of quality assurance, evaluation and monitoring are also separate from the functions of learning provision. In short, ETQAs cannot apply for accreditation as constituent providers.

The principle of separating "referee" and "player" makes it necessary to distinguish clearly between providers, assessors, assurance, and assessment achievements.

The Regulation here makes specific reference to external quality assurance. This is to ensure that ETQAs and providers retain responsibility for internal quality assurance and management functions and responsibilities.

Representation and Decision-making

3(2)(h) in respect of the quality assurance function, it has national stakeholder representation at decision-making level, which representation shall ensure public accountability and transparency

Given the variety of forms that ETQA bodies can take, SAQA will not specify the composition of national stakeholders at decision-making level for ETQAs. In this regard, however, it must be noted that there should at least be national stakeholder representation in respect of the primary focus identified for the ETQA.

This means that the composition of national stakeholder representation as spelt out for NSBs (RSA, 1998c) will not be made compulsory for ETQA bodies. ETQAs will be required to indicate which national stakeholders have representation in decision-making structures and how this representation ensures public accountability and transparency and promotes the objectives of the NQF.

Advancing the Objectives of the NQF

3(2)(i) its activities will advance the objectives of the National Qualifications Framework

This function should be read in conjunction with the earlier section on the Primary Focus requirements for the accreditation of ETQAs. In essence, each ETQA is required to have a mission statement in which it specifies the principles and objectives of the NQF that it will take as its own objectives over the period of accreditation and within its ETQA sector.

Within the broad quality system outlined in Section Two of this document, the ETQA is required to reflect in its submission to SAQA how these objectives will be its focus for the accreditation period and how its operational policies and practices will reflect these. ETQAs will be required to ensure that this requirement is reflected in the policies and practices of their constituent providers and will also be required to report on the achievements of constituent providers in advancing the objectives of the NQF.

In the Authority's evaluation of the ETQA, there will checks for evidence of the inclusion of these in the application. Accredited ETQAs will be required to demonstrate how these objectives have been addressed in their practices over the review period.

Rights and Responsibilities of SAQA

3(3) An organisation seeking accreditation as an Education and Training Quality Assurance Body shall accept in writing—

(a) the right of the Authority to examine at any time the activities of an Education and Training Quality Assurance Body and review its quality management policies and procedures;

(b) the right of the Authority to provide guidance on issues relating to the activities of an Education and Training Quality Assurance Body; and

(c) the right of members of the Education and Training Quality Assurance Body to approach the Authority directly on matters affecting the effectiveness of the Education and Training Quality Assurance Body; provided that reasonable steps to resolve such matters have been taken at the level of the Education and Training Quality Assurance Body.

The intention of the SAQA Act and the NQF as a whole is to ensure an integrated and coherent approach to the national education and training system. Given the powers and responsibilities of statutory bodies, the approach to implementing the ETQA Regulations — certainly in this transitional phase — is that these be confined to standards and qualifications registered on the NQF. For the first accreditation phase, the standards and qualifications against which ETQAs can be accredited will be those qualifications recorded for the interim as nationally recognized qualifications.

It must also be noted that ETQA structures can take a variety of forms, depending on their establishment and location. As previously indicated, ETQA models range from statutorily constituted single focus bodies to line functions within other bodies and structures. SAQA's implementation of the Rights and Responsibilities will, in all instances, be confined to the ETQA structure — regardless of form — in respect of the NQF standards and qualifications for which the ETQA has been accredited.

Section Four: The Accreditation Application Process

Accreditation of an ETQA, or the granting of an accreditation extension, should be seen as a two-way process between SAQA and the ETQA. The relationship should be seen as a mutually beneficial and reinforcing one in which the interests of the learner and the users of learning outcomes are the principal focus for all concerned.

The quality assurance system for the NQF is intended and designed to be regulated through commitment to implementing nationally agreed accreditation, quality management, auditing and monitoring policies and procedures. When fully established, each ETQA will be responsible and accountable for all these activities within its accredited primary or extended focus. This requires

that all ETQAs will have to define for themselves, within the principles and objectives of the NQF, what it is that constitutes quality of learning within that sector and in respect of those standards and qualifications. SAQA's role is to specify the minimum criteria and guidelines by which all ETQAs and providers will undertake the quality assurance processes and evaluate the quality of learning provision and of learning achievements.

During the establishment phase of an ETQA, SAQA will provide assistance for capacity building and development. This assistance will take the form primarily of advising the ETQA and facilitating information sharing and resources between SAQA and ETQAs as well as across ETQAs. SAQA assistance may include physical resources, where necessary and justifiable and within SAQA's means. Given that the system is intended to be self-sustaining and self-regulatory, SAQA cannot provide financial assistance to ETQAs or providers.

It should be noted that all applications for ETQA accreditation will be considered within a transparent process and without prejudice. Whatever the sector or standards and qualifications, all ETQAs will be expected to go through the following steps as part of the current application process:

__1.__ All applications must be made in writing to

The Executive Officer
South African Qualifications Authority
(For Attention: The Director, Framework Implementation)
Postnet Suite 248
Private Bag X06
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0145

and should be clearly marked: __ETQA APPLICATION.__

__2.__ SAQA will record the application and, within one calendar month, submit to the applicant any and all additional documents that need to be completed and any additional information required in respect of ETQA procedures that need to be submitted. SAQA staff will be available, on request and with sufficient fore warning, to assist applicants in this phase of the process.

__3.__ On receipt of the completed application, SAQA will ensure that the application meets all necessary requirements for evaluation purposes. A team consisting of SAQA staff and acknowledged "expert" stakeholders in the field and in relation to the particular standards and qualifications will then be appointed to undertake the necessary investigation of the application. Such investigation will include a formal review of the application, site visits, meetings, and a process for establishing the legitimacy of the application.

__4.__ Once satisfied, the task team will make a formal recommendation to SAQA. If accepted, the recommendation will be communicated in writing to the applicant, together with full reasons for the finding.

5. If the applicant is granted full accreditation status, the written communication will be accompanied by the necessary certification to enable it to start practising as an ETQA with immediate effect.

6. There may be instances in which an ETQA is granted provisional accreditation. This status places an obligation upon SAQA to assist such ETQAs with organizational and operational development to ensure that they are able to receive full accreditation at the end of the provisional period or on review.

7. Should any applicant be dissatisfied at any point in the proceedings, they have the right to communicate such dissatisfaction to SAQA directly though the Executive Officer. Such appeals will be treated transparently and will proceed through the Directorate of Framework Implementation to the SAQA Management Committee to the SAQA Executive Committee. If it is impossible to resolve the issue at any of these levels, the applicant can appeal to be heard at a full meeting of SAQA.

Works Cited

NTB (1994). A Discussion Document on a National Training Strategy Initiative. Pretoria: National Training Board.

RSA (1995). "South African Qualifications Authority Act (Act No. 58 of 1995)." Government Gazette No. 1521 (4 October). Pretoria: Government Printer.

RSA (1997). "Higher Education Act, 1997." Government Gazette No. 18515 (19 December). Pretoria: Government Printer.

RSA (1998a). "Regulations under the South African Qualifications Authority Act (Act No. 58 of 1995)." Government Gazette No. 19231 (8 September). Pretoria: Government Printer.

RSA (1998b). "Further Education and Training Act, 1998 (Act No. 98 of 1998)." Government Gazette No. 19421 (2 November). Pretoria: Government Printer.

RSA (1998c). "Regulations under the South African Qualifications Authority Act (Act No. 58 of 1995)." Government Gazette No. 18787 (28 March). Pretoria: Government Printer.

Appendix: Definition of Terms

In the ETQA Regulations, any word or expression to which a meaning has been assigned in the SAQA Act has such a meaning and, unless the context otherwise indicates,

"accreditation" means the certification, usually for a particular period of time, of a person, a body or an institution as having the capacity to fulfil a particular function in the quality assurance system set up by the South African Qualifications Authority in terms of the Act;

"Act" means the South African Qualifications Authority Act, 1995 (Act No. 58 of 1995);

"assessor" means the person who is registered by the relevant Education and Training Quality Assurance Body in accordance with criteria established for this purpose by a Standards Generating Body to measure the achievement of specified National Qualifications Framework standards or qualifications, and "constituent assessor" has a corresponding meaning;

"conditional registration" means the registration of a private higher education institution as specified in the Higher Education Act, 1997 (No. 101 of 1997);

"constituent" means belonging to the defined or delegated constituency of an organisation or body referred to in these regulations;

"Education and Training Quality Assurance Body" means a body accredited in terms of section 5(1)(a)(ii) of the Act, responsible for monitoring and auditing achievements in terms of national standards or qualifications, and to which specific functions relating to the monitoring and auditing of national standards or qualifications have been assigned in terms of section 5(1)(b)(i) of the Act;

"field" means a particular area of learning used as an organising mechanism for the National Qualifications Framework;

"moderation" means the process which ensures that assessment of the outcomes described in National Qualifications Framework standards or qualifications is fair, valid and reliable;

"moderating body" means a body specifically appointed by the Authority for the purpose of moderation;

"National Standards Body" means a body registered in terms of section 5(1)(a)(ii) of the Act, responsible for establishing education and training standards or qualifications, and to which specific functions relating to the registration of national

standards or qualifications have been assigned in terms of section 5(1)(b)(i) of the Act;

"outcomes" means the contextually demonstrated end-products of the learning process;

"primary focus" means that activity or objective within the sector upon which an organisation or body concentrates its efforts;

"professional body" means a statutory body registered as such in terms of the legislation applicable to such bodies, or a voluntary body performing the functions contemplated in the legislation for such bodies but not registered as such;

"provider" means a body which delivers learning programmes which culminate in specified National Qualifications Framework standards or qualifications and manages the assessment thereof;

"quality assurance" means the process of ensuring that the degree of excellence specified is achieved;

"quality audit" means the process of examining the indicators which show the degree of excellence achieved;

"quality management system" means the combination of processes used to ensure that the degree of excellence specified is achieved;

"registered standards" means standards or qualifications registered on the National Qualifications Framework;

"sector" means a defined portion of social, commercial or educational activities used to prescribe the boundaries of an Education and Training Quality Assurance Body; and

"Standards Generating Body" means a body registered in terms of section 5(1)(a)(ii) of the Act, responsible for establishing education and training standards or qualifications, and to which specific functions relating to the establishing of national standards or qualifications have been assigned in terms of section 5(1)(b)(i) of the Act.

ASSESSMENT IN AN OUTCOMES-BASED EDUCATION AND TRAINING SYSTEM: AN OVERVIEW

Contents

Footnotes

1. *'Professional body' means a statutory body registered as such in terms of the legislation applicable to such bodies, or a voluntary body performing the functions contemplated in the legislation for such bodies but not registered as such" (RSA, 1998a).*
2. *It should be noted that there may be different arrangements required by different ETQAs and even for different providers in this respect. Some ETQAs may devolve all certification responsibilities to their constituent providers, while others may wish to retain all these rights and responsibilities. Moreover, at this stage there is no policy on the inclusion of provider details on learner certificates. Again, options range from full to no provider details, depending on the assessment and certification management system that would be appropriate for the particular ETQA and the need to demonstrate articulation, equivalence and national and international credibility in the education and training system.*
3. *The term qualification is used here in its context of applied competence, as currently defined in standards setting processes and procedures. It is expected that these qualification requirements will increasingly align with NQF qualifications, standards and levels over time.*