SAQA BULLETIN

Key readings: the South African NQF 1995 - 2011
Special edition in recognition of the contribution of Samuel BA Isaacs to the development of the NQF in South Africa
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SOUTH AFRICAN QUALIFICATIONS AUTHORITY
POSTNET SUITE 248
PRIVATE BAG X06
WATERKLOOF
0145

FACSIMILE: +27 (0)12 431 5039
WEBSITE: www.saqa.org.za
HELPDESK: 086 010 3188
E-MAIL: saqainfo@saqa.org.za
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Introduction

As the Chairperson of SAQA it is my privilege to introduce this special edition of the SAQA Bulletin. First published in March 1997, the SAQA Bulletin represents an important medium through which the intellectual project of the National Qualifications Framework (NQF) has been captured over the years. To borrow from the words of the outgoing Chief Executive Officer of SAQA, Samuel Isaacs, the SAQA Bulletin has embodied the intellectual scrutiny and democratic participation that are two of the important pillars of NQF development.

After 15 years at the helm of SAQA, Samuel is retiring in February 2012, and this special edition of the SAQA Bulletin has been prepared in recognition of his contribution to the NQF during this period. The wide selection of papers included represent important periods during the development of the NQF in South Africa, from the very earliest conceptualisation, to the harsh realities of implementation, to the extended review period, and finally, to the current situation where the NQF is understood as a framework of communication, collaboration and coordination across education, training, development and work. Supported by the broader NQF community, Samuel has consistently provided the intellectual leadership necessary for a successful NQF. This contribution is clearly evident in the papers included in this edition and I invite you to read these anew as we collectively follow the evolution of the NQF since its conceptualisation in the early 1990s.

The use of this edition of the Bulletin as an 'NQF Reader' for students from all over the world who will participate in the continuing education course on lifelong learning and NQFs (developed by the University of the Western Cape with support from SAQA) is another important avenue through which the intellectual project will be sustained.

Samuel, while we will sorely miss your contribution as CEO, we realise that your contribution to the intellectual project has not ended. On the contrary, with more time on your hands I am sure we may very well hear much more from you in this regard. I wish you well in all your endeavours as I look forward to working with the incoming CEO, Joe Samuels. Joe has contributed to the NQF project in his own right, and he will ably carry forward the important legacy that you leave at SAQA.
In closing I want to express my gratitude to Dennis Gunning and Trevor Coombe for their valuable contributions to this special edition of the SAQA Bulletin. Thank you also to James Keevy, Heidi Bolton, Ernst Vorster and Stanley Maninjwa for realising an idea initially expressed by Joe Samuels.

May this collection of readings help us to remember the original vision of the NQF as we make the NQF work for the people of South Africa.

JJ Njeke  
Chairperson  
South African Qualifications Authority  
February 2012
I was extremely honoured to be invited to write the Foreword to this publication. I was particularly pleased to be associated with a publication that celebrates the career of my good friend and colleague Samuel Isaacs at this time of his retirement from the South African Qualifications Authority. Many years ago, in my native Scotland, I was a student at a secondary school which had a Latin motto - “Respice, Prospice” - meaning “Look back, look forward”. Having retired recently myself after 40 years working in the public education service, it seems to me to be an equally good motto for someone on the brink of retirement. This publication will provide an excellent source of material for Samuel, and for a wider audience, to use to look back at the emergence of national qualifications frameworks and to look forward to the benefits that such frameworks are intended to those for whom education and training is the key to a better future.

It's easy to forget that the current model of qualifications is a relatively recent invention. It has been argued that qualifications used to be one of the ways in which a society's elite made sure that the elite continued in its privileged position. An elite might be defined by its wealth, its social class, its academic prowess or its ethnicity. A model of qualifications that seeks to perpetuate privilege could not survive the desire in many countries for increased equality of opportunity and greater access to advanced levels of education for all ages; nor could it adequately support the need in other countries for education to contribute to their redress and reconciliation agenda.

To move forward, qualifications needed to be more accountable and flexible, to be capable of recognising achievement beyond that which arises in formal, academic classroom situations, and to be seen as steps on a bigger lifelong journey, rather than being ends in themselves. A modular, standards-based system of education was seen in some countries as offering greater flexibility and choice to learners, greater openness about the standards that a learner had to achieve to receive credit for their knowledge and skills, and greater clarity of pathways so that learners could build on their successes.

I first met Samuel Isaacs at a conference in Johannesburg to launch South
Africa's national education reform programme - a programme that was an inevitable consequence of its introduction of universal suffrage in 1994. Scotland had been developing and introducing modular, standards-based qualifications, hence the invitation to talk about those experiences to the Johannesburg conference. It was understandable, given the sense of energy and appetite for change in South Africa, that the timetable for reform would be over-optimistic. Nevertheless, South Africa threw itself into the development of a new qualifications system based on much the same principles as Scotland's earlier reforms, and was able to draw on the lessons learned there and in other countries such as New Zealand that had followed similar reform pathways.

By the time of that conference in 1997, a number of countries had developed the concept of a standards-based, modular approach to qualifications. There is a danger, in such a system, of proliferation and confusion if very large numbers of qualifications are developed in an unregulated way. Such dangers might be avoided if learners, teachers and employers have a simple road-map available which shows how qualifications relate to each other and which assist learners to develop their learning journeys. If that road-map is comprehensive, in that it covers learning across the spectrum - school, college, workplace, university - then so much the better.

It has been argued that road-maps could have a range of purposes, spanning a continuum from communication to transformation. A communicative road-map could be an after-the-event way in which to make the relationships between existing qualifications clearer. A transformative road-map could be developed starting from a blank sheet of paper rather than from existing provision, and used as a basis for the development and quality assurance of future qualifications. National qualifications frameworks emerged as that road-map in a number of countries in the 1990s, Scotland's as a way of describing and rationalising existing provision and South Africa's as a framework for the development of a new system of education and training fit for its new democracy.

A comprehensive national qualifications framework contributes to a democratisation of education because it does not privilege one style of learning over another nor privilege one type of learning provider over another. National qualifications frameworks support equity and access by giving recognition for learners' knowledge and skills, wherever and however these are developed, and
by encouraging individuals and organisations to plan learning pathways for the future. A key aspect of that democratisation is that all learning is recognised as valuable, not only the learning that leads to well-established educational rights-of-passage such as school leaving certificates or university degrees.

The emergence of broadly similar national qualifications framework developments in many different countries during the 1990s reflected the extent to which experience was being shared through exchange of information and expertise in publications, at conferences and through study visits. Since then, many more countries developed or are developing national qualifications frameworks - and many countries have established national qualifications authorities to be responsible for their framework. Full credit to New Zealand for setting up the first national qualifications authority and developing the first fully-functioning national qualifications framework in 1990/1.

International collaboration on national qualifications frameworks continues to this day and has been formalised, in a number of regions, in the more recent development of transnational qualifications frameworks, reflecting the growing importance of learner and labour mobility but also, perhaps, as a means by which to encourage cross-border policy convergence. Collaboration has also been deepened by the adoption of national qualifications frameworks as a key instrument of policy by international organisations and donor agencies.

Many countries that have developed a national qualifications framework would, I think, agree that the framework is not easy or straightforward to implement and that the framework should not be set in stone. Implementation has proved to be a lengthy, even a continual, process in most countries, memorably summarised by Samuel Isaacs in his reference to “NQF” as meaning both “National Qualifications Framework” and “No Quick Fixes”, the latter phrase having been first used in that context in South Africa by Gino Govender of the National Union of Mineworkers. Most countries that were early developers of national qualifications frameworks have also found that as implementation proceeds, so evidence emerges that points to the need for evolution of the framework - the recent major reform of the Australian Qualifications Framework is a good example.

Among politicians and policy makers, there has been much recent talk of the need for policy to be evidence-based. Many countries might struggle to justify
their development of a national qualifications framework as an example of evidence-based policy-making. Instead, the process might be seen as more like the approach famously illustrated in the movie “Field of Dreams” and encapsulated in the belief that “if you build it, they will come”. Such an intuitive approach needs to be accompanied by a readiness to evaluate the success of what has been built and the extent to which it meets national, local and individual needs. The reflective pieces contained in this publication shows that national qualifications frameworks are now the subject of healthy scrutiny in individual countries and through trans-national comparative studies.

It should be an outcome of the implementation of a national qualifications framework that the framework becomes part of the country's language of learning. Perhaps inevitably, the community of purpose that needs to exist to create a national qualifications framework will largely involve national agencies and national stakeholder organisations. But a much wider community of purpose is required if the national qualifications framework is to make the move from a pretty diagram and elegant policy papers to becoming part of the language of learning for learners, teachers and employers

Like Orville and Wilbur Wright's first flying machine, a national qualifications framework doesn't have to be perfect before it enters the real world. It's usually preferable to be pragmatic, to test out, to build support of the wide variety of potential users - rather than to try to launch a framework that is perfect in every last detail. Seeking perfection before going public is understandable - but the time taken to achieve it may well build frustration amongst users rather than demand. Demand is built by having learners, teachers and employers as advocates of the national qualifications framework because they have experienced its benefits. Such advocates will be far more effective in pushing forward implementation than a roomful of beautifully written policy papers!

For national qualifications frameworks to become part of the language of learning, rather than another passing fad, the benefits experienced by learners, employers and learning providers need to researched and then communicated widely. Learners have to see the level and credit value of their achievements as being as valuable as the money in their pockets - and to see the national qualifications framework as supporting their ambitions of progressing into employment and further learning. Individual employers (not just national
employer organisations) need to see the benefits of improved retention, productivity and customer service when they use the national qualifications framework in their recruitment and selection practices and in their employees' training. Teachers need to see the benefits of the flexibility offered by the national qualifications framework in improving their capacity to make judgements about entry to courses and progress through courses, including giving proper recognition to learners' prior knowledge and skills. And government ministers and their officials need to see the benefit of the national qualifications framework as a cornerstone of an education and training system that will lead to vibrant national and local economies, strong and sustainable communities, and skilled, educated and fulfilled people.

Although there is much work for the future, a publication such as this is also an opportunity to pay tribute to those who have been early pioneers in developing and shaping national qualifications frameworks, many of whom are represented among the list of authors and referenced documents in this publication. I am sure that everyone in South Africa and far beyond who have worked on the development of national qualifications frameworks will join me in sending our very best wishes to one of those pioneers, Samuel Isaacs, as he retires after a distinguished career at the helm of the South African Qualifications Authority.

I end this foreword with a quote, very appropriately from South Africa, but also universally applicable. It beautifully summarises the journey of individual learners - and equally beautifully summarises the challenge for those who work on the development and implementation of national qualifications frameworks. In particular, the quote will sum up the position in which Joe Samuels finds himself as he takes over the reins of SAQA. Everyone associated with this publication will wish him every success in that new role.

“After climbing a great hill, one only finds that there are many more hills to climb.”
_Nelson Mandela_

_Dennis Gunning_

_February 2012_

_Dennis Gunning retired in 2010 after 40 years working in the public education service in Scotland, England, Australia and Wales. His main career focus has_
been on senior management roles in national education and training bodies, especially in relation to post-school education, vocational education and national qualifications frameworks. He was made a CBE by the Queen in 2011.

Note:

To avoid complications, I have adopted generic terms throughout this Foreword. In particular, I want to make clear that I use the terms “learner” and “teacher” to cover the wide variety of settings and circumstances - education and training institutions, workplace, home, online - in which learning takes place. Also that I use the term “qualifications” to cover all learning that is recognised within a national qualifications framework, both individual units/modules and their aggregation into, for example, school leaving certificates, certificates of occupational competence and higher education degrees.
Editorial comments

This special edition of the SAQA Bulletin has been prepared in recognition of the contribution of Samuel Isaacs to the development of the National Qualifications Framework (NQF) in South Africa. Starting out as the convenor of the Committee for Development Work on the NQF in December 1995, serving as the first chairperson of the South African Qualifications Authority (SAQA) between 1996 and 1997, and then as Chief Executive Officer for a fifteen year period between 1997 and 2012, Samuel Isaacs' contribution has been considerable. An important characteristic during this period has been regular and timeous written contributions that provide a detailed account of the history of the NQF. This Bulletin is a collation of some of these key publications by Samuel Isaacs and fellow journey-men and women over the period.

As a living contribution to Samuel Isaacs this special edition of the Bulletin will not only be a valuable resource for researchers and key stakeholders; it will also serve as a reader for a newly established course *Lifelong Learning and NQFs: Leaders for Learning* jointly developed by the University of the Western Cape (UWC) and SAQA. The first intake commences their studies in February 2012. They will participate in this structured continuing education programme which includes the key themes of relationships between lifelong learning and NQFs; conceptual frameworks underpinning NQFs and their evolution; ways of describing the architecture and changing structures of NQFs; the important role of leadership in developing and implementing NQFs; and an aspect championed by Samuel Isaacs over time: the social uses of qualifications.

This edition of the Bulletin includes 14 selected papers written between 1995 and 2011. Each of the articles has already been circulated in the public domain; where prior publication was in non-SAQA books or journals, the necessary permissions have been obtained. In the case of some of the earliest publications, original texts were not available in electronic form and were scanned from hard copies. The original referencing styles of the papers have been retained, and as a result, some differences between papers will be evident. Every effort was made in this process, to ensure accurate reflections of the original texts. The reader is requested to alert SAQA if any inaccuracies are found; these items will be corrected in the first reprint of this Bulletin.
Papers in this volume sketch evolving thinking relating to the South African NQF over time, starting in 1995, and up to 2011. Several important developments prior to 1995 are worth noting in order to contextualise the selection of papers included in the volume. These developments include the critical role of researchers in the labour movement that brought the NQF concept into South African discourse well before the transition to democracy. In this regard the selection the Manpower Board's National Training Strategy Initiative (NTSI), initially one of the de Klerk government's own reform initiatives, played an important role in the formation of the NQF. The NTSI was later transformed under union pressure into a major collaborative research project with multiple working groups and study teams. In the meantime the ANC's new Education and Human Resource Development desks had mobilised their respective intellectual constituencies in the task of hammering out new policies. John Samuel, head of the Education desk, established the Centre for Education Policy Development (CEPD) as an arms-length policy unit. The task of the CEPD was to work with all of the education organs of the mass democratic movement and formulate a draft policy framework as a basis for discussion in the African National Congress (ANC), its alliance partners and the public at large. Following from the immense exploratory work, notably the National Education Policy Initiative (NEPI), the ANC's comprehensive Ready to Govern: ANC Policy Guidelines for a Democratic South Africa (May 1992) brought together the two streams of policy thinking on education and human resource development. The NQF concept had not yet matured, but its essential features were starting to take shape.

As a result of engagement between the ANC and COSATU during this period, the ANC's A Policy Framework for Education and Training (the “Yellow Book”) was published in January 1994, and the National Training Strategy Initiative discussion document in April 1994. The two documents were closely aligned, together introducing the new vocabulary of comprehensive human resource development. The common purpose across both documents was redress of the damage wrought by racial injustice over generations, and building a new education and training system that would open opportunities for all to advance. The NQF was seen as a strategic instrument to help achieve closer integration of education and training than was previously the case. It was to provide a mechanism for assessment and the recognition of prior learning achieved by adult workers whose formal education had been cut short, and it would provide structures for managing qualitative improvement and facilitating progression and mobility within and across learning and career paths.
Another important development during this period was the establishment of the Inter-Ministerial Working Group (IMWG) by Minister Bengu in 1994. The role of the IMWG was to advise how the “training” function in the then Department of Labour could be brought into the Department of Education. The IMWG was chaired by another stalwart of the NQF in South Africa, Dr. Trevor Coombe (see the End note in this special edition). The IMWG was tasked with developing the SAQA Bill which it completed successfully. The attempt to transfer the training function was abandoned and only materialised 15 years later, in 2009, when the Department of Higher Education and Training was established in Minister Nzimande’s term.

Considering these developments, the first contribution in this volume is an extract from the seminal report *Ways of seeing the NQF: an introduction* published by the Human Sciences Research Council (HSRC) in 1995. *Ways of seeing the NQF* provides a comprehensive account of what an NQF in its early years could look like in South Africa. Its origins lie in the Manpower Board's National Training Strategy Initiative (NTSI). As noted, the major push towards the development of the NQF at the time came from COSATU, as well as a work on recognition of prior learning (RPL) and the NQF by the National Union of Metalworkers of South Africa (NUMSA) and the National Union of Mineworkers (NUM). *Ways of seeing the NQF* was released in support of the legislative process already underway through the work of the IMWG. The SAQA Act was promulgated in 1995, providing the legal framework for the establishment of SAQA which was to oversee NQF development and implementation.

As noted in the Foreword of *Ways of seeing the NQF*, the publication represents views from a variety of sectors at the time of writing, including the tertiary education sector, labour unions, the adult basic education and training sector, industry training boards, the then Department of Education, the Independent Examinations Board (IEB), and the HSRC itself. The book attempts to provide an overview of the NQF, including the reasons for its establishment and basic principles on which it would be based. Key concepts covered include those of competences; capabilities; standards, and learning outcomes. Practical implications for standard-setting; the accreditation of education and training providers; and the combination of units of learning (part qualifications) to form accredited qualifications, are also addressed.

Reading *Ways of seeing the NQF* some fifteen years later the influence of ideas it presents, on the NQF as it evolved in practice, is starkly evident. There is no
doubt that this document is a key collection of conceptualisations relating to the NQF in South Africa. The extract included in this edition of the Bulletin covers the still-current key issues of integration and reform, while meticulously explaining the role and purpose of the NQF in transforming the education and training system in the country. The influences of then-new thinking in countries such as New Zealand, Australia and Scotland are acknowledged, although emphasis is placed on the local contextualisation of such ideas. Importantly, the tensions between education and labour continued to impact significantly on the NQF in the years to follow.

The second contribution in this Bulletin was released one year later, in 1996, by the Ministerial Committee for Development Work on the NQF set up by the then Department of Education chaired by Samuel Isaacs. As noted in the Chairperson's Foreword to the Discussion Document: Lifelong learning through a National Qualifications Framework, developments represented in this report were presented as 'the beginnings of an exciting journey towards an outcomes-based education and training system'. The main purpose of the report was to demystify the NQF, and to enable learners, role-players and stakeholders to participate actively in its development and implementation. An important contribution of the report was to signal the areas of contestation expected to follow. The more than 30 recommendations of the Committee provided significant guidance at the time, specifically for the establishment of the SAQA Board in August 1996 with Samuel Isaacs as first chairperson. In March 1997 David Adler took over as SAQA chairperson when Samuel Isaacs was appointed as the Chief Executive Officer. Some recommendations such as that for the establishment of three Quality Councils were not implemented at the time; they were realised more than 13 years later when the SAQA Act of 1995 was replaced by the NQF Act in 2008 (for ease of reference both Acts are included at the end of this Bulletin). The recommendation of adequate funding for SAQA outstripped its allocation from the Department of Education and SAQA was supported by external funders in order to fulfil its mandate. Samuel Isaacs then the newly appointed Chief Executive Officer, played a key role in building strong and productive long-term relationships with the European Union, the Canadian International Development Agency and others. An important contribution of the report of the Committee for Development Work on the NQF is that it outlines expected practical implications of the NQF for the education and training system, including for example its potential role in shaping curriculum development, and the role of its level descriptors.
Samuel Isaacs' 2001 paper *Making the NQF road by walking reflectively, accountably and boldly* introduces the idea of the NQF as a social construct linked to the democratic participation of stakeholders, intellectual scrutiny and adequate resourcing, and proved a key anchoring theme in the early years of the twenty-first century. The paper reflects on some of the initial NQF development and implementation experiences. Drawing on Freire and Horton's (1991) *We make the road by walking*, Fullan's *Change Forces* and others, it provides a conceptual basis for the NQF implementation strategy. The concept of the NQF as a social construct is a complex one, an area requiring further research of the kind currently underway as part of SAQA's work towards measuring the impact of the NQF.

The paper *Reflections in the seventh year of the SAQA* by Samuel Isaacs and the then chairperson of SAQA, Mokubung Nkomo, was presented at a Commonwealth seminar in New Zealand in 2003. The theme of the seminar was 'Promises and problems for Commonwealth Qualifications Frameworks'; the event included contributions from a range of Commonwealth countries. While the paper by Isaacs and Nkomo presents a useful account of progress made with the South African NQF between 1995 and 2003, both it and the seminar signal an important shift in international NQF discourse from initial generative thinking towards more critical engagement. The paper addresses the notion of why are 'qualifications frameworks so pregnant with possibilities and yet so plagued with problems'. It identifies contestations and power struggles as key features of NQFs. Importantly, the paper was written at a time in which the review process of the NQF in South Africa was gaining momentum - a process with various stages between 2000 and 2007, including a mid-term European Union review (related to the associated funding received by SAQA) in 2001, and the appointment of a Study Team on the implementation of the NQF which finished its work in 2002. The Study Team was chaired by Jairam Reddy, and included Trevor Coombe, Ben Parker and Mokubung Nkomo amongst others.

In 2004 SAQA approached Jonathan Jansen to conduct a meta-study of an independent investigation into the effectiveness of the standards setting system of the NQF. Jansen was subsequently also invited to speak at the SAQA Chairperson's Lecture. Jansen's paper offers a unique and frank reflection on the NQF at a time when criticism of it was at its most acute. Jansen recognises the participatory nature of the NQF process in South Africa and commends SAQA for opening the process to intellectual scrutiny. In asking 'how did such a good idea fall on such hard times?' Jansen argues that the NQF promised what it could
never deliver in practice, that it was a product of the euphoria present in the 1990s with the incoming of a new democratic government for the first time in the history of the country. Jansen notes that the NQF was compromised from its beginnings due to the establishment of separate ministries of education and labour, and a lack of funding. According to Jansen, a third factor comprising the NQF was the fact that it lacked a credible theory of action. These and other ideas provided important points of reference in turbulent times for the NQF in the country. Jansen's paper gives us a snapshot of then-current debates.

David Raffe has made a significant and constructive contribution to the NQF discourse in the United Kingdom, Europe and also in South Africa. As an intellectual, he has provided policy makers and implementers with key insights into the nature of NQFs. In 2005 SAQA invited Raffe to an NQF Colloquium that also included other key thinkers from South Africa and abroad. The paper presented by Raffe focuses on the concept of integration. It provides useful insights into the extent to which the South African NQF could embrace different forms of learning in a single unified framework, a key feature of the original design of the NQF. The paper also identifies a paradox of NQFs where in his view the most successful frameworks are the least ambitious and the most incremental. Raffe's introduction of coordination and communication was an important contribution that re-emerged some years later (see the article by Parker and Walters below).

The paper by Shirley Walters entitled “Optimism of the will, pessimism of the intellect”: Building communities of trust in South Africa was delivered at the Sixth Q-Africa Conference in 2005. This paper is important in that it re-emphasises the location of the NQF in broader lifelong learning discourse by focusing on learning communities and communities of trust. In the article Walters explores the concepts of social capital and trust and applies related ideas in the South African context where, “communities of trust at whatever level in South Africa needs to take very seriously the legacies of distrust with which we live”.

As a direct development of Walters' (2005) paper, Tom Schuller was invited to contribute to the South African debate at SAQA's Fourth Annual SAQA Chairperson's Lecture in 2006. His paper Recognising learning and its outcomes focuses on the recognition of learning and the outcomes of learning, but links concepts to those of social, human and identity capital. The paper also raises important questions about how learning is conceptualised and valued. Like Walters, Schuller locates his discussion within broader lifelong learning
discourse, arguing that valuing learning comprises more than recognition in the form of certificates or credit points. It involves acknowledging that education has outcomes that shape the health of societies.

In 2007 SAQA called on Jim Gallacher from Wales to provide insights in relation to the extent to which NQFs are able to change education and training systems. The paper by Samuel Isaacs National Qualifications Frameworks: instruments of change or agents of change? is a response to Gallacher’s paper. It sheds light on another key moment in the history of the NQF in South Africa. In this paper Isaacs again draws on Fullan (1999) and others as he argues for NQFs having agency through the discourses and practices it establishes.

Another 2007 contribution from Ben Parker and Ken Harley The NQF as a socially inclusive system: communities of practice and trust, compares the introduction of a transformational NQF in South Africa with the South African nation-building project and its collective identity. These authors borrow elements of Thomas McCarthy’s pragmatic critical theory and Basil Bernstein’s (1996) concepts of pedagogic practice and the pedagogic device to create a useful ‘midway’ theoretical framework that avoids the universalism of Habermas and the particularisation of Rorty and the post-modernists, for understanding a socially inclusive and cohesive NQF. This elegant paper makes an important contribution to the intellectual project of the NQF - or in Jansen’s words - a credible theory of action. At the time of its writing the article sparked interest in Lave and Wenger’s (1991) work on ‘communities of practice’; it led to SAQA’s close engagement with Etienne Wenger in 2008, and the continued and still ongoing use of related ideas in the years that followed. Shortly after the writing of the paper, Ben Parker became directly involved in SAQA’s work, first as a Deputy Director, and later as Research Director. He introduced an innovative long-term research partnership model at SAQA - in which strong evidence-based research with clear theoretical foundations was and continues to be, fed into SAQA’s internal and external work, and used in the furthering of NQF objectives.

The Keevy and Samuels (2008 paper that follows) draws on research conducted by SAQA for the Commonwealth of Learning that explores the possibility of a transnational qualifications framework within the context of the Virtual University for Small States of the Commonwealth. Samuel Isaacs was at the forefront of initiating the process of SAQA working with the Commonwealth of Learning. The paper was presented at the 2008 Biennale on Education in Africa organised by the Association for the Development of Education in Africa (ADEA), in Maputo,
Mozambique. This paper is important in that it locates NQF debates within the African context. Keevy and Samuels suggest that NQFs in Africa should avoid extreme standardisation by allowing for sector differences and by building on existing practice. NQFs should also facilitate communication and relationship-building by promoting trust and credibility. The writers emphasise that enabling quality assurance systems must balance theory and vision on one hand, against pragmatism and expediency on the other. The paper also reflects on what was happening in the South African debates around 2008, notably the move towards three separate sub-frameworks that some felt could have resulted in systemic fragmentation. The then Minister of Education, who was in the audience, quickly moved to ensure that the draft legislation was amended to describe the NQF as a 'single integrated system which comprises of three coordinated sub-frameworks'.

In 2008 Ben Parker and the then SAQA Chairperson, Shirley Walters wrote a key article *Competency Based Training and National Qualifications Frameworks: insights from South Africa*. This paper introduces the idea of an evolving NQF through reflections on the indigenisation of competency-based training in South Africa. It articulates the notion of the NQF as a mechanism for communication, coordination and collaboration across education, training, development and work. These ideas signal a move away from earlier conceptualisation of the NQF as an instrument for transformation, and also take up the strong emphasis on communication and coordination first raised by Raffe in 2005. Sadly Ben passed away suddenly in 2008 at a time when his contributions were at their most significant. The paper by Shirley Walters and Samuel Isaacs included in this volume draws on the original paper; at the time of writing it was adapted for an international audience. The paper was delivered at the European Qualifications Framework conference held in Brussels in January 2009.

*Lessons from the South African National Qualifications Framework* by Samuel Isaacs (2010) was initially presented in Bergen, Norway at a conference on the implementation of the Norwegian NQF. This paper focuses on ten of the most important lessons learned in the first 15 years of implementation and further development of the NQF in South Africa. It is unique in that it captures a range of key lessons from the perspective of someone closely involved in the NQF process from its start. Amongst others important points, Isaacs notes that it is important to take intellectual scrutiny seriously to avoid NQFs being seen as purely technical instruments to be implemented in overly bureaucratic and technicist manners. He also emphasises the need for active stakeholder and role-player participation, as well as communication and advocacy. With a proven
track record of managing change in the South African context, Isaacs' views on systems change are also worth reading in this contribution.

The last paper in this Bulletin How are we doing in relation to NQF objectives? Measuring the impact of the South African NQF by the editorial team ourselves (Heidi Bolton and James Keevy, 2011) articulates evolving conceptualisations of the South African NQF over time, while NQF objectives have remained constant. It outlines four distinct understandings of the NQF, namely as (1) a register of qualifications (the original conceptualisation in 1995 and 1996); (2) a social construct (as introduced by Samuel Isaacs in 2001); (3) a comprehensive system (as interpreted from the late 1990s onwards), and (4) a mechanism for enhanced communication, collaboration and coordination (introduced by Parker and Walters in 2008). Drawing chiefly on what is often referred to as 'third generation' Cultural Historical Activity Theory (CHAT), Bernstein's (1996) concept of 'pedagogic device' and complexity theory, the paper sketches theoretical tools for developing analytical categories to measure the impact of the NQF in a systematic way. The diagram below (from Isaacs 2011) illustrates the ways in which the NQF has been perceived over the years. Importantly, the paper introduces a fifth and integrated understanding of the NQF as a relational device - an organizational principle facilitating relational thinking about the education and training system as a whole, and how its constituent parts relate to each other and to development and the world of work.

![Diagram: (R)evolving understandings of the NQF (Isaacs 2011)](image-url)
In conclusion, from the selection of papers in this Bulletin it is clearly evident that the contributions of Samuel Isaacs to the South African NQF both in terms of its theoretical foundations and implementation are considerable. His emphasis on intellectual scrutiny, and ability to listen to the ideas of others, even though they may be different from his own, are strongly evident not only in what he has contributed, but also in his leadership style. Further articles authored by Samuel and others relating to NQF development in the country are not included in the current volume due to practical constraints. Some of these contributions are recognised through the extensive reference lists at the end of the papers that do feature. Since this publication has been prepared in recognition of Samuel Isaacs' work and thinking, attempts have been made to focus on items in which his voice is most clear.

Additional texts such as the National Training Strategy Initiative Discussion Document (National Training Board, 1994), the Education and Training White Paper 1 (RSA, 1995), the Study Team Report (Departments of Education and Labour, 2002), the NQF Consultative Document (Departments of Education and Labour, 2003), and the Joint Policy Statement (Ministers of Education and Labour, 2007), should also be consulted for a fuller view of developments over time.

We acknowledge the work of all those who assisted in the preparation of this edition; and specifically Joe Samuels for the original idea of developing this publication; Dennis Gunning for the thoughtful Foreword; Trevor Coombe for a carefully crafted tribute to Samuel Isaacs in the End note, as well as for valuable insights into the period that preceded the SAQA Act; Stanley Maninjwa for working tirelessly to obtain permissions for the re-publication of some of the papers; and Ernst Vorster for meticulous assistance with reproducing the historical documents only available in hard copies, and editorial work.

James Keevy with inputs from Heidi Bolton
February 2012
Ways of seeing the National Qualifications Framework: an introduction
*Human Sciences Research Council*

**BACKGROUND**

Although not yet a commonplace in the thinking of a majority of South Africans, a major initiative called the National Qualifications Framework has been proposed to address some of the urgent reforms needed in South African education and training. The thinking which has been done about the National Qualifications Framework, or NQF as it is more commonly known, has been done in the hope of finding a system which would take a holistic view of the personal, social, and economic needs of our rapidly developing society, and then propose ways forward to address all these concerns on a broad and integrated front.

In this Section we hope to address the most basic questions which people might ask when introduced to the idea of a National Qualifications Framework for the very first time.

*Why do we need an educational and training reform in South Africa?*

It is difficult to imagine that there is anyone in South African education or training who is not aware of the present difficulties being faced in those fields. Such difficulties are being experienced quite acutely as people grapple with creating a unified system from the multitude of educational bodies which governed South African education and training not so very long ago.

Three major challenges which face South Africans in the field of education and training have been identified:

- First and foremost, we need to create an equitable system of education and training which serves all South Africans well. Such a system will need to accommodate those people who are in conventional schools, colleges and training programmes. It will also need to find ways to include the learning needs of the many South Africans who have not enjoyed formal education and training.

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1 This is an extract from the original 1995 publication and is reprinted with permission from the HSRC. Minor formatting adjustments have been made to improve readability.
There is an understanding that, in order to achieve significant levels or economic growth and to become internationally competitive, the quality of our education and training will have to be greatly improved. The present level of education and training is inadequate for meeting these needs.

Education and training have been separated, both by the way they are organised and by the way society thinks about them. For example, academic study is generally perceived to be more 'valuable' than training for useful occupations.

In addition, neither education nor training has fully recognised the importance of formally including the more general abilities such as communication, problem-solving and learning applied effectively. As the recently released White Paper on Education and Training puts it:

"Successful modern economies and societies require the elimination of artificial hierarchies, in social organisation, in the organisation and management of work, and in the way in which learning is organised. They require citizens with a strong foundation of general education, the desire and ability to continue to learn, to adapt to and develop new knowledge, skills, and technologies, to move flexibly between occupations, to take responsibility for personal performance, to set and achieve high standards, and to work co-operatively."\(^2\)

Many of the present issues within training and education are the results of apartheid policies, practices and mind sets. It has been a system which has denied many South Africans the opportunity for personal development and the chance to contribute to the economy. Equally, the system has failed to provide the country with a large, productive workforce matched to the needs of employment. In short, there is a clear need for an approach that makes education and training more flexible, efficient and accessible. The answer being proposed in this book is the integration of education and training into a single, coherent and unified approach: the National Qualifications Framework or NQF.

The Framework will prevent learners from being locked into one learning

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\(^2\) Department of Education, 1995:15
compartment or another, as happened in the fragmented system. In the future, learners must readily be able to move between various areas and levels of learning, taking with them recognised credits for the learning that has already taken place. Such an integrated approach to learning, it is argued, will benefit the individual learner, the education and training system, and the economy.

**What does an integrated approach really mean? And how can it be achieved?**

Perhaps it is helpful to begin answering this question by describing more clearly what we mean when we use the word *integrated*.

In the first place, we mean that a *culture of learning* is central to both education and training, and must be seen as equally important in both spheres. Both are sites where learning of skills, knowledge and the generic abilities such as communications, problem-solving and working well with people can be acquired.

One of the hallmarks of an integrated approach is that it will take into account and give value to the kind of learning that people have already achieved in their lives, whether at school, on-the-job or even on-the-street. This recognition of what people already know is called Recognition of Prior Learning.

In an integrated approach, people should be able to enter (or access) the education and training system at a point that depends on their prior learning. So for example, an adult woman who left school at age 12 with a Standard 5 and who now, at age 35, wants to study further, may not have to begin with Standard 6. She will be assessed to see what she knows and what she can do, and she can then enter the system at the point that suits her.

Another feature of the integrated approach is that learners can keep progressing up levels, by gaining credits for successfully completing units. They can also move across different fields, which means that their credits are portable or transferable. So the 35-year-old adult learner can use her credits to enter the training world, for example. Relevant credits must be readily transferable across different programmes, industries and education and training providers.

It is proposed that to achieve an integrated approach, South Africa needs a National Qualifications Framework. The aim of this framework is to unify
qualifications in education and training based on set standards and set assessment procedures that are nationally applicable.

The purpose of a National Qualifications Framework is to make it possible for all candidates to achieve national qualifications through a wide variety of mechanisms and a multiple delivery system. The Framework will generate coherence across the traditional divides of education and training, and allow articulation between currently fragmented and divided sectors and institutions. It will also provide access to, and progression through, recognised qualifications for all learners, whatever their level, and allow learners to transfer credit across different modes of study and qualifications within the national framework.

Consequently, learning in many different kinds of learning situations could be recognised and its value assessed. For example:

- informal learning in the community, at home or at work;
- school learning, both full- and part-time;
- in employee-provided courses;
- formal or institutional learning at any education and/or training institution such as a community or a technical college;
- learning through participating in employment-creation, regional development or youth employment schemes;
- learning through distance programmes;
- instruction in religious classes;
- learning through courses provided by non-governmental organisations.

Indeed, any assessable learning acquired through any combination of these can be recognised via a process called the assessment of prior and experiential learning, and due credit awarded.

**How will the National Qualifications Framework be established?**

We need to identify firstly, the official processes that will lead to the establishment of the National Qualifications Framework, and secondly, the actions that will be required on the plan of a large number of stakeholders.

At an official level, there is already a clear commitment from Government expressed in the Education and Training White Paper (1995) to establish the National Qualifications Framework. Indeed, the Minister of Education will
ultimately accept executive responsibility in Cabinet for the National Qualifications Framework.

In the last quarter of 1994, an Inter-Ministerial Working Group was brought together to look more closely into the proposed South African Qualifications Authority, a governmental body which would be responsible for the development and management of the National Qualifications Framework. This Inter-Ministerial Working Group has representation from major constituencies, such as, the Departments of Education and Labour, the National Training Board, organised business and organised labour. The Inter-Ministerial Working Group was charged with producing draft legislation for the creation of the South African Qualifications Authority and the associated National Qualifications Framework. The Act has been published, commented on and revised in the light of public comments, and has been passed by parliament as the South African Qualifications Authority Act.

The system outlined in the Act has three structural elements:

- the coordinating structure, the South African Qualifications Authority;
- bodies registered by the South African Qualifications Authority to set standards in particular areas of learning, generally referred to as National Standards Bodies; and
- bodies accredited by the South African Qualifications Authority to ensure that the standards set are in fact delivered. These bodies are generally referred to as Education and Training Qualification Authorities.

The passing of the Act clears the way for the South African Qualifications Authority to come into existence. The Ministers of Education and Labour will appoint the South African Qualifications Authority Board which becomes responsible for establishing the National Qualifications Framework and maintaining it. The South African Qualifications Authority Board will also grant formal recognition to standards-setting bodies and quality assurance bodies.

At the stakeholder level, there appears to be a general consensus - in government, among business, labour, adult basic education and some professions - on the need for the South African Qualifications Authority and the National Qualifications Framework. Other sectors have been less enthusiastic in their response to the idea of a South African Qualifications Authority and a
National Qualifications Framework. Yet other sectors have still to formulate and share their responses.

The National Qualifications Framework is envisaged as being developed and implemented on an interdepartmental basis, with fully consultative processes of decision making, including all concerned government departments, education and training providers, and major national stakeholders in education and training. An attempt is being made to fully involve all these national stakeholders around clearly articulated, nationally-agreed objectives, while at the same time recognising the right of individuals to learn and the right of institutions to provide learning opportunities, as each think most appropriate.

In many different contexts, South Africans are already starting to grapple with the challenges of having to work together and to accommodate the needs of constituencies they have not needed to consider very much previously. The business sector sees the opportunities provided by the proposed National Qualifications Framework as a means to become more globally competitive and are attempting to position themselves accordingly. Organised labour sees the legislation as giving the nod to lifelong learning opportunities, especially for people whose access to decent education was limited or denied. Educational institutions, training institutions, and the people who are teaching in them also are working to understand how these changes will affect what they do and the way they do it. All in some way, seek a model which in some way, makes things easier by providing guidelines and a procedure to follow.

In short, we envisage the National Qualifications Framework as “growing” through a process of tactful direction from the South African Qualifications Authority Board and by harnessing the creative force of a wide range of people in the education and training sectors working through their respective standards-setting bodies.

A NEW APPROACH TO EDUCATION AND TRAINING

What principles underlie the National Qualifications Framework?
A set of principles was developed in the National Training Strategy Initiative.

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3 National Training Board, 1994 a discussion document on a national training strategy initiative
process to help analyse the education and training systems of foreign countries, to assess their relevance for South Africa, and to evaluate the education and strategy for our country as it emerged during the research. These in turn have come to underpin the decisions which have led to the promulgation of the South African Qualifications Authority and the development of the National Qualifications Framework.

This set of principles is reproduced in the table below:

<table>
<thead>
<tr>
<th>Principle</th>
<th>Definition: Education and Training should…</th>
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<tbody>
<tr>
<td>Integration</td>
<td>Form part of a system of human resource development which provides for the establishment of a unifying approach to education and training.</td>
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<tr>
<td>Relevance</td>
<td>Be and remain responsive and appropriate to national development needs.</td>
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<tr>
<td>Credibility</td>
<td>Have national and international value and acceptance.</td>
</tr>
<tr>
<td>Coherence</td>
<td>Work within a consistent framework of principles and certifications.</td>
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<tr>
<td>Flexibility</td>
<td>Allow for multiple pathways to the same learning ends.</td>
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<tr>
<td>Standards</td>
<td>Be expressed in terms of a nationally agreed framework and internationally acceptable outcomes.</td>
</tr>
<tr>
<td>Legitimacy</td>
<td>Provide for the participation of all national stakeholders in the planning and coordination of standards and qualifications.</td>
</tr>
<tr>
<td>Access</td>
<td>Provide ease of entry to appropriate levels of education and training for all prospective learners in a manner which facilitates progression.</td>
</tr>
</tbody>
</table>
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 though 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 learning	Through assessment, give credit to learning which has already been acquired in different ways e.g. through life experience.

Guidance of learners	Provide for the counselling of learners by specially trained individuals who meet nationally recognised standards for educators and trainers.

The principles suggested for the National Qualifications Framework indicate clearly that the Framework is intended to be a way of achieving a fundamental restructuring of the education and training system. It will serve to encourage the creation of new and flexible curricula, to promote the upgrading of learning standards, to monitor and regulate the quality of qualifications and will permit a high level of articulation between qualifications based on the recognition and accumulation of credits.¹

*How will the National Qualifications Framework help us to adopt a new approach to learning?*

One of the main purposes of the National Qualifications framework is to change the way people think about training and education. The National Qualifications Framework will help to transform our thinking in the following ways:

- It enables us, as a nation, to acknowledge that all learning is for a purpose, and that good learning can serve pressing national priorities such as

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national and social development.

- The National Qualifications Framework provides a coherent way of thinking about education and training, and about how learning relates to competence. It will help people to acknowledge that any learning activity should be aimed at making the learner more capable.

- The National Qualifications Framework enables us to recognise that much learning takes place outside the formal delivery system and that learning should be assessed against nationally acceptable standards and recognition given accordingly. In short, the litmus test is: "Can you perform to the required standard?" not "Where did you learn?"

- The National Qualifications Framework can help us to consider learning from a learner's point of view. With a commitment to the principles outlined above, we should surely devise a system which would empower people, not catch them in a spider web of rules of combination, prerequisites, artificial choices, closed systems, endless requirements for unit standards and other administrative procedures.

- With the use of learning outcomes and appropriate assessment criteria, the move towards a learner-centred approach - which makes the learners active participants in the process - is very much easier. The performance which will now count is the learner's, not the teacher's.

- The National Qualifications Framework provides us with a way of recognising that formal qualifications have a special importance in the South African context. They are a major means of entry to better jobs and living standards. Apartheid policies and practices denied qualifications to many South Africans and functioned as an exclusionary mechanism. For the South African qualifications system to be effective, it must achieve universal acceptance.

- The National Qualifications Framework is proposing that a number of capacities, such as communication, problem-solving, social interaction and learning-how-to-learn, are essential to the formation of fully rounded learners. These have been called the learning abilities in this book. We propose that such capacities are intrinsic to all learning situations, and that standards registered on the National Qualifications Framework will need to reflect the concurrent development of such skills along with the content and skills specific to the field of learning.
In short, the overriding concern of the National Qualifications Framework is to provide a means of formal recognition of each person's progress throughout a lifetime of learning.

An essential aspect of progression is to acknowledge the achievement of defined levels of capability in ways which ensure that the person is capable of entering the next level of learning complexity.

**Why should learning abilities be incorporated into all the standards in the National Qualifications Framework?**

Learning abilities (or generic competencies) such as problem-solving, decision-making, communication and learning-to-learn are arguably the broadest outcomes of any learning process. These abilities are seen as broader and more complex than subject-specific skills because they include the ability to apply a skill to perform a task; a theoretical understanding of the task, and the ability to transfer knowledge, skills and understanding to other tasks and situations. Learning abilities, while they are acquired in particular learning contexts, are not strictly subject-specific or context-bound. They are seen as underpinning the entire education and training system and cut across subject areas and learning contexts. They act as a common reference point for education and training and provide the bridge that allows for articulation, cross-accreditation and career-pathing. They are intended to exist in all courses so that all learners, no matter what course they follow or in what context, will acquire core learning abilities.

**A NEW APPROACH TO QUALIFICATIONS**

**What do we mean by a qualification?**

A qualification has been defined as the "formal recognition of the achievement of the required number and range of credits and such other requirements at specific levels of the National Qualifications Framework, as may be determined by the relevant bodies registered such by the South African Qualifications Act."

The new view of a qualification is worth considering. If, in the past, there have been qualifications which have been formed from a number of fragmentary units, supposedly representative of certain bodies of knowledge, then the time for such qualifications has passed. There is a strong feeling that clusters or specific packages of units do not in themselves make a qualification. The qualification
itself should be viewed as a learning outcome, as an integrated, total performance or overall competence incorporating the individual learning outcomes which have been learned in the process. The learner thus needs to demonstrate that all aspects of the learning process have been internalised, are accessible and are integrated.

Integration of learning is thus the ultimate requirement of a qualification. This principle is a very old and well established one. It became formalised during the middle ages - the craftsman's masterpiece and the doctoral dissertation are both expressions of such integrative learning.

The National Qualifications Framework is specifically aimed at achieving a balance between the "street value" of qualifications and their impact on the twin aims of social redress and economic growth. It does so by describing the purpose and nature of every qualification in a way that is nationally understood and which ensures that the qualification is comparable with its reputable counterparts in other countries. A national qualification recognises learning which has met specific competence criteria and which has been demonstrated through an appropriate combination of capabilities, knowledge and skill at a particular level. In short, a qualification will be awarded when a learner has demonstrated his or her ability to fulfil all the outcomes, and to satisfy any required combinations of outcomes associated with that particular qualification, together with an integrative assessment, at a certain level on the National Qualifications Framework.

It is worth noting again that the achievement of a qualification no longer depends on a learner attending a particular course, but by a learner accumulating credits. These qualifications might be achieved by full-time, part-time or distance learning, by work-based learning or by a combination of these, together with the assessment of prior learning and experience.

An important benefit of qualifications, as we have described them, is that it will remove the obsession with institutional learning as the measure of a person's worth, because national qualifications will be blind as to where the learning takes place. This has tremendous implications for access and portability as well as incentives for lifelong learning and the broadening of provision.
How will learners obtain qualifications in future?

A national qualification will define a genuine competence at a particular level on the National Qualifications Framework. The qualification itself will happen through:

• The learner's accumulation of credits for units of learning, where each unit of learning defines a genuine capability. The assessment of units will also allow for recognition of prior learning and experience; and
• An integrative assessment which allows learners or candidates (for recognition of prior learning) to demonstrate their full capability to understand, apply and transfer a range of abilities, knowledge and specific skills. It is the integrative assessment which allows for qualification articulation with recognition of prior learning at a level and not simply in respect of a credit.

The proposed National Qualifications Framework comprises a number of registered units of learning. These units combine to form clusters which - in specified combinations - give learners sufficient credits at a particular level to apply for a full qualification. Once a learner has obtained sufficient credits, she or he can apply for a full qualification, e.g. Adult Basic Education & Training Level 3, General Education Certificate, a Plastics Industry Level 5 or a Bachelor of Science degree. To obtain the qualification, the learner will undertake a final assessment which establishes whether she or he has integrated all the learning, and whether she or he is able to use it in specific contexts. Integration and synthesis of the learning which has taken place is, thus, the ultimate competence required for a qualification.

How will credits be combined to make up qualifications?

Individual qualifications will be made up of a number of units for which credits will be awarded. These are called 'unit standards' and are discussed in the very next section.

A question that has been challenging all our thinking has been this, “At what point can a combination of units be considered for a national qualification, endorsed by the South African Qualifications Authority?”

In order to answer this question, it will be necessary to develop rules of combination. These will identify:
- The nature of the units which may be included in a particular qualification, including the requirement that the units be registered on the National Qualifications Framework. It would not, for example, be appropriate to include in a nationally accredited qualification units that are not duly recognised and registered by the South African Qualifications Authority or its agents;
- The means to demonstrate that there is consistency between the stated purpose of a qualification and a particular combination of units within it;
- The categories (for example, fundamental, contextual and specialised) of units that are to be incorporated in a qualification;
- The proportion of units that must be at a specified level on the National Qualifications Framework and, conversely, the conditions under which a qualification may contain a certain number of units at levels above or below the accredited level of the qualification as a whole.

Of course, before candidates can obtain a qualification, they would have to undergo a final integrative assessment. If the candidate is successful, a qualification will be awarded.

What is a unit standard?
A unit of learning is the smallest entity registered and assessed on the National Qualifications Framework. The unit standard is a statement of the outcomes (knowledge, skills and abilities) that are to be demonstrated by an individual in order to obtain credit for the unit. The unit standard also describes the performance, range and assessment criteria against which the demonstration of the outcome will be judged.

In other words, the unit standard is outcomes-oriented and is expressed in terms of learner capability: it is not just the conventional "shopping list" of content items found in many existing syllabi. The unit standard will also need to contain administrative information.

How will existing qualifications be included in the National Qualifications Framework?
Existing awards such as certificates, diplomas or degrees are granted both by public and private institutions, including formal educational institutions (such as universities and technikons), non-governmental organisations, workplace-based
training divisions and community-based centres of learning. There is, of course, no shared groundwork between these organisations and institutions which currently ensures uniformity of quality or standard.

If, however, an existing institution wishes to seek endorsement of one or more of their awards by the South African Qualifications Authority (or any other accredited body) they may choose from four basic options:

- They can apply to the South African Qualifications Authority (or another accredited body) for endorsement of the existing award at a level to be determined by the South African Qualifications Authority according to National Qualifications Framework criteria. For example, a Bachelor of Commerce degree from one university may be rated by the South African Qualifications Authority as National Qualifications Framework Level 5, whilst a degree with the same title from another university may be rated as National Qualifications Framework Level 4 plus 8 credits towards National Qualifications Framework Level 5.

- They can apply to the South African Qualifications Authority for endorsement of the unchanged award at a specific level proposed by the applicant, for example, National Qualifications Framework Level 5. If the South African Qualifications Authority does not rate the award as proposed, it may provide an alternative rating or return the application for modification.

- They can apply to the South African Qualifications Authority to endorse an award that has been amended to meet National Qualifications Framework requirements at a level to be determined by the South African Qualifications Authority according to National Qualifications Framework criteria.

- They can apply to the National Qualifications Authority to endorse an award that has been amended to meet National Qualifications Framework requirements at a specific level proposed by the applicant.

Alternatively, the institution may choose not to seek the South African Qualifications Authority endorsement for an award and to continue to offer it with institutional endorsement only. This does not rule out the possibility of the South African Qualifications Authority’s endorsement of some of the unit standards within the award.

**How will assessment be carried out?**
In order to achieve a qualification, learners must undergo a final, integrative
assessment. As regards assessment, the National Qualifications Framework will specify:

- The criteria for and type of assessment appropriate to assess achievement of the unit standard and/or qualification against the nationally agreed standards, and
- The outcomes in a clear and transparent manner so as to enable learners to prepare for assessment through teaching, training and learning.

The assessment of unit standards and the receipt of qualifications by learners will vary. We list three of the possibilities below:

- The teaching and learning process can be tightly coupled with assessment as it is in higher education institutions. At such institutions, assessment against the relevant unit standard(s) is undertaken by the provider. An example of this type of assessment may be a university, which both teaches and assesses students.
- The learning activity may be separate from the assessment: the provider teaches but does not examine. Assessment against the relevant unit standard is performed by a separate agency. An example may be an adult learner who learns at a night school near where he lives, but who goes to a separate examining authority to be assessed.
- While learning may have taken place informally (e.g. on the job), the learner may choose to be assessed by a recognised authority. This type of assessment is referred to as assessment of prior learning. Granting credit on the basis of assessment of prior learning is termed recognition of prior learning. An example could be a person who has taught herself to type (i.e. has not attended a course) and now wants to have her typing skills formally assessed and accredited.

**How will the levels on the National Qualifications Framework work?**

In order to achieve portability of learning credits across the system, and progression through it, units of learning will need to be described in ways that can be understood, have currency, and provide coherence across the whole system. A critical part of the organisation of learning into a coherent system is, thus:

- The way in which learning is organised (including the rules of combination of credits for qualifications);
- Defining and managing the levels. In order to transfer learning credits
between contexts, it will be necessary to ensure that all learning registered at a particular level is equivalent in some way.

It is essential that the way learning is organised facilitates developmental progression for learners, regardless of the particular field of learning they are engaged in.

Current proposals for the National Qualifications Framework are that it should be made up of a set of levels. The notion of levels is, in fact, already familiar as education and training systems have a number of generally recognised levels of achievement. For example, the present matriculation demarcates high school from tertiary education.

The Framework is often represented in broad outline as a table (as shown below). The horizontal divisions of the table are the levels. At present, there are eight levels proposed for the National Qualifications Framework and three sub-levels to accommodate the adult basic education and training levels. (It must be noted that there is still debate around the number of levels.)

The table is divided into three main sections: on the left are the proposed levels for the National Qualifications Framework, on the right are the various learning contexts, while the central column suggests the kinds of qualification or award associated with each level. For example, below Level 1. The compulsory school system outcomes that must be satisfied to earn the General Education Certificate will be defined by a set of standards. Similarly, the standards for the fourth level of adult basic education and training (ABET) are also allocated to Level 1. In the range of Levels 2 to 4 there is potentially a larger number of sectors which might provide various forms of integrated education-and-training: senior secondary school, RDP programmes, labour market schemes, industry training and so on.

The levels of learning on the National Qualifications Framework lay the basis for progression. Each qualification standard and unit standard will be registered at a level, and a common approach to levels of learning could generate coherence across the whole new learning system.

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<table>
<thead>
<tr>
<th>NQF level</th>
<th>Band</th>
<th>Types of Qualifications And Certificates</th>
<th>Locations of Learning for units and qualifications</th>
</tr>
</thead>
<tbody>
<tr>
<td>8</td>
<td></td>
<td>Doctorates</td>
<td>Tertiary/Research/Professional Institutions</td>
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<td></td>
<td></td>
<td>Further Research Degrees</td>
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<tr>
<td>7</td>
<td>Higher Education and Training</td>
<td>Higher Degrees</td>
<td>Tertiary/Research/Professional Institutions</td>
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<tr>
<td></td>
<td></td>
<td>Professional Qualifications</td>
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</tr>
<tr>
<td>6</td>
<td></td>
<td>First Degrees</td>
<td>Universities/Technikons/Colleges/</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Higher Diplomas</td>
<td>Private/Professional Institutions</td>
</tr>
<tr>
<td>5</td>
<td></td>
<td>Diplomas, Occupational Certificates</td>
<td>Universities/Technikons/Colleges/</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>Private/Professional Institutions / Workplace/ etc.</td>
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<tr>
<td>4</td>
<td></td>
<td>Further Education and Training Certificate</td>
<td>School/College/Trade Certificates</td>
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<td></td>
<td></td>
<td>Mix from units for all</td>
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<tr>
<td>3</td>
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1 year Reception
STRUCTURES

**What is the South African Qualifications Authority? What will it do?**
The South African Qualifications Authority has been conceptualised as comprised of a Board of between twenty-two and thirty members appointed by the Ministers of Education and Labour, with a Chairperson. Executive Director and supporting staff established in terms of the South African Qualifications Authority Act.

In terms of the Act, the South African Qualifications Authority has the following essential functions:

- To oversee the development of the National Qualifications framework in consultation with bodies to be nominated by the Ministers of Education and Labour. The Minister of Education has the executive responsibility for all aspects of the implementation of the National Qualifications Framework;
- To formulate and then publish policies and criteria for the registration of bodies responsible for establishing education and training standards and qualifications;
- To accredit bodies responsible for monitoring the delivery of standards and to audit achievements in terms of such standards and/or qualifications.

**What is a National Standards Body and what will it do?**
A number of National Standards Bodies will be established by agreement with the South African Qualifications Authority. Each National Standards Body will recommend qualification standards and write and review unit standards for its field of learning. Demarcating the fields of learning will be one of the first major tasks for South African Qualifications Authority and one which will need to be addressed early on.

The broad composition of a National Standards Body should include everyone with a legitimate interest in the standards being generated. Given the difficulty of making such a requirement practical, it is likely that nationally organised interest groups will be favoured. Those that do not actually sit on the coordinating structure of a National Standards Body will have an automatic right to view and comment on standards generated - both within the generation phase as well as during the comment phase when draft standards are made public.
What is an Education and Training Qualification Authority and what will it do?
The setting of standards and the establishment of some meaningful qualification's framework is futile unless the society at large is sure that agreements reached are in fact being implemented. The credibility of credits and certificates is entirely dependent on this assurance. The principal role of each Education and Training Qualification Authority is to ensure the maintenance of quality.

Broadly, the current proposals leave Education and Training Qualifications Authorities at the point of "monitoring and auditing achievements." From the proposals it would appear that a body would be required to demonstrate the following in order to be accredited as an Education and Training Authority; competency in the area, capacity to carry out accreditation, and the ability to be sufficiently representative for the constituency that it serves.

It seems clear that the boundaries for Education and Training Qualification Authorities will not simply be those of a corresponding National Standards Body. In fact, there will probably be a larger number of Education and Training Qualification Authorities than of National Standards Bodies. The boundaries will only be settled once the South African Qualifications Authority has ruled on the matter. However, there appears to be agreement on at least two "categories" for Education and Training Qualification Authorities:

- Provincial authorities for schools and, perhaps, adult basic education;
- Sectoral bodies such as industry training boards in collaboration, especially at the higher levels, with the relevant professional bodies and, at the lower levels, with the provincial authorities for adult basic education and training.

Education and Training Qualification Authorities fulfil one, two or three of the following important functions:

- In all cases, Education and Training Qualification Authorities verify that the assessment of learners is carried out in terms of the standards drawn up by the National Standards Bodies;
- In addition, where multiple examining authorities assess against the same standards, the moderators will carry out a moderation function which ensures that assessment is fair and consistent across all examining
bodies. Education and Training qualifications Authorities may act as moderators or may themselves be subject to moderation;

• Education and Training Authorities may accredit individual providers to deliver quality learning which leads to assessment against the registered national standards; and

• at the higher education and training levels, individual providers may be accredited as Education and Training Qualifications Authorities and carry out all three functions, subject to some form of external moderation agreements.

**How do all the structures work together?**

We have looked at the National Qualifications Framework itself and the entities that will enable its successful operation. It is useful to summarise their functions as below:

• The National Qualifications Framework is the facilitating mechanism for achieving a coherent system of education and training and for publicly registering qualifications and unit standards;

• National Standards Bodies are competent and representative organisations which recommend qualifications and set unit standards at credible levels;

• Education and Training Qualification Authorities ensure that assessment is carried out in accordance with the standards as they have been defined by the National Standards Bodies; that various assessors carry out their evaluation of learners consistently and fairly; and that individual providers of education and training deliver quality learning; and

• The South African Qualifications Authority ensures that the National Qualifications Framework is maintained, that the National Standards Bodies and the Education and Training Qualification Authorities are competent to perform their respective tasks, and that they do so as part of an on-going process.

*The National Qualifications Framework and its attendant structures are thus responsible for developing and implementing nationally accepted standards and ensuring that they are met.*
WHO WILL BENEFIT?

There is little point in developing a detailed national framework unless it can clearly be shown that people and groups will derive benefit from it. In this section we give some examples of how the National Qualifications Framework can benefit different people and groups. The examples are intended to show how some of the more abstract concepts will translate in practice.

The National Qualifications Framework will benefit and work for the following people and groups in the following ways:

**An individual school-going learner**

Sipho is a township high school student. Over the years he has had to leave school at various points to help out at home, but he returns to carry on studying whenever he can.

Sipho could complete his Further Education Certificate by accumulating credits. The prescribed set of credits could be obtained either at school or informally, for example through community learning centres. Because unit standards will be expressed as learning outcomes, Sipho will have a clear idea of what he has to achieve in order to gain a credit. Since the credits are obtained at a particular level on a national framework, Sipho can be assured that his qualification will be equal to any other at that level no matter where it was obtained.

**A person of school going age, but who is not in school**

Jonah is a 12-year-old who has never been to school, but who has become aware of the value of learning. He has some "street learning".

When Jonah returns to school he will be assessed against the standards and his prior learning will be determined and used to place him at an appropriate level. After that, a suitable learning pathway could be mapped out with him, and he could choose an institution at which to pursue his learning. It is likely that Jonah will be more mature than his peers, so he may be able to race through some units. The unit standards would encourage an open learning system which would allow a person multiple entry points, assessment when the person feels "ready" and a qualification which has the same value as any other at that level.
An adult learner
Grace is 25-years-old and is unemployed. She has had odd piece-work jobs, but would like to study so as to develop a career.

Grace can be assisted to map out a learning pathway which would say, lead toward a qualification in child care. This process would include identifying suitable education and training providers which cater for adult learners.

Once Grace approaches a provider, her prior experience and learning can be assessed against the requirements of the individual unit standards. She can then embark on a learning programme which leads in a direct way to a career of her choice rather than first having to complete a matric.

A worker
John has worked for the same large plastics manufacturer for years, and has been sent on courses run by different providers. He has sometimes received certificates from these courses, but when applying for other jobs has been told that the certificates are not recognised.

An important benefit of the new approach for workers is that National Qualifications Framework credits will be nationally recognised and portable. With his recognised credits, John can progress in his current career path or acquire additional credits to become fitted for a new job.

An under-qualified school teacher
Busi is a high school teacher in a rural area. She has been teaching for fifteen years, but has only a Standard 8 and two-year teaching diploma, so her salary is low. She also finds that she has an inadequate background to deal with the subjects she has to teach. She would like to study further, but would find it impossible to stop working for the time it would take to get a 'matric'.

In the past, Busi has been unable to upgrade her professional qualifications. With the National Qualifications Framework, Busi will be able to gain credit for all the learning she has acquired while teaching. Busi can apply to be assessed at an appropriate institution where she may well be awarded the equivalent of matric. Then she can enter a distance education programme to upgrade her teaching qualification. With the equivalent of matric and a teaching diploma, Busi's
prospects of a higher salary and a promotion will greatly improve. She will also have gained greater confidence in her teaching abilities and broadened her knowledge of teaching and learning strategies and so be better equipped to assist in the development of her pupils.

**A training officer and learning facilitator**

Joan, a trainer for a national company, develops her own courses. She wants to ensure that the training she does is relevant both to the company’s needs, but also addresses the needs that learners have for formally recognised qualifications.

The unit standards provide Joan with clearly identifiable learning goals and are written in such a way that they are general enough for her to apply to her specific situation. The qualifications structure allows her to design her courses so that they serve as components for a nationally recognised qualification. She can therefore structure her course to provide for both the needs of her learners and of her company.

**An employer**

The Hands On Company has a fairly high staff turnover and Jim, the MD, feels that part of the reason for this is that the education qualifications do not prepare people adequately for the work environment. Taking on school-leavers with a matric is a lottery. Some of them can barely read or write, others have enormously high expectations, while still others feel that the work is beneath them.

Because the unit standards require performance beyond mere recall of information, they enable an employer to assess a person’s capabilities, and not just their paper qualifications. The range of units and the level to which they are performed make it possible for Jim more easily to match the job requirements to the level, interests and aptitude of the work seekers. Jim could, in addition, recognise gaps in the person’s palette of abilities and provide on-the-job training to address those gaps. So, while Jim achieves a competent and more stable workforce, the workers can extend their qualifications.

**Members of a community-based project**

A group in the Mahlabab district have a small project which produces and sells woven, carved curios and clay-based artefacts. They have very little schooling,
but have picked up the rudiments of running a business through their activities and the advice of a development agency.

The skills and knowledge that this group have acquired during the life of their project would be assessed against unit standards which deal with such skills as engineering, retail and marketing, and business administration skills.

From the set of National Qualifications Framework standards, the people in the group can then select one set that is appropriate to their needs. Each person in the group would require units which suited his or her activity. Through the development agency, they could gain access to distance education institutions and, ultimately, could gain meaningful qualifications.

The National Qualifications Framework will also benefit the following:

- **Government**
  The National Qualifications Framework could pull the whole country together, ensuring that learning serves the interests of the broader community and the development goals set by the government. Institutions and departments involved in education and training could be encouraged to focus on learning that is relevant to the needs of the people and the country. In addition, the problems of access to education can be addressed by allowing for an open learning system that acknowledges that learning does not happen only in the classroom. "Informal" learning which happens during other activities can also be harnessed.

- **An industry training board**
  Each industry can apply the generic outcome statements in a unit standard to their particular industry, without having to create a new qualification. For instance, all manufacturing industries could have a common structure, even though they are focussed on the particular materials and process found in the various sub-sectors. On-the-job training and formal education and development programmes can all be incorporated into a coherent, flexible system. The industry can adapt to the changing technological and economic environment more quickly and easily.

- **A learning institution**
  All qualifications would have assessable outcomes which would ensure that no matter where the qualification was obtained, the outcomes would be equivalent.
The transfer of credits between institutions would be simplified for learners.

Institutions that are struggling to meet the requirements of the framework, perhaps because they were historically disadvantaged, could be identified and given support in order to gain accreditation.

Because the unit standards would be expressed in generic terms, learning institutions could still retain their identity and their unique offerings and could expand the standards in their specialisations.

- A profession

A profession frequently requires both academic qualifications and professional competence. An outcomes-based qualifications system would allow the profession to assess, modify, update and refresh their own qualifications system more easily. It would allow them to accommodate different categories or sub-professions more easily but also it would allow them to define alternative routes to the qualification. Multiple access points, various articulation possibilities and providing institutions with curriculum guidelines would allow the profession to grow more quickly without compromising the quality of such qualifications.

**SOME CRITICISMS**

A new system is often met with scepticism. In this section, we present some of the more common criticisms and provide a comment on each of them.

1. "The National Qualifications Framework imposes a single viewpoint on all education and training."

The National Qualifications Framework in its commitment to the idea of nationally valued standards, certainly seeks to propose a single, unified system for education and training. However, the creation of qualifications and the unit standards within them is seen to happen through consensus-building among relevant stakeholders, within a field of learning. Thus the nationally agreed standards will really reflect the values, knowledge, skills and insights of a nationally credible working group in that particular field of learning.
2. "The National Qualifications Framework is a system to introduce standardised curricula for all levels and learners."

The National Qualifications Framework is an attempt to bring coherence to education and training, while building in the greatest amount of flexibility possible. Thus, while qualifications and the unit standards within them will be determined through a nationally credible process, actual curricula and programmes for delivery will be the domain of the authority, institution and educator to develop. The national standards will be expressed only as outcomes. This encourages maximum flexibility and creativity - the hallmarks of professionalism in education and training.

3. "The National Qualifications Framework is a way of lowering standards by forcing the 'vocationalisation' of education."

The present proposals for the National Qualifications Framework will certainly do away with some aspects of current education and training practices. For example, rote learning and task-specific training. However, the unifying vision in the present proposals is for the development of quality learning which is demonstrable, as performance, in a particular context. This context could have a strong vocational quality. Equally it could be an advanced academic context. A look at the section on performance will help readers to understand the 'thick, rich way in which performance can come to be understood.

4. "The approach of the National Qualifications Framework may bring chaos through the ad-hoc selection of unrelated bits of learning to make up qualifications."

The Framework aims to achieve coherence and integration across units and qualifications. Also, the stakeholders themselves will be able to give input about how qualifications should be made up, thus the selection of learning units is not likely to be random. Furthermore, for each and every qualification, there will be an integrative assessment across all the capabilities that have to be developed within qualifications.
5. “The National Qualifications Framework could end up as a nightmare of bureaucratic red-tape”

The body that will administer the National Qualifications Framework, namely the South African Qualifications Authority, is envisaged as a Board of not less than twenty-two and not more than thirty representatives of nationally significant stakeholders. National Standards Bodies, it is proposed, will be established at the 'highest level' of generality and will also consist of representatives of national stakeholders. How Education and Training Qualifications Authorities will be established is yet to be determined. There are bureaucratic pitfalls in every system design. However, with sufficient will and determination to maintain the principles which underpin the proposals for the National Qualifications Framework - chiefly, integration, coherence, flexibility and learner-centeredness- it is hoped that the system will be streamlined rather than top-heavy and labyrinth-like. The main intention is to ensure that the South African Qualifications Authority facilitates the implementation of the National Qualifications Framework and adds value to the standard-setting and quality assurance activities of stakeholders.

6. "The National Qualifications Framework could devalue the standard of learning to the lowest common denominator in the field."

On the contrary, the National Qualifications Framework is a system that, through consensus and based on a true understanding of levels, aims to raise the status of qualifications to realistic, nationally credible levels where this is not already the case. Important principles are quality national credibility and international comparability of qualifications.

7. “The National Qualifications Framework is a plot by labour to collapse the difference between mental and manual labour.”

The debate that led up to the National Qualifications Framework recognised that the distinction between mental work (linked with education) and manual work (linked with training) is strongly established, but inappropriate. Conditions in the new labour market are vastly different from those of the past. The emergence of new technology and new forms of work
organisation demands a labour force with higher and more flexible skills. Workers with poor basic education skills are ill-equipped for such change. Therefore, far from being a labour plot, the proposed framework is seen as having benefits for both education and the workplace. Both of which, in turn, are presumed to have a positive, interactive relationship with productivity and the health of the economy.

8. "The National Qualifications Framework could rob any institutional sector of its identity or 'academic freedom.'"

The National Qualifications Framework certainly aims to open up access and provision to learners who can demonstrably meet agreed national standards. While such standards will be stated as the outcomes of learning, they will not prescribe the process of learning. Institutions will not only be instrumental in creating appropriate unit standards for their contexts, but will have freedom to innovate in terms of the delivery of learning for those standards.

9. "The National Qualifications Framework will be a straightjacket to force all Qualifications to look the same."

Diversity is recognised as strength. However learners, teachers and employers all need to know what the commonly agreed outcomes are for a particular qualification. For example, a national diploma in mechanical engineering. Nevertheless, a particular institution offering a programme leading to this qualification will continue to offer a range of choices. They will certainly continue to impart an individual, institutional emphasis through the particular delivery approach they adopt.

10. "The National Qualifications Framework is another good idea invented by government which provides the opportunity for countless scams and the exploitation of learners and their parents."

The National Qualifications Framework attempts to give a coherent rationale for acceptable standards across levels and contexts. The existence of such standards makes it possible to assess the quality of provision, and rid the system of "fly-by-night" providers.
11."The National Qualifications Framework is a means of devaluing formal education and training."

The Framework certainly will provide a means for recognising that learning takes place in various places and at various times, and will provide a mechanism for measuring and rewarding such learning.

While the National Qualifications Framework endeavours to overcome the present system's inability to deal with informal learning, it will in no way diminish the value of formal education and training. In fact, by making it more reasonable to aspire to, and access learning opportunities, the National Qualifications Framework will attach a greater value to learning than has previously existed.

12."The invention of national qualifications means that only the government will issue qualifications."

The term "national qualification" actually means a nationally recognised qualification, not one issued by the government. Qualifications will continue to be issued by various authorities and providers which have been accredited to do so by the relevant Education and Training Qualifications Authorities, under guidelines determined for them by the South African Qualifications Authority.

13."Quality assurance is another term for 'thought policing.'"

The purpose of quality assurance is to enhance the quality of learning to the benefit of learners, their employability in a competitive economy, and participation in learning and in society. This result is possible only if people from relevant stakeholder groups participate in the standards-setting, quality assurance, assessment and provision processes.

14."The National Qualifications Framework is not relevant to higher education, especially to the universities who are concerned with generating new knowledge and not just transmuting existing knowledge."

Firstly, universities do in fact transmit a vast body of existing knowledge as well as generate new knowledge. The envisaged implementation of the
National Qualifications Framework, however, is concerned with more than just the transfer of knowledge: the development of important abilities such as problem-solving and communication is equally essential. This is true throughout all levels of the Framework. It is understood, especially in higher education, that much generation of new knowledge occurs in higher degree studies, and the Framework is capable of accommodating all existing criteria for masters and PHD degrees as statements of the agreed outcomes of those degrees.

APPROACHING INTEGRATION

This section briefly describes the policy processes in which this book is located and some of the different interests involved in the debate about integrating education and training.

The proposals contained in this book follow from the National Training Board process which led to the publication or a Discussion Document: A National Training Strategy Initiative (1994). However, policy development is not a smooth process which occurs between like-minded people or groups. What, then, were the different views which contributed to the various policy proposals on integrating education and training?

During the discussions which led to the National Training Strategy Initiative, four stakeholder groupings - the state, employers, labour and education and training providers - were locked in battle over many issues. Even in the subsequent process which has produced the work presented in this book, the participants were not always in easy agreement - despite the interest and enthusiasm which provided the momentum for many hours of voluntary effort. We contributed as individuals and thus without mandates from our constituencies, but we were by no means neutral. We came with mind sets that were informed by our own life experiences, our work contexts and our need to influence the proposals as much as possible in favour of the needs of our own learner groups and institutional settings.

It is important to grasp the differences of opinion behind arguments for an "integrated approach" for when temporary consensus is reached in any negotiation process, it does not mean that differences miraculously disappear.
Some stakeholders often decide to "sit on the fence" for a while; some continue to push for interpretations or meanings that are congruent with their needs and interests; others withdraw and move to negotiation forums which better serve their purposes. The point is that a major transformation such as the proposed National Qualifications Framework has, and should have, both proponents and critics. It would be naive and even unhealthy to pretend that an "integrated approach" is not a contested proposal. However, acknowledgment of such contestation should also not stop us from attempting to develop concepts and structures that could facilitate long-term consensus policy development.

Many policy documents attempt to put forward powerful, persuasive arguments which present their underlying concepts, processes and terms as uncontested and self-evident. This obscures the untidy nature of the conceptual work that precedes the final version of any public document. In this book we hope to share some of the processes and thinking that led to the proposals being made here.

The first part of this book outlined education and training. In this chapter we take one step back in order to trace the positions put forward by national stakeholders as well as by curriculum developers and providers during the discussions that preceded the work undertaken by this group.

Who initiated “integration”? 
During the period 1989 - 1994 there were a number of groupings who began exploring ways in which the South African education and training system could be transformed. They include the work done by NUMSA and COSATU in 1989; the National Educational Policy Investigation (NEPI) in 1992: the work conducted under the auspices of the National Training Board (from 1993); the PRISEC work (1993) the ANC: Draft Policy for Education and Training (1994); and the subsequent reports produced by the Implementation Plan for Education and Training (IPET) working groups under the auspices of the Centre for Education Policy Development (1994). There were also a range of policy proposals put forward by various national and regional sector groupings.

The National Training Board process began in 1993, a few months before the first election for a Government of National Unity. Not surprisingly, its initial debates were located within a training (or vocational) context. However, by the time its recommendations were published in the Discussion Document on a National
Training Strategy Initiative (NTSI) in April 1994, much of the value lay in the way in which the national scope of the debate had been influenced through an extended range of stakeholders. One could almost say that it was the timing - just before the first national elections - that made this process influential and indeed, possible.

Four stakeholder groupings had entered the National Training Board process with concerns closely related to the needs and conditions of their constituencies. Two of the four, employers and labour, were used to bargaining against each other in an industrial relations framework. The other two were new to this type of engagement.

- Given the particular moment in the history of our country, the state grouping was a rather complex configuration. The official state representatives represented two departments from the "old" state - Education and Labour (called the Department of 'Manpower' at the time). The two departments came out of a deeply divided system in which they literally never spoke to each other. Even in respect of apprenticeship learning, the Education Department designed a theory component independently of the practical training under the Department of manpower. The two departments often united in their desire to resist integration.
- The "new" or "shadow" state representatives came in under the ANC-COSATU alliance. The latter grouping therefore did not officially represent the state, yet their concerns (many of which were shared by the official state representatives), dominated the agenda. In a nutshell, their view was that the new education and training strategy should address the concerns of economic reconstruction and growth, should lead to active labour market policies and should address past injustices and inequities in domains of learning.
- Employers share the concern about economic growth and highlighted the issue of global competitiveness. They placed particular emphasis on the need to improve productivity through worker training.
- Labour concerns (driven by COSATU representatives) revolved around the need for employment security and employment growth for their members, as well as the need for progression or career paths that would be opened up by access to education, training and development opportunities. They strongly articulated a need for the provision of Adult Basic Education as an integral part of formal or accredited learning.
• Providers were concerned about the fragmented systems of learning that prevented the possibility of continuous learning pathways; the curriculum shifts that would be required and the competence of the people currently teaching or instructing learners.

These four sets of concerns interacted in both complementary and contradictory ways. They shifted the debate from a concern about vocational training to a broader conception of vocational education and training and then to the argument for an integrated approach to all activities and systems currently classified as education and training. The definition of "integrated approach" was deferred, with some participants hoping to see full integration (as a seamless spectrum from general to applied learning) and others anticipating separate education and training tracks lying side by side under a common umbrella.

The proposed National Qualifications Framework, based on the twelve principles outlined in the first section, constitutes the integrating and regulatory mechanism that will bring cohesion to current learning systems and practices and simultaneously transform these systems and practices.

The challenge of finding consensus between trainers and educationists
A fascinating feature of the National Training Board process concerns those issues which were not initially contested between the participants. One of these was the use of competencies as basic building blocks in the National Qualifications Framework. For many of this consensus was puzzling, given the proliferation of meanings and methodologies attached to this term. Although the term "competence" was familiar to the training-minded participants, the notion of competence having an educational dimension was unknown to most people from the training sector. They were concerned that, given the institutional power of the formal education providers, "competence" might become too theoretical or academic, and not reflect sufficiently the measurable demonstration of performance standards in explicit behavioural terms.

The education-minded participants, on the other hand, were immediately concerned about the power issue of "whose standards would be used to determine competence?" They feared that if education were to become the handmaiden of the economy, loss of curriculum autonomy would result. They would thus lose the opportunity to prepare individuals for social, cultural,
intellectual, political as well as economic roles in a democratic society.

The subsequent adoption of the internationally-popular and more generic term outcomes-based did little to dispel fears on both sides. For many educationists the discourse remains "technicist" and training-oriented. For many trainers, known methodologies of curriculum design such as behavioural objectives or criterion-referenced approaches are suddenly in dispute, although some remain convinced that the term is simply a case of "old wine in new bottles".

While the positions outlined above may, at one level, be seen as institutions and occupational groupings defending their “turf”, there is a further explanation which is clearly articulated by Christie (1995). She explores the importance of local differences in implementing global trends and "policy-borrowing". Referring to the contestation around the competency agenda she states:

“Most of the policy proposals in the White Paper, including outcomes-based approach to curriculum and assessment, are merely fields mapped for play in a very uncertain game. And if global policy outlines can be easily transferred from context to context, it is surely the case that the struggles of implementation are a wholly local matter”

When one examines the stance various stakeholders adopt to the National Qualifications Framework, it becomes clear that apparent interim consensus hides the contestation that surrounds the conceptual nuts and bolts required to develop a new system in practical terms. It is usual for policy developers to seek advice and guidance from the work done in other countries, but no policy, no matter how developed, can be imported and implemented directly. Local contexts and conditions may be far removed from those existing in the countries in which policies originated. Local research, development, debate and contestation are therefore crucial ingredients of policy work.

In this book you see us searching for concepts and terms that will be acceptable to both the education and training sectors. We have indeed "borrowed" internationally, but we have also worked hard to formulate local meanings that create pathways for discussion and debate across different contexts.

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The development and implementation of a National Qualifications Framework (NQF) in South Africa presents our nation with exciting opportunities to reconstruct and develop our current education and training systems into a system that reflects an integrated approach which addresses the learners' and nation's needs.

The objectives of the NQF are to create an integrated national framework for learning achievements and to enhance access to, and mobility and quality within, education and training (SAQA Act, 1995: clause [2]). These objectives present our nation with a significant paradigm shift. The successful development and implementation of the NQF will require paradigm pioneers that are able to communicate the conceptual shifts, as well as establish the new enabling structures and their necessary linkages with existing and changing education and training systems.

These conceptual shifts, new enabling structures, and linkages were the issues with which our Committee had to grapple. This report responds directly to the brief of the national Minister of Education in this regard, and is structured in such a way as to give recommendations - with their reasoning - and to signal clearly certain areas of difficulty.

We acknowledge the valuable contributions of the NQF Reference Group, the Task Team of the national Department of Education, and the various consultations and meetings that were held. Appendix A lists the members of these groups, those consulted, and the meetings addressed. While these meetings and consultations were not exhaustive and did not cover all possible

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7 This is an extract from the original 1996 document. Minor adjustments have been made to improve readability and numbering. Not all sections of the original document have been included. The full document is however available on request. Appendices are not included in this extract but are available on request.
stakeholders and role-players, they certainly mapped out the need for:

• user-friendly NQF material and information
• provincial and other forums for NQF discussions

In addition, we acknowledge the invaluable contribution made by participants in the HSRC's *Ways of Seeing the NQF* process, and by members of the New Zealand Qualifications Authority. With their permission, we have freely made use of materials from their publications.

It became clear to the Committee that comprehensive examples of NQF concepts, structures and linkages were necessary to assist people to make the required paradigm shift. In contrast, skimpy and inadequately thought out examples invariably led to confusion rather than illumination. To this end we found using comprehensive materials and actual examples from other countries extremely useful to gain an understanding of concepts for an NQF, and of the implications an NQF will have for education and training. Such an understanding was invaluable in the preparation of the Committee's proposals for the appropriate development of an NQF in a South African context.

The developments represented in this report are but the beginnings of an exciting journey towards an outcomes-based education and training system. The report will have served its purpose well if it:

• demystifies the NQF
• enables learners, role-players and stakeholders to participate actively in the development and implementation of the NQF
• signals unambiguously the areas of contestation, difficulty and agreement.

Developing our own comprehensive, user-friendly NQF materials and examples must, therefore, be prioritised.

There remain many choices to be made in building the NQF and, hopefully, the recommendations made in this report will assist in negotiating some of these.
I would like, in conclusion, to thank Jonathan Gunthorp, Beverley Malan, and Meg Pahad for their diligent work and valued contributions as members of the Committee.

Samuel B.A. Isaacs
Convenor
Committee for Development Work on the NQF

12 December 1995

MEMBERSHIP & BRIEF

The Committee for Development Work on the NQF was appointed on 9 October 1995 by the national Minister of Education, Professor Sibusiso Bengu, for a period of nine weeks. The members were:

Jonathan Gunthorp
eastern seaboard Association of Tertiary Institutions (esATI) consultant
Samuel Isaacs
Peninsula Technikon [Committee convenor]
Beverley Malan
Vista University [East Rand Campus]
Meg Pahad
Independent Examinations Board

The Committee was supported by a Reference Group and a Task Team of the national Department of Education and held discussions with numerous persons and groupings (see Appendix A).

It was accepted at an early stage that two types of representation were not satisfactorily apparent in either the NQF Committee or the Reference Group, namely full representation of all stakeholders, and full representation of the range of experience of reality in South Africa.

It was recognised, however, that this would be somewhat mitigated by a thorough process of wide consultation once the Report had been presented to the Minister in December, and had been released as a discussion document. It was also
noted that the SAQA Board, which will ultimately consider the document, would be fully representative. In the interim, the Committee was urged to consult and liaise as widely as possible in the time available, and to cultivate a particularly close relationship with the more fully representative Consultative Forum on Curriculum.

The Brief
The brief of the Committee was to compile a report to be submitted by 12 December 1995. The terms of reference were:

...the Committee will formulate proposals which will serve as guidelines for further debate and development work regarding the following:

a. A curriculum framework which will underpin the NQF and the establishment of standard-setting bodies, and which will make provision for a modular approach with core and optional modules.
b. Definitions for concepts relating to an NQF, procedures for the setting of standards, and criteria for the registration of standard-setting bodies and qualifications bodies.
c. The monitoring and auditing of standards which will include accreditation and certification, and criteria for the accreditation of monitoring and/or auditing bodies.

RECOMMENDATIONS

While the brief of the Committee for development work on the National Qualifications Framework (NQF) was confined to the three areas outlined earlier, the culmination of its work made it apparent that there are a number, of related issues which need resolving if the NQF is to function effectively. The Committee took it upon itself to comment on some of the most pertinent of these issues in the recommendations below. These recommendations are therefore divided into the following two categories:

• Recommendations related to the Brief; and
• Additional recommendations arising from the development work.

With regard to the Brief it is recommended that:
1. South Africa adopt an eight-level framework with three identified bands: General Education and Training (recognised to have two distinct sectors - formal schooling and Adult Basic Education and Training) culminating in Level 1 on the NQF; Further Education and Training comprising NQF Levels 2-4; and Higher Education and Training, comprising NQF Levels 5-8.

2. Level descriptors, based on nationally agreed essential outcomes, be written with the participation of all relevant stakeholders.

3. Thirteen organising fields be adopted as the 'field level' components within which much of the development work of the NQF will occur.

4. Standards Generating Bodies (SGBs) be adopted as the bodies responsible for generating unit standards for registration on the NQF.

5. National Standards Bodies (NSBs), as allowed for in the SAQA Act, 1995, be adopted within SAQA as the 'field level' co-ordinating bodies which will regulate the process of registering unit standards on the NQF.

6. Three Qualifications Councils be adopted as bodies which will formulate 'protected terms'; set rules of combination; and oversee, on behalf of the SAQA, the granting of the right to offer national qualifications.

7. Provision be made in the SAQA regulations for 'protected terms' and that such terms be formulated by the Qualifications Councils after consultation with all stakeholders.

8. National education and training credit value be based on a 'notional learning time' ratio of ten notional learning hours being equal to one credit on the NQF.

9. Education and Training Quality Assurers be adopted as bodies to which SAQA will grant 'primary accreditation' in order that they may fulfil their role as quality assurers.

In addition it is recommended that:

10. The South African Qualifications Authority Board, as provided for in the SAQA Act, 1995, be established by no later than 31 March 1996.

11. An Executive Director for the South African Qualifications Authority (SAQA) be appointed to contract with the brief to manage the establishment of a fully operating, cost-effective SAQA. This appointment should be made no later than three months after the Board has assumed office.

12. Under the authority of the SAQA Board, development work on the NQF...
move with due haste in 1996. In particular, attention should be given to the establishment of the National Standards Bodies and Qualification Councils within SAQA, and to the writing of regulations governing the establishment of SGBs and ETQAs. These regulations should have been tested with public opinion and be ready for gazetting by July 1996.

13. The SAQA Board form an Establishment Unit (EU), in order to assist the Board in operationalising an infrastructure for SAQA. Such a unit should have expertise to create a decentralised, innovative, efficient and effective structure, and would include, among others, experts in organisation development, financial, management, information technology, and education and training systems.

14. The recommendations on the structure of SAQA reflect the necessities arising from the growth of the NQF. Such recommendations will be informed by and discussed with major role-players, and scrutinised and approved by SAQA. They will need to be phased so as to allow for implementation with all due haste.

15. The national Government proactively takes up its responsibility for the establishment of SAQA and related structures by making the necessary budget provisions. Funding for areas such as those mentioned above must be sufficient to ensure that the NQF is able to function effectively.

16. The budgetary implications of establishing and maintaining the NQF, at national and provincial level, be determined by the Establishment Unit. Costing would take into account new costs as well as savings achieved through consolidation or abolition of existing structures.

17. Funding for SAQA and related structures should also take account of staff development for education and training personnel in respect of capacity to implement the NQF.

18. Funding for areas such as those mentioned above should not be dedicated exclusively to SAQA. In many cases it will be more efficient and effective to have money as a part of budget appropriations of the Departments of Education and Labour as well as any other relevant government departments.

19. Programmes for capacity building which will allow sectors and provinces to build the NQF, be identified and project plans and budgets be drawn up and approved for such programmes.

20. The dynamic development of outcomes-based curriculums on the one hand, and the NQF on the other, be recognised, and that the process of
curriculum development and standard setting be brought into a healthy working relationship.

21. Under the authority of the SAQA Board, regulations governing the procedures for generating and registering standards, the registration of national qualifications, and the accreditation of providers and assessors be written.

22. An intensive multi-media campaign explaining the unfolding NQF to the general public be launched in April 1996. Prior to the establishment of the SAQA Board this should happen under the auspices of the national Department of Education.

23. Reference materials used in this report, and elsewhere in key discussions concerning the NQF, should be collated by the national Department of Education and made available, on request, to interested parties. An executive summary should be included in the Report.

24. Comprehensive, user-friendly South African materials and examples about the NQF be developed by SAQA as a priority.

25. A process of continuing communication between the Board/Establishment Unit and sectors of civil society be embarked upon in early 1996. Such communication should be specifically targeted at key participants in building the NQF, and might begin by selecting those sectors legislated with representation on the SAQA Board. Extensive workshops and dialogues with these sectors should begin as early in the year as possible.

26. Such a process will ideally involve a cadre of public communicators fulfilling three functions:
   • explaining to sectors how to become part of the NQF and its structures
   • engaging in advocacy for the NQF
   • listening critically to feedback and acting as channels for communication back into emerging SAQA structures.

   Prior to the SAQA Board taking office, these functions should be initiated and overseen by the Inter-Ministerial Working Group on Education and Training (IMWG).

27. Pilot projects in commerce and industry, and in education, be launched or supported in 1996 as part of building the NQF. In particular, pilot projects for the writing of unit standards for school subjects/clusters for NQF levels 1-4 should be initiated. The latter standard-writing projects would be under the auspices of SAQA, and managed by the national Department of Education
The projects will inform and be informed by curriculum development exercises.

28. A member of the national Department of Education be given the full-time task of overseeing the Department's contribution to building the NQF.

29. Curriculum structures within national or regional Departments of Education maintain a close working relationship with standard-writing structures.

30. A report of Higher Education and Training’s participation in the NQF be commissioned by the national Minister of Education. The process for compiling such a report would be widely participated in by key national stakeholders in Higher Education and Training, and would include, among others, the Committee of University Principals (CUP), the Committee of Technikon Principals (CTP), college of education representatives, staff associations, students, commerce and industry, and the Ministry of Education. The work already done by the National Commission on Higher Education (NCHE) would be a major resource for such a report

31. The implications of the NQF for Educators, Trainers and Development Practitioners be recognised and receive immediate attention.

THE ORIGINS OF INTEGRATION

A record of documents
As early as 1992 the National Education Policy Investigation and the Education Renewal Strategy emphasised the importance of integrating general education and vocational training into a coherent system. The NQF itself was first proposed in the ANC Education Department document, Policy Framework for Education and Training, in January 1994. In April 1994 a National Training Board Report: Discussion Document on a National Training Strategy Initiative fleshed out the concept for the training world, while the Centre for Education Policy Development released its Implementation Plan for Education and Training, with a chapter on the NQF, in May 1994. Towards the end of 1994 an Inter-Ministerial Working Group was mandated by the Ministries of Education and Labour respectively to consider - among other issues - the implementation of an NQF. In March 1995 the White Paper on Education and Training again detailed elements of a proposed

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8 The concept of a National Institute for Lifelong Learning Development (NILLD) arises in the Consultative Forum for Curriculum documents where it replaces the former concept of a National Institute on Curriculum Development (NICD). Provincial Institutes for Lifelong Learning Development (PILLDs), referred to in this document, are the provincial counterparts of the NILLD.
NQF. Three months later, on 2 June 1995, the Draft National Qualification Framework Bill was published and, on 4 October 1995, the South African Qualifications Authority Act 1995, (Act no 58 of 1995) was gazetted.

The debate
One of the major elements of the National Qualifications Framework (NQF) is integration, specifically the integration of education and training. In Ways of Seeing the National Qualifications Framework, a Human Sciences Research Council publication, the concept of integration, mooted by the ANC-COSATU alliance in 1992, is also pointed out as being the most hotly contested point of early debates on a proposed NQF.

Essentially, the debate divided itself into two schools of thought, namely one which wanted no distinction drawn between education and training and one which wanted them to exist in parallel tracks, joined by some kind of umbrella body, a far more tentative approach towards the integration of education and training. The first point of view, which seemed to favour total integration, was held by organised labour as well as by the "shadow State" (the ANC), while the latter was held by the Departments of Manpower and Education respectively, neither of which had a good track record of considering - or consulting - each other on common issues like education and training. Although united in their reticence, their reasons were not the same.

The education sector was concerned that education would lose its 'soul', that it would become narrow in focus, concentrating only on teaching that which was required by the world of work - training, in other words. At the centre of their concern was the fear that education standards would decrease rapidly if training was to prescribe to education.

The training sector, on the other hand, was afraid that the integration of education and training would lead to unreasonable demands for "high" academic standards in the training world; an imposition, it was claimed, that would make it difficult, if not impossible, for those who trained workers to adjust rapidly to employment demands when required.

Although the debates have since cooled down and there is consensus on many of the fundamental issues related to the adoption of an integrated approach to
education and training, *Ways of Seeing* warns that the fears have not necessarily disappeared, and that we should remember them since they may surface again when the integrity and/or nature of either of the sectors is threatened. A case in point might be the debate regarding the fields which are to inform the NQF. The *Ways of Seeing* suggests the following 12 fields: Agriculture and Nature Conservation; Arts and Artistic Crafts; Business, Commerce and Management Sciences; Communication Science and Languages; Education, Training and Development; Engineering and Manufacturing Processes; Human and Social Sciences; Law, Military Science and Security; Mathematics; Medical Sciences, Health and Social Services; Natural and Life Sciences; and Utility Services. These, according to the formal education sector, are nothing more than occupational fields intended to force education into a training mould.

The education sector would like to use subject disciplines which, it is claimed, form the basis of all these occupational fields anyway, as the foundation of the NQF.

The broader integration debate might have gone either way: allowing one or the other of the sectors to absorb the other completely (an assimilation model) or allowing each one to continue its own separate way (thereby maintaining the fragmentation which had characterised the system for so many years). The publication of the White Paper on Education and Training signalled a key stage in attempts to resolve these debates. By calling itself the *White Paper on Education and Training* it committed the State irrevocably to the adoption of an integrated approach. It also officially introduced the mechanism which would be used to facilitate this "integration", namely the NQF.

What the White Paper has to say about the NQF reveals its position on the debate: it accepts neither of the two arguments completely. Rather, it tries to affect a compromise by acknowledging that, although consensus had been reached about certain fundamental issues, there were still a number of principled differences, especially with regard to implementation. It rejects, without reservation, rigid divisions between academic and applied knowledge, theory and practice. Rather, it points to the need for convergence on certain issues, such as a single aim for education and training: "the provision of meaningful learning experiences which will prepare learners more effectively for life's opportunities" (p.26, clause 9 paraphrased), while acknowledging the need for divergence,
"allowing the Department of Labour to respond rapidly to the need for new training courses without having to go through lengthy consultation processes with the Department of Education" (1995: 16, clause [II] paraphrased).

A few extracts from the White Paper on the nature, function and processes of the NQF should give a relatively clear picture of how this compromise is to be reached. The first extract, which describes the nature of the NQF, states very clearly what the State's perception of an integrated approach is:

"An integrated approach to education and training will link one level of learning to another, and will enable successful learners to progress to higher levels without restriction, from any starting point in the education and training system" (1995: 26, clause [10]).

The second extract gives more detail about what "without restriction" refers to when it says:

"Learning and skills which people have acquired through experience and on-site training or self-education could be formally assessed and credited towards certificates, in order to enable them to qualify for entry to additional education and/or training" (1995: 26, clause [10]).

The NQF will not, however, credit any skill for any course - only those which are relevant to the learning or career pathway which a learner wants to follow. The White Paper makes it very clear that the framework, although facilitating access, will also be a mechanism for regulating education and training, especially with regard to the issuing of qualifications. This is clear from the following extracts, which state that:

"The NQF will be developed in terms of national guidelines and a mutually agreed regulatory framework - developed and implemented on an inter-departmental basis, with fully consultative processes of decision-making" (1995: 16, clauses [14 & 15]).

These "fully consultative processes" will be one way of moving education and training closer together because the establishment of the NQF will enable all existing public and private sector education and training providers to assist in
formulating and registering appropriate national standards, in their specialist fields, through respective standards bodies and to seek recognition for their programmes in terms of such defined standards. The White Paper goes on to refer to the issue of curricula by stating that "New, flexible and appropriate curricula are needed that cut across traditional divisions of skills and knowledge, with standards defined in terms of learning outcomes and appropriate assessment practices" (1995: 26, clause [9]).

Read together, these extracts imply that an integrated approach to education and training means at least the following:

- Perceptions of what knowledge is, of how people learn, and of how learning should and could be organised, need to change. Knowledge can no longer be equal to content only but must be recognised as having an interdependent relationship with skills and attitudes - all of which contribute towards competence. Learning will no longer be the sole property of formal education but can take place anywhere, at any time and through any means, provided that it meets nationally required standards.

- An accommodation model (where all sectors retain some of their characteristics while adapting others along the way) requires change from both the education and training sectors. Any sector which, for example, wants its learners to obtain a General Education and Training Certificate (GETC) will have to meet the same criteria with regard to registered unit standards, although not necessarily with regard to the means used to attain those standards.

- Wide participation in defining and developing standards will facilitate new liaisons between employers, learners, professional bodies, communities, providers and practitioners.

There remain, of course, a number of unresolved questions and issues arising from the statements made in The White Paper. The Committee hopes that this Report, prepared for the Minister, will address at least some of the more substantial or urgent of these, and it proposes some possible solutions for further debate.

**Key principles**

The vision of lifelong learning advanced in The White Paper will become a reality only when certain conditions are met. To remind us of the centrality of the NQF in
the realisation of this vision, some of these conditions are outlined below:

- Suitable career/learning advice, placement testing, and assessment programmes for the recognition of prior learning must be available to guide learners.
- Alternative learning programmes must exist for a range of learners who are unable to attend education and training institutions either on a full-time or on a regular part-time basis.
- Learners must be equipped to take advantage of open learning and multi-media education and training opportunities.
- Providers must be supported in developing courses and materials accessible to this range of new learners.
- Providers must be monitored and supported in meeting quality assurance criteria.
- Learning programmes must lead to nationally recognised, portable credits which are equivalent across all types of providers and across provinces.
- These credits must lead to nationally recognised, legitimate and credible qualifications.
- There must be coherent career/learning pathways which ensure relevance and progression.

When we focus specifically on the NQF, a set of principles emerges from this vision. These principles, first developed in the National Training Strategy Initiative process [1994] are listed in *Ways of Seeing*. They all relate directly to the realisation of the policies outlined in *The White Paper*, guide the development work around the NQF, and will be implemented through the SAQA and the various bodies through which it accomplishes its work. The guiding principles as set out in *Ways of Seeing* (1995:11) are reproduced below, in a slightly adapted form:

**The framework must:**

**Integration**

establish the basis for an integrated approach to education and training as part of a human resources development policy aimed at integrating the theory with the practice, and the academic with the vocational.

**Relevance**

be, and remain responsive to national economic, social and political development needs.
<table>
<thead>
<tr>
<th>Feature</th>
<th>Description</th>
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<tbody>
<tr>
<td>Credibility</td>
<td>Have national and international value and acceptance.</td>
</tr>
<tr>
<td>Coherence</td>
<td>Work within a consistent framework of principles and certification which allows learners to clearly link credits into a meaningful learning or career pathway.</td>
</tr>
<tr>
<td>Flexibility</td>
<td>Allow for multiple pathways leading to the same learning ends.</td>
</tr>
<tr>
<td>Quality</td>
<td>Be expressed in terms of nationally agreed outcomes and performance/assessment criteria, thus facilitating both monitoring and provisioning.</td>
</tr>
<tr>
<td>Legitimacy</td>
<td>Provide for the participation of all national stakeholders in the planning and co-ordination of standards and qualifications.</td>
</tr>
<tr>
<td>Access</td>
<td>Provide ease of entry to appropriate levels of education and training for all prospective learners in a manner which facilitates progression.</td>
</tr>
<tr>
<td>Progression</td>
<td>Ensure that the framework of qualifications permits individuals to move through the levels by accumulating appropriate combinations of credits.</td>
</tr>
<tr>
<td>Portability</td>
<td>Enable learners to transfer their credits from one context to another.</td>
</tr>
<tr>
<td>Articulation</td>
<td>Provide for learners, on successful completion of accredited prerequisites, to move between components of the delivery system.</td>
</tr>
<tr>
<td>Recognition of Prior Learning</td>
<td>Through assessment, give credit to learning which has already been acquired in non-formal ways, e.g. through life/work experience.</td>
</tr>
<tr>
<td>Guidance of Learners</td>
<td>Provide for the counselling of learners by specially trained individuals who meet nationally recognised standards for education, training and development practitioners.</td>
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</table>
Democratic Participation provide for the active participation of practitioners in the relevant field in the writing of unit standards and in their regular revision.

Equality of Opportunity provide common learning outcomes which can be reached at different rates by learners with specialised educational needs, by adults, and by children, both inside and outside mainstream schooling.

TOWARDS A WORKING DEFINITION OF OUTCOMES

New paradigms: introduction
An Outcomes-Based Education and Training (OBET) System has as its starting point the intended outputs (significant exit outcomes) as opposed to the inputs of traditional curriculum-driven education and training. This approach is summed up by Spady (1992:7), when he defines 'outcome' and 'based' as follows:

An outcome is in fact a culminating demonstration of the entire range of learning experiences and capabilities that underlie it, and it occurs in a performance context that directly influences what it is and how it is carried out. These defining elements clearly tell us that an outcome is not simply the name of the learning content, or the name of a concept, or the name of a competence, or a grade or test score, but an actual demonstration in an authentic context.

'Based'
means to define, direct, derive, determine, focus, and organise what we do according to the substance and nature of the learning result that we want to happen at the end of the learning process.

In other words, if we were to base learning on outcomes, we would start at the end point-with our intended outcome - and then define, derive, develop, and organise all our curriculum processes, i.e. curriculum design, instructional planning, teaching, assessing, and advancement of learners according to that desired demonstration. Veteran Outcomes-Based Education (OBE) practitioners call this the design down or "design back from the end" process, and in strong OBE schools one often hears the saying, "Design down from where you want to end up." When we put these two words together, therefore, the term Outcome-Based
implies that we will design and organise everything we do directly around the intended learning demonstration we want to see at the end. Other than needing to get clarity regarding what is meant by "the end", the concept is quite straightforward and makes a lot of sense to most educators once they have some practical experience with it.

Clearly the 'design down' process belongs to curriculum development which has as its starting point intended outcomes. The way these intended outcomes are defined and set out are crucial to the understanding and operationalising of the National Qualifications Framework (NQF). The defining of outcomes in terms of the NQF, in a way that is meaningful to most citizens, is essential to ensure understanding, active participation, and ownership in the development of the NQF; a process which will be overseen by the South African Qualifications Authority as one of its primary functions (the SAQA Act, 1995:5(l)[a][i]).

**An NQF context for defining outcomes**
The SAQA Act, 1995, establishes SAQA (clause 3) to oversee the development (clause 5[a][i]) and the implementation of the NQF, including the registration of national standards and qualifications (clause 5[b][ii]). The terms "standard" and "qualification" are defined in the Act as follows:

*'standard' means registered statements of desired education and training outcomes and their associated assessment criteria (clause l[x]).

*'qualification' means the formal recognition of the achievement of the required number and range of credits and such other requirements at specific levels of the NQF as may be determined by the relevant bodies registered for such purpose by SAQA (clause l[viii]).

The terms "outcomes", "assessment criteria", "credits" and "levels" are not defined in the Act and these need to be given working definitions in order to proceed meaningfully with the development and implementation of the NQF.

Before refining these terms further than is done in the glossary, it is useful to sketch the essential characteristics of national standards and qualifications and their uses. It is also necessary to allay the fears and confusion that abound when a new system such as the NQF is introduced.
Outcomes and competence

This section addresses four concepts with which educators are familiar. However, terminology and usage have been inconsistent, so it is necessary to capture these concepts and describe and define them clearly.

The definitions given at the beginning of this report are expanded for greater clarity below.

Outcomes

Outcomes are the end products of a learning process. The word "outcomes" is used broadly as an inclusive term, referring to everything learnt, including social and personal skills, learning how to learn, concepts, knowledge, understanding, methodologies, values, attitudes and so on, and including both intended and unintended outcomes. In outcomes-based education and training, curriculum developers work backwards from agreed desired outcomes within a particular context. These state clearly what the learner should be able to demonstrate an understanding of and ability to apply. Programmes of learning are then designed to help the learners to achieve these outcomes. We have defined two sets of outcomes, which we are calling "essential" and "specific" outcomes.

Essential outcomes

Essential outcomes are cross-curricular, broad generic outcomes that inform all teaching and learning. Examples could include problem-solving or communicating effectively. The concept appears in a wide range of documents and is a part of education discourse but many different terms are used (generic competencies, core skills, essential outcomes...). Some examples of essential outcomes used in various education and training systems are given in Appendix B.

These essential outcomes are of key importance as a focus for both standard setting and curriculum development, and they should permeate specific outcomes at every level of the NQF. They perform an integrative function, facilitating both inter-disciplinary integration and the integration of education and training.

These essential outcomes underpin an outcomes-based system, and should lead to the development of conceptual skills and understanding which transcend
the specific, gradually developing the learner's capacity to transfer learning from one context to another.

**Specific outcomes**
Specific outcomes are contextually demonstrated knowledge, skills and values, reflecting essential outcomes. An example, using the essential outcome "communicating effectively" is: Complex issues are explained so that comprehension is maintained by lay readers throughout the article. Standards registered on the NQF are described in terms of specific outcomes plus assessment/performance criteria together with various other, administrative details. The achievement of a specific outcome leads to the award of credit Specific Outcomes are the building blocks which enable learners to achieve overall competence in a field at a given level. They are the key to learning progression.

**Competence**
As learners meet the criteria which show they have achieved the outcomes for required unit standards, they accumulate credits towards a particular qualification. When they have the required number and combination of credits, they have achieved the defined degree of competence in that area, and receive a qualification.

**The relationship between these kinds of outcomes**
The following representation, adapted from *Ways of Seeing the NQF*, is a useful summary of the relationship between the outcomes and the defined degree of competence:

<table>
<thead>
<tr>
<th>A Qualification</th>
<th>is the recognition of</th>
<th>Competence</th>
</tr>
</thead>
<tbody>
<tr>
<td>is built up from</td>
<td></td>
<td>is built up from</td>
</tr>
<tr>
<td>Unit Standards</td>
<td>are the recognition of achieved</td>
<td>Specific Outcomes</td>
</tr>
</tbody>
</table>
A concern addressed
The experience of some sectors and countries which have used outcomes-based learning has given rise to the concern that it can become narrow, prescriptive and behaviourist. Various safeguards have been introduced to counteract this tendency where it has been recognised. The model advanced in this report contains two major provisos as safeguards, which must be clearly understood by the writers of unit standards. They are:

- The specific outcomes and performance/assessment criteria registered in unit standards must not be too detailed and prescriptive; they should be regarded as pointers to guide educators and learners; they should address broad clusters of skills, knowledge, concepts, applications and so on, and be general enough to allow some flexibility in interpretation;
- the underpinning role allocated to the essential outcomes should ensure that conceptual development and transferable learning remain constantly in sight, and that approaches to teaching and learning are both holistic and developmental; each unit standard (if not each individual specific outcome) should reflect at least one of the essential outcomes in a fairly direct manner.

Allaying fears and confusion about outcomes-based learning
It may be helpful to consider the differences between what we have had before and the new system by considering the following chart which identifies some significant differences between learning described in terms of outcomes, and learning described in terms of objectives (Ontario Ministry of Education and Training, 1995: 27):

<table>
<thead>
<tr>
<th>OBJECTIVES</th>
<th>OUTCOMES</th>
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<tbody>
<tr>
<td>Focus on what the teacher will do</td>
<td>Focus on what the student will do</td>
</tr>
<tr>
<td>Describe the intent of teaching</td>
<td>Describe the results of learning</td>
</tr>
<tr>
<td>Focus on opportunities provided for learning</td>
<td>Emphasise how learning is used, especially how it can be applied in new areas</td>
</tr>
<tr>
<td>Involve estimating the amount that can be learned in a given period of time</td>
<td>Require flexible allocation of time</td>
</tr>
</tbody>
</table>
In the South African context where objectives have, in the recent past, been used behaviouristically, it may be more useful to regard the above table as learning described in terms of inputs (objectives) and outputs (outcomes).

We have all had experiences of learning delivered through curricula which were both prescriptive and descriptive. Such curricula structured attitudes on what constituted knowledge, gave rise to static forms of learning, and, consequently, promoted rote learning. Outcomes-based learning would encourage the use of different curricula since outcomes would be assessable in different ways. This would allow for participation in creating and enjoying knowledge. Furthermore, outcomes-based learning calls for transparency in the assessment of learning, enables the recognition of prior learning and experience, and is not rigidly time-based.

**Sketching the essential characteristics of national unit standards, qualifications, and their respective uses**

In discussing national unit standards it is easier to start with national qualifications as many practitioners already have a grasp of degrees, national diplomas and certificates, as well as of complications regarding the accreditation of non-formal learning programmes.

Awarding national qualifications is one way of formally recognising learning achievements. It is an important mechanism for gaining access to and facilitating mobility in careers and further learning. Many national qualifications are synonymous with occupational roles. The holders of such qualifications are expected to possess a repertoire of knowledge, skills, and values - of which knowledge and skills will be contextually demonstrable, while attitudes (or values) can only be inferred. This repertoire will be constructed of unit standards.

It is instructive to compare the foregoing with the statement that a national qualification consists of specified courses (subjects, modules). Unless the latter formulation results from a curriculum development process that uses agreed national standards as its starting point we are back with a rigid, time-based, prescriptive curriculum which focuses more on content than on the learner.

National standards, as previously defined by the SAQA Act, are registered statements consisting of two parts:
In the New Zealand NQF a unit standard is based on the following:
- specified outcomes (or elements)
- performance criteria

Various formats for unit standards have been developed over the past two years which attempt to realise the outcomes-based approach in particular contexts, relevant to South Africa. The formats proposed in *Ways of Seeing*, as well as in the Interim Guidelines for a National ABET Framework, are reproduced in Appendix D.

What is critical to note is that while the formats are different, the elements of the formats are the same. Various approaches will be tested during the NQF development and piloting phase and SAQA will have to decide on the national format. Whatever format is finally adopted, must be simple to administer and easy to understand.

Since unit standards form part of a paradigm shift that requires a new orientation to learning, teaching, and assessment, it is important to provide as many fully documented examples of unit standards as possible. These examples should include information about the system and context in which they are being used. Skimpy examples, and ones that are not properly thought out, simply raise queries and cause confusion. They ought, therefore, to be avoided. It is for this reason that international examples have been chosen. These allow us to interrogate and gain a useful understanding of the utilisation of these concepts in other countries and will enable us to develop appropriate unit standards of our own.

At this point it is useful to provide a number of examples of desired outcomes. Examples have been taken from the Ontario Ministry of Education and Training (1995:23-29, 45, 51, 75, 86). and are reproduced as Appendix E. Unfortunately, no specific assessment criteria are provided except for some guidelines entitled Assessment, Evaluation, and Reporting (1995:21-22). These have been reproduced as Appendix F. The examples are particularly useful since they deal with school education Grades 1-9. Examples of unit standards from the New
Zealand Qualifications Authority Registration of Units and Qualifications (1993: 11-16) are reproduced as Appendix G.

A useful series, *How to analyse unit standards for school subjects*, produced by the New Zealand Qualifications Authority is also available. This provides a user-friendly format for understanding what a unit standard is. Their document, *A Guide for Biology*, has been reproduced as Appendix H. For more examples consult the Further Reading List provided in this Report.

Relationships between National Unit Standards, Qualifications, and Curriculum Development

Standard-setting is conceived of as a separate process from curriculum development. However, it cannot operate in a vacuum. The setting of national unit standards will, of necessity, be informed by:

- curriculum determinants which influence, inter alia, credit value and levels, and which prepare learners for attaining those standards
- qualifications, which recognise the capacity for continuing performance within specified ranges and contexts, resulting from the integration of a number of specific outcomes via agreed rules of combination.

A clear understanding of these relationships is thus essential to the successful development and implementation of the NQF. To this end a detailed analysis of the relationships between the NQF and curriculum development is contained in Part 4 of this report.

*Rationale for moving to a new paradigm*

**Input or outcomes?**

Outcomes-based education and training requires a shift from focusing on teacher input (instructional offerings or syllabuses expressed in terms of content) to focusing on learner outcomes. There is no reason why educators should not continue to state their intentions as well as defining the desired outcomes. Insisting, however, on statements of learning outcomes, implies a number of other changes in emphasis, all of which facilitate the realisation of the vision and many of the principles outlined above. It does, therefore, represent a significant paradigm shift.
Changing theories of language, learning and cognition
The move towards outcomes-based education and training is supported by changing theories of language, learning and cognition which, broadly summarised, could be said to be moving away from 'transmission' models.

At the same time, these theories of learning suggest that the image of learners as empty vessels which have to be filled with knowledge, or other approaches where the learner is regarded as a passive recipient or rote learner, deprive many learners of adequate opportunities to realise their full potential.

Outcomes-based learning focuses on the achievement of clearly defined outcomes as opposed to syllabus content only. In NQF proposals these outcomes are expressed as balanced and integrated national standards which demand the holistic development of competence, and encompass knowledge, skills, and attitudes.

Recognition of prior experiential learning
Outcomes-based learning makes it possible to credit learners' achievements at every level, whatever learning pathway they may have followed, and at whatever rate they may have acquired the necessary competence. It also provides for the recognition of prior experiential learning (RPL).

With RPL, credit is awarded to learners for unit standards which they have never formally studied if they can demonstrate that they are able to meet the registered outcomes for those unit standards. Outcomes-based learning thus moves us away from the traditional concept which involved spending a specified period of time in an institution. Learners will be expected to demonstrate through agreed procedures that they have met the required learning outcomes before they are awarded credits. Credits will only count towards a given qualification if they are relevant to that qualification.

Recognition of the achievements of learners with specialised educational needs
The existence of agreed common learning outcomes, which can be met at different rates by learners with specialised educational needs, facilitates the recognition of the achievement of learners who may need a longer time to achieve certain outcomes than the average learner. It also enables learners with
specific challenges to demonstrate their competence in whatever manner may be most appropriate to their needs. For example, a blind learner may demonstrate learning achievements through the use of Braille, oral work and tape recordings. This applies to all learners with specialised educational needs, adults and children, both in and outside mainstream schooling.

**Transparency of process and support of learning through agreed performance/assessment criteria**

In outcomes-based learning, a learner's progress is measured against agreed criteria. This implies that formal assessment will employ criterion-referencing and be conducted in a transparent manner. All learners who meet the agreed criteria for specified teaming outcomes receive the appropriate credit/s. Those who do not meet the criteria should receive clear feedback, indicating areas which need further work in order for them to reach the required standard. They are thus given support to try again. The concept of pass/fail is radically altered to credit/try again.

**Acknowledgement of competence at every level**

Outcomes-based assessment seeks to acknowledge competence wherever it is demonstrated (irrespective of the fields concerned), whilst acknowledging that competence may be harder to judge in some fields than others.

In certain fields, outcomes-based assessment has always been used (for example, in driving and flying tests, music examinations, and swimming lessons). A candidate receives the credit/s on demonstrating competence at a certain level, and in any particular batch of candidates, if no-one is competent, no-one passes. If all are competent, all pass.

This approach contrasts with systems which were usual in formal education. These relied overwhelmingly on norm-referencing, with selection as their primary purpose. Where norm-referencing dominates assessment, learners are measured against each other, with certain more-or-less fixed percentages of learners failing, passing or gaining distinctions. A learner may make significant progress without receiving recognition. In essence this approach to assessment is competitive, selecting a minority for success and consigning the majority to failure. The NQF, which is outcomes-based, will ensure that assessment in South Africa is firmly based on criterion-referencing or self-referencing, where a learner's progress is measured against her/his own previous achievements, and
not against those of other learners. However, norm-referencing will continue to play a limited role in moderation procedures.

**Flexible credit accumulation allowing portability and progression**

Adult education and training, and much of education and training above the GETC level, will be modularised, and credits will be given to candidates who meet the assessment criteria included in the unit standards registered on the NQF. Learners whose studies are interrupted by family circumstances, changing jobs or housing, and those with specialised educational needs, will be able to retain their credits and build on them to achieve a qualification whenever and wherever the opportunity arises. Because the credits are based on nationally recognised standards, they will be accepted in all parts of South Africa. Qualifications awarded should also receive international recognition once the system has been firmly established.

**MAKING LEVELS COHERENT: LEVEL DESCRIPTORS**

**The purpose of level descriptors**

Level descriptors focus on essential outcomes and achieve four key purposes. They:

- help the writers of unit standards to achieve consistency in relation to levels;
- ensure progression;
- facilitate integration and coherence across the different components of a qualification;
- provide interdisciplinary links and encourage transferability.

**What levels are included?**

Level descriptors will be written for at least some of the key levels and sub-levels of the NQF. The essential outcomes are clustered into very general groupings. They are not intended to cover all aspects of learning, merely to focus on some key cross-curricular aspects as a guide to the establishment of levels.

The level descriptors will be brief and very broad. They simply indicate a level of complexity in a cross-curricular way. An example is given in Appendix C. This is taken from the Scottish further education and training system, and is entitled "core skills".
Which essential outcomes shall we use?
A suggested list of essential outcomes for use in the NQF is reproduced in Appendix B. Because we in South Africa intend to use these across all levels and ages, we have tried to cluster our proposed essential outcomes under headings which are appropriate for all South African citizens, from young children engaged in formal education to adults across the spectrum of education and training. All learners should become increasingly competent in these broad areas as they progress from level to level in the NQF.

How do we write level descriptors?
There are several possible approaches. Below we outline two, both of which could be tried by the team appointed by SAQA for this task. This team will be best qualified to decide which approach to use after some practical experience.

One approach has been used by the Alverno College in the USA and the further education and training sector in Scotland. (An example taken from Scotland is in Appendix C). Level descriptors are written for at least some key levels on the NQF, for each of the chosen essential outcomes. These are very general and decontextualised, providing broad guidance to writers of unit standards and qualifications and designers of programmes of learning to give consistency to each level on the NQF. If this approach was adopted, using the ten recommended essential outcomes (or something similar), there would be ten broad level descriptors for each level on the NQF. Specific outcomes which are contextually in areas of learning would be written later as a key part of the standards setting process.

The Ontario (Canada) school system offers a clear alternative. In this approach level descriptors are written for each of the essential outcomes only when contextually in each of the defined areas of learning. In Ontario they have ten essential outcomes but have clustered together the areas of learning for the school curriculum into four broad clusters. Thus there are forty level descriptors for each level. In this model, the level descriptors are actually the specific outcomes and would form the basis of unit standards.

If we followed this model with ten essential outcomes, it would be important for the compulsory school system in South Africa to follow Ontario's example and reduce the number of broad areas of learning so as to make the exercise
manageable. The National Curriculum in the UK nearly floundered in its infancy when it started with hundreds of detailed "attainment targets" for each of the core school subjects. Later it was decided to cluster these outcomes much more broadly and use level descriptors.

The areas of learning are defined in curriculum frameworks and, in terms of rules of combination, by the relevant Qualifications Council.

THE NQF, LIFELONG LEARNING DEVELOPMENT AND A CURRICULUM FRAMEWORK

The NQF, lifelong learning development and a curriculum framework

Learning, teaching and assessment are inextricably linked. It is only in the context of the other that each has meaning: without learning, assessment has relatively little value; without assessment, the effectiveness of learning and the accountability of teaching cannot be determined. It follows, therefore, that the development of a qualifications framework (a system/mechanism for the recognition and registration of national standards and qualifications) and the development of curricula (programmes for attaining these standards and qualifications) should go hand-in-hand: they should at least have the same points of departure, be informed by the same values, principles, aims and objectives. These links are clearly spelt out in The White Paper which states that

An integrated approach to education and training, linked to the development of a new National Qualifications Framework (NQF) based on a system of credits for learning outcomes achieved, will encourage creative work on the design of curricula and the recognition of learning attainments wherever education and training are offered. (1995:15)

The discussion which follows aims to look at how the link between learning, teaching and assessment can inform both curriculum development processes and the processes for establishing a National Qualifications Framework (NQF).

Point of departure
The point of departure for both curriculum development and the development of an NQF is the vision of lifelong learning espoused in The White Paper in early 1995. The White Paper, the SAQA Act, and the Interim Guidelines for a National
Adult Basic Education and Training Framework (1995) also underscore the move towards an integrated, outcomes-based system of education and training, which will implement the principles outlined earlier in this Report. A curriculum framework, which provides the philosophical and organisational framework to guide the development of learning programmes, must also reflect these principles.

**Current status of development work**

During the past two months there have been three development processes:

- development work on the NQF
- development work on a curriculum framework for General and Further Education and Training
- development work on structures for curriculum development

Reports on these will be submitted to the Minister of Education and, if approved, these three reports will be released as discussion documents with a view to finalising proposals regarding each of these areas.

**Structures**

**NQF Structure**

According to The White Paper (1995: 21) the NQF will be "the scaffolding on which new levels of quality will be built." This "scaffolding" is envisaged as having eight qualification levels. Each level will be described in terms of registered statements of essential outcomes. The diagrams on the next two pages depict the three bands of the NQF (General, Further and Higher Education and Training), its levels and sub-levels and indicate some of the providers at various levels, as well as the phases within school in the General Education and Training band.

**Curriculum Structure**

Until recently curricula, although specifying goals, aims or objectives as points of departure were, in fact, content-based. They were organised in terms of prescribed and optional content which was to be offered at specific stages and for fixed periods in institutions of learning. In schools, learners' progress from one class to the next depended largely on the extent to which they had mastered (or memorised) the required content (e.g. five of the six subjects, which should
include pass marks in two languages). Assessment took place at various points during the year and in year-end examinations, but learners could progress from one class to the next at the end of a year only.

For the same reasons that the NQF, which regulates standards and qualifications, is outcomes-based, curricula developed in accordance with NQF requirements should also be outcomes-based. This implies that, provided learners can demonstrate their ability to attain the required learning outcomes, it does not matter what content helped them to do so or where, when and how they acquired such ability. In terms of learning programmes (curricula), therefore, the NQF will only specify unit standards which define the required specific outcomes and their associated performance/assessment criteria.

Curriculum, however, consists of more than this. Since specific outcomes are informed by knowledge, skills, attitudes, values, and essential outcomes, their attainment is demonstrated within specific contexts. Providers always need to take the process further than the mere statement of desired specific outcomes and performance/assessment criteria. In fact, providers have to develop learning programmes which contextualise outcomes in selected content areas. There are, of course, a wide range of providers, including commercial and non-profit establishments.

Although the selection of contexts can be left to the providers within the modular system of education and training, during compulsory schooling it is desirable to identify some key elements of the basic context at national level to ensure that school learners, even if they move from province to province, follow a broadly similar programme in terms of general coverage of concepts and content, for example in Mathematics, Geography or History. In the case of History, it might well be agreed that the learners' sense of the historical development of human society is best served by studying more ancient societies in the early years of their education, and moving chronologically towards the study of more recent history as they grow older. Details of the themes, the focus, and the actual content can be decided at provincial level. Even here, it would stimulate a more creative
approach to teaching and learning if some space were to be left for variations at local, school or even classroom level.\textsuperscript{9}

Thus the national curriculum framework for compulsory schooling (and pre-school years) may specify very broadly some of the learning content as well as the areas of learning to be addressed through school learning programmes. This organisation of learning will obviously have to be taken into account when specific outcomes are developed. The next three paragraphs attempt to show this relationship in greater detail.

Although the first qualification in the GET band in compulsory schooling is the GETC, it is recommended that SAQA should initiate projects working on nationally agreed essential and specific outcomes for the years 0-5 (pre-school), the foundation phase (years 5-9), and the intermediate phase (years 9-12). The composition of the standards generating projects would reflect the major stakeholders for these phases. For example, the pre-school group developing outcomes would include representation from the Departments of Health and Welfare, and be composed mainly of ECD practitioners from the different areas of learning. The specific outcomes statements would reflect the integration of areas of learning during the early years.

It seems to make sense that specific outcomes should be agreed for whole phases. That is, they may be achieved at any time during the phase, not just at the end. In some cases they may not be achieved during the phase, but later. The specific outcomes are set to guide the education, training and development practitioners, learners, parents, and the developers of learning programmes. They need not include all the other information needed for unit standards, because they are not going to be used to award modular credits. Where specific outcomes are used as a basis for assessment, they will not be used for promotion or streaming. The pre-school specific outcomes will not be used as a basis for 'school-readiness' tests. In other words, the outcomes will be set to ensure that compulsory school (and pre-school education) reaps the advantages of an outcomes-based system as described in this Report.

\textsuperscript{9} Two diagrams in the original document have not been reproduced here. The first is the same diagram of the NQF that can be found in the HSRC publication that precedes this report. The second is an alternative interpretation of the structure of the NQF. The original document is available on request.
It is envisaged that there will be 10 years of compulsory schooling. However, learners who leave school without a GETC and return to learning later, will each have a record of learning as a part of their evidence for RPL assessment.

For ABET Level 4 (GETC) and for the senior phase of compulsory schooling, full unit standards will be developed. These must be agreed jointly between the school and ABET sectors, as many of the unit standards will be common between the sectors, leading to credits towards a GETC qualification. The ABET, unit standards for Levels 1, 2 and 3 could theoretically be set independently. So could the specific outcomes for the three younger learners' phases: pre-school, foundation, and intermediate. But ABET 4 is also the end of the senior phase of compulsory schooling, and it too leads to the GETC, the first qualification on the NQF. This obviously means that the two processes connect at this point. Therefore specific outcomes within the GET band need to be developed with strong links to ensure progression towards an equivalent qualification at the end of the band.

**Development processes**

*Developing the NQF - How does the NQF impact on providers and learning programmes?*

The White Paper states that the Minister of Education will accept executive responsibility in Cabinet for the National Qualifications Framework but that it will be "developed and implemented on an inter-departmental basis, with fully consultative processes of decision-making, including all concerned government departments, education and training providers and major stakeholders in education and training." (1995:16)

It also states that the establishment of the NQF will “enable all existing public and private sector education and training providers to assist in establishing appropriate national standards in their specialist fields through the respective accrediting bodies, and to seek recognition for their programmes in terms of such defined standards. Learners engaged in education and training under the auspices of RDP programmes will be able to earn credits towards national qualifications by so doing." (1995:16)

Furthermore, and this is especially important for curriculum development, the
establishment and operation of the NQF is the "main strategic objective of the Ministry of Education in the development of an integrated approach to education and training." (1995:16)

**Curriculum Development - How will it work?**

Curriculum development should be a dynamic process in which all relevant stakeholders are continuously involved. In order to perceive the role of the NQF in curriculum development it is important to understand the separate factors which impact upon the overall process of curriculum development. At each stage in this process the relevant education, training and development practitioners participate and all relevant stakeholders are consulted. This process is envisaged as involving the following interactive factors:

- level descriptors under SAQA
- unit standards under NSBs within SAQA
- national curriculum frameworks, under a NILLD/ PILLD alongside the national Department of Education
- qualifications under SAQA
- learning programmes, under provincial Education Departments and other providers
- quality assurance, under the ETQAs

**The relationship between the NQF and Curriculum Development**

Six critical factors are described here with the aim of illustrating the relationship between the NQF and curriculum development.

**The development of level descriptors**

The South African Qualifications Authority is responsible for the development of level descriptors for the 8 main levels on the NQF and the sub-levels of General Education and Training band (the ABET levels and, separately, the school phases, including ECD). These describe briefly the expected level of competence of learners at the specified levels in relation to certain cross-curricular *essential outcomes*, like *communicating and problem-solving*. These are not intended to cover all aspects of learning, merely to focus on some key cross-curricular aspects as a guide to the establishment of levels. This process will be carried out in co-operation with the national Department of Education/National Institute of Lifelong Learning Development (NILLD), the
envisaged Higher Education and Training Council and other relevant stakeholders.\(^\text{10}\)

\[\text{INTERACTIVE RELATIONSHIP BETWEEN THE NQF AND CURRICULUM DEVELOPMENT}\]

The drafting of essential outcomes can start without delay, but all essential outcomes will be submitted to SAQA to ensure that a process leading to national consensus is followed before the level descriptors are finally registered.

**The setting of standards**

National Standards Bodies (NSBs), established by SAQA, oversee the setting of standards in various fields of learning. NSBs will work in co-operation with the

\(^{10}\) National and Provincial Institutes for Lifelong Learning Development NILLD and PILLDs have been proposed by the Consultative Forum on Curriculum Development (CFC). NOLA is the proposed body for capacity building around open learning.
national Department of Education/NILLD\textsuperscript{11} and other relevant Departments. They will be composed of the main relevant stakeholders in the field. Unit standards (consisting of specific outcomes, together with appropriate performance/assessment criteria and other necessary information) are developed for the various levels and sub-levels by Standards Generating Bodies, comprising, amongst others, practitioners in the area under discussion. These SGBs also have at least one member whose brief is to ensure continuity and progression from the level below and up to the level above; and one member whose brief is to ensure portability: maximum transferability across the level between the different providers and career paths (focusing on the level descriptors and transferability).

Unit standards are recommended via the NSB to SAQA for approval and registration on the NQF. The SAQA Board itself is representative of the country's major stakeholders in Education and Training.

The Ministry could instruct SAQA to prioritise the setting/registration of standards in certain fields, for example those where the stakeholders and practitioners have already completed extensive development work, like the ABET sector and some sectors related to the NTB; and also those sectors where disputes during political transition have already been running for too long, such as formal schooling and the Education, Training and Development Sector, including ECD. Interim standards could be registered and pilot programmes could then take the process forward.

When standards are being set, this process is informed by an understanding of the organisation of education and training at the particular level, and by the requirements for qualifications: that is, the work of Qualifications Councils and curriculum frameworks [see below].

**The registration of qualifications on the NQF**

Competent bodies in various fields of learning propose qualifications governed by agreed rules of combination to three main Qualifications Councils of the

\textsuperscript{11} The concept of a National Institute for Lifelong Learning Development (NILLD) arises in the Consultative Forum for Curriculum documents where it replaces the former concept of a National Institute for Curriculum Development (NiCD).
SAQA. The GET Council will be divided below GETC level into ABET and compulsory schooling. These Councils will be responsible for the registration of qualifications on the NQF. Qualifications Councils deal with qualifications, that is from GETC (Level One on the NQF) upwards. This will necessarily include credit accumulation leading to GETC, particularly the ABET levels. While attending compulsory schooling, school learners are not following modular courses, and, therefore, the areas of learning which they study will be defined by a curriculum framework, not by rules of combination.

The drawing up of curriculum frameworks
The national Department of Education/NILLD, in consultation with the provincial Departments/PILLDs and other relevant stakeholders, will be responsible for the drawing up of a national Curriculum Framework in order to ensure that learning programmes are balanced, reflect national education policy principles and goals and achieve nationally consistent and internationally acceptable standards. Curricula will be outcomes-based and will reflect the NQF Unit Standards, but the Framework will not prescribe in detail the content which will contextualise learning.

This common overall framework provides a philosophical framework for the development of curricula. It outlines the principles guiding curriculum development, the organisation of education and training in the General and Further Education and Training bands, and the areas of learning to be addressed. In addition to this overall framework, it will be necessary to draw up separate, more detailed framework sections for the Further Education and Training band (including schooling), outlining the new modular structure and rules of combination for qualifications, and catering for the differing needs of different learners within the GET band (ABET, pre-school, compulsory schooling and LSEN).

For example, the framework for compulsory schooling will prescribe areas of learning to be addressed to ensure access by each school student to her/his educational entitlement to intellectual, physical, personal, social, political, emotional and spiritual development. It will also give broad guidelines on overall content to be covered in each phase so as to increase coherence and national mobility. In the case of adult learners following a modular curriculum, the framework is less detailed, allowing adults to accumulate credits at their
convenience, guided by rules of combination and their personal and career objectives.

The national Department of Education/NILLD and the Department of Labour, will co-operate with other relevant stakeholders in this development work.

Curriculum framework developments will influence the work of those setting standards and are, in turn, informed by the standards set. These processes are so interlinked that it is important to ensure that the membership of these development teams overlaps, so that the clear links are kept constantly in mind and the development process remains interactive and dynamic. At the same time, and in no way contradicting this factor, neither processes nor structures should conflate. They remain separate but linked.

**The development and provision of actual learning programmes**

At this stage the development and provision of actual learning programmes are taking place. The national Department of Education/NILLD and the provincial departments of education/PILLDs will be involved in this process, in co-operation with the provincial Education Departments and other providers.

Learning programmes will be designed at the level of provision. In ABET and ECD there may be a number of public and private, national, regional, provincial or local providers who design their own programmes; in formal schooling at General Education Level the provision will be at provincial and local levels; in the FET band there is a multiplicity of provision covering a wider variety of learning contexts. Private providers will also be governed by the same processes as state providers if they wish their credits and qualifications to be recognised nationally on the NQF.

It is envisaged that the allocation of time for something like 80% of the timetable for formal schooling might be a provincial competence, while perhaps 20% might be left unassigned to allow for regional, local, and school level choice and innovation.

The various providers will refer to the registered Unit Standards and Qualifications, and to the nationally agreed Curriculum Frameworks in drawing up learning programmes. The active participation of large numbers of
practitioners in developing, piloting, evaluating and adapting programmes will be essential to the success of this process, leading to a sense of ownership of the agreed learning programmes. This will be an on-going process, involving regular review and improvement.

**The assurance of the quality of these programmes and their delivery**

Education and Training Quality Assurers (ETQAs) accredited by SAQA will be responsible for the assurance of the quality of these programmes and their delivery. In the case of schooling, the ETQA is likely to be attached to the provincial Education Department, however, to ensure the integrity of ETQAs so that the providers do not monitor their own provision alone. ETQAs must meet certain criteria, for example the inclusion of other stakeholders. Learning programmes will be presented to ETQAs, who apply agree criteria to decide whether to accredit a provider to provide a particular programme leading to a particular qualification on the NQF. ETQAs continue to assess and monitor the quality of provision on an ongoing basis. They also have the duty to support the provider in improving quality and building capacity where shortcomings are detected until criteria can be satisfactorily met (or, should this prove impossible, de-accredit the provider).
Making the nqf road by walking reflectively, accountably and boldly

Samuel BA Isaacs

In 1999, the South African Association for Research and Development in Higher Education (SAARDHE) hosted a conference with the following theme: "The Reconstruction of Higher Education in South Africa and the Role of the South African Qualifications Authority (SAQA) and the National Qualifications Framework (NQF)." I used that conference as an opportunity to pose several critical questions in relation to our work on a national qualifications framework: who is reconstructing what for which purposes? Is all this necessary begin with? "Who benefits from the rethinking of qualifications? In trying to reflect on questions as SAQA's executive officer, I cannot claim a neutral position, nor do I wish to. However, I do wish to be true to the statement that 'we will make the NQF road by walking reflectively, accountably and boldly.' In those last three adverbs lie the keys to reconstruction and development of all education and training, including higher education and training, in South Africa.

Making the NQF road by walking reflectively

An opening question could surely be: 'why make this NQF road?' To reflect on this requires a deep understanding of the nature and purposes of the NQF, and the need and desire among many for the reconstruction and development of higher education and training in South Africa. Such reflection is difficult because very often the vantage points, understandings and motivations of the individual - especially with regard to basic research questions such as 'who benefits?' - are so different, and the awareness levels so guarded and masked. In striving to be a reflective practitioner, I have had to ask myself these questions repeatedly, and the answers have not been easy or complete. I have also learnt that trying to share these reflections with others is not easy, and the dangers of misunderstanding so great. For as Polanyi rightly observed: "you always know more that you can tell"; and as Spinelli records: 'whatever you think, it is more than that.' So, with those two caveats in mind, I will share in a distilled form some of the things I have learned from my reflections on these matters.

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The NQF as a social construct

The essential nature of the NQF is that of a social construct in that we as social society not only theorise about, construct and implement it, but we also enable, activate, change or work against it.

Three necessary criteria for a successful social construct

For the NQF to be a successful social construct three necessary criteria must be met:

• Democratic participation of stakeholders: legitimacy of the social construct is seriously undermined if this does not occur.

• Intellectual scrutiny: if the social construct cannot withstand intellectual scrutiny, its credibility weakens and therefore its legitimacy is undermined. For 'intellectual scrutiny', we can read academic scrutiny, international benchmarking, best practice, cutting-edge research and development and appropriate international comparators.

• Adequate resourcing: most social constructs falter and fail because of the failure to consider the issues of affordability and sustainability. Designing and building social constructs that we cannot afford to maintain, let alone build, condemns them to failure. However, with regard to the NQF, it is not just how much money the state provides, but rather how we release, align and focus the multitude of resources - human, physical and financial - already allocated for education and training.

How dynamic is the NQF?

Because the NQF is not a panacea for all the ills of education and training in South Africa, I always hasten to point out that I remain grateful to Gino Govender of the National Union of Mineworkers (NUM) who says that the acronym NQF stands for No Quick Fixes. It certainly is not a blueprint to be followed slavishly. It is a dynamic social construct that is and can be shaped through democratic participation and intellectual scrutiny by all stakeholders. The SAQA has the role of developing and overseeing the development and implementation of the NQF. Thus development and implementation is the essential work of all stakeholders. In this oversight role the SAQA has to ensure a high level of democratic participation and intellectual scrutiny. In addition, because the SAQA Act is enabling legislation, it therefore does not prescribe the NQF to the final or ninth degree.
A troubling question?
Is the NQF modernist, constructivist or post-modernist in nature, and therefore subject to the criticisms and advantages of the specific label? I will leave this question for the sociologists to argue, and merely point out that a critical argument around the NQF springs from the social uses of qualifications. The need for the legitimacy of qualifications in society requires an open and transparent process for the democratic participation of stakeholders and intellectual scrutiny by the public. In other words, democratic participation of stakeholders can, through close intellectual scrutiny, bring a multitude of world-views and theories to bear on the development of the NQF. This evolving NQF will tend toward particular theoretical directions as a consequence of intellectual scrutiny, rather than being determined in advance by tight definition.

The social uses of qualifications
The NQF is about interrogating our society’s uses of qualifications, ensuring that all learners are able to develop to their full potential and enhancing our society’s social and economic development. Through the creation of an integrated national framework for learning achievements, the NQF must facilitate access in its widest sense, enhance quality, accelerate the redress of past and unfair discrimination and develop both the individual learner and the economic and social fabric of society in respect of education and training.

The SAQA Act states that the objectives of the NQF are:
• To create an integrated national framework for learning achievements;
• To facilitate access to, and mobility and progression within, education, training and career paths;
• To enhance the quality of education and training;
• To accelerate the redress of past unfair discrimination in education, training and employment opportunities; and thereby
• To contribute to the full personal development of each learner and the social and economic development of the nation at large.

These five objectives speak directly to both the global and national challenges facing learners in South Africa. Ulrich (1998) groups these global trends as:
• Quality in education and training;
• Lifelong learning provision;
• Intellectual capital as the defining competitive edge;
• Rapid technological advancement; and
• Change, change and more change.

The history of the NQF over the past ten years has been a struggle for the just, equitable and legitimate social uses of qualifications, social uses that will be legitimated through democratic practices.

Society uses qualifications to distribute the 'social goodies' through giving and refusing opportunities, allowing some in and keeping others out, and filtering out rather than empowering. When such determinations are unjust and inequitable, and condemn people a life of underdevelopment and poverty with very little chance of redress, then serious questions emerge that require resolution.

As stakeholders of the NQF, the initial questions we must address are:
• How do our institutions and our practices measure up against the five key objectives?
• the NQF?
• Do we want to measure up to the NQF or not?
• What is it that we want to measure up to?

International trends in education and training
There are two pervasive trends in education and training today. Quality and lifelong learning dominate the education and training literature, contemporary reform movements in many countries and the new global economy. Underpinning these transnational trends are the global phenomena of intellectual capital as competitive edge, rapid technological change and the ever-increasing rate of social, political and economic change. Globally, there is a powerful discourse about core competencies, generic skills, learning abilities, essential outcomes or, in our case, the critical cross-field education and training outcomes that must be mastered by all earners and embedded appropriately in all qualifications.

Conceptually, the NQF is at the cutting edge of such developments. However, we envy the capacity of many countries - for example, Scotland, Canada, New Zealand, Australia and Mexico- to implement such frameworks. As with so many globalisation trends, there is no respite for South Africa. These are challenges we must and can meet. The major task is to align the political, bureaucratic, technical and popular will in our society to achieve our stated objectives within agreed
resources and timelines that are meaningful, relevant and achievable. Increasingly, education and training in many countries are demand-led, outcomes-based and learner-centered. The Scottish Credit and Qualifications Framework, launched on 8 January 1999, is a good example of new education and training policy, like ours is aimed at addressing the need for quality lifelong learning.

Ron Tuck, Chief Executive Officer of the Scottish Qualifications Authority, regards the single biggest strategic challenge facing education and training providers as the delivery of provision, in order to combine high levels of flexibility for the learner with rigorous quality standards. The greatest obstacles to be overcome are the 'academic year-dominated, lecturer-centred and other traditional delivery practices of education and training institutions, which work against learner-centeredness'.

**National priorities for education and training**

Our national policy development processes have culminated in an impressive array of legislative measures to significantly transform our education and training systems. These include the following:

- National Education Policy Act;
- South African Qualifications Authority Act;
- Higher Education Act;
- Skills Development Act;
- Skills Development Levies Act;
- Further Education and Training Act;
- South African Schools Act.

The NQF is the cornerstone of this deep transformation, and all the legislation is coherent in its support of this concept. Underpinning this legislation are the imperatives of the government's human resources development and macroeconomic strategies. In addition, regional and local socioeconomic priorities impact on the relevance and responsiveness required of providers. The quality improvement of the schooling and apprenticeship systems are high national priorities. Further education and training (FET) has been flagged for a major overhaul.

When the Council for Higher Education (CHE) met for their first strategic planning
meeting in 1998, I tabled the following priority areas requiring attention:

- Ensuring that the higher education sector is a single co-ordinated sector;
- Establishing the Higher Education Quality Committee (HEQC), including clarification on the future role of the Certification Council (SERTEC) for technikons and the Quality Promotions Unit (QPU) for universities;
- Developing a towering competence on NQF matters;
- Making interim arrangements for private higher education institutions and no qualifications;
- Creating coherence for SAQA and Higher Education Act-driven regulations; and
- Structuring relationships between Education and Training Quality Assurance (ETQA) bodies.

However, two years later, these areas have still not been satisfactorily addressed.

**Conceptualising the NQF: the essentials**

The conceptualisation of the NQF is driven by its five objectives and their consequences for the critical concepts of qualifications and quality assurance.

**Outcomes-based education and training (OBET)**

The SAQA Act introduces the notions of OBET very subtly in two phrases. Firstly, it defines a standard as follows:

>'Standard' means registered statements of desired education and training outcomes and their associated assessment criteria.

The phrase 'desired education and training outcomes' is used but 'outcomes' are not defined. Secondly, it states the first objective of the NQF is to:

>... create an integrated national framework for learning achievements.

The phrase 'for learning achievements' establishes the notion of learning results (outcomes) as opposed to learning inputs. While facilitative access, mobility and progression depend largely on establishing a common currency for the NQF, and any system based primarily on learning inputs for comparison becomes restrictive, the shift to OBET, though highly desirable, was not fully debated. What
we mean by OBET therefore gets caricatured with other often narrow, technicist and behaviourist curriculum reform initiatives. Our OBET is primarily about systemic change, and we have reinvented OBET for our purposes in an holistic and educationally sound manner.

As a result of the lack of full debate, ownership of OBET is not always confidently declared by stakeholders. In a few cases, I suspect that some wish it would just go away. The alternatives to OBET that will also achieve the objectives of the NQF have also not been forthcoming.

The debate has been further confused in that the schools curriculum reform initiative (Curriculum 2005), outcomes-based education and the NQF are regarded as synonymous, when in fact they are not. Such confusion bedevils systemic change.

**Defining 'qualification'**
The SAQA Act defines 'qualification' as follows:

'Qualification' means the formal recognition of the achievement of the required number and range of credits and such other requirements at specific levels of the National Qualifications Framework as may be determined by the relevant bodies registered for such purpose by the South African Qualifications Authority.

SAQA worked very hard to operationalise its enabling legislation and published, after wide public hearing and comment processes, the National Standards Bodies Regulations (1998) which specified that a qualification shall:

- a) Represent a planned combination of learning outcomes which has a defined purpose or purposes, and which is intended to provide qualifying learners with applied competence and a basis for further learning;
- b) Add value to the qualifying learner in terms of enrichment of the person through: the provision of status, recognition, credentials and licensing; enhancement of marketability and employability; and opening-up of access routes to additional education and training;
- c) Provide benefits to society and the economy through enhancing citizenship, increasing social and economic productivity, providing
specifically skilled/professional people and transforming and redressing legacies of inequity;
d) Comply with the objectives of the National Qualifications Framework contained in section 2 of the Act;
e) Have both specific and critical cross-field outcomes, which promote lifelong learning;
f) Where applicable, be internationally comparable;
g) Incorporate integrated assessment appropriately to ensure that the purpose of the qualification is achieved, and such assessment shall use a range of formative and summative assessment methods such as portfolios, simulations, workplace assessments, written and oral examinations; and
h) Indicate in rules governing the award of the qualification that the qualification may be achieved in whole or in part through the recognition of prior learning, which concept includes but is not limited to learning outcomes achieved through formal, informal and non-formal learning and work experience.

These specifications are critical for ensuring that a qualification is holistic, in that it:
- Is a 'planned combination of learning outcomes';
- Provides 'applied competence'; and
- Is a 'basis for further learning' (i.e. promotes lifelong learning).

It also specifies the critical cross-field outcomes, which promote lifelong learning. Critical outcomes include but are not limited to:

a) Identifying and solving problems in which responses display that responsible decisions using critical and creative thinking have been made;
b) Working effectively with others as a member of a team, group, organisation, community;
c) Organising and managing oneself and one's activities responsibly and effectively;
d) Collecting, analysing, organising and critically evaluating information;
e) Communicating effectively using visual, mathematical and/or language skills in the modes of oral and/or written persuasion;
f) Using science and technology effectively and critically, showing responsibility towards the environment and health of others;
g) Demonstrating an understanding of the world as a set of related systems by recognising that problem-solving contexts do not exist in isolation;

h) Contributing to the full personal development of each learner and the social, economic development of the society at large, by making it the underlying intention of any programme of learning to make an individual aware of the importance of:

i) Reflecting on and exploring a variety of strategies to learn more effectively;

ii) Participating as responsible citizens in the life of local, national and global communities;

iii) Being culturally and aesthetically sensitive across a range of social contexts;

iv) Exploring education and career opportunities; and

v) Developing entrepreneurial opportunities.

These critical outcomes are similar to other international comparators, and are variously described in other countries as generic skills, core skills, learning abilities and essential outcomes.

The term 'applied competence' is defined in the National Standards Bodies (NSB) regulations as follows: 'Applied competence' means the ability to put into practice in the relevant context the learning outcomes acquired in obtaining a qualification.

Operationally, it means the integration of practical, foundational and reflexive competences. These are understood as follows:

- Practical competence - the ability to make decisions, knowing how and being able to do;
- Foundational competence - knowing and understanding what and why one decides and does; and
- Reflexive competence - the ability to learn and adapt through self-reflection and to apply knowledge appropriately and responsibly.

The issue of the assignment of levels to standards and qualifications (i.e. level descriptors) has been specified as process rather than defined. This action research process was chosen as available international examples for level descriptors did not stand up to intellectual scrutiny. However, not having level
descriptors specified created other problems for standards-setting and while a number of discussion documents have been previously circulated, this matter is now receiving urgent attention. The problem created relates mainly to which qualification and standards should be at which level. This is particularly problematic when we consider qualifications in different fields. The above illustrates some of the difficulties that arise, both in terms of intellectual scrutiny as well as with agreed decisions on how to proceed, with developing and implementing the NQF.

**Quality assurance**
Essentially, the NQF is about quality assurance. Access must be established to quality lifelong learning. It is quality that makes the difference, and quality does not happen by accident. Without a quality assurance system, the NQF’s objective to enhance the quality of education and training is unattainable.

The NQF has been operationalised as a three-component quality assurance model. These components include:

- Setting the standards;
- Assessment in terms of the set standards; and
- Having a quality management system that covers, among others, the following inputs to learning: curriculum development, staffing and staff development, learner support, and learning materials and experiences.

It is important to note that OBET does not ignore the inputs to learning but deals with these seriously in the quality management system as part of quality assurance. This trashes the notion that OBET is only about outcomes and totally disregards learning inputs.

**Implementation considerations**

**Difficulty of change**
Change is far more complex and difficult than we can imagine. In The Prince, Machiavelli reminds us how problematic change can be:

> There is nothing more difficult to carry out, nor more dangerous to handle, than to initiate a new order of things. For the reformer has enemies in all who profit by the old order, and only lukewarm defenders in all those who
would profit from the new order. The luke-warmness arises partly from fear of their adversaries, who have law in their favour, partly from the incredulity of mankind who do not truly believe in anything new until they have actual experience of it.

Handy (1998) reflects that the key to progress and survival in life and work is to be able to deal with paradoxes, and that this is not easy for most people:

Life is like a seesaw, a game where the movement and the excitement come from a balance of opposites, because it will always inevitably be full of paradox. I believe that the key to progress and even to survival in life and work is to be aware that contradictions can coexist, and to learn to live with them.

For instance, I argue that organisations have to be centralised and decentralised at the same time. They need to be both global and local. Differentiated and integrated. Tight and loose. They have to plan for the long term and yet stay flexible. Their workers should on the one hand be more autonomous, and on the other hand be more of a team. But the point is, we mustn't let people get confused by all that. We've got to find a way to live and work with these kinds of contradictions, to reconcile the opposites instead of trying to choose between them.

I don't think most people can manage paradox very easily, so we will have to try and make life a little simpler to understand. The first thing to do is to make people aware that there is paradox, and that there is no simple solution. There is no golden route to glory and happiness in life. But, at the same time, we need to give some structure to things so that managing paradox becomes easier for people to handle.

We require not only the insight of Machiavelli and the wisdom of Handy, but, cardinally, a shared vision which is also collectively and individually owned. The overt and covert agendas, SAQA members, staff, stakeholders and government departments are potential threats to the implementation of the NQF. Bold conceptual leadership by the SAQA that is subjected to rigorous intellectual scrutiny and democratic participation is the only guarantee for transparent dialogue and accountable decision-making.
**Dealing with complexity**

The NQF and, indeed, most education and training reforms, are complex social constructs. The complexity can be easily underestimated, especially when there is a lack of an appropriately deep understanding of the systems requiring change and the potential unintended outcomes of chosen change strategies and tactics. The available level of capacity and effective leveraging of other potential resources are important considerations in choosing strategies and tactics for implementation. Over-ambitious plans, which miscalculate resistance or the withholding of support and resources by stakeholders, can prove very detrimental to implementation if they are not carefully assessed and the risks carefully managed.

Careful systems thinking must be applied to ensure holistic implementation, which allow for multiple implementation strategies for the various education and training bands, specific provider grouping, national and other agreed priorities. Macro-level plans recommended by provider groupings, as well as joint implementation plans between the SAQA, government departments and stakeholders, have and are being considered to ensure maximum coherence-efficiency and effectiveness.

**Making the NQF road by walking accountably**

**General accountability**

To be accountable is to be responsible for one's actions, to be able to explain them and in ways that are understandable to the wider public. This applies equally to all SAQA members, staff and stakeholders. We must all constantly seek an NQF that can be explained and understood and take responsibility for our actions in respect of it.

The SAQA has processes and procedures that ensure that it operates transparently in all its affairs, especially with its co-operation and consultation with stakeholders. Since life chances are affected so critically by qualifications, it is imperative that all society is able to participate democratically in setting their norms and standards as well as being assured that the assessments for awarding qualifications are valid, fair and reliable.
The constitution and membership of the SAQA ensures participation over a wide range of education and training stakeholders. These include: the Departments of Education and Labour; organised labour; organised business; the South African Vice Chancellor Association (SAUVCA); the Committee of Technikon Principals (CTP); the Committee Colleges of Education Rectors of South Africa (CCERSA); the Committee of Technical College Principals (CTCP); national organisations representing the adult basic education and training sector; national organisations representing early childhood education; the teaching profession; lecturers and trainers; and national organisations representing the special education needs sector. In addition the Minister of Education, in consultation with the Minister of Labour, appoints six additional members at their discretion and two members co-opted by the SAQA at its discretion.

This membership allows for full participation by the various stakeholders in the SAQA provided that members communicate and interact on a consistent basis with the stakeholder sector that nominated them. SAQA members do not hold mandates from the stakeholder groupings that nominated them, but are expected to reflect and articulate the concerns and positions of their specific stakeholders with due regard to the functioning of the SAQA in overseeing the development and implementation of the NQF.

The standards-setting system allows for public comment, narrow and wide consultations in respect of standards and qualifications, and wide communication to stakeholders on:

- Membership of National Standards Bodies;
- Membership of Standards Generating Bodies;
- Registration of Standards Generating Bodies; and
- Registration of standards and qualifications.

The essential purpose of such co-operation and consultation is to ensure legitimacy through democratic participation and intellectual scrutiny, and thereby prevent the situation where any stakeholder grouping or individual is prevented from participating and from having their comments and objections meaningfully engaged with in the standards-setting process. Similarly, the quality assurance system allows for public comment and wide communication to stakeholders on the accreditation of Education and Training Quality Assurance Bodies (ETQAs).
In addition, ETQA Regulation 3(2)(h) states, as a specific criterion for accreditation as an ETQA, the organisation shall demonstrate that:

*in respect of the quality assurance function, it has national stakeholder representation at decision-making level, which representation shall ensure public accountability and transparency.*

This requirement effectively prevents 'closed-shop' arrangements. For example, an ETQA for the qualifications of accountants would also include some members who are not accountants with a national public interest profile, and with a specific brief to ensure public accountability and transparency for the purposes of the common good.

The SAQA's Electronic Management Information System has as its backbone the National Learners' Record Database (NLRD). This gives the nation's learners and administrators a comprehensive management information system that enables us to steer our learning system to focus on access, quality, redress and development, and to know how well we are doing.

The NLRD will allow us to do longitudinal studies for learners relatively easily and inexpensively. Such studies are extremely difficult and prohibitively expensive without such a facility. The results of these longitudinal studies will further assist us to give a more comprehensive account of our national learning system and subsystems. The individual learner's record will of course be confidential and will only be made available to a third party with the consent of the individual learner.

During the various public hearing and comment processes, significant changes were made to both the NSB and ETQA regulations. Such responsibility and integrity, in taking democratic participation, intellectual scrutiny and resourcing seriously, has ensured that our NQF is being made, and more importantly owned, by the stakeholders.

However, as Joe Samuels, the SAQA's Director for Standards Setting and Development, points out, when stakeholders complain that they find a particular aspect of the NQF confusing, what they are often indicating is not confusion but contestation. These contestations must be addressed between the parties and
the SAQA. Suitable resolutions must be considered and decisions taken appropriately and accountably.

**Specific accountability**
The primary function of the SAQA is to oversee the development and implementation of the NQF. The stakeholders carry out the development and implementation work. This gives rise to the situation where the SAQA is between a rock and a hard place when it comes to advancing the NQF.

The SAQA is dependent on National Standards Bodies (NSBs), Standards Generating Bodies (SGBs) and Education and Training Quality Assurance bodies (ETQAs) for generating standards and qualifications and for assuring the quality of providers and their provision, respectively. If the various stakeholders are tardy or remiss in ensuring the formation and effective functioning of the SGBs and ETQAs, then the progress of the NQF will be seriously retarded and the learners will not receive the full benefits of quality lifelong learning for all which the NQF offers. This will mean that the issues of access, quality, redress and development will not have been addressed for the vast majority of learners. The SAQA cannot allow this to happen, and therefore has accepted the policy of joint implementation plans (JIPs) between stakeholders and SAQA.

Coherent policy implementation is critical for the success of the transformation of the education and training systems. Unless strategies and tactics are carefully worked out and formally agreed upon by the relevant parties in such JIPs, then the 'devils in the detail' ensure policy incoherence and fragmentation, notwithstanding all the high principles of the original policy. These JIPs can, and must, ensure that the benefit of the NQF becomes a reality for all our learners. The SAQA therefore takes both its fiduciary and leadership role very seriously. To this end, it seeks to meet its responsibilities in terms of the SAQA Act both in the letter and the spirit of the law. The activities of the SAQA are fully reported in:

- Annual reports to Parliament;
- The SAQA website (http://www.saqa.org.za);
- The SAQA Bulletin;
- The SAQA Updates; and
- The decisions of the SAQA.
Making the NQF road by walking boldly

Leadership
Walking boldly is about taking ownership and providing leadership. Anyone can complain and whine about perceived problems and difficulties, but who will do the analysis, give the alternatives and take the lead in showing better ways of dealing with our challenges and difficulties? Fullan (1999:ix) writes:

The original Change Forces [1993] hit a responsive chord. Using a combination of new theories (in particular, chaos theory) and insights from our own and others’ change projects around the world, I identified novel insights and better ways of comprehending overloaded and fragmented educational reform. I criticized and called into question key concepts such as vision and strategic planning, site-based management, strong leadership, collegiality and consensus, accountability and assessment. Not that these ideas were all wrong, rather they contributed to superficial thinking.

It is time now to move even deeper into the analysis and action implications of studying the dynamics of change forces in educational reform. The field is richer in theory and more sophisticated in empirical investigation than it was five years ago. Change Forces: The Sequel focuses on the exciting progress that has been made very recently in thinking about and strategizing about organisational and policy reform. As before, myths are debunked and new insights are advanced. We will see that the concept of moral purpose - improvements designed to make a difference in the lives of students - is not as straightforward as it seems. We will unlock the black box of why collaborative cultures really work, and what it takes to sustain them. We will see that breakthroughs occur when we begin to think of conflict, diversity and resistance as positive, absolutely essential forces for success. We will probe deeply into the role of knowledge inside learning organizations, as well as knowledge and outside connections. We will learn from chaos and complexity theory and evolutionary theory that learning occurs on the edge of chaos, where a delicate balance must be maintained between too much and too little structure. We will understand that ‘anxiety-containing’ strategies are essential under such circumstances. We will appreciate how ‘inside-out’ and ‘outside-in’ orientations to change at the
school level must come together. We will also unpack the problem of transferability - why others do not use obvious good ideas, and how to reframe the matter so that larger-scale change becomes possible. Finally, we will come to appreciate the essential fusion of intellectual, political and spiritual forces.

The kind of movement into 'deeper analysis and action implications' of educational transformation advocated by Fullan requires a special kind of leadership - fusion leadership. Fullan in (1999:82) quotes Daft and Lengel (1998) on this issue:

One theme in all types of fusion (interaction) is that organisational and personal fusion reinforce each other. Individuals discover their own wholeness in a fusion relationship with others. And organisational fusion needs the leadership and enthusiasm of participants to transform the larger system. Fusion is accomplished through conversation across traditional boundaries that meets people's yearnings to be part of something larger than themselves, to face reality and new challenges, create a shared future together, and to take action that serves others and the organization. Fusion aiders understand how to orchestrate fusion to achieve bursts of motivation and change.

Such leaders will demonstrate integrity in taking intellectual scrutiny very seriously. Such scrutiny must deal with the issues of power, moral purpose and knowledge creation. The heart of enabling leadership lies in getting the balance and integration of these three right. Contestations, problems, difficulties, challenges and related issues must be honestly acknowledged and addressed. Similarly, other (and possibly better) ways of solving problems, implementing policies and resolving conflicts proposed by others must also be acknowledged and seriously considered.

De Mello (1990) regards this generosity of spirit in acknowledging one's own limitations and the contributions of others, as well as the deep conviction and motivation to include the excluded of society, as being the hallmarks of true humanity. And true humanity is the mark of exceptional leaders championing the common good.
We need educational leaders and organisations that hold onto the moral purpose of the systemic change and who are able to harness both the creativity and innovation, as well as to mobilise the power to achieve the desired changes. Fullan (1990) argues convincingly that moral purpose, ideas, and power are the necessary conditions for successful systemic change:

*Ideas without moral purpose are a dime a dozen. Moral purpose without ideas means being all dressed up with nowhere to go. Power with no ideas or moral purpose is deadly. Moral purpose and ideas without power means the train never leaves the station. The interactive systems I described… - the deep meaning of collaboration to obtain substantial results are precisely systems that gain their tremendous energy through the fusion of intellectual, political and spiritual purposes.*

The NQF provides the moral purpose in its five objectives; the stakeholders and the SAQA processes have provided numerous innovations for systemic change; and it has political power. Real change for the advancement of quality lifelong learning for all South Africans is now possible if we seize the opportunities the NQF provides and demonstrate the kind of, leadership characterised by:

- Deep integrity, both intellectually and ethically;
- Vision of and commitment to the moral purpose;
- Towering competence in national qualifications frameworks and related issues;
- Acceptance of the difficulties of managing change and dealing with complexity;
- Perseverance to work meaningfully and consistently; and
- Flexibility to change tactics and strategies without undermining the moral purpose.

All too often, the vested interests and opportunistic tendencies of stakeholders create turbulence, which, if not addressed through principle-centred leadership, can undermine the objectives of the NQF.

**Leadership of the NQF**

As a social construct, the NQF has leadership dispersed throughout its structures, practice stakeholders and the wider society. The quality of that leadership ranges over a very wide spectrum and it is difficult to comment
comprehensively about it in the absence of substantive research. What is clear, however, is that the NQF discourse has been established and that it is growing. There is strong and weak leadership for the NQF at government, SAQA and stakeholder levels. This both promotes and undermines the NQF.

**Challenges faced by the NQF in higher education and training**

**Systemic change**

Systemic change is complex with most social constructs, but is evidently more complex and difficult to achieve successfully for education and training systems. Part of the complexity and difficulty arises from the nature of education and training systems, while another stems from the proposed changes themselves. Essential to this debate are the purposes, processes and social uses of education and training. To gain meaningful consensus on these, and especially on the proposed changes, is a mammoth undertaking.

Coupled to the above, systemic change is severely hampered when there is lack of understanding of its nature and issues of implementation. This is often evidenced by:

- An underestimation of the huge inertia within education and training systems;
- A lack of systems flunking;
- Incoherent and uncoordinated implementation plans;
- Totally inadequate or only partial resourcing estimates in terms of the human resources, funding and organisational capacity required;
- An underestimation of the innovation and creative expertise required to effect the changes in intellectual and practical terms;
- An inability to deal adequately and appropriately with power struggles generated by the huge vested interests of particular stakeholders;
- The confusion of curriculum or operational, funding and cosmetic changes with systemic change; and
- Inadequate communication and change management strategies.

**Confusing curriculum reform with systemic change**

NQF is about systemic change and not primarily about curriculum change. However, the existing paradigm in higher education and training (HET) often regards curriculum change as the equivalent of systemic change. The NQF
registers qualifications and standards, and not curricula, courses or learning programmes. Curricula are the sole business of the lecturers, departments and faculties in the HET institutions and, for the purpose of quality assurance, their Education and Training Quality Assurance bodies. However, standards setting (which includes the determining of the requirements for qualifications) and quality assurance often get confused with curriculum design, which is rightly the preserve of the educator.

Consequently, because of an understanding that whoever controls the curriculum has the power, there is a desire to control the standards-setting and quality assurance process as this is now seen as the new locus of power. The debate becomes intense when overlaid with issues of academic freedom, autonomy and public accountability, all of which the SAQA respects and supports.

The design of the NQF asserts that the social uses of qualifications require a social construct that legitimises the standards and qualifications and their quality assurance through democratic participation by stakeholders, intellectual scrutiny and resourcing considerations. HET institutions are solely responsible for their curricula, but are required to participate in the wider public process of standards-setting to ensure that standards and qualifications, which are internationally comparable, are registered and quality-assured. The wider public process also addresses the issue of relevance across disciplines and social and economic sectors.

Inadequate communication and change-management strategies
There has to be adequate public debate about proposed changes. The principles, values and objectives of the change have to be established through appropriate communications. There has to be constant evaluation of stakeholders' feedback. The change-management strategies must ensure that there is adequate ownership of the proposed systemic change as well as the requisite leadership adequately distributed throughout the system.

Appropriate communication strategies must endeavour to communicate clearly, simply and logically. Often antagonists exploit unclear and complex communications for their own purposes, rather than testing them against the
vision or moral purpose of the systemic change. There has to be commitment to the vision or moral purpose of the systemic change.

Integral to systemic change of this nature is the ability to negotiate the required change with the various bureaucracies, and the balancing (often the mobilising) of the political, bureaucratic, technical and popular wills, of the society in which the change has to occur.

As the implication of systemic change required by the NQF becomes increasing more apparent, and real change is required, stakeholders will be inclined to selectively own and disown agreed decisions. Effective communications and management strategies must hold the stakeholders accountable for their agreements and actions.

**The overt and covert agendas of NQF stakeholders**
The most critical threat to the successful implementation of the NQF is the overt and covert agendas of the SAQA members, SAQA staff, government departments, professional councils and bodies, consultants, providers, industrial training boards and other stakeholders. This was highlighted at both the May 1998 and March 1999 SAQA staff retreats. This threat, which relates mainly to vested interests, competing ideas and organised politics, can be addressed through adequate communications and management strategies as outlined above.

**Opportunities for the successful implementation of the NQF**

*A unique creative space*
South Africa has a unique creative space, shaped by its historical trajectory and the struggle for freedom and democracy, for the development and implementation of the NQF. An enabling legislative framework, with an impressive array of acts, is in place. The establishment of the South African Qualifications Authority, its extensive consultative process in publishing the NSB and ETQA regulations and its operationalising of its three infrastructural deliverables - the Standards-Setting System, the Quality Assurance System and the Electronic Management Information System - have resulted in the establishment of the NQF discourse. This discourse is growing rapidly and manifesting itself in a number of significant practices. There is a huge
groundswell of alignment with the NQF and its processes across a wide range of stakeholders. By 30 June 2000, all 21 universities and 15 technikons submitted to the SAQA their existing qualifications in an agreed, outcomes-based format. More importantly, there is a growing awareness of the revolution in the way universities and technikons are thinking about their qualifications and the significant catalysing role that the NQF has played in this. While they have actively been shaping the NQF, it has also been shaping them.

**International recognition**
South Africa is internationally recognised as being at the forefront of qualifications system thinking and development. The Scottish Credit and Qualifications Framework closely resembles the National Qualifications Framework. The SAQA also continues to play an active role in the harmonising of qualifications within the SADC region towards the agreed goal of a regional qualifications framework.

The South African model has also attracted the attention of UNESCO and of developing countries in Africa as a solution to cater for their basic education and vocational education and training needs. The substantial international funding that the SAQA and the Labour Market Skills Development Strategy have attracted is indicative of the significance with which NQF developments are viewed globally.

**Conclusion**
Dr Mokubung Nkomo, the Chairperson of the SAQA, stated in his opening address at the Unisa Symposium on Quality Assurance for Open and Distance Learning (31 January 2000) that

…the challenge to all higher education and training providers is how you embrace this new power for real change to give South Africa an education and training system for the 21st century. Embracing this new power entails owning the NQF as yours as much as it is all South Africans’. It also requires commitment to the values implicit in the five objectives of the NQF. It requires you to build the NQF through reflective and accountable practices. It demands visionary and accountable leadership. It requires you to give an understandable account of how your sector and individual institutions provide quality lifelong learning for all higher education and training
learners. It means that issues like accelerated learning and the recognition of prior learning (RPL) will have to be debated and that defensible practices are and will be the order of the day.

We stand at a sea change. We can no longer uncritically accept the practices of the past and their underlying assumptions. Neither can we uncritically pursue innovations and new practices which are illegitimate, do not stand up to intellectual scrutiny and which are unsustainable. Failure on these three counts will ensure failure for an education and training system for the 21st century. The future in this regard is in our hands and indeed also yours.

Reflecting on this as well as Tuck's (1999) observation that 'combining high levels of flexibility with rigorous quality standards is the biggest single strategic challenge for education and training providers', I can only conclude that the NQF enables us to adequately meet this challenge if we are prepared to make the NQF road by walking reflectively, accountably and boldly.
References


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Tuck, R. 1999. Quoted in discussions at the SAQA.
Introduction
For South Africa, 1994 represents an historic moment full of hope and fulfilment as the country gave birth to democracy. Decades of struggle culminated in the achievement of freedom for all. Yet, behind all of the excitement lay more than three centuries of deprivations suffered by the majority of its citizens. One particularly debilitating legacy of undemocratic governance by past regimes was the systematic under-resourcing of education for blacks. This has become the loadstone that weighs South Africa down and undermines its potential in profound ways.

South Africa has been at the tail end of virtually all of the international score cards such as the World Competitiveness Report and the Third International Mathematics and Science Survey. The simple explanation is that over the years very little was invested in human resource development, especially in resourcing black schools: a sad legacy that will remain as a stubborn scar on the face of an otherwise well-endowed country.

Aside from the numerous subjective states of mind bequeathed by apartheid oppression that undermine the national capacity, there is a simultaneous existence of a plethora of objective indices of general underdevelopment: poverty, illiteracy, poor health, lack of proper housing for many, skills shortages, and continuing unequal provision in education and training opportunities throughout the system.

To be sure, a number of achievements have been registered since 1994, e.g. a democratic Constitution, the Commission on Gender Equality, the Human Rights Commission, the Office of the Public Protector and the Constitutional Court. In the education and training sphere, the National Qualifications Framework (NQF) enjoys the same stature and intent to establish fundamental democratic rights to all South Africans. The NQF goals are:

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• to create an integrated national framework for learning achievements;
• to 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 and training and employment opportunities; and thereby
• contribute to the full personal development of each learner and the social and economic development of the nation at large.

Thus, the goals of the NQF are to be understood against the backdrop of past education and training policies and practices that have saddled the country with a human resource deficit of immense proportions. The underlying NQF philosophy was to construct a system that will not only undo the underdevelopment, but create systemic conditions that would ensure not only the elimination of the skills deficits but bring about the establishment of higher standards and qualifications and that reflect international best practices. In view of the dire state of the human development profile, an underlying assumption was that a substantial investment in education and training would be made to achieve the NQF goals.

Furthermore the adoption of the NQF was a response to two fundamental imperatives. The first was the need to democratise (i.e., to even the playing field) education and training opportunities across race, gender, class, etc.; and, secondly, a response to the existential reality of the late twentieth and early twenty-first centuries - that is, globalisation. Not only was education and training to meet individual and societal needs but also, as recognition of the interdependence of states in trade, commerce, capital and labour laws, a knowledge-based global economy requires a work force that is highly skilled. In a sense, the two imperatives interacted with one another in dynamic and synergetic ways, posing a critical challenge to the NQF.

Purpose
The purpose of this contribution is to describe and reflect on the genesis, present state of, and the critical challenges facing South Africa’s NQF within the global emergence of national qualifications frameworks.

The history of South Africa’s NQF
The history of the NQF is traced by some to dates before 1990, but it was in that
year that two important interventions were made. The National Training Board (NTB) put in place a process to develop a national training strategy initiative. This process delivered a report, which in fact was the second National Training Strategy Initiative (NTSI), in April 1994, just before the first democratic elections in South Africa. The second intervention was the National Education Policy Investigation (NEPI). NEPI began in 1990 and reported in 1992. The ideas from these interventions are linked with projects such as the Participatory Research Project of the Congress of South African Trade Unions (COSATU) and the Education and Training Framework of the African National Congress. The Implementation Plan for Education and Training (IPET) document (1994) of the Centre for Education Policy Development brought all these ideas together to provide a powerful rationale and advocacy for the NQF.

The NTSI was an important lesson in democratic participation. The first NTSI documents were printed and released in 1992. The initiative was aborted that same year because various stakeholders maintained that it was illegitimate because they had had no participation in developing it. An important lesson learnt from this event, and this is not the only time, is that legitimacy can only be achieved through democratic participation of stakeholders.

It is often commented that the NQF is a largely labour-driven process since the NTB focused on the labour market. The NQF is not only rooted in training. The role-players from the NTB and NEPI through to the IPET involved a wide range of people, covering universities, technikons, colleges, industry, government and non-governmental organisations.

Three outcomes were envisaged by both the NTSI and IPET documents: the integration of education and training; the NQF; and a structural integration of education and training in a single Ministry of Education and Training. What was achieved in 1994 were: a Minister of Education and a Minister of Labour, responsible for training, instead of a Minister of Education and Training; and a commitment to a national qualifications framework. The White Paper on Reconstruction and Development, and the White Paper on Education and Training, clearly spell out the commitment to the NQF. However, in these two White Papers, there is a shift from the integration of education and training to an integrated approach to education and training. Writing about the history of the NQF, Isaacs (1998:20) prophetically wrote about this shift:
“I believe that this is going to come back to haunt us.”

An integrated approach to education and training means different things to different people. The spectrum ranges from an actual integrated system to two systems, running side by side with an "occasional look over the fence dividing the two”.

There had to be some kind of co-ordinating mechanism (as a coherent system under a single Ministry had been decided against) in order to avoid an independent system of denuded educational programmes and another that dealt with labour market training programmes in isolation. In an attempt to bridge the chasm, the Ministers of Labour and Education established an Inter-Ministerial Working Group. They sponsored the NQF Bill, which became the SAQA Act, promulgated in October 1995.

The timeline stretched from 1990 to 1995 just to achieve the legislation. The South African Qualifications Authority (SAQA) Act did not present South Africa with a NQF. This enabling Act makes the NQF possible. It is very important to understand this. All The Act says in this regard is that hereby is established the statutory body, SAQA, and it is its mandate to oversee the development and implementation of the NQF, which has the five objectives as indicated above. The processes to reach agreement by the South African Society on the parameters under which the development and implementation of the NQF could take place still had to be undertaken, once the members of SAQA were appointed. While the Act was promulgated in October 1995, the members were appointed seven months later (on 31 May 1996) and the Inter-Ministerial Working Group convened the Authority for the first time on 2 August 1996. At this stage, no staff appointments had yet been made and the new Authority had to begin its work almost from scratch. Very often these facts are not taken into account when comments about the slow pace of the implementation of the NQF, and by inference SAQA, are made.

**The present state of South Africa's NQF**

It is possible to distinguish three phases in the development of the South Africa NQF. The first phase, which has been described, is characterised by the broad stroke conceptualisation and establishment of a legally-enabling environment for the re-structuring and transformation of education and training in South Africa,
through the NQF. During this phase, the concept of an integrated approach to education and training was mooted and the SAQA Act was developed and negotiated between stakeholders. This stage spanned the period 1990 to 1995.

The SAQA Act established the legal basis for the governing body, the South African Qualifications Authority (SAQA), to be established. The first Authority members were appointed on 31 May 1996 and the first meeting of the Authority was held on 2 August 1996. The Authority can consist of 29 members appointed by the Minister of Education in consultation with the Minister of Labour. Authority members are generally drawn from national stakeholders in the education and training system. The Authority is responsible for making and implementing policy concerning SAQA’s mandate in overseeing the development and implementation of the NQF. The work of SAQA is executed via an executive officer, who is an ex-officio Authority member, and who is supported by a staff complement.

The second phase of development is characterised by the fleshing out of these ideas into functions for which the Authority could be held accountable. These are: the development of the structure of the NQF itself; the conceptualisation of the policies, processes and structures that would be required to carry out these functions; the modus operandi of the Authority and its structures; and the nature of relationships between the various role players in the system. During this phase the National Standards bodies (NSBs) and Education and Training Quality Assurance bodies (ETQAs) regulations were developed. A number of key SAQA policy decisions were taken and related policy documents were developed, for example: an 8-level NQF was decided upon; the NSBs were established in 12 fields; the different scopes of each field including sub-fields was determined; the process for the development of level descriptors was agreed; a variety of criteria and guideline documents were conceptualised and developed; the framework of a national quality assurance system was conceptualised and the processes for its implementation developed; legislation for other sections of the system were developed and linked to the SAQA Act to establish a coherent system with rational and logical relationships mapping interaction between diverse sectors. This stage spanned 1996 to 1999.

The third and current phase, that is, implementation, is characterised by the
establishment of structures - the application of relevant policies and procedures to give practical effect to the theory of the NQF described in the various conceptual documents. During this phase SAQA established the three key infrastructural deliverables of the NQF: a national standards-setting system; a national quality assurance system (establishment of the relevant structures); put into practice the policy and procedure documentation; and the NLRD, electronic information system which supports the NQF\textsuperscript{14}. This stage began in earnest in 1999.

The South Africa NQF encompasses all key players in the education and training system.\textsuperscript{15} Consultation and negotiated consensus are key factors in all aspects of the development of the NQF. This means that no major decisions are taken by SAQA without prior broad consultation with key stakeholders. This consultation includes the registration of standards and qualifications, the accreditations of quality assurance bodies and the implementation of any new policies. This adherence to the principle of transparency of development and operation has ensured that SAQA is perceived as a trustworthy organisation. However, it has also been cited as the major cause of what has been termed by some as "implementation at a snail's pace".

\textsuperscript{14} The NLRD (National Learners' Records Database) is a comprehensive database holding information about all standards and qualifications that are registered on the NQF. The quality assurance bodies and accredited providers that oversee quality provision, and finally individual learner achievements.

\textsuperscript{15} The key players are: government, organised business, organised labour, providers of education and training including the teaching and lecturing communities, key organisations such as professional bodies and other key stakeholders including learners, previously marginalized groups such as the disabled, community organisations.
## NQF LEVELS

### TABLE 5.1: THE NQF’S CURRENT STRUCTURE

<table>
<thead>
<tr>
<th>NQF LEVEL</th>
<th>BAND</th>
<th>QUALIFICATION TYPE</th>
</tr>
</thead>
</table>
| 8         | HIGHER EDUCATION AND TRAINING BAND | • Post-doctoral research degrees  
|           |      | • Doctorates  
|           |      | • Masters degrees  
| 7         | FURTHER EDUCATION | • Professional qualifications  
| 6         | FURTHER EDUCATION | • Honours degrees  
| 5         | FURTHER EDUCATION | • National first degrees  
|           | AND TRAINING     | • Higher diplomas  
|           |      | • National diplomas  
|           |      | • National certificates  

### FURTHER EDUCATION AND TRAINING CERTIFICATE

<table>
<thead>
<tr>
<th>NQF LEVEL</th>
<th>BAND</th>
<th>QUALIFICATION TYPE</th>
</tr>
</thead>
</table>
| 4         | FURTHER EDUCATION AND TRAINING | National certificates  
| 3         | FURTHER EDUCATION AND TRAINING | National certificates  
| 2         | FURTHER EDUCATION AND TRAINING | National certificates  

### GENERAL EDUCATION AND TRAINING CERTIFICATE

<table>
<thead>
<tr>
<th>NQF LEVEL</th>
<th>BAND</th>
<th>QUALIFICATION TYPE</th>
</tr>
</thead>
</table>
| 1         | GENERAL EDUCATION AND TRAINING | Grade 9  
|           |      | ABET Level 4  
|           |      | National certificates  

SAQA originally adopted an eight-level framework, with levels 1 and 8 being regarded as open-ended. Level I accommodates three Adult Basic Education and Training (ABET) certification levels as well as the General Education and Training Certificate. However, debates resulting from the NQF Focused Study have indicated a strong possibility that the NQF will become a 10-level framework, with levels 5 to 10 accommodating higher education and training. Level descriptors for levels 1 to 4 have been agreed while finalisation of the descriptors for levels from level 5 upwards await the political decision about the number of levels that will finally constitute the NQF.

**Standard setting and quality assurance functions**

The NQF standards-setting and quality assurance processes embrace two basic tenets:

- Knowledge, relevant for the current world, is created through partnerships between and amongst varied groupings in society, from academics and researchers to business; from workers to professional experts; from government to community organisations; and from learners to professors - in other words knowledge creation is no longer the preserve of narrowly-defined groups of "experts".

- The national system of education must balance the need for quality education for all its citizens with the need for flexibility to cater for the wide-ranging circumstances that face learners and the wide-ranging options in what constitutes relevant education and qualifications that is a balance between society’s needs and the needs of the individual.

The first of these tenets is addressed in the structures that SAQA has in place. Membership of the National Standards Bodies (NSBs) reflect these new partnerships in the creation of knowledge. The NSBs are made up of representatives from six national stakeholder bodies with a key interest in the field: State departments, organised business, organised labour, providers of education and training, critical interest groups and community/learners organisations. Historically, few of these partners have sat down together to discuss education and training needs for the country. Furthermore, members of the SGBs are nominated from key education and training stakeholder interest groups in the sub-field, again recognising that relevant knowledge creation is brought about through discussion on a broader front.
The NQF's commitment to outcomes-based education and training as the means for bringing about systemic change in the nature of the education and training system in South Africa addresses the second tenet. By describing national standards and qualifications in terms of learning outcomes through a participatory process, the NQF is placing the national demands in respect of quality before the citizens of the country. No longer can the nation support a situation where the range of competence that exists between holders of the same qualification is so wide that the employers of the qualifying students cannot be sure of what the competences are; no longer can the nation tolerate discrimination against learners on the basis of perceptions of what their competences are; no longer can the nation afford to ignore global standards in qualifications. In short, the learning outcomes, standards and qualifications, must be clear so that there is no doubt as to what is expected of qualifying learners.

By the creation of Education and Training Quality Assurance bodies (ETQAs), SAQA has recognised that delivery of the standards and qualifications is the preserve of the professional providers and learners and other key stakeholders in the field. Different qualifications and standards will make different demands on curriculum development and delivery, on assessment and teaching. SAQA's concern is not in ensuring that all providers follow a national programme of delivery but rather in ensuring that the learners who are awarded a registered NQF-qualification or standard are able to demonstrate the learning outcomes of the qualification or standard in accordance with the described criteria and requirements. SAQA therefore will not register learning programmes on the NQF; however ETQAs will evaluate the learning programmes of different providers in a process of accreditation, thereby assuring learners and other users of the system that any learner who has been deemed successful after participating in that learning programme, has displayed the learning outcomes required for that qualification or standard. The best group for ensuring that this is the case is a body made up of representatives of stakeholders, active in the area of the qualification or standard - that is, the ETQA which has that area as its primary focus. For that reason, in respect of its quality assurance functions, an ETQA must have national stakeholder representation at decision-making level, which representation shall ensure public accountability and transparency.

**Standards setting and quality assurance structures**
SAQA has two "arms" i.e. Standards Setting and Quality Assurance. The sub-
structures in the standards setting arm are the National Standards Bodies (NSBs) and the Standards Generating Bodies (SGBs), while the sub-structures in the quality assurance arm are the Education and Training Quality Assurance bodies (ETQAs). SAQA may choose to appoint moderating bodies for limited periods to evaluate standards drift if it deems it necessary. The functions of SAQA are set out in the SAQA Act and have already been outlined above. The functions of the NSBs and SGBs are set out in the Regulations under the South African Qualifications Authority Act (Act No. 58 of 1995): NSBs, Government Gazette No. 18787 (28 March 1998) while the criteria for accreditation and the functions of the ETQAs as well as providers of education are set out in the Regulations under the South African Qualifications Authority Act (Act No. 58 of 1995): ETQAs. Government Gazette No. 19231 (8 September 1998).

In the NQF, all learning is organised into 12 fields. SAQA has established 12 NSBs, one for each organising field. The 12 organising fields are as follows:

- NSB 01: Agriculture and Nature Conservation
- NSB 02: Culture and Arts
- NSB 03: Business, Commerce and Management Studies
- NSB 04: Communication Studies and Language
- NSB 05: Education, Training and Development
- NSB 06: Manufacturing, Engineering and Technology
- NSB 07: Human and Social Studies
- NSB 08: Law, Military Science and Security
- NSB 09: Health Science and Social Services
- NSB 10: Physical, Mathematical, Computer and Life Sciences
- NSB 11: Services
- NSB 12: Physical Planning and Construction.

**Critical outcomes**

The Critical Cross-field Education and Training Outcomes, commonly known as the Critical Outcomes, are a mechanism through which coherence is achieved in the framework. These Critical Outcomes describe the qualities that the NQF identifies for development in students within the education and training system, regardless of the specific area or content of learning, that is, those outcomes that are deemed critical for the development of the capacity for lifelong learning.
These outcomes are intended to direct the thinking of policy makers, curriculum designers, and facilitators of learning as well as the learners themselves.

It is mandatory for standards setters to incorporate at least some of the Critical Outcomes in the standards that they recommend and proposers of qualifications must ensure that all Critical Outcomes have been addressed appropriately at the level concerned within the qualifications being proposed.

**Standards setting**
The standards-setting process is a fully consultative process. The inclusion of key stakeholders within the standards-setting structures has ensured an enormous degree of capacity building within sectors that were previously denied access to such processes. Before any standard or qualification is registered on the NQF there is an open public comment process whereby any interested individual may engage with the proposed standard or qualification.

At this time one of the greatest challenges is the monitoring of the "take-up" of the newly registered qualifications and standards and their credibility within the society.

Through the development and promotion of learnerships through a number of financial incentives to business, the Department of Labour has ensured the enrolment of 15,000 students in 289 learnerships culminating in qualifications registered on the NQF. The continued development of learnerships together with the building of their credibility and ensuring their success in creating meaningful learning pathways is certainly a primary objective for SAQA and its key partners.

The unresolved debate about what is meant by an integrated approach to education and training bedevils standards setting for the traditional education sector. This debate is at the centre of determining the extent to which the glass barriers between formal education and training in the broader education and training arena are retained or removed.

As the NQF Focus Study recommendations became known, it was evident that representation for the Higher Education and Training (HET) sector began gradually withdrawing from the national standards-setting processes managed by SAQA. While HET may believe that this is appropriate for HET standards and
qualifications, their gradual withdrawal means that the development of meaningful learning pathways from Further Education and Training (FET) to HET is made more difficult as the necessary engagement between the FET and HET sectors cannot take place.

**Quality assurance**

The following is a brief analysis of the development of the national quality assurance system.

The following structures are in place:
- 33 accredited ETQAs, of which two are "deemed" to be accredited by law
- A directorate within SAQA to support ETQAs, auditing and monitoring their work with the primary aim of providing guidance and support to ensure that learners receive quality learning experiences.

The ETQAs have begun the process of accrediting providers and while some sectors have accomplished more in this area than others have, there is a general acceptance within the education and training community that providers should be accredited and that learners deserve quality provisioning. The majority of ETQAs have begun the process of registering assessors in order to improve the quality of assessment in the sector as well as to ensure consistency of competency judgements from provider to provider. This process has resulted in many practitioners who previously did not consider knowledge of assessment theory and methodology as important, giving specific attention to this aspect of their work. Students too are far more aware of their rights to expect quality provisioning and insist on seeing evidence from a provider that they have been or are in the process of seeking accreditation.

SAQA has adopted a developmental approach in the accreditation process, enabling new institutions to build up their capacity and learn from established organisations. This methodology has been particularly effective in that the awareness of quality as a primary feature in provisioning has been created across all sectors and not only in sectors where there are well-established quality assurance bodies. It has also meant that the less experienced sectors have learnt what works and is appropriate from the experiences of the more experienced sectors. This approach has also encouraged the development of a culture of sharing information and experiences. SAQA has started embarking on
its auditing and monitoring functions and these processes have encouraged ETQAs to continue to focus on the promotion of quality provisioning within their sectors.

SAQA has always promoted the management of overlapping areas of interest through partnerships between ETQAs that can be described and managed through an agreed Memorandum of Understanding or Service Level Agreement. This approach has been challenged by some quality assurance agencies that believe their legislation entitles them to prescribe rather than negotiate the modus operandi for quality assurance within their sectors of operation. This phenomenon of conflicting approaches and competing agendas has bedevilled SAQA's work and continues to be problematic. It has been the fundamental reason for the first cracks in a comprehensive body of legislation. The General and Further Education and Training Quality Assurance Act has "deemed" the General and Further Education and Training Quality Assurance Council to be an accredited ETQA while an amendment to the Higher Education Act has "deemed" the Council on Higher Education Council to be an ETQA. This has in effect created two kinds of ETQAs - those "deemed", and therefore which technically cannot be de-accredited by SAQA, and those which have to apply for accreditation and which can be de-accredited. While this is of itself not necessarily an issue, the perceptions of different status and relationships between ETQAs create an environment where collegial partnership relationships, envisaged by the ETQA Regulations, are made difficult by ETQAs seeking primacy. The tensions created by such a division of ETQAs make management of the system difficult and undermine further the establishment of a coherent system of education and training.

**National Learners' Records Database (NLRD)**

The following is a brief analysis of the development of the NLRD.

In 1999, SAQA launched the NLRD. At that stage the NLRD had been fully conceptualised, that is, the data that needed to be gathered was identified, the structure of the database was determined, the actual database and the procedures and specifications for data loading and handling had been developed. Subsequently, SAQA has focused on further development work to include the production of reports and the extraction of data as well as the gathering of data, both current and historical. By 31 December 2002, the NLRD
held achievement records for some 600,000 graduate learners. Historic data for approximately five million learners with their school leaving qualification will be recorded onto the NLRD within the first quarter of 2003. There is a project on track for completion in 2003 that will incorporate the historic data for apprentices. The ETQAs are in the process of developing their IT systems to ensure that their data can be imported onto the NLRD. In some ETQAs, the processes are well advanced and it is expected that SAQA will be receiving data on a regular basis from 2003.

All standards and qualifications registered on the NQF are captured on the NLRD. The requirements of the standard or qualification are expressed as learning outcomes together with their associated assessment criteria and are made available to the public through a searchable database on the SAQA website. In this way, any learner or interested member of the public can find out exactly what is required in order to achieve a specific qualification or standard. This commitment to transparency is indicative of the degree of transformation in the education and training system in South Africa. We have moved from a system where the learning requirements resided in the minds of the teachers or lecturers, to a system where anyone who is interested has access to the learning requirements. Employers now know what they can expect from an employee who holds a specific qualification. While the trust of society in qualifications from different providing institutions remains an issue, the problem can now be confronted, as the desired outcomes are clear. If a qualified student does not demonstrate the required skill or knowledge, the providing institution can be held accountable through the relevant ETQA.

The next stage of development includes the extraction of relevant statistical reports that will assist decision-makers in formulating appropriate policy and implementation planning. There is currently a substantial project aimed at the development and monitoring of key indicators of the impact of the NQF. Much of the data for that project will emanate from the NLRD.

The nature of SAQA’s research work and the nature and use of data from the NLRD are indicators of the maturity of the NQF. If we consider the research agenda at SAQA, up until 2002 it was concerned primarily with development work in the area of policy and guidelines for implementation. Its current research agenda has moved significantly to analysis of impact and review of systems and processes.
TABLE 5.2: A Comparison of National Qualifications Frameworks
- a comparison of budget, staff size and nature of national qualifications frameworks from various countries

<table>
<thead>
<tr>
<th>Country</th>
<th>Population (Millions)</th>
<th>Staff Size (Full &amp; Part-time)</th>
<th>Total Budget ($US Millions)</th>
<th>Amount spent per 1000 persons ($US)</th>
<th>Nature of NQFs</th>
</tr>
</thead>
<tbody>
<tr>
<td>England, Wales and Northern Ireland (QCA)</td>
<td>59.2</td>
<td>473 (Full &amp; Part-time)</td>
<td>102.8</td>
<td>1,739</td>
<td>National curriculum General and general vocational; Occupational</td>
</tr>
<tr>
<td>New Zealand (NZQA)</td>
<td>3.96</td>
<td>246 (Full &amp; Part-time)</td>
<td>8.63</td>
<td>2.179</td>
<td>Post-compulsory education and training and senior secondary.</td>
</tr>
<tr>
<td>Mexico (Conocer)</td>
<td>100.0</td>
<td>146 (Full-time)</td>
<td>12.4</td>
<td>124</td>
<td>Further and Vocational education and training.</td>
</tr>
<tr>
<td>Namibia (NOA)</td>
<td>1.8</td>
<td>8 (Full-time)</td>
<td>0.66</td>
<td>366</td>
<td>General, further and higher, schools, colleges and universities. Vocational schools to start</td>
</tr>
<tr>
<td>South Africa (SAQA)</td>
<td>42.0</td>
<td>86 (Full-time)</td>
<td>4.99</td>
<td>119</td>
<td>Covers general further and higher, schools, colleges and universities</td>
</tr>
</tbody>
</table>

16 Source: Qualifications and Curriculum Authority (OTA) Annual report 1998/9
19 Source: Office of the Namibian Qualifications Authority. (NQA) 2002
20 Source: South African Qualifications Authority (SAQA) 2002/2003 Budget
Table 5.2 is useful in illustrating the diverse natures and resourcing levels among national qualifications frameworks. While context and scope differ, it is reasonable to expect that similar functions and services would require resources of comparative magnitude and that there would be some rational establishment of core resourcing to meet agreed quality service levels expected of national qualifications frameworks. Adequate resourcing is a key performance indicator of the success of national qualifications frameworks on three levels. Firstly, it enables comprehensive and realistic implementation. Secondly, it is a measure of the power underpinning it. Thirdly, it is a measure of how the society has been able to align all its resources, financial, physical infrastructure, organisational, and people behind it.

Based on the critical human development indices, there is universal consensus that South Africa is woefully underdeveloped and must, perforce, create a policy environment and an effective implementation strategy in order to tackle the challenge successfully; that was done through the NQF. The robust pre-1994 debates involving key stakeholders, and the prolific production of policy documents accompanied by regulatory instruments suggested a collective will that would sustain the drive under the supervision of the principal departments exercising the requisite will to deliver; but there has been a faltering in this regard principally due to the bifurcation of "education and training" and the perception of diminished authority resulting in a determined effort to reassert such lost authority: all this at the expense of an essentially well-intentioned vision. The figures above show that South Africa spends the least per thousand persons and, as shown later in the contribution, it does not receive the appropriate level of resourcing from the State commensurate with its mandate - hardly an indication of high priority investment in human resource development.

At the time of finalising this paper (April 2003), Ministerial finality on the recommendations of the Report of the Study Team on the Implementation of the National Qualifications framework had not been achieved. Given the well-documented commitment of the Ministers of Education and Labour to the NQF, the policy uncertainty that has ensued is indicative of the complexity around large-scale education and training transformation. Michael Fullan (1999) rightly concludes that moral purpose, ideas and power are necessary for education change and that "moral purpose and ideas without power means that the train never leaves the station". Successful systemic change like that enabled by the
NQF requires that one ensures and maintains the necessary power to develop and implement it. The power flux experienced by SAQA directly affects its ability to exercise leadership in its role of overseeing the development and implementation of the NQF.

**Why are National Qualifications Frameworks so pregnant with possibilities and yet so plagued with problems?**

Isaacs (2001, 124) stated that the "essential nature of the NQF is that of a social construct, in that we as social actors in society not only “theorise about, construct and implement it, but we also enable, actively change or work against it". I (ibid 2001, 25) presented the three necessary criteria that must be met for the NQF to be a successful social construct as:

- **Democratic participation of stakeholders**: Legitimacy of the social construct is seriously undermined if this does not occur.
- **Intellectual scrutiny**: If the social construct cannot withstand intellectual scrutiny, its credibility weakens and therefore its legitimacy is undermined. For "intellectual scrutiny", we can read academic scrutiny, international benchmarking, best practice, cutting-edge research, development, and appropriate internal comparators.
- **Adequate resourcing**: Most social constructs falter and fail because of the failure to consider the issues of affordability and sustainability. Designing and building social constructs that we cannot afford to maintain, let alone build, condemns them to failure. However, with regard to the NQF it is not just how much money the state provides, but rather how we release, align and focus the multitude of resources - human, physical and financial - already allocated for education and training.

Transformation, change, and new social constructs are faced with a host of challenges they seek to address, such as realignment of power relations; new beneficiaries are included; vested interests are threatened; unintended outcomes are created; and, therefore, struggle and contestation continue. The problem is acute in large systemic change of education and training systems. Given that the time cycles for systemic change in such systems are long (estimates range from two to four decades for schooling systems), it is easy to proclaim certain reforms as successful or failed prematurely. Two lines from Dietrich Bonhoeffer's poem (1999) called "Success and Failure" are particularly apt:
What is success and what is failure?
Time alone distinguishes.

In fact, the constant creation of perceptions of failure through unsubstantiated allegations can undermine even the best policies. There is therefore always an urgent need for intellectual scrutiny and responsible engagement with integrity in the development, implementation and evaluation of social constructs like national qualifications frameworks.

Because of the contestation, power struggles and the sometimes ambivalence and uncertainty inherent in new policy initiatives concerning national qualifications frameworks, it is necessary to establish clear agreed modalities around issues of legitimation that include democratic participation of stakeholders, intellectual scrutiny and resourcing. Failure to do so will inevitably lead to circumstances that constantly provoke attempts to question the policy and its implementation in ways that paralyse and work against transformation and the achievement of the objectives of such policy.

Central to such agreed modalities of legitimation is a national management information system which will enable longitudinal studies that will track success and failure of the national qualifications framework through monitoring the uptake of standards and qualifications, the progression of learners, the performance of providers and overall quality of the system.

The issue of policy choices needs to be addressed as well. The focused study report (2002, 132-2) comments:

Of all the leading exponents of national qualifications frameworks South Africa has the least mature learning system, the greatest social disparities and the most acute capacity problems. Yet it is striking how often, given a choice, South Africans have chosen the most austere and demanding option. From the outset, our NQF has been all embracing when other systems have chosen a dual-track approach or left the higher education sector to its own devices. We decided on a complex formula for the representation of interest groups in the standards setting process. We decided not just to record all existing qualifications as others have done but also to require providers to reformat all six thousand of them in outcomes-
based mode, an exceptionally time-consuming task for providers. NSBs and SAQA staff alike. South Africa decided on an open-ended approach to ETQA recognition that has brought 31 into the arena with more in the offing. We decided on an accreditation process that embraces both provider accreditation and the accreditation of every programme on offer. We decided that every private provider, including every workplace provider of national standards and qualifications, must not only register with the Department of Education but also apply for accreditation by an ETQA. We decided not just to facilitate the registration of workplace training assessors but also to require every summative assessor in the country to be registered by a certain date after achieving the necessary unit standard.

Decisions like these have been made with the most honourable of intentions: to ensure that the message of transformation through quality assured qualifications was taken into every nook and cranny of our learning system. However, cumulatively such decisions have put the NQF under terrific stress and, in retrospect, provoked the circumstances that brought the Study Team into being.

South Africa's NQF is ambitious, but is it unachievable? Given the enormity of the task, and that the public and private education and training expenditure in South Africa is of the order of R75 billion (US$ 8.3 billion), and that SAQA projected a fully documented budget of R60 million for 2003/4 within a five-year business plan to provide the steering mechanism for overseeing the NQF, the financial resourcing of the NQF is not an unreasonable expectation or incongruent with the task at hand. SAQA requires less than 0.1 percent of the total expenditure of the education and training budget.

SAQA's budget for 2003/4 is presently pegged at R33.6 million with R11.27 million from government, self-generated funds of R1.3 million, and donors (largely the European Union) providing the balance. The Minister of Education has undertaken to review the funding of SAQA once the deliberation on the focused study report recommendations have been finalised. This resourcing issue, as previously argued, is a key performance indicator and this at present is the greatest risk that SAQA must manage at the levels of realistic implementation, enabling power, and alignment of the available resources. It is also an indicator of how SAQA and the NQF is presently being perceived and
supported. Political will is what is needed to adequately fund SAQA's oversight role of the NQF.

**Future prospects for the NQF: National Qualifications Framework capacity building of the region, the continent and globally**

The 14 member states within the Southern African Development Community (SADC) region signed a protocol on education and training (1997), which commits them to find ways of greater cooperation. Through the protocol, a number of technical committees were established to drive the objectives of the protocol. The Technical Committee on Certification and Accreditation explored a number of areas of cooperation around qualifications, alignment of education and training systems, and the registration of private provision. One of the key ideas that the Technical Committee pursued was the establishment of a Regional Qualifications Framework (RQF). A draft paper was developed on the purpose of the RQF, what it might look like and the short-term steps that should be put in place to meet this important goal. SAQA has been asked to play a key role, both in supporting the process of conceptualisation of the RQF and providing support and capacity building of member states in establishing National Qualifications Frameworks in their own countries. SAQA has established an internal committee to coordinate the support, training and capacity building of member states. Countries like Namibia, Swaziland, Lesotho, Botswana, Tanzania, Malawi, Mauritius, Zambia and Benin have visited the SAQA offices to discuss cooperation. A seminar was held in November 2002 that was attended by 11 member states. The published seminar proceeding will take the debate about the form and content of the RQF further. The seminar started a process of mapping qualifications for marketing, freight forwarding and clearing, hospitality and gaming across the region. SAQA is also currently working on a proposal to be recognised as a regional capacity building institution within SADC.

The New Partnership for Africa's Development (NEPAD) builds on strong regional cooperation. It has also emphasised human resource development, institution building and alignment and harmonisation of education and training institutions. The RQF is an important tool to meet the NEPAD objectives of building strong cooperation amongst education and training institutions and harmonising the various regional qualifications and quality assurance structures. If each of the regions build their RQFs it will be relatively easy to negotiate harmonisation at the sub-regional levels. As part of the November 2002 seminar
on Harmonisation and Articulation Initiatives, SAQA commissioned a preliminary survey to establish what areas of industry already are providing training and development within the African continent. Through this survey it was clear that a number of South African companies in the following areas were already providing education and training: banking, electricity, oil, retail and wholesale, transport and construction. South African qualifications and standards are used where there are no alternatives.

SAQA has also ensured that as part of its development, the South African qualifications and standards are compared to those countries particularly that do have national qualifications frameworks for example, New Zealand, Australia, England and Scotland. In addition to the above initiative SAQA has also participated in the Global Forum on Project Management Standards. This is an initiative from the project management industry to establish global standards for project management and thereby raise the quality and profile of project management globally. The initiative has been supported by the following players: Eriksson, Rolls Royce, NASA, the Qualifications and Curriculum Authority (QCA), the Australian National Training Authority (ANTA), SAQA, Services Sector Education and Training Authority, Australian Services Sector as well as all the internationally recognised project management institutes and associations. Similar initiatives are under way for the hairdressing and beauty industries, and the engineering fraternity.

Another important initiative is that all overseas companies that want to offer education and training within South Africa need to ensure that their qualifications and courses meet the SAQA requirements.

Conclusion

South Africa’s NQF having been forged in the baptism of fire of the democratisation of our society still offers South Africa the best option to focus and achieve the real and moral purposes enshrined in the five NQF objectives of the transformation of our education and training system.

As the Report of the Study Team on the Implementation of the National Qualifications Framework (2002:35) notes in its excellent chapter on the international developments on national qualifications frameworks:
The National Qualifications Framework is a product of South Africa's democratic transformation. It was brought into existence on the strength of an intense collaboration among South Africans in the labour movement and its political allies, organised business, academics, trainers and NGO specialists.

The NQF concept seemed to meet the needs of the times, which was to create democratic institutional responses to the country’s history of division, suppression and inequality. It offered a radical departure from all past South African practice in education and training. It promised an entirely new education and training dispensation for workers, an open-ended scheme of progression for learners of all ages, along high-quality learning and career pathways that would blast through the educational and occupational roadblocks and dead ends installed by the apartheid regime. It seemed like a particularly dynamic contribution to the national Reconstruction and Development Programme.

Although the NQF is home-grown, its main concepts and organising principles are in a line of lineal descent from similar movements in Scotland, England, New Zealand and Australia in the mid to late 1980s. These movements were closely investigated by the South Africans who worked in the Training Board's National Training Strategy Initiative, the ANC's education and HRD policy process prior to 1994, the Inter-Ministerial Working Group in 1994-95 and the NQF development process from 1996 onwards.

Intellectual and professional exchange on national qualifications frameworks and related matters has flourished worldwide during the past fifteen years and more. As in South Africa, intense debates have accompanied the construction of NQFs elsewhere, in both national and multilateral forums. The international movement to establish national qualifications systems is being advanced both by the exchange of transfer of experience between individual nations and by the explicit actions of regional and international bodies.

The worldwide and diverse nature of national qualification frameworks is recognised in the Report (2002:36). The confluence of democratisation and
globalisation provided a significant platform for South Africa to establish its NQF and continues to drive its development.

This strategic decision by South Africa has been justified in the light of international developments. The Report (2002: 55) confirms this:

South Africa's decision in 1995 to establish the NQF was strategic. It asserted a unifying vision at the moment when the South African people had come together under one Constitution and Parliament. The NQF was designed to play its role in nation-building, reconstruction and development. South Africa became one of the early exponents of purpose-built national qualifications frameworks. The international trend has amply vindicated this decision. Moreover, the development of the South African NQF, led by SAQA, has received significant international recognition. This needs to be borne in mind as the country considers the next phase of development of the Framework.

The stage is set for the next phase of the development of the South Africa NQF and the struggle continues.

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Do good ideas matter?
Jonathan D. Jansen

It is my privilege to respond to the 2004 SAQA Chairperson’s Lecture in the form of the excellent paper by Dr Gary Granville from the Faculty of Education in the National College of Art and Design in Dublin, Ireland.

I wish to start, however, by saying something about the people who constitute the leadership of the South African Qualifications Authority (SAQA) and those privileged to participate in this massive transformation project. There are few organisations in South Africa where both the Chairperson of the Board and the Chief Executive Officer are persons so widely regarded for their integrity, their humanity and their commitment. There are few projects which have given such sincere and deep meaning to the word “participation” through the active involvement of ordinary South Africans in the implementation of the national qualifications framework (NQF). There are few policy initiatives which have consciously dubbed its major reform as “a social construct” with all the risk entailed in such an open-ended conception of the NQF. And there are no other national educational initiatives that I know of that have so consistently opened themselves to what the SAQA CEO likes to call “intellectual scrutiny.” This project to measure the implementation progress and impact of the NQF on own initiative is a superb example of this commitment to intellectual scrutiny. I wish to congratulate SAQA for this public stance, and for meaning it.

The paper by Gary Granville is a polite and yet honest report; it is funny in parts and deadly serious in others; it has a point of view without being doctrinaire; and it is thoroughly engaging and refreshing in its ‘take’ on issues of evaluation, assessment, policy and change that stretch far beyond the immediate concerns of the NQF. Its real value lies in stimulating further reflection and debate on education reform and I wish to share some of my own thoughts that arose as I read this important contribution of Dr Granville to policy deliberation in South Africa. I will as always speak largely to my own experience, and in this respect I

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21 This article was first published in the SAQA Bulletin Vol. 6(2), 2004 as a response to the SAQA Chairperson’s Lecture titled: “The National Qualifications Framework and the Shaping of a New South Africa” paper commissioned by SAQA.
will refer mainly to what I observe within higher education institutions generally and universities in particular.

One of the things I keep asking myself when I reflect on the NQF is this: “how did such a good idea fall on such hard times?” The idea of access and mobility; of quality and redress; of integration and achievement; of personal and social development; of progression and opportunity…how did such good ideas struggle to find expression in the practice of education and training? It does not help us as South Africans to avoid addressing this question in an honest, open and responsible way. One of the great difficulties in public engagement on policy of any kind is the knee-jerk defensiveness in response to any criticism; I am hoping that as our democracy matures, we will begin to understand criticism and commitment to be the same thing, and to recognise that there is nothing to be gained in chanting slogans ten years after such ambitious experiments were first launched.

The first reason the NQF has had minimal impact in the South African education and training system is quite simply that the NQF promised what it could never deliver in practice. This in part has to do with the nature and complexity of practice, but it has a lot to do with the idealism and euphoria of policymaking in the years immediately preceding and following the formal installation of a democratic government in 1994. Put bluntly, we got carried away. This is not the place to repeat what some of us have called the over-investment in policy symbolism or others have observed as the tremendous moral imperatives that underwrote the education and training policies of the first post-apartheid government. The NQF was to address 'employment opportunities' as well as 'economic development' as well as 'career paths' and of course 'redress past unfair discrimination.' I know of no policy in the world that can address all of these things in the ways envisaged, let alone all at the same time. Yet we believed in the redemptive power of policy, and we are paying the price.

The second reason the NQF struggled through implementation was that it was compromised from the very beginning. It does not take much logic to recognise that installing a department of education separate from a department of labour would immediately cancel out any profound expectations of creating 'an integrated national framework for learning achievements.' Add to this compromise a lack of substantial and sustainable funding from the South African
government, rather than the helpful but unsustainable funding from donors, and there is very little that well-meaning, hard-working people can achieve in the real world of institutional practice. Reform costs money, it is as simple as that. There was nothing in our national commitment to resources that came close to the ambitions set out in legislation for the national qualifications framework. There is an ominous parallel reform in which we seem to be going down exactly the same track of unbridled optimism to be followed by unmitigated exasperation and that is the FET system. It is very clear to me that the technical colleges will never be able to overcome their apartheid legacy unless there is a massive injection of sustained state funding to take these poor cousins of the post-school system and make them competitive, productive and high-status institutions that deliver on the training needs and priorities of business and industry, and on the aspirations and dreams of adults and youth.

The third reason the NQF struggled to find its way into the norms of everyday institutional practice is because it lacked a credible *theory of action* that would take these good ideas and implant them in educational practice. The most obvious example is RPL policy. I know of few universities that have chosen to take the opportunities offered in this policy position and broaden access to higher education as a result. The introduction of RPL in higher education deliberations remains highly contested. On the one hand, familiar charges of protecting “standards” invariably wash-out any sensible or sustained discussion on how supposed standards compromise common sense and fail to remediate disadvantage. On the other hand, the push for RPL has often underestimated the real differences of learning and knowledge acquisition in different contexts. I do not regard these arguments and counter-arguments as constituting insurmountable charges against implementation; our failure was and is the lack of hard thinking through the political strategies and intellectual arguments that would enable RPL to advance learning opportunities within and across institutions in an educationally honest way.

The fourth reason the NQF struggled to gain credibility in practice is that the manageable set of good ideas soon found itself engulfed and overpowered by a powerful bureaucratic and administrative apparatus so that the simple founding principles were completely lost to ordinary people. This observation is not unique to the NQF but appears more and more to be a South African response to policy reform. Whether it was outcomes-based education or institutional quality audits
or whole school evaluation, we can for once claim South African exceptionalism through reference to this inordinate capacity to make the simple so complex that is inaccessible to practitioners. I have long wondered where this behaviour comes from. Is it our deep lack of self-confidence below that miracle façade with which we claim so much from this democracy? Is it our English colonial legacy that confuses arcane language or excessive wordiness with intelligence? Is it our need to elevate policy authority beyond the reach of ordinary citizens, thereby retaining power at the centre the way magicians operate? I am not sure. But I do know that making the simple appear complex has been a major stumbling block en route to sensible implementation of good ideas.

Does this mean the NQF should be abolished? I think not, for what the NQF has established is a discourse of educational change among ordinary citizens; it has generated hope and optimism among those most marginalised from the education and training opportunities; it has bequeathed a profound philosophy of education and training wrapped up in those five simple statements of ambition; it has brought together hundreds of people from across fields and sectors, and from all parts of the population to build the NQF and give meaning to this 'social construct'; and it has not become cynical about 'participation' at the very point that the delivery agenda of the central government has cast suspicion on this highly valued legacy of the struggle for education.

I believe that the appropriate route to follow is to return to the first principles of the NQF and to ask what simple pathways could enable these good ideas to take root and flourish within the education and training system.

The Impact Study project of SAQA is easily one of the most sophisticated measurement and monitoring systems that I have yet witnessed to emerge in South Africa. Its sophistication lies in its self-critical posture and its consciousness of the limits and potential of impact studies, especially in its more quantitative conception. I suspect that a useful starting point in institutions is to examine the diversity of implementation pathways followed in practice. Our research based on end-user practices with respect to the NQF shows a rich variation one that should intrigue rather than concern us. For example, in a university with a strong sense of institutional commitment to governmental action, we found in various Faculties examples of policy avoidance (finding innovative ways to avoid dealing with the NQF), policy compliance (complying
with NQF guidelines in a routine and mechanical manner), and *policy adaptation* (adjusting practice based on a selective adoption of NQF guidelines in the light of experience, capacity and competing external pressures).

I raise these examples of institutional practice for a number of reasons. First, to underline the point that a mature and useful impact study will not seek to straightjacket practice on the basis of some centralised and uniform reading of the NQF and what it demands, but recognise the value, utility and richness of ways in which institutions seek to attain the goals of the framework. Second, to privilege an understanding of practice rather than a valorisation of policy. If we work from the presumption that institutions do what they do for reasons that make sense to practitioners, and if research and evaluation seeks to unlock those compelling logics of practice, then we might come closer to solving the implementation puzzle that constrains all education policy in South Africa. Rather than condemn the stone age resisters or attribute racial or ideological motives to those who fail to change, it might be useful to begin with the half-scary assumption that there is a more persuasive logic locked up in daily practice that needs to be understood in order to be changed. Third, to engender humility about policy reform in ways that bring greater maturity to our ambitions to change the education and training system. It is time for us as South Africans to grow up. Change happens slowly. Change costs money. Change seldom responds to profound and moving policy dictates. And change might not happen at all.

In this regard it might be useful to take a sombre look at the variable of *time* as it is often used to defend the slowness of change. Invariably, those in government and the self-interested international consultants who benefit from the lack of change would make the point that change may take many decades and even centuries before it becomes reality in our institutions. This kind of positioning is disingenuous at best, deceptive at worst. Of course change takes time….but how do we know that this kind of posturing is not an excuse for non-action or a defence for the lack of resource inputs or a mask behind which lies state intransigence and a lack of political will?

Well, the acid test of change or reform lies in how we respond to a number of critical questions. Another way of putting this is, *how do you know whether government (or another lead agency) is serious about a particular change proposal or policy reform?*
The framework provided in these ten questions empowers those who work on the receiving end of policy reform to judge the credibility and adequacy of change proposals.

• what kinds of **resources** have been dedicated to enable change to happen?

• what kinds of **plans** have been put in place to make change happen? Are the plans feasible, and do they articulate a clear and persuasive logic of implementation?

• what kinds of **timeframes** have been stipulated against which reasonable progress can be measured? Are the timeframes realistic?

• what kinds of **contexts** have been described, in all their variations, as the receptive sites within this the change has to happen? Is there sufficient capacity within these contexts to make sense of, engage and implement the proposed changes?

• what kinds of **support** for the change have been built among practitioners, policymakers and planners to ensure smooth implementation?

• what kinds of **key personnel** have been identified to lead the change process? That is, is there sufficient expertise and capacity at the centre to drive the change process?

• what kinds of **obstacles and impediments** to change have been anticipated, and how will these concerns be addressed in the implementation process?

• what kinds of concrete **benefits** flow from the change plan? In other words, why should (would) practitioners buy into the change plan to begin with?

• what kinds of **consequences** result from non-implementation? Who is held accountable, and under what conditions, for implementation failure?

• what kinds of **evidence** exists that this change proposal can make a
positive difference in practice? In other words, is the plan credible on the ground?

The value of the NQF Impact Study lies in its attention to several of these variables and, principally, the question of evidence ... how do we know that the NQF is really making a difference?

The key question that remains is whether there is sufficient maturity in the education and training system to deal with the outcome of such an impact assessment. For if the evidence tells us that our principal achievements have been at the symbolic and political level or in terms of the mechanical achievements of administrative goals, then we should have the courage to end the dance, and move on.

The NQF presents to South Africa what is arguably the most cogent and progressive set of ideas for transforming the education and training system. These core ideas have mobilised and inspired millions, and offered hope to those long excluded from this system. Those entrusted with this national project have taken the bold step of shining a bright and honest light on the achievements of the NQF.

More than anything else, it is this courage of introspection and integrity of leadership that might well secure for the NQF a continuing and central role in the transformation of education and training for many decades to come.

Reference

National Qualifications Frameworks as integrated qualifications frameworks

David Raffe 22

Introduction

At the heart of current debates on national qualifications frameworks lies a paradox. On the one hand, many countries, including South Africa, introduce such frameworks in order to transform aspects of their education and training system, their society, or their economy. On the other hand, the literature on qualifications frameworks suggests that they are most successful when they are modest in ambition and incremental in approach: when they build upon existing structures and practices and on the trust, the mutual understandings and the power relationships that are embedded within them. In other words, it would seem, the frameworks that are judged to be most successful are those which succeed in transforming very little.

The solution to this paradox may lie in the meaning of a 'successful' qualifications framework. To address the problems of integrated frameworks, therefore, we need greater clarity about their purposes. Integration is not an end in itself; it is a means to other ends. In this paper I start by discussing what we mean by an integrated qualifications framework. I then identify possible purposes of an integrated framework and briefly discuss whether qualifications frameworks achieve these purposes by commenting on the Scottish experience. I then review three kinds of barriers to integration, which I label epistemological, political and institutional. I conclude with a few suggestions on how these barriers might be overcome, in the hope that these might stimulate reflection and discussion on the current position in South Africa. 23

I draw on the experience of qualifications reforms in Scotland, in the other countries of the United Kingdom and in other, mainly English-speaking, countries. I also draw on cross-national research by colleagues and myself on what we have called the 'unification' of post-compulsory education and training

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23 I am grateful to John Hart, Jeff Mukora and Michael Young for comments on an earlier draft of this paper. Responsibility for the opinions expressed and for errors of fact and interpretation is, of course, my own.
systems. This term describes a range of policy initiatives, not always involving qualifications frameworks, by which countries try to bring academic and general education closer to vocational education and training. Integrated qualifications frameworks can be understood as part of this wider process of unification.

**What is an integrated qualifications framework?**

A problem in discussing integrated frameworks is that the concepts we need to use - such as integration, education and training - are all highly contested. I therefore start by asking two questions: what do we mean by an integrated qualifications framework? And what are the different forms of knowledge that we are trying to integrate?

There is an extensive literature on the concept and meaning of a national qualifications framework (Donn and Davies, 2003, Young, 2003, 2005, OECD, 2004); here I focus on what it means for a framework to be integrated. An integrated qualifications framework is more than just a comprehensive one. A comprehensive framework, as distinct from a partial framework, includes all types of learning: academic and vocational, formal and informal, education and training. Being comprehensive is a necessary condition of an integrated framework, but it is not a sufficient condition. A comprehensive framework could be a mere list, or a loose coupling of distinct sub-frameworks with 'just an occasional look over the fence dividing the two' (Isaacs and Nkomo, 2003:80). An integrated framework is one that not only includes different types of learning, but also changes the relationships between them. And when we ask how it should change these relationships we find two contrasting perspectives on the concept of integration.

The first perspective stresses *uniformity*. An integrated framework, in this perspective, is one that fits all learning and all qualifications into a single mould. It imposes stringent common design rules for the structure of qualifications, for the way their content is specified, for assessment and certification, for quality assurance, and so on. In other words, it is a *tight* framework. One of the most common distinctions in the literature on qualifications frameworks is between those that are tight and loose, strong and weak, stringent and less stringent. Until recently this literature tended to assume that an integrated framework and a strong framework were the same thing. It is probably true that a very loose framework - with no common design rules, or with only very weak ones - is
unlikely to be integrative; but this does not mean that we should define integration in terms of tightness. For one thing, the literature is full of warnings about the difficulties of implementing tight frameworks and making them work: if we define integration in terms of tightness we may condemn ourselves to fail. But more importantly, tightness refers merely to the characteristics of a qualifications framework, whereas the definition of an integrated qualifications framework should refer to the purposes - the vision of integration - that such a framework is expected to serve.

In more recent policy debates integration has been associated, not with uniformity, but with diversity. An integrated qualifications framework is one that recognises and celebrates a wide range of purposes, epistemologies, modes and contexts of learning, but which also recognises the need to build these into a coherent and coordinated system. In order to do this, it has to impose some aspects of uniformity. Some design rules have to be tight, in order to promote coherence; other design rules should be loose, in order to encourage diversity. The trick, of course, is deciding which should be tight and which should be loose. This is the tension, which Young (2005) has described, between the principle of difference and the principle of equivalence. To manage this tension effectively we need to be clear about the purposes of integration.

**Understanding the diversity of learning**

This leads to my second question: what are the forms of learning or knowledge which we want to integrate within our diverse but co-ordinated system, and how do they differ?

In South Africa, integration is usually understood in terms of linking or unifying education and training, although other terms including discipline-based and work-based (or practice-based) are used. In much of continental Europe the debate uses the terms general and vocational; in many English-speaking countries the former is subdivided into academic and general and latter into professional and vocational. These terms all have different connotations, but they do not affect my general argument, and I will refer simply to education and training or to academic and vocational. How do these types of learning differ?

One view sees education and training respectively as representing distinct knowledge structures, distinct modes of learning and distinct social relations.
They are incommensurable, and they cannot sensibly be combined within a single framework. This view has been expressed forcibly by critics of integrated frameworks in New Zealand and South Africa (Smithers, 1997, Ensor, 2003). An opposing viewpoint, represented by Pring (2004) in England, challenges the 'false dualism' between the academic and vocational or between education and training. The terms education and training describe distinct purposes of learning, but as practices they are not mutually exclusive. The Study Team in South Africa expressed a similar view when it argued that education and training were points on a 'continuum of learning' (DoE and DoL, 2002): education and training are different, but the differences are of degree and they can shade into one another. A similar perspective underlies the Consultative Document's proposal for three interconnected pathways (DoE and DoL, 2003).

A third view sees education and training primarily as social constructs which reflect institutional, political or status divisions within the system. They sometimes correspond to different forms of knowledge or different purposes or modes of learning, but at other times they do not; the connections are variable. An integrated qualifications framework will include types of learning which vary along a number of distinct dimensions: they vary with respect to their purpose, epistemology, mode of learning, institutional context, and so on. And when we use terms such as education and training, or academic and vocational, we may be invoking any or all of these differences, or possibly none of them.

This third view may seem like an elaboration of the second, but it has distinct implications. Instead of a single continuum of learning it identifies several continua, weakly correlated with each other. Integration therefore raises a range of different issues - epistemological, political and institutional - which will be important in different circumstances and different contexts. It may be misleading to wrap all these issues up into a single dichotomy - or even a single continuum - between education and training. I return to this point later, when discussing barriers to integration.

Another implication is that nearly all qualifications systems or frameworks, however partial in scope, face problems of integration, because they all straddle differences of one kind or another in the content, mode or organisation of learning. They all incorporate assumptions about equivalence and commensurability which are based on a compromise between technical and
conceptual purity, on the one hand, and what is practical and affordable on the other. Comprehensive national qualifications frameworks which aim for integration face the same problems, but to a greater degree.

**The purposes of integration**

Integrated qualifications frameworks need to be understood in relation to a cross-national trend, which colleagues and I have termed the 'unification' of academic and vocational learning. We have studied this trend in a range of (mainly Organisation for Economic Co-operation and Development [OECD]) countries, and especially as it affects upper-secondary education and training (Lasonen and Young, 1998, Spours *et al.*, 2000, Lasonen and Manning, 2001). This trend is the result of three broad pressures (Raffe, 2003a).

The first is *economic*. Many countries unify academic and vocational learning as part of their response to the economic challenges of globalisation. Changes in work practices are perceived to require new types of skills and knowledge and new modes of learning which transcend the traditional distinctions between academic and vocational, for example by emphasising the integration of theory and practice or demanding 'connectivity' rather than specialist occupational skills. The development of flexible labour markets calls for education and training systems that can respond flexibly to changing needs, unimpeded by the rigidities associated with academic/vocational divisions.

The second pressure is *democratic*. In South Africa the case for integration is dominated by the history of apartheid and the issue of redress; but there are democratic forces at work in other countries as well. For example, in both Sweden and Scotland there has been public support for unified upper-secondary systems which are perceived to extend the egalitarian principles of comprehensive education; and in many countries more unified systems are seen as a way to include learners who are disaffected, disadvantaged or at risk of social or economic exclusion. Democratic pressures encourage the pursuit of 'parity of esteem' between different learning pathways, the replacement of socially selective tracks by more flexible pathways, the extension of opportunities for access and progression, and the recognition of skills possessed by people who previously had no access to formal qualifications.

Much of the discussion about unification - and about qualifications frameworks -
has focused on the tensions between these economic and democratic aspects (Allais, 2003, Strathdee, 2003). However, when colleagues and I studied 'unifying' trends across Europe, and across the home countries of the United Kingdom, we identified a third pressure which was at least as important as these two. This can best be described as systemic. The unification of academic and vocational learning is a response to the increased scale and complexity of education and training systems, to the wider range of economic and social purposes that they are expected to serve, and to systemic problems such as credentialism and academic drift. In the past different sectors of education and training could be managed separately because their organisation and purposes were relatively simple and distinct. Now, they are interdependent parts of a larger and more complex system which requires stronger measures of coordination and coherence. Systemic pressures thus encourage systems of governance, regulation, funding and quality assurance that embrace all sectors of education and training, measures to enhance the standing of vocational training relative to academic education, and arrangements for articulating different types of learning and supporting progression and transfer between them.

Many countries are pursuing some measure of unification, although they do not all use qualifications frameworks to do so. Their strategies vary in the relative importance of economic, democratic and systemic imperatives. They vary in the strength of the model of unification: our earlier research identified a continuum of 'tracked', 'linked' and 'unified' systems (Spours et al., 2000). And they vary in the extent to which qualifications systems and qualifications frameworks are used as instruments for change.

An integrated qualifications framework may therefore be used to promote different purposes, corresponding to distinct concepts or models of integration (Raffe, 2003a). These include:

- **curricular**: to encourage learners to combine different types of learning (e.g. applied and theoretical), to develop integrated forms of learning and knowledge, to promote transferable and generic skills, or to promote parity of esteem;
- **longitudinal**: to make pathways more flexible, to facilitate portability and transfer, to provide seamless opportunities for access and progression in lifelong learning, to promote recognition of informal and non-formal learning; and
organisational: to promote more coherent and better co-ordinated arrangements for the delivery, staffing, quality assurance, governance and funding of learning.

Do qualifications frameworks achieve these purposes?

It is difficult to generalise about the extent to which qualifications frameworks achieve these purposes. This is partly because frameworks vary widely in design and purpose (and some do not aim for integration at all), and partly because the experience of most qualifications frameworks is still very recent. There is a limited research base on which to judge whether and how qualifications frameworks achieve the various purposes of integration.

So let me comment briefly on a single case study: Scotland. The Higher Still reform introduced a 'unified curriculum and assessment system' of post-16 education starting in 1999; we have studied its progress and we recently summarised our conclusions (Raffe, Howieson and Tinklin, 2005). In varying degrees Higher Still aimed to achieve all three sets of purposes: curricular, longitudinal and organisational. It has updated the curriculum but its impact on curricular integration has been limited. The chief executive of the Scottish Qualifications Authority recently commented that it had done little to promote parity of esteem. Nevertheless, the curricular aims of Higher Still were opposed by some teachers, especially English teachers who felt that their subject's role in developing critical awareness and understanding was being replaced by a 'training' model which emphasised communicative competence. The biggest source of dispute was the Higher Still assessment model, a hybrid of the old academic and vocational models, based on the principle that all programmes should include a combination of internal and external assessment. The practical difficulties in implementing this principle led to a national crisis in 2000 (Raffe, Howieson and Tinklin, 2002). It met resistance from both sides of the academic/vocational divide, and it was tacitly subverted by the ('vocational') Further Education colleges which exploited the new system's flexibility by offering programmes based on units (assessed internally) without grouping these into courses (assessed externally). With respect to longitudinal integration, Higher Still has had a substantial and positive impact on opportunities for access but there are still many issues to be resolved before it provides a seamless progression framework. It has encouraged collaboration between schools and colleges (an aspect of organisational integration) and, together with other
reforms, it has helped to create a more flexible and manageable education and training system. However, the new qualifications introduced by Higher Still were implemented more slowly than expected in vocational areas, partly because their design features were considered unsuitable and partly because some of them were considered too 'academic'. The new framework never covered as wide a range of vocational education and training as was at one time envisaged.

This task has been left to the Scottish Credit and Qualifications Framework (2003). The SCQF, formally launched in 2001, is a looser but comprehensive framework, of which the qualifications introduced by Higher Still are in effect a sub-framework. We are currently evaluating its early experience. I cannot tell you our conclusions, but some issues are already in the public domain (Raffe, 2003b). Of the three purposes of integration, the SCQF is primarily concerned with longitudinal integration and organisational integration. It has been successful in developing an agreed model which covers all areas of education from higher education to informal and non-formal learning. It provides a tool to support curriculum change, institutional collaboration, credit transfer and the recognition of learning; educators claim to find this tool useful. However the SCQF cannot force any one to use this tool, and there are tensions over the extent to which the framework alone can force change. So far its direct effect on (for example) credit transfer has been small. There is some frustration with the slow pace of progress.

And this is in a country which is regarded as one of the 'success stories' of qualifications frameworks (Tuck, Hart and Keevy, 2004, Young, 2005)! The balance sheet for many other qualifications frameworks is, at best, similarly mixed and tentative. Of course, most national qualifications frameworks are at a very early stage and the literature stresses the long time it takes for them to develop and to become fully implemented.

The Scottish experience illustrates two features which are shared by other integrated qualifications frameworks. First, the integration of academic and vocational learning, or of education and training, tends to be the most contentious aspect of the design and implementation of these frameworks. Issues arising from integration have been associated with very public conflicts and with resistance to the reforms. Second, all frameworks experience a tension between two characteristics of qualifications frameworks described earlier: scope (comprehensive versus partial) and tightness. This is illustrated by Figure 1.
Many integrated qualifications frameworks are designed as frameworks of type D. They tend to move in the direction either of B (by becoming less comprehensive) or C (by becoming looser), or a combination of both. This was true of Higher Still; it has been true of the national qualifications frameworks in South Africa and New Zealand (Philips, 2003); it has also been true of many frameworks which started as partial frameworks, such as the National Vocational Qualifications framework in the UK, which became looser and more partial as it developed (Raggatt and Williams, 1999).

![Figure 1. A simple typology of National Qualifications Frameworks](image)

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What are the barriers to integration?
The barriers to integration are of three broad types.

The first is *epistemological*. In several countries, most notably New Zealand, higher education and 'academic' schools have resisted the incorporation of their qualifications into a framework designed, as they see it, to fit the epistemological assumptions of industrial training (Smithers, 1997, Mikuta, 2002). Education and training, in their view, represent different structures of knowledge and different modes of learning: they can neither be classified into a single set of levels, nor fitted into a single curriculum and assessment model. Their epistemological arguments have typically focused on:

- the unit-based nature of integrated frameworks (in conflict with the holistic character of educational knowledge);
- the specification of knowledge in terms of 'outcomes' (in conflict with the open-ended nature of educational learning);
- the model of assessment (atomistic and competence-based); and
- the use of common level descriptors (either inapplicable to both education and training, or too general to be meaningful).
Integrated frameworks have also been resisted, for parallel reasons, by vocational interests. In many countries, such as England and France, there have been concerns that a common qualifications system could undermine the integrity of vocational learning.

The epistemological issues are real and important. However, many of the epistemological barriers described above may have more to do with the particular design of the qualifications framework than with integration *per se*. The Scottish experience shows that a unitised and (loosely) outcomes-based model can accommodate academic learning. Conversely, when the UK introduced a very tight model for National Vocational Qualifications there was fierce opposition from *within* vocational education and training. The problem was the model, not integration. The argument is further confused by being polarised in terms of education and training - or rather, in terms of caricatures of education and training. I have already argued that the differences among types of learning are multi-dimensional, and that epistemological issues arise *within* education and training. In Scotland, for example, we are debating whether the levels of the SCQF, developed mainly for post-16 education, can be used in relation to the school curriculum where the structure of levels must reflect the processes of cognitive development in childhood. All systems of qualifications cover an epistemological range and make compromises in the process. We have become used to the idea that schools, or universities, should use common systems of assessment and awards for subjects with very different knowledge structures; it is only when we apply the same approach in less familiar contexts that we become aware of the assumptions and the compromises that are involved. The experience of numerous qualifications reforms reminds us that technical perfection is unattainable, and that the quest for technical perfection can be damaging.

The second barrier is (in the broad sense) *political*. National qualifications frameworks attempt 'revolutionary change' (Young, 2005:13). They may be seen either to sustain established economic and social interests and power structures, or to challenge them. They are variously used to extend government control of education and training, to reduce the autonomy of educational providers, to increase the influence of employers and to promote social justice and equal opportunity (*ibid*.; OECD, 2004). It is hardly surprising that they may meet political resistance.
Political barriers are harder to overcome if the different interests of education and training are represented by different departments of government or different regulatory systems. They are also aggravated to the extent that institutions, staff and learners come to define themselves in terms of academic or vocational missions, and therefore feel that their identities are threatened by integration. Above all, they are aggravated by the nature of qualifications, and especially academic qualifications, as a positional good. A positional good is one whose value declines as other people have more and more of it. In a credentialist society qualifications are a positional good, and a reform which aims to raise the status of vocational qualifications (and increase their value) threatens to undermine the positional value of academic qualifications. It therefore threatens the institutions which deliver academic qualifications and the social groups which most often achieve them. This may explain why, even though integrated frameworks have at times been resisted by both academic and vocational interests, the academic interests have been more powerful. And it may explain why in England the government recently rejected proposals for a unified framework of general and vocational diplomas for 14-19 education. Instead it has proposed a separate vocational track while affirming that General Certificates for Secondary Education (GCSEs) and A levels (the main academic qualifications) will remain the 'cornerstones of the new system' (UK DfES, 2005:6).

The third barrier is institutional. Political and institutional barriers are closely linked and the distinction between them is a fine one. But whereas political barriers are more or less consciously erected by those who oppose particular aspects of integration, institutional barriers arise as unintended consequences of the way that institutions work, and of the operation of social structures such as the labour market. In our analyses of qualifications reforms in Scotland we have distinguished the 'intrinsic logic' of the qualifications system from the 'institutional logic' in which it is embedded (Croxford et al., 1991, Raffe et al., 1994). The intrinsic logic encourages flexible pathways, portability and parity of esteem, but the institutional logic may perpetuate existing divisions and barriers. For example, we found that some colleges were reluctant to recognise credits earned at school because it made their timetabling more complicated or because funding arrangements discouraged it. And the institutional logic of work-based learning is very different from that of college-based vocational education, as it depends on the availability and willingness of employers to recruit, promote and train people. An employer does not have the same incentive as a college to provide a
progression route through vocational learning. This is true even in countries, such as the Netherlands and Norway, which have tried to integrate school-based and college-based vocational learning.

Different institutional logics may be a direct consequence of the separation of education and training at government level, if this results in different funding and regulatory regimes and in different opportunities and incentives for learners and providers. Inadequate resources, nationally or locally, can be a further barrier to integration.

How can an integrated qualifications framework overcome these barriers?
How can an integrated qualifications framework overcome these barriers? This, of course, is for the Colloquium to discuss. I will conclude with a number of suggestions, and a few comments on the South African situation as perceived by an (ill-informed) outsider.

Clarify the meaning of an integrated framework. When I was asked to introduce this session on integrated frameworks my first step was to find out what people meant by integration in the South African context. This was not easy. I soon came to agree with Heyns and Needham (2005:30) that ‘there does not seem to be a common understanding of what is meant when we talk about “an integrated framework”’. The same is probably true of any other country. An important condition for progress is to try to reach this common understanding.

Clarify the objectives of integration. In order to do this, however, it is necessary to reach agreement about the objectives of integration, and the priorities among these objectives. And by objectives I do not refer to the features of the framework, but the broader goals to which it should contribute. Is the main objective to develop new forms of knowledge, to promote access and progression, to promote social justice and redress, to make the system more manageable, or what?

Make sure that the objectives are achievable. All national qualifications frameworks tend either to have exaggerated ambitions, or to be the subject of unrealistic expectations. For example, many European countries expect qualifications frameworks, or other ‘unifying’ measures, to promote a concept of
'parity of esteem' that could never be achieved without totally changing the way in which their labour markets worked, let alone their education systems. The South African National Qualifications Framework is more ambitious than most frameworks, particularly with respect to integration (Granville, 2004). As Jansen (2004:88) has commented, it 'promised what it could never deliver in practice'.

**Clarify the barriers to integration.** I have the impression that in South Africa, as in other countries, there is a tendency for barriers that are really political or institutional to be represented as epistemological. This may be reinforced if the debates are conducted by technical specialists whose frame of reference emphasises the technical and epistemological aspects. To identify the barriers as (say) more political than epistemological does not in itself make them easier to overcome, but clarifying the barriers is the first step in developing a strategy for change. A possible starting point is to identify the institutional barriers, some of which might be at least *relatively* easy to surmount.

**Make the framework as loose as possible, consistent with its (achievable) objectives.** An integrated framework is not the same as a tight one, although a framework needs to have some design rules in order to introduce coherence. As I have suggested above, the challenge is to decide which features should remain tight, and which features should not. For example, in Scotland the Higher Still reform emphasised a common assessment regime as a principle of integration, for cultural and pedagogical reasons; but when this regime was tacitly relaxed, I do not think that this severely undermined the objectives of integration. I do not know which aspects of the South African National Qualifications Framework, if any, should be relaxed (perhaps the Colloquium will accept this challenge), except to say that this will depend on the objectives of integration. It will also depend on which barriers are judged most important, as my next suggestion illustrates.

**Exploit the integrative possibilities of unitisation.** South Africa is now committed to a unit-based framework (DoE and DoL, 2003), but it seems to be following a top-down approach which starts with whole qualifications. An alternative approach would start with a national bank of units. These could be of different sizes and types (discipline-based, work-based, etc) with different design rules for each type. Most qualifications would comprise more than one type of unit, and the same units could be used for different qualifications and for
qualifications in different 'pathways'. This approach would promote the curricular and longitudinal objectives of integration, and it would address the main epistemological issues. However it would still face institutional and political barriers. It would require a more centralised approach to the development and regulation of units because units would no longer 'belong' to particular pathways or sectors (except perhaps for programme-specific units of synthesis). It could also be seen to challenge the autonomy of universities and occupational interests. However a compromise between this approach and a top-down approach might be achievable.

**Progress in stages.** The literature on National Qualifications Frameworks emphasises the long time required for their development and implementation. They need to be based on communities of trust and organic relationships which can only be built up over time (Granville, 2003, OECD, 2004, Young, 2005). The frameworks which are considered to be most successful have developed incrementally, but there are different ways in which this can happen. One way is to start with sub-frameworks: for example, the SCQF is effectively a confederation of sub-frameworks (including the one introduced by Higher Still) whose development can be traced back at least to 1983. Another way is to expand the functions of a framework in stages. The SCQF may again be an example. Its main impact so far has been internal to institutions, for example as a tool for curriculum re-structuring; external functions such as credit transfer may follow. Either way, it is important to be aware of the longer-term goals of the framework as well as its short-term objectives. If an integrated framework can only be achieved by first creating sub-frameworks, we must ensure that these sub-frameworks do not merely preserve the separation of their respective types of learning.

**Coordinate with other policies.** A further impression of the South African National Qualifications Framework is that it is not only more ambitious than other frameworks, it is also less supported by complementary policy measures. Such measures - termed 'policy breadth' in some of the literature - would take some of the strain off the National Qualifications Framework. Especially if the main barriers - or the barriers that are most easily removed - are perceived to be institutional, then institutional reform, staff training and development, funding and regulation structures, measures to influence the processes of educational and occupational recruitment, may all help to promote the objectives of integration. And if the NQF is no longer the sole policy instrument for integration, it may be
easier to make it a looser framework without compromising the objectives of integration.

Concluding comment
I return to my initial paradox: how can a qualifications framework be transformative if it has to be embedded in current practices and understandings? There is no simple answer, but my paper has pointed to two rather different types of challenges, and we must meet both of them to have a chance of success. The first is technical: to design the framework in the way which best meets the objectives of integration. This means devising appropriate design rules, finding the best balance of tightness and looseness, drawing up appropriate level descriptors, determining the role of sub-frameworks, deciding on the status of units compared with whole qualifications, and so on. The second challenge is more difficult. It is to define the goals of integration and relate these to wider economic, social and political transformations; to identify and overcome the barriers to progress; to plan the evolution of the qualifications framework, and of the wider education and training system, over a sequence of stages; and to manage and steer this evolution. In other words, the second and harder challenge is to envision, motivate and manage change.
References


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Notes
“Optimism of the will, pessimism of the intellect”: Building communities of trust in South Africa

Shirley Walters

Introduction
Apartheid was a political and economic system actively promoting distrust and, not surprisingly, has therefore left a legacy of a culture of distrust.

The questions I wish to pose today are, with this kind of legacy, is it possible to build communities of trust, particularly with reference to the communities of trust needed to create the possibility of lifelong learning? And if so, what will it take? What happens if this is not the case? Can a 'learning region' only operate in relatively homogeneous, developed economies? Is lifelong learning only for the rich?

I am going to pose this question concretely by looking at it through the lens of an illustrative case study. This is the Western Cape’s vision of building a learning region in the province, which they call the Learning Cape.

However, before attending to this case study, it is necessary to examine firstly, the theoretical framework surrounding the concept of learning regions, and secondly, the nature of social capital in South Africa, focusing on communities of trust at local level.

A learning region and its characteristics
There is no single understanding of a 'learning region', as the notion is imbedded within different understandings of economic and social development. These in turn refer to various theories of democracy and citizenship. At the one end, a neo-liberal view could encourage an extreme form of competitive individualism within a limited state; at the other end, there could be emphasis on social solidarity with an interventionist and developmental state.

Through its being imbedded in these various notions of democracy and citizenship, the concept of a 'learning region' focuses attention on the...
interconnectedness and interdependence of the local and the global arenas. While a learning region may appear to be a local phenomenon, it encourages us to think of the world as a single space - not one necessarily mapped territorially according to national borders.

There do seem to be certain essential characteristics of a learning region identified in the literature and which are shown briefly here. These include: a world-class education and training system at all levels, with high participation rates; high levels of collaboration, networking, and clustering within and across economic and knowledge sectors, especially around areas of innovation; world-class systems for the collection, analysis, management, and dissemination of information; a constant challenging of traditional knowledge categories to suit rapidly changing social and economic realities; the provision of frequently updated, easily accessible information and counselling services to enable citizens to maximise their learning opportunities; a high value being placed on formal, non-formal, and informal learning throughout life, expressed in tangible improvements in learners’ employment and community situations; and learning support for high levels of social cohesion (across social class, ethnicity, gender, ability, geography, and age) within a society of limited social polarities.

There is an assumption that countries will not be able to move to competitive knowledge economies if there is not sufficient social cohesion. I will further examine this assumption in the case study of the Learning Cape.

**Key concept: social capital**

From the global to the local, from the World Bank to community-based organisations, social capital has emerged as a new language of value. In simple terms, social capital can be defined as social networks, informed by trust, that enable people to participate in reciprocal exchanges, mutual support, and collective action to achieve shared goals. As an increasingly popular indicator of social cohesion, social capital has featured in a burgeoning social science literature as the key to democracy and development.

All definitions of a learning region emphasise the importance of social capital but may mean different things by it. For example, some may highlight the importance of social capital within a neo-liberal framework. In a scenario such as this, people are urged to volunteer, and to take on more and more community work while the
government reduces its public spending in the social sector. In other words, this represents one aspect of a new type of social contract in the 'risk society', where individuals are being told to invest in education throughout their lives. If they fall by the wayside, it is their own fault.

Others, who support a participatory democratic view of development, would urge the strengthening of social capital in communities, families, and workplaces, to build capacity amongst the citizenry broadly, and to engage in governance at all levels in the society. This view of social capital, as will be shown in the case study, is perhaps of particular relevance for new, middle-income democracies.

Most of the countries developing the concept of learning regions are high-income countries. However, in middle-income countries, like Brazil, India, and South Africa, the challenge is to interpret and develop the notion in contexts of widespread poverty and social polarisation. Some regions may emphasise high-end research for economic development only. Others may also highlight the importance of social justice and equity as integral to economic success.

Key words that constantly recur in the literature of social capital are 'trust', 'community', 'partnerships', and 'networks'. A small example of a social system based on trust that facilitates effective economic transactions is the revolving credit savings clubs in poor communities.

Social capital is a particularly important concept for the development of the learning region, as the argument is that trusting relationships are good for social cohesion and for economic success. So a learning society is dependent on partnerships and collaborations of multiple kinds, both for economic development and greater social cohesion.

**Key concept: trust**

In general terms, we need to recognise that support for new democracies is more volatile than support for established ones. Most citizens of a new regime have been socialised into a different order. A new political order will build trust on high hopes, but increasingly the people may also start assessing government on actual performance. The question of how to assess social capital and trust becomes more pressing once the initial novelty of the new democratic order begins to wane.
A burgeoning body of literature on trust has pointed to a lack of social capital and limited associational life as key determinants in the growth and depth of democracy. Looking at the extent of civic engagement in the polity of local government (conventionally portrayed as the foundation stone of democracy and as the first line of service to local communities) becomes therefore very important. The advancement of local government is seen as a counterweight to the hegemony of a rigid and autocratic central state. Good local government has increasingly been associated with principles of liberal democracy. In addition, adherence to liberal democratic principles has increasingly been included in the conditionality of international aid to developing states.

A culture of trust possesses a number of attributes that promote the well-being of a nation. In a trusting society, the development of trust, sociability, and associational life are encouraged and supported. The presence of this culture of trust, moreover, lowers transactional costs, as the need to monitor the behaviour of others decreases and the enforcement of claims and obligations is reduced, thus increasing spontaneity and openness. The absence of a culture of trust, in contrast, hampers the functioning of society. It does so in the first instance by constricting human agency and by inducing routines and conformist conduct, which can degenerate into passivism. A culture of distrust erodes social capital, leading to social atomisation and isolation and the decay of interpersonal networks. At the same time, it gives rise to a social climate of hostility, defensiveness, prejudice, and even xenophobia.

In the next section I will turn to the South African case, and focus particularly on the crucial dimension of trust within local government with reference to the concept of social capital.

**The South African case**

South Africa is an especially stark example of deep social and economic divisions, where sophistication and simplicity, wealth and poverty live side by side.

The first democratic government of South Africa in 1994 enacted a Constitution that has embraced the ideal of social cohesion. It has enacted a constitutional framework with its constitutional patriotism and its imagining of a unitary citizenry - it starts with the invocation, “We the people of South Africa”. Implicit in the
Constitution is the presumption of a homogeneous citizenry, sharing common understandings of the form and function of democracy in the country and the necessary obligations of citizenship. Based on a political ideal, the constitution not only prescribes a common South African citizenship and asserts that all citizens are equally entitled to the rights, privileges, and benefits of citizenship, but also maintains that they are equally subject to the duties and responsibilities of citizenship.

This constitutional framework was developed for a country that has just emerged from over three hundred years of colonialism and nearly fifty years of legalised racism and discrimination in terms of gender, race, class, and religion against 80% of its population. This apartheid system was a political and economic system that actively promoted distrust.

South Africa re-entered the global economy in 1994 after a sustained period of exclusion. At the same time, the new government expressed its inevitable commitment (given South Africa's history) to equity and redress in a Reconstruction and Development Programme. Since then, the central debate has been around the nature of South Africa's insertion into the global economy, with some advocating a high-end ICT focus, and others seeking more directly to channel the forces of globalisation for the elimination of poverty. These are the differences, which run through from the neo-liberal, to the social democratic, to the socialist views of development. These different views inevitably also play out in the different understandings of a learning region.

**Social capital and trust in the South African case**

The ending of apartheid rule in South Africa in 1994 brought with it the hope that, not only would civil rights be restored to the majority of the population, but that significant gains would be brought to the welfare of those people hitherto disadvantaged by apartheid. This hope was underscored by the fact that the new Constitution adopted in 1996 had all the hallmarks of a modern liberal democratic state, which promised a free and open society. Not only did it set in place the formal institutions of democracy, but it entrenched in the Bill of Rights a set of welfare entitlements to housing, health, education, and so forth.

In the years succeeding the transition to democracy, the state has been restructured to reflect a more developmental orientation, and a plethora of
policies have been formulated to promote greater social equity (including the SAQA Act of 1995). Parliament demarcated nine new provinces, with the provincial governments having certain powers over the distribution of resources in health, welfare, education, transport, and economic development. The third tier of government, at the local level, was seen as key to taking governance to the people.

Despite the fact that South Africa has a laudable democratic infrastructure, it is widely recognised that a culture of democratic governance has yet to take root in the country. Equally problematic is the fact that the new democracy, in some instances, does not appear to be providing an adequate voice to the poor, nor is it adequately meeting their need for improved welfare. During the passage of the past eleven years, despite some important gains in the delivery of basic services to the poor, the predicament of the poorer segment of society has not improved significantly and the gap between rich and poor has remained constant, although the racial composition of the 'rich' has shifted somewhat.

This state of affairs highlights the distinction between democratic institutions and democratic politics. A culture of democracy, it is held, can be achieved provided an appropriate balance develops between the state and civil society. In the context of South Africa, the impact of the apartheid state, mass dislocation, migrant labour, unemployment of between 30 and 40%, and rapid urbanisation, have seriously undermined traditional norms, values, and practices.

Social capital and trust at local level
Unlike many other countries in sub-Saharan Africa, post-apartheid SA has moved beyond political rhetoric in its efforts to decentralise administrative responsibilities to local level. In a marked departure from post-colonial norms, local government’s status has been elevated significantly. It is a distinct sphere of government, the foundation stone of democracy, and the first line of service to local communities.

The social milieu into which local government was introduced was a major challenge. For 40-50% of the population, who had lived in ethnic homelands, life under a system of local government was entirely new. There was no social or institutional memory to draw on. In many small rural towns, newly elected councillors had to compete with the residue of previous power systems, namely
the civic associations and the traditional leadership structures, both of which asserted their right to represent the interests of the people. For the bulk of black urban population, who had lived under the discredited Black Local Authorities, the advent of legitimate local government, with a degree of real autonomy and with the promise of resources, was an equally novel experience.

To communities with low levels of trust and who have been conditioned to resist municipal rule and support rent and service boycotts, the transition has not been easy. This is even more so because the liberal democratic system prescribed by the Constitution assumes that a particular social framework is in place:

1. that there is a sizeable rent-paying community in existence, and that these citizens contribute to the financial autonomy of the municipality;
2. that the citizenry participate in the electoral process; and that individuals elected to public office have a popular mandate; and
3. Perhaps most importantly, that there is a well-established tradition of associational life which supports a vibrant civil society.

The lack of social capital and trust at the local level manifests itself in low municipal polls. (With local government elections coming up and with the extensive encouragement to get everyone to register, the authorities clearly want to change this.) Under these circumstances, many of the councillors assuming office do so without broad popular mandate; they are free from constant scrutiny and hence not accountable for their actions; there is the development of corruption and clientelism; politicians interfere in the administrative processes, which perpetuates the problems; and there is little faith in the system, which further constrains development of social capital.

At the same time as local government structures are being established, civil society structures are undergoing change. During resistance to apartheid, there were dense networks of community organisations that formed part of the social movements of the day. Since 1994, these have changed significantly with many becoming dormant or closing.

However, in the last number of years, new organisations and social movements have been forming in response to the contemporary issues relating to poverty, housing, violence, or HIV/Aids.
In a local community, social capital is accumulated in and through social networks, informed by trust, sympathy, and mutual obligation, all of which enable people to act together in advancing common interests. Several local community organisations have recognised that their interests are not only 'local', but are impacted by global forces. They have intentionally connected with other organisations globally, for example, the Homeless People’s Federation, or the anti-globalisation lobby, or the HIV/AIDS movement. Therefore, some South African communities are building social capital at the intersection of local interests, national policies, and global forces.

It is in this paradoxical context of hope and optimism, on the one hand, and mistrust on the other, that the seeds of a learning province were sown. I turn now to describe briefly the Learning Cape.

**The Learning Cape**
The Western Cape is the second wealthiest province in South Africa. It has a population of about 4.5 million. On the one hand, certain parts of the economy are fairly buoyant, like tourism, services for film, media, and IT, and the fruit and wine industry. On the other hand, 67% of people live below the poverty line, there is 24% unemployment, 30% of adults are 'illiterate', 78% of pre-schoolers do not have access to early childhood development opportunities, and the number of tuberculosis and HIV/AIDS infected people is increasing rapidly. The disparities between rich and poor are among the most extreme in the world.

In 2001 the Provincial Government, after lengthy consultative processes, adopted an economic development White Paper (PAWC 2001) that argued for an intimate relationship between economic development and learning within a learning region framework, coining the term Learning Cape, as one of four key pillars for economic and social development. The White Paper set out to address the 'twin challenges of increasing competitiveness and alleviating poverty in the global knowledge economy of the 21st century'. Whilst the use of the Learning Cape framework is not yet fully entrenched as a foundation of government policy, the Learning Cape concept and the preliminary moves being made to develop it in a systematic way represent the most explicit and determined example of serious engagement with the notion of a learning society in South Africa. I will give one illustrative example of a strategy that is engaging civil society, government,
labour, and business in promoting the Learning Cape concept - the month long Learning Cape Festival that has been running for the last four years.

The Learning Cape Festival
In October 2001, a proposal was made to the provincial Department of Economic Development (DED) that an annual Learning Cape Festival (LCF) could contribute to the development of the concept and strategy of the Learning Cape. DED canvassed the proposal amongst higher education, civil society, trade unions, business, local government, libraries, and the Department of Education. A Steering Committee made up of a range of social partners was set up to run it. By starting the month-long festival on National Women's Day, 9 August, and ending it on International Literacy Day, 8 September, it was hoped to entrench issues relating to the most marginalised citizens as part of the festival.

Since then there have been four, month-long, festivals. I will not attempt to do justice here to the depth, breadth, and texture of the month's 500 or more activities, but will rather discuss some pockets of intense engagement that illustrate how the Festivals have promoted various forms of learning, advocacy, networking, and partnership-building within and across sectors.

For example, two community workers in a poor, working-class, gang-dominated township used the Festival as a way of promoting its sustainable community projects. The Festival provided a rare, conflict-free space, because, as they said, 'everyone could agree on the importance of building a lifelong learning culture'. It linked programmes related to adult literacy, early childhood development, health, science (in partnership with higher education), small business skills development, sports and recreation, and second chance learning, with personal (individual) and community (collective) development, as well as promoting local citizen actions to the broader Cape Town community. Presently in the same community there is a campaign with the slogan: “Proudly Manenberg - a place of learning not of crime”.

Another example is the pioneering collaborative events amongst the four Higher Education Institutions (HEIs), which don't have a history of working together, which has led to a standing committee being set up to promote the relationships between higher education and the province.
The LCF was also influential in the establishment by the provincial Departments of Economic Affairs and Education of a process that produced a Human Resource Development Strategy (HRDS) for the province. This has stressed the significance of linkages and partnerships within a learning province framework.

**Lessons from the Learning Cape Festival**

In summary, the LCF has helped to move ideas of lifelong learning beyond rhetoric to implementation. It has profiled lifelong learning that is concerned with economic development and social equity and redress. This has been possible because of the particular socio-economic imperatives in the area, and also because of the composition of the Steering Committee, which has had fairly strong civil society and government representation. A new stage has now been reached, with the establishment of an independent non-profit company that brings together the four social partners, business, government, labour and civil society, plus higher education, the SETAs, and the LCF, and which will promote and advocate the Learning Cape.

The LCF has highlighted, in important ways, that to work out of silos takes practice. It requires people who can facilitate the processes that key into important issues for the different sectors. It takes long-term vision and sustained commitment to working together. It requires ongoing advocacy to motivate and to mobilise resources to support the activities. These have captured the imagination of many people and have given hope that creating a learning region may be possible. It is seen to have enormous potential to be a vehicle for institutions and individuals to learn to behave differently. Trust has been built amongst a diverse set of practitioners and institutions. It is, however, very fragile, and requires constant vigilance in order to ensure that one sector, institution, or individual does not dominate and so render others passive.

**“Optimism of the will, pessimism of the intellect”**

In a context where the levels of historical and structural distrust nationally are so deep, what point is there to aspiring to build a learning region, which has high levels of social capital and trust as prerequisites? What purpose is there in a world in which there are contradictory impulses and pressures, which on one hand promote ideas of social cohesion as integral to economic development; and on the other, a kind of ‘casino capitalism' often dominates, which encourages
extreme forms of competition and individualisation, with distrust amongst people, institutions and regions as the result?

The answers to these questions cannot be given at a local level alone but have to take into account the interconnectedness and interdependence of all of us. At the various levels of governance, it is important to recognise that a democratic constitution and democratic institutional structures do not guarantee democratic practices. Institution building takes time and members of new organisations have to learn to trust one another and gradually establish common rules and routines. Processes of trust-building are critical to building democracy and they take place over extended periods.

Truth-telling, justice, solidarity, and equality have to become imbedded in the ways of life of people, most of whom have only known injustice and inequality, in order to secure the development of institutional trustworthiness. While there are many examples that highlight the limited levels of social capital and trust in South Africa, there are signs that indicate that focused, sustained, and honest interventions can turn distrust to trust. The LCF is one amongst several examples where this is happening. The idea of the 'learning region' can therefore be used developmentally to build democratic practices within and amongst institutions.

One of the values of thinking about development within a geographical entity such as a learning province is that it is spatially contained. It enables politicians and citizens to grapple with socio-economic issues at a local level. While the local environment can only be fully understood within an analysis of the bigger national and global pictures, focusing on the local is easier to manage conceptually for most people. It is also physically possible to interact with people and institutions to build new relationships of trust.

Notions of development within the learning region that argue for 'joined up' approaches by government, civil society, labour, and business make it possible to recognise that development is not a linear process but must be enacted in more holistic ways. What may be seen on one hand as disparate development initiatives can be conceptualised on the other as related pieces in the development jigsaw puzzle. A key example of how a learning region enables new conversations and approaches to development is in relation to lifelong learning. This is an abstract notion barely understood by many politicians and
development practitioners, but through the learning region discourse, lifelong learning gains some meaning within the socio-economic development debates.

**Conclusion**

In this paper, I have suggested that the notion of a learning region, within a context where social capital and trust is often in short supply, can have a developmental purpose. It can provide a framework for a capable agency to strengthen democratic citizenship and so contribute to the enhancement of social capital and trust. There does seem to be evidence that development does not just depend on the stocks of social capital, but also on the agency of community leaders in drawing upon those resources to realise development goals.

In answer to the questions that I posed at the beginning of this paper, it seems that lifelong learning is not necessarily only for the rich. The conclusion that can be drawn from the example of the Learning Cape is that setting up a framework for a learning region can enhance and develop precisely that social capital and institutional trust required.

Research into social capital and trust within a developmental framework are only just beginning in South Africa, but they clearly challenge us to think deeply on what holds us together as a collective and what pushes us apart. While we're not in a position to answer these questions, just the process of asking them promotes serious reflections on democracy, citizenship, and development, which connect individuals and communities both locally and globally.

My argument therefore is that building communities of trust at whatever level in South Africa needs to take very seriously the legacies of distrust with which we live. The processes need also to be located as part of the bigger development jigsaw puzzle that connects us locally, regionally and globally.
Recognising learning and its outcomes

Tom Schuller

It is an honour for me to give the SAQA lecture. I hope to share with you some insights from current work in the Education Directorate at OECD, but also from my previous work in several UK universities, working in and on the education of adults.

I want to address the topic of the lecture from three angles. First, I want to place the lecture in the context of international comparative work on education. It is very easy to say that we all need to learn from each other. But why do we do this kind of work, whether we work as I do in an intergovernmental organisation whose specific function this is, or as many others do in a different role, for instance as a university researcher? Are there any dangers or disadvantages? What could we as providers of comparative analysis do more (or less) of, and what do those who use our work expect from it? These are genuine questions to you as an audience, as well as to myself.

Secondly, I want to locate the debate on qualifications within the context of lifelong learning. I have been fascinated to learn something - a very little so far - of the political nature of the debate on qualifications within South Africa. The issue of qualifications, and more generally the accrediting of skills, knowledge and competences, is of growing importance across OECD countries. Given SAQA’s role you would expect me to say that, but I believe it to be true. The question for me is whether the qualifications issue is treated as a more or less technical one, or whether its wider implications are brought into the frame. You will gather that in my view they cannot be ignored.

Thirdly, and following very closely from this second point, I want to argue that the debate on qualifications needs to tackle the relationship between education and broad outcomes which are not usually measured in the actual certification process. This includes educational goals that are often honoured more in rhetoric than reality. I am talking especially about values and behaviour to do with social

25 This paper was presented at the SAQA’s Fourth Annual Chairperson’s Lecture held that took place on 15 March 2006. The paper was first published in the SAQA Bulletin Vol. 9(1).
and personal well-being. I shall offer a framework for thinking about those issues, though I have no simple means of dealing with them.

The title of my lecture is deliberately a little ambiguous. In talking about 'recognition' I am not referring only to the kinds of recognition that are entailed in the award of qualifications. I mean firstly to raise the question of what we - collectively or individually - actually see as learning; and secondly how we value it. By valuing I mean not only giving it some kind of official recognition in the shape of certificates or credit points, but a much more fundamental sense of acknowledging that education has outcomes that shape the health of our societies, both literally (i.e. the physical and mental health of their citizens) and metaphorically in the sense of the levels of civic engagement and participation.

Why do we do comparative analysis, and what might you expect to learn from it? You will have your own answers to this. I speak here (and incidentally I speak in a personal capacity) from the OECD perspective, but of course there are many others. I happen to believe that South Africa has both much to gain from closer dialogue with a body such as OECD, and much to offer the other OECD Member countries. But in posing the question about the value and functions of international research, I am implicitly holding up a mirror to those of us who spend our time doing this kind of work, and asking what is that we should, and should not, be doing. Before setting out a possible response let me briefly describe the work of the OECD on education. It is often unnecessarily portrayed as rather shadowy and mystique-shrouded, and even a simple account of its organisation may be useful context.

The Directorate for Education was created as a separate directorate in 2002. Education was previously part of a joint directorate with Labour and Social Affairs, but education was considered sufficiently significant to warrant a discrete directorate (one of nine within OECD). The principal units within the Directorate are the Education and Training Policy division (ETP), which deals mainly with national and thematic reviews; the Indicators and Analysis division, including the famous Programme for International Student Assessment, which is arguably OECD's highest profile activity; IMHE (Institutional Management in Higher Education); PEB (Programme on Educational Building); a programme building links with non-member countries such as China and Brazil; and CERI, the Centre for Educational Research and Innovation, for which I am responsible.
The substantive components of CERI's title - 'research' and 'innovation' - have meaning within the OECD context. That is, CERI is concerned with original knowledge accumulation of different kinds, and pursues lines of investigation that are not wholly predetermined; and it is oriented towards innovation in the sense of identifying and analysing new trends and issues in education. The research may be primary, in the sense of commissioning or executing work involve new data gathering, or secondary and synthetic, bringing together results from existing research in member countries. In both cases, however, one of CERI's key characteristics is the aim of developing new tools, frameworks and indicators for the gathering and analysis of data, both quantitative and qualitative. There is an agenda-setting as well as a reporting role, and this extends to the setting of research as well as policy agendas.

Against that background, I offer the following as a list of the kinds of activity we engage in executing international policy analysis and research:

- Generating tables/rankings comparing the performances of individual countries or jurisdictions
- Constructing benchmarks, and helping countries apply these benchmarks
- Identifying and disseminating examples of good practice
- Developing and clarifying concepts which might be helpful in identifying and analysing issues
- Analysing trends, issues and innovations
- Evaluating policy impact (as distinct from programme impact)
- Setting an agenda, for research or policy-making.

These functions commonly overlap with each other and interact, in ways which are sometimes obvious and sometimes not. It is a contestable list, but assuming for the moment that they are accepted as valid functions, the application in each case is also potentially contentious. Anyone who is concerned about how knowledge is defined, generated and applied can select each of these functions and examine it in that context. The more they are scrutinised, individually and as a list, the better. It is important that each country, or research community, interprets these functions transparently and rigorously.

These functions all have their place in helping our understanding of the way education systems work, and how they might work better. They can also be misused. For example, league tables have a head start on the others because
they are by far the most likely to attract media attention and, at least partly for that reason, to exercise political influence. Tables and rankings certainly have their place, as one means of getting a fix on performance and (more importantly in my view) of prompting internal debate on what the record is - and therefore of doing something sensible to improve it. But they can equally turn into totem poles around which rather weird and unattractive dances are performed.

There is no one best form or mode of international comparison, and the same is broadly true for internal analysis within individual countries. My belief is that the value of our work depends very heavily on the attitudes, processes and mechanisms that exist nationally, or even locally. That is, if a country is self-confident enough to engage in democratic debate and honest enough to place proper information in the public domain, then comparison is likely to be highly beneficial. This does not mean it provides ready-made solutions, but (to mix a rather alarming metaphor) it will fertilise and illuminate the debate. I have no more time to go into this question, but I hope at least that the list above may help clarification of the benefits of comparison.

Having set this background let me turn directly to the qualifications issue, and its location in the context of lifelong learning. I propose to do this first by discussing some wider issues to do with the place of certification and authority in a knowledge society; and then more concretely by describing a major project on the recognition of non-formal and informal learning currently under way within the OECD, directed by my colleague Patrick Werquin.

**Qualifications in knowledge societies**

Part of the usual and very familiar rationale for lifelong learning is that we live in a world of incredibly rapid transmission of facts and ideas, and of changing demand for skills and competences. Rather less familiar but very much part of the same rationale is a more critical sense that this increased circulation of knowledge also includes factoids, doubtful judgements and sheer misinformation, which can spread equally rapidly. Much of this is circulated on the web, and is not subject to any authentication process - which is as it should be in open societies. But I suggest that we need to think quite hard about how and by whom knowledge and, consequently, the skills need to handle knowledge, are authenticated and endorsed. The implications of this are political in the widest sense. That is to say, they involve questions about knowledge, authority and the nature of truth -
political epistemology, if you like - as well as educational politics to do with the structure of our institutions and curricula. The links between the qualifications debate and these broader political issues should be obvious.

Figure 1: The knowledge society

I suggest a simple 3-dimensional diagram as a way of thinking about the knowledge society. The first dimension refers to the accumulation of information and skills. Taken on its own this represents the simplest, even crudest, interpretation of the knowledge society: a place where amassing information or skills in large volumes is what matters. Under this interpretation, in comparative analysis what counts is how many school or college graduates a system produces, how big the R&D expenditure is, how many patents are produced and so on. Such data may be useful, but we need more than this. The second axis refers to the distribution of access to knowledge. This refers to the extent to which different social groups have access to this growing mountain of information and to skills acquisition. It matters a great deal how broad this distribution is, and what shape it has. I am not saying there is any perfect distribution. But the rhetoric of the knowledge society sometimes disguises situations where low skills predominate, and where amongst large parts of the population there is not a lot of learning going on, either at work or outside. The 'long tail' of people with no or few qualifications is something which arguably disqualifies some societies from claiming to be a knowledge society, however high their graduate output or cutting edge their research.
It is the third axis that interests me most in the context of today's topic. It concerns the need we all have - as individuals and as members of systems - for trustworthy systems of validating knowledge. I deliberately use the work 'trustworthy' because it incorporates one of the key terms in the social capital debate, which has long interested me, and this third axis deals significantly with social capital. How are we to sort and sift good information from bad? How do we go about building up critical competences, so that our citizens have the capacity to scrutinise the sources of their information, and to distinguish reliable from dubious? Social capital refers to the networks, norms and values that help us to attain goals, individually and collectively (Baron et al 2000; Halpern 2005). Here the application is to the validation of knowledge. Sometimes we rely on informal networks, of friends or colleagues, to help us with the task of sifting. For the most part this is done without any reference to the process of certification or qualifications. Trust is essential here: we rely on these network members to give us honest and, in the case of colleagues, professionally grounded judgements on the quality of the information. This informal process is, overall, both the most efficient and the most agreeable way of sifting reliable knowledge from the rest.

But qualifications also have a role here as part of the validation process, and an important one. A trustworthy, sound and effective system of qualifications is an essential component of the knowledge society because of the part it has to play in verifying knowledge and skills in a public and articulated way. Where there is such an intensively competitive market in knowledge and skills, the reliability and independence of publicly authorised qualifications at all levels has a crucial role.

It is therefore significant that a recent CEDEFOP study introduces the notion of a 'zone of mutual trust '(ZMT) to further understanding of public policy on access and progression within agreed qualification frameworks. ZMTs refer to "agreements between individuals, enterprises and other organisations concerning the delivery, recognition and evaluation of vocational learning outcomes" (CEDEFOP 2005 p12, though I see no reason why they should be restricted to vocational outcomes). The model proposed gives trust a central place in developing effective linkages between qualifications frameworks, contextual conditions such as labour markets, and the levels of mutual understanding that exist between the different stakeholders within this system. The mechanisms for ZMTs include direct formal ones such as legislation or
national accreditation agreements; indirect formal ones such as credit structures; and informal ones such as guidance processes and local validation systems.

In short, knowledge societies, however we define them, demand not only the capacity to access and handle information but the ability to evaluate it critically. For this to happen we need both networks of professional and personal contacts and trustworthy systems of assessment and qualification. The relationship between these two elements is a fascinating one, which I suggest should be looked at more closely.

**Recognition**

Let me now say something about qualifications frameworks and their relationship to learning, especially non-formal and informal learning. This is something in which OECD has taken a good deal of interest over the past years, again as part of its commitment to a strategy of lifelong learning (OECD 1996). How successful we have been in promoting lifelong learning, understood as the efficient and equitable distribution of learning opportunities over the life course, is another matter. It would require a long and politically quite sensitive analysis, which would take me too far from today’s topic.

There are a number of broad headings under which we could consider the question of qualifications systems: economically, do they work effectively to give due recognition to learning where it occurs, and promote the fair and efficient allocation of human capital; socially, do they give equitable recognition and acknowledgement to learning of different kinds; educationally do they mesh with the curriculum and pedagogy to make a coherent package; and psychologically do they empower learners and encourage their steps to greater participation?

All these are important questions, which apply to qualification systems generally. We could even use them to give some kind of ranking to different systems. The current OECD work develops these with specific reference to non-formal and informal learning.

Why is this issue important? This audience hardly needs me to make the case. I make only two points. First, there is more and more evidence that informal modes of learning are often those that attract people who have been relatively unsuccessful previously in education. At least, they are more likely to be
attractive than courses which are strictly formal, and which have traditional modes of testing. Some of the evidence is quite contested, but the overall case is strong (Livingstone 2005, Unwin et al 2005). So there are strong arguments to do with both equity and efficiency. Secondly, at a policy level there is a built-in drive or need to measure what is happening. I must stress that this is very far from saying that everything should be measured, and from saying that all measurement is appropriate. We could spend a long time on horror stories of inappropriate forms of measurement, both in education itself and of educational policy. The point is rather that if we believe that informal learning is important we need some systematic evidence to back this up.

The OECD framework focuses strongly on the institutional and technical arrangements governing the recognition of learning. First, there is a major descriptive job to be done in identifying existing arrangements. Doing this can itself be educational, since the arrangements turn out to be so complex or incoherent that the act of description is enough to bring out the case for change. There will be issues to do with the distribution of authority between different ministries, and how adequate the horizontal linkages are. There will be questions about the relationships between public authorities and industry, and how far responsibilities are shared. And then there is a series of questions to do with how formally these different responsibilities are defined.

Turning to the links to the qualifications framework itself, there is a cluster of questions to do with what types of qualification are more closely linked than others to the recognition of non-formal/informal learning; or what problems are encountered in developing such links, e.g. resistance from HE institutions or from employers. And there are questions to do with the forms of assessment employed: how are these carried out and by whom? Assessment, incidentally, is becoming more and more significant, especially in the respective roles of formative and summative assessment (CERI/OECD 2005). In a world where testing and qualifications become more and more dominant, the need for pedagogically suitable forms of assessment becomes particularly acute. This applies both in schools and colleges, and in respect of rather different groups such as adults with low basic skills, which is the theme of a current study (www.oecd.org/edu/whatworks).

The above outline on recognition of learning is very much work still in progress. A
South African perspective would I'm sure be very welcome to my OECD colleagues.

I move on now from the benefits of recognising learning to recognising the benefits of learning. The main thrust of my argument is that there is a constant struggle to have the wider outcomes of education acknowledged, in several senses of the term. I draw here on work carried out with my former colleagues at the Centre for Research on the Wider Benefits of Learning at the University of London (www.widerbenefits.net)\textsuperscript{26}, and which happily I have been able subsequently to take forward and integrate at international level into the CERI programme (www.oecd.org/edu/socialoutcomes).

'Recognition' of the wider benefits has several senses. Firstly, there is the political acknowledgement that education does indeed have wider goals than the efficient production of qualified people for the economy. These wider goals usually include at least some version of citizenship, and the reproduction of national or regional culture, however that is interpreted. It is not necessarily cynical to ask how far the recognition of these goals goes beyond general rhetoric. If politicians declare that they are committed to these goals, what are the actual policy initiatives that are put in place to achieve them? Secondly, though, there is the question of what mechanisms exist for assessing the success of schools and colleges, or of the system as a whole, in achieving these goals. This is a substantial political issue, which also brings with it extremely difficult technical or methodological questions. These questions fall broadly into two parts: how to assess whether or not individuals have acquired the skills, values and competences necessary to fulfil these goals; and secondly how we know what happens as a result. I am not going to deal here with the first of these, i.e. the issue of whether citizenship skills or other related outcomes should be assessed and certified, and if so how. I want instead to concentrate of the broader question of how we can go about recognising the impact of education on the wider goals.

Figure 2 is another simple one that I hope will help to illuminate the issue. It brings together three forms of 'capital'. I pass over definitional issues about whether it is

\textsuperscript{26} The WBL Centre was initially a joint venture between the Institute of Education and Birkbeck, both constituent parts of London University. It is now wholly part of the Institute.
legitimate to use the term capital in these senses. The key point is to show one approach that brings together the different forms of assets which education helps (or should help) us build up.

Figure 2: Three forms of capital

Human capital is very familiar, referring to knowledge, skills and qualifications, essentially as individual assets or attributes. We have already met social capital as comprising norms, networks and values, the essential focus being on the relationships that exist within and between these networks. Identity capital may be less familiar: it can be understood, very summarily, to refer to self-esteem, self-efficacy and a sense of purpose or direction in life (Côté and Levene 2002).

We have used this framework to analyse some of the benefits of learning, especially in relation to health, family relations and aspects of social and civic life (Schuller et al 2004). Here I want to make three points. The first is that it is the interaction of these different forms that is central to understanding the impact of education, for individuals and for society. Investing in human capital alone - i.e. in the accumulation of individuals' qualifications and competences - is far less likely to have results than if we understand its interaction with social capital - the norms and networks which foster access to education, and to the opportunities to make use of qualifications once they have been obtained. The same is true for the kinds
of personal self-esteem and self-efficacy which identity capital covers. Our education systems need to address all three points of the triangle. If we concentrate only on one form of capital, we are unlikely to get the best returns on our individual and collective investment in education. I use this economistic language deliberately - on the one hand to challenge us to think rigorously about what kinds of outcomes we expect but, more importantly, to take the debate on social outcomes into the terrain best understood by policy-makers.

The implications for qualification systems are considerable. What do qualifications do to bolster (or subvert) the elements that make up identity capital? And how do they fit with the use students make of networks, actually or potentially? These are difficult questions that may appear rather abstract, but they are not hypothetical creations. A system that sees the accumulation of human capital in isolation from these other elements is, I suggest, less likely to fulfil its function.

Secondly, though, a note of warning. The more I have been involved in thinking about these issues, the more I have become aware of the limitations of the tools and data we have at our disposal for understanding the actual outcomes of education in this broader sense. Tracing causal effects - the extent to which a given quantum of education leads to a particular outcome - is incredibly difficult. There are two rather contrasting dangers or temptations. One is to look for simple numbers, to give a sense of the returns on learning. For example, we can be asked to define by how many percentage points crime will go down or health levels go up if we invest more in education. This is a natural policy-maker's aspiration, and it is to be respected up to a point. But it can turn into an unreasonable request for precision about outcomes, when we are dealing with what everyone knows is a very complex set of interactions. The second temptation is to fall into a 'let's justify education' mode, looking only for quantitative or qualitative results which appear to tell us what a Good Thing education is, and how we should spend more on it. This is all very well, and can be necessary to maintain morale; but it does not necessarily help us to improve the service. I have to add, perhaps a little provocatively, that it sometimes stands in the way of the kinds of radical change which some of the professional providers say they aspire to.

Which takes me to my third and final point or, rather, final questions: what should
be the role of qualification systems in fostering these wider goals? What contributions do we think they make at present, positive or negative? On the negative side, for example, the effect of examination-taking on health is probably a fairly strong negative; and the increasing pressure on curriculum time may squeeze out the kinds of civic activity which students might otherwise have engaged in. But the positive aspects are naturally the ones that call for our attention. We know that there are strong positive associations between education levels, as measured by qualification, on the one hand, and such things as good health and high levels of civic engagement on the other. We can also see similar linkages between education and attitudinal outcomes such as tolerance and intercultural sensitivity. These are not unimportant by-products of education systems. Quite apart from their intrinsic value, they are arguably central to economic success, which can only be achieved within societies with reasonable levels of personal and social well-being.

Let me finish with a quote from a long way away: from Finland, at the other end of the world, and from a body that may seem equally distant to the concerns of many SAQA stakeholders, the Confederation of Finnish Industries. Their report on Education Intelligence is a hard-headed assessment of the competences required for success in today's internationally competitive world. These include technical, scientific, business and design competences, all 'hard' skills. But the concluding sentence runs: “The ability to share visions with others is also needed, as is an open-minded positive attitude towards new ideas and people.” (CFI 2005) This is 'bridging social capital', the collective capacity to communicate and build trusting relationships with people from diverse walks of life. Identifying what kinds of learning build this kind of competence, and then deciding how they should be recognised, is a challenge to all of us. I am sure that SAQA will play a significant part in meeting it.
References


Response to Dr Jim Gallacher's paper, “National qualifications frameworks: instruments of change or agents of change?”

Samuel BA Isaacs

National qualification frameworks are universal. Every country has one, even though they may not have formalised it by calling it a national qualification framework. Every country has a raft of laws, policies and practices regarding their education and training qualifications and learning systems. In the absence of a formally declared national qualifications framework, this raft of laws, policies and practices regarding a country’s education and training qualifications and learning systems conceptually constitutes one for it. The question then arises; “If this situation works, why formally constitute a national qualifications framework?”

All national qualification frameworks (nqfs) have arisen to address specific issues such as access, progression, mobility, articulation, integration, quality, development and redress. They all are attempting to address specific issues and resolve specific problems, and hence they all have change agendas. However the question whether they are instruments or agents of change, raises an interesting choice of metaphor, which I will not address here, but recognising the limitations of metaphors, I would argue that nqfs can be either or both. I base my reasoning on the following:

1. Nqfs arise out of their historical trajectory and therefore are formalised in ways acceptable to a specific context and country. They therefore get shaped as an instrument or an agent or both.

2. When a formalised nqf establishes a distinctive discourse with specific discoursal practices, it begins to have agency and therefore cannot be viewed as just an instrument. James Keevy (2006, p54) gives the following interpretation of power in the NQF discourse:

Power exists in the NQF discourse in that different NQF stakeholders continually and consistently exercise power - this power represses the voices of some stakeholders in order to make others more dominant.

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It is this mediation of power that is a manifestation of the NQF's agency.

3. Michael Fullan (1999) argues that for change to be successful we require moral purpose, good ideas and power:

“The interactive systems I described ... the deep meaning of collaboration to obtain substantial results - are precisely systems that gain their tremendous energy through the fusion of intellectual, political and spiritual purpose”.

If transformation policy is envisaged like this, they cannot be just instruments.

The second question that arises is, “Why do formalised nqfs not achieve as ambitiously as intended?” The simple answer is that they have to overcome the same obstacles and mediate the same vested interests faced by their predecessor non-formalised nqfs. However as Fullan (1999) points out, change happens when the “deep meaning of collaboration” is achieved. We therefore must evaluate nqfs in terms of how they are established for achieving systems that exhibit this “deep meaning of collaboration to obtain substantial results” and whether they “are precisely systems that gain their tremendous energy through the fusion of intellectual, political and spiritual purpose”.

A country's nqf in design, development and implementation, is in fact a barometer for the status of the various interactive systems that make up education and training infrastructure and learning systems of that country. It maps the relationships, the power and the vested interests of those systems as well as the policy intentions. It maps the social geography of the education and training qualifications' and learning systems' field. It is this mapping with its overt, hidden and opaque aspects that gives rise to considerations about what the mapping should describe and once described what strategies, tactics and advances can be used in the engagement between the stakeholders defined and affected by the specific nqf.

Dr Gallacher's paper provides a very useful reflection on the Scottish Credit and Qualifications Framework and the South African National Qualifications Framework (NQF). The different historical trajectories and social geographies
are clear as well as the similarities, in terms of social justice, economic development, lifelong learning and other local and global phenomena. He poses six questions for our consideration in reflecting on our NQF:

1. **Re-visiting the objectives**

During the NQF review process which started officially in 2001 (although pressure for it began in 1999) and which is still unresolved today in 2006, the one area that no stakeholder grouping objected to and in fact were in universal support were the NQF objectives (See Department of Education/Department of Labour, *Report of the Study Team on the Implementation of the National Qualifications Framework*, Pretoria April 2002; Department of Education/Department of Labour, *Consultative Document: An Interdependent National Qualifications Framework System*, Pretoria, July 2003). It was in the area of the structures both in standards setting initially and later in quality assurance that there were criticisms and alternate proposals. The fact that these have not been resolved by Government to date is indicative of the difficulty in mediating the relationships between various stakeholders and government agencies which find it increasingly difficult to demarcate their legitimate interests in an environment which is increasingly joining up, globalising and cross cutting in significant ways. In our context the issues of integration of education and training has become a very vexing one and yet all indications are that the “traditional distinctions between academic and vocational knowledge and learning are being eroded” (Gallacher 2006). The underlying problem is not so much the “erosion” or the “integration” but rather who is in charge and how this is managed. And this raises directly the question about structures.

Our NQF has the advantage of a set of objectives that are agreed and this can form the basis of a shared vision and mission. It can form the basis of a shared set of values that can inform our choices about structures and implementation for the achievement of that vision.

2. **Differing agendas embedded in lifelong learning policies.**
   **Who are the priority target groups?**

Our Government has set the national priority as poverty and unemployment
alleviation. There are numerous education and training initiatives (e.g. Our National Skills Development Strategy, our National Human Resource Development Strategy and Tirasano) that are underpinned and supported by the NQF. However, for the NQF to target priority groups it must have fully operational systems to be effective. Setting up the operational system is often confused with not being focused.

The targeting of priority groups is evident in our standards and qualifications for Adult Basic Education and Training, Early Childhood Development Practitioners, Community Development Workers, Health Caregivers, and expanded public works programmes. At the same time the issues of quality in education and training as well better assessment practices including the recognition of prior learning have been firmly highlighted in our society.

3. How can the change most effectively be introduced? Viewing nqfs as instruments or agents of change?

The introduction of change requires careful strategies, tactics and nuanced advances with stakeholders to negotiate the social geography mapped out by nqfs. Since our NQF has been shaped as an agent of change by its historical trajectory it has had to face the contestations that are inherent to our environment. I am not convinced that conceiving our NQF as an instrument of change would have prevented this. The SCQF examples of how they now need to consider new structures, have more ambitious objectives (yet realistic and achievable in a specified timescale), and need to develop a programme of work on SVQs and other vocational qualifications, especially in the field of work-based learning, are indicative of the issues that have to be addressed by nqfs. In our NQF we confronted these issues at inception and much work has been done. Which way is better? I am more convinced that our historical trajectories determine what is possible and we have to make our choices. Dietrich Bonhoeffer's words ring true: “What is success, what is failure? Time alone distinguishes”.
4. Consideration of structures which are in place to support this work with the wider range of bodies and organisations involved in education and training

The challenge is always to find the appropriate structures which enable effective progress to be made. An old organisational development adage is “form follows function”, but this has to be tempered by what is possible in a specific environment. Just as the SCQF is considering proposals around new structures, the NQF review process has proposed new structures for our NQF. The proposed structure changes for the SCQF is significant in that a new body (possibly like a SAQA?) is being envisaged. I would similarly argue that function, historical trajectory and the current environment will determine the kind of structures that are best suited to take nqfs forward.

5. Relationships with the wider education and training community hinges on the nature of the change which is being introduced

I agree with Dr Gallacher (2006) that “reflection on this process of change might create opportunities to develop a more evolutionary approach in which the development of consensus and communities of trust might have a more central place”. Central to the development and implementation of our NQF are three important overarching considerations: democratic participation, intellectual scrutiny and adequate resourcing. While there were always considerable opportunities for the development of consensus, the issues of communities of trust were not adequately addressed. In fact in 1995 many observers remarked that the NQF would not materialise and therefore did not have to be taken seriously. As our NQF took shape and started to effect the education and training system, the areas of contestation started to emerge in significant ways.

This resulted directly in the NQF review process which is still unresolved. More careful attention to building these communities of trust among stakeholders as well as building the shared values and purposes for advancing our NQF, must be given. This may well be the critical, necessary and sufficient condition for a successful nqf.
6. Wider international context: Traditional distinctions between academic and vocational knowledge and learning are being eroded

The wider international context is providing new ideas and innovations including new challenges. When traditional distinctions, like those between academic and vocational knowledge and learning, are being eroded they create new challenges and new opportunities. The development of nqfs around the world and particularly the development of the European Qualifications Framework means that our NQF cannot just be written off as failed policy as at least one South African researcher would have us believe. Rather our NQF must be regarded as a national work in progress to resolve the vexing education and training issues of a national integrated framework for learning achievements, access, quality, redress and development for South Africa. As we take intellectual scrutiny seriously we continue to make our NQF Road by walking and rolling reflectively, accountably and boldly (Isaacs, 2001). To this end the wider international context provides a very important sounding board.

Conclusion

Nqfs can be understood as instruments of change or agents of change or both. However our NQF can best be understood as having agency though the discourse and practices it has established. It is the nqf as discourse and discoursal practice that holds the greater opportunities for creating the interactive systems that make “the deep meaning of collaboration to obtain substantial results” possible, because “they gain their tremendous energy through the fusion of intellectual, political and spiritual purpose” (Fullan, 1999).
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The NQF as a socially inclusive and cohesive system: communities of practice and trust

Ben Parker and Ken Harley

“There is a great need to infuse the NQF with trust and mutual respect. We place emphasis on the importance of communities of trust in which providers and users of qualifications develop a common understanding. We consider that qualifications and standards on their own are but instruments to facilitate learning, and that curriculum and pedagogy and assessment form the cornerstones of the national learning system and must be given their due.” (Report of the Study Team on the Implementation of the National Qualifications Framework. Pretoria: DoE/DoL. April 2002 p. xi).

Introduction

A central analogy running through this paper configures constructing an NQF as comparable to building a democratic South Africa within a context characterised by inequalities and fractures that have their roots in both our apartheid past and our globalising present. The intertwining of democracy and education has its roots in the Enlightenment project where reason emerges as our primary instrument for social and personal development. To learn is to become a member of a community and constructing a nation requires an educational programme (however 'hidden' this curriculum may be) and central to both projects, in spite of the vast differences in scale, is an orientation towards reason and democracy.

Education and democracy are both dependent on the evolution of communities characterised by stable patterns of particular practices. Schools are 'rule-governed' (and when not rule governed become dysfunctional and non-educational) through explicit social orders and personal disciplines that create a strong sense of good and bad or right and wrong. Progressive societies, characterised by their commitment to improving well-being, are regulated by systems that strive to strengthen social cohesion and improve material and social conditions. Inevitably, characterising education and democracy as desirable 'public goods' towards which societies and individuals ought to strive is to indicate the value-laden nature of these projects.

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Discourses about social order and personal discipline are invariably value-laden in their attempts to grasp the affective and moral underpinnings that inform our explanations of social and personal development. Within education, values find their clearest expression in our conceptions of quality. High quality education is good education that does all the right things. The challenge comes in recognising and realising what is 'good', 'right' and 'high quality'.

The roles of values in a democracy and quality standards in an NQF face similar implementation challenges when moving from universal and generic values and standards to particular and specialised practices. How does one translate theory into practice, standards into programmes (curriculum, pedagogy and assessment) and constitutional values into ethical practices?

Communities of practice are examined against this background as democratic and educational 'relaying' agencies that interpret universal values and standards and translate or recontextualise them into specialised practices. The complexity and multiplicity of communities and the challenges facing any attempt to 'create' or develop communities of practice are explored briefly and the importance of language and communication, of purposive and deliberative reasoning and of decision-making legitimated by sufficient agreement, are posited as the necessary pre-requisites for the successful functioning of communities of practice as builders of a socially inclusive and cohesive NQF.

**Social inclusion, cohesion and trust**

Building a socially cohesive NQF grounded on 'trustful' communities of practice is not dissimilar a process to building a South African nation and collective identity - a South African community. Indeed, part of the *raison d'etre* of the NQF, expressed most clearly in the critical outcomes, is a vision of the ideal 'learned' South African with a strong commitment to the values of South Africa's Constitution. Whereas the development of many other NQFs, especially those in the developed world, has been accretive, administrative and technical in an attempt to 'co-ordinate' what already exists, South Africa's NQF has a strongly normative orientation; what is (apartheid education) must be transformed into what ought to be (democratic education) (Harley & Parker, 2006). The moral imperatives guiding this journey into the future come from our Constitutional values. These values, however, provide only abstract concepts that still have to be interpreted and put into practice - a process that can lead to differences,
disagreements, contradictions and conflict. To counter the fragmentation that may emerge from these disagreements, the Constitution provides for a Constitutional Court with supreme sovereignty to resolve conflicts between differing interpretations in accordance with an orientation provided by the values of our Constitution.

The uncertainties of translating abstract and generic juridical concepts into concrete and specific legal practices is similar to the process of translating generic educational standards into specific educational practices - the curriculum, pedagogy and assessment through which learning is structured into 'worthwhile' programmes. Constitutional values provide generic or universal benchmarks of a civilised society - human dignity, equality and freedom - to indicate the objectives, which ought to guide the development of South African society. However, they still need to be interpreted or translated into particular practices by the citizens and communities inhabiting South Africa. In an ideal cohesive and trustful society where there is strong agreement, the movement from universal to particular should be smooth and seamless. The universalising agreement, marked by our consent to the sovereignty of the Constitution, provides an overall framework of agreement within which contests between different interpretations or translations can be mediated peacefully.

One measure of our distance from realising our social objectives is the amount of violence in our society, where violence indicates a breakdown in the universalising agreement; a breakdown that breeds distrust and conflict. In an ideal cohesive and trustful community of educators where there is strong agreement between communities of practice on the standards, criteria and practices that constitute high quality education and training, the movement from generic universalising standards to particular pedagogic practices should be smooth and seamless. Different communities (for example academic and occupational educators) will agree on interpretations of generic standards and how they are translated into specialised practices. In the real world, however, dissonance, tension and conflict tend to mark the communication processes making agreement hard to reach. This similarity between 'implementing' constitutional values and educational standards resonates with the strong interconnections between education and society. It would be naïve to believe that one can construct an inclusive NQF in a society fractured by exclusions, or, to recall the language of the liberation struggle, to have normal education in an
abnormal society. Education and training and by implication the construction of an NQF are part and parcel of making a democratic South Africa and face challenges similar to those prevalent in the broader society.

The recent discussion document on macro-social trends in South Africa: “A Nation in the Making” released by the Policy Co-ordination and Advisory Services of the Presidency (PCAS, 2000) identifies specific challenges to social cohesion that are symptomatic of a weak national consciousness/value orientation:

- South Africa is a highly diverse society with multiple identities
- While race, ethnic and language identities are receding, class identity is rising
- Although a majority of young people identify themselves as African or South African this is primarily in respect to a geographic and state identity
- Tension between a western-oriented cosmopolitanism and African oriented local identities and cultures
- Weak entrepreneurial culture

In addition to these specific challenges, the report identifies the major challenge mitigating against strengthening social cohesion as lying in the tension between, on the one hand, a market-based economy with competitive, self-interested and individualistic identities desiring wealth and conspicuous consumption and, on the other hand, a caring, compassionate, fair and equitable society with public-interested identities oriented towards 'collective goods' such as justice, fairness, honesty, human solidarity and respect for the dignity of the 'other'.

This tension between a competitive market-based economy and a cooperative caring society resonates with a tension between ethical approaches to public policy and the governance of society. On the one hand there is a 'needs-based' approach that prioritises the public interest and is broadly utilitarian (the state ought to do what will bring the greatest well-being to the greatest number of people); on the other hand, there is a 'rights-based' approach that prioritises private interests and is broadly deontological (the state ought to do what will best protect the 'sanctity' and rights of the individual). The utilitarian approach views institutions, organisations, people and their actions from a social perspective: what is in the best interests of the majority of society? The deontological perspective is that of the individual: what is in the best interest of an individual?
Public policy has to chart a course that achieves a balance between these approaches with the Constitutional Court acting as the final arbiter of what constitutes a 'just balance' between the rights of the individual and the interest of the collective. The state and associated collective governance structures must protect both individual freedoms and nurture the vulnerable and innocent; encourage individual self-advancement and promote collective social development; respect individual excellence and practice social equity; encourage bonds of solidarity and cultivate individual creativity.

Building a 'national' identity goes beyond the formal requirements of the law and requires an ethical commitment to a common identity and common interests as South Africans, to a sense of belonging with each other. The values underpinning our constitution have to be progressively realised through an ethical development project that transforms relations between people from a 'fearing' of the other towards 'trusting' - even if this is conditional. This ethical project aims at shifting the balance between starkly dichotomous outcomes, from a negative to a 'positive' pole: fear and suspicion contra trust; a willingness to be violent and harm others contra respecting and caring for the well-being of others; an egoism prioritising only self-interest contra an altruism supporting a healthy society.

It is only within a context of massive social transformation strengthening social cohesion that the NQF can realise its own contribution to social cohesion. There is however a large gap between espousing values such as honesty and our daily practices. Closing this gap, learning to be ethical, is an educational process grounded in induction into a community of practice. Our moral development is similar to and linked with our cognitive development. Not only are both processes fundamentally social they are grounded in our ability to communicate with others.

History teaches us that most successful societies have high degrees of social cohesion and that many societies with strong social cohesion are highly homogenous and, conversely, increasing diversity often leads to a weakening of social cohesion. How cohesion is achieved varies enormously from country to country reflecting a broad range of factors including history, geography, religion, politics and economics.

Developing South Africa's social cohesion is impeded by the inequalities that scar our society. Many of our citizens live in poverty and experience its 'evils' on a daily
basis. Continuing income inequalities, high rates of unemployment, high mortality rates, high violent crime rates (especially, violence towards women and children), low achievements on education and health indicators, rapid urban migration and a fracturing of households (evidenced in the increase in households and their changing demographics) are indications that for many the values enshrined in our constitution are not present in their lives. These conditions make creating a socially inclusive and cohesive NQF and trustful communities of practice a difficult endeavour. Given that the NQF contains diverse communities of practice and that tensions between different identities, interests and orientations abound, how can trust be built?

Increasing calls for standards and quality assurance are an indication of a mistrustful society. Our faith and trust in the 'good-will' of others has been eroded and there is an increasing demand for transparent and accountable practices, for binding contracts and performance indicators. These demands for standards setting and quality assurance structures and processes that are accountable are part of a broader deepening of democracy. Increasingly, the importance of democracy lies in those organisational practices that promote transparency, accountability, justice and human rights - the very ingredients that are needed to strengthen social cohesion and increase levels of trust.

Building a democratic South Africa characterised by constitutional values and building a socially cohesive and inclusive NQF depend in similar ways on creating communities where good values and best standards are embodied in everyday practices. How do we best construct communities of practice within the NQF system with the potential for achieving the objectives of the NQF?

**Communities of practice**

The notion of 'communities of practice' has become influential within debates in education over the past fifteen years. Lave & Wenger (1991), amongst the foremost exponents of the concept, offer the following definition:

“A community of practice is a set of relations among persons, activity and world, over time and in relation with other tangential and overlapping communities of practice. A community of practice is an intrinsic condition for the existence of knowledge.” (Lave & Wenger, 1991:98)
Communities of practice are primarily a means of categorising a particular set or web of relations between people as having a particular identity, value orientation and purpose. Within a strong community of practice there is a strong sense of shared values and beliefs; a consciousness of, and commitment to, an overall holistic purpose that shapes the activities of the community; and, agreement on the set of practices that constitute 'competent practice'. At some level, learning is always induction into a community whose boundaries are marked by commitment to a set of beliefs about what counts as knowledge and skills and what are 'good' values and attitudes to underpin and infuse learning as a process of enlightenment, enhancement and attunement.

The existence of educational communities of practice is a necessary condition for learning to take place:

“As an aspect of social practice, learning involves the whole person; it implies not only a relation to specific activities, but a relation to social communities - it implies becoming a full participant, a member, a kind of person...(this) implies becoming a different person with respect to the possibilities enabled by these systems of relations.” (Lave & Wenger, 1991:53)

This definition once again highlights the similarities between building a democratic society and an educational community - being a member of a community is necessary for becoming learned and for becoming a citizen in a democratic society. Another key aspect of this definition is an holistic perspective: learning involves the whole person and by implication learning always has an overarching holistic purpose.

A South African example

McLaughlin (2003: 348) notes that one of the important contributions made by the concept of 'communities of practice' is related to difficulties in articulating educational goods in fully transparent ways, especially when what is at stake is not the articulation of abstract ideals but of forms of action in particular circumstances.

“The need for 'communities of practice' is seen, for example, in relation to the exercise of forms of pedagogic phronesis in relation to complex
pedagogic challenges where abstract principles and guidelines require interpretation and implementation in practical contexts.” (McLaughlin, 2003: 348)

South Africa provides an interesting and recent example of an attempt by a state to construct a pedagogic phronesis through national regulations that depended for success on a strong community of practice. In 2000, the Department of education (DoE) produced a new set of Norms and Standards for Educators using an outcomes-based approach that does not provide a curriculum for teacher education but represents, in a broad and generic manner, the requirements of the DoE as an employer in respect of the learning outcomes achieved in a qualification - the knowledge, skills and values or applied competence - a person must have to recognised as an educator (where applied competence is understood to mean the ability to put into practice in the relevant context the learning outcomes acquired in obtaining a qualification (SAQA, 1998: 3).

In addition, a hierarchical framework of levels of achievement corresponding to the levels of the NQF is provided enabling the employer, after negotiation with the unions in the Education Labour Relations Council, to determine ranks and grades and their remuneration values. The Norms and Standards for Educators (NSE) are heavily influenced by labour law requirements such as the construction of an occupational structure with clearly defined career paths and the ability to identify 'incompetent' or 'incapable' teachers or teachers guilty of 'misconduct'.

The NSE criteria are 'formal' rather than substantive standards and provide little specification of the selection, pacing, sequencing, progression and evaluation criteria that will characterise the curriculum and there is no indication of appropriate depths of content knowledge and levels of cognitive demand. While this allows for a significant degree of institutional autonomy over the curriculum, it presupposes that teacher educators and teachers can read the criteria in a way that is meaningful and 'aligned with' the meaning intended by the state in promulgating the criteria.

In their critique of the Norms and Standards for Educators, Shalem and Slonimsky assert:
“...the point is that any of the 120 specifications displayed for the three kinds of competence (practical, foundational and reflexive) only make sense from within the moral and political values and the pedagogical preferences embedded in the educational perspective held by the competent educator” (Shalem and Slonimsky, 1999: 14).

The criteria are only useful as descriptions of competence for an educator who already understands and practices and competence. The NSE are not themselves an educational 'tool' that teach a person how to be a competent educator. Furthermore, they only enable a person to recognise a competent educator if that person already knows what it means to be a competent educator. A trainee teacher will only achieve competence with its ethical, epistemological and ontological commitments through initiation and inculcation into a community of practice that is already demonstrating and displaying the knowledge, skills and values described by the criteria:

“I cannot be told criteria. I am in criteria in much the same way that I belong to a community” (Ibid: 14).

The intention of the NSE is that teacher educators will be able to judge the value of a student's performance using the criteria (Ibid: 11). But as long as the teacher educator does not know what kind of object good teaching is, her judgements based on the criteria are not in fact applications of the criteria (Ibid: 12). Another way of expressing this conundrum is to say that we can only recognise the meaning of the criteria when we can already realise the knowledge, skills and values indicated by the criteria.

In addition to overcoming this cognitive conundrum, (teacher) education can only take place where there is a strong affective relationship between educator and learner. Following Winch, Shalem and Slonimsky argue that there is a mutual obligation to seek attunement between learners, teachers and governments but this obligation is not captured by the Norms and Standards (Shalem and Slonimsky, 1999: 22). Obligation is not about following someone's authority to tell you what to do. Rather, it is a relationship where no one feels independent and free from the voice of the other (Ibid: 26). In the cognitive realm, to understand the NSE we have to recognise the meaning of the concepts and criteria. And in the
affective realm, we have to recognise the humanness of the other - their sentience and consciousness.

This dual recognition highlights the need to foreground and extend trainee teachers' own conceptions of the end and goods of teaching in order to develop their powers of excellence. For Shalem and Slonimsky, the NSE confuses the pedagogical and regulatory intents and capabilities of the state to the detriment of both aims. The NSE criteria can't give access to the goods of the practice and as a result may not be much use for regulation.

Shalem's and Slonimsky's critique reminds us that pedagogy is grounded in interpersonal relations and 'good' pedagogy requires moral and affective orientations that infuse 'instructional interactions' at the teaching-learning interface. This moral 'purpose' and its associated affective desires cannot be captured by a set of generic criteria. Bernstein reminds us that pedagogic discourse is both a discourse of skills of various kinds (and their relations to each other) and a discourse of social order (Bernstein, 1996:46). Bernstein distinguishes 'instructional' discourses of skills, specialised competences and consciousness from 'regulative' discourses of order, relation, identity and conscience. The regulative discourses of social order refer to the form that hierarchical relations take in the pedagogic relation and to expectations about conduct, character and manner. These expectations find expression, where the framing is strong, in character labels such as conscientious, attentive, industrious, careful and receptive (Bernstein, 1996: 27). Education for values and education for competence/performance are integrated in pedagogic discourse although this integration is not on an equal footing as:

“Fundamental to my argument is that regulative discourse is the dominant discourse. In one sense this is obvious because it is the moral discourse that creates the criteria which give rise to character, manner, conduct, posture, etc. In school, it tells the children what to do, where they can go, and so on. It is quite clear that regulative discourse creates the rules of social order....and produces the order in the instructional discourse.” (Bernstein, 1996: 48. Emphasis in original).

For Bernstein, pedagogic discourse is constructed by a recontextualising principle, which selectively appropriates, relocates, refocuses and relates other
discourses to constitute its own order (Bernstein, 1996:47). This recontextualisation delocates discourses from their substantive practice and context and relocates them in a virtual or arbitrary space according to principles of selective reordering and refocusing that remove the discourses from the social basis of their practice (Bernstein, 1990: 184). Another way of expressing this is to see it as a movement from the real to the ideal. In the process of recontextualisation a gap or space is created in which ideology can play - making the ideal a construction of dominant beliefs and practices rather than an abstract representation of the real (Bernstein, 1996: 47).  

Reading Bernstein together with Shalem and Slonimsky, one can suggest that understanding the inside of a pedagogic practice, recognising its intrinsic worth and purpose, is inextricably interwoven with recognising what is outside of the practice - the social order within which the practice is embedded. Within any discourse, be it regulative, instructional, philosophical or musical, meaning emerges from an 'embedded' perspective - speaking and listening with understanding are communal or collective practices - and these perspectives are always value-laden. If the pedagogic practice does not have these affective and moral attributes, it risks becoming an empty vessel: a matter of form rather than substance. Teaching and learning become ritualistic practices where 'going through the motions' is more important than cognitive and affective demand.

In mitigation of this moral absence that characterises the NSE, the Department of Education could point to the large scale and intensive consultation process undertaken in developing the Norms and Standards for Educators. Although this response indicates a commitment to democracy, inclusivity and transparency, it does not address the question of how generic criteria could be 'translated' into specific outcomes and assessment criteria that demonstrate attunement to the intrinsic values of the pedagogic practices. The lack of this moral sensibility became evident when the NSE were interpreted in very different ways by different communities of practice in accordance with their own ethical, epistemological and ontological commitments. It is not that these diverse communities were deliberately flouting the prescribed commitments of the DoE; rather they were filling a vacuum created by the lack of explicit value commitments with their own value commitments.

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29 See Mattson, E. and Harley, K. (2002) for an example of this phenomenon.
Looking back with hindsight, one can evaluate the NSE as partially successful. They provided a stable frame of reference and a reasonably efficient process of approving institutional programmes. However, their contribution has been undermined by their inability to change practices. As the identities of teacher education communities have become more visible through the Ministerial Committee on Teacher Education and the programme re-accreditation review of the HEQC, it is clear that the normative and transformative intent of the NSE has not been realised. Institutions were able to interpret the NSE criteria in ways that suited their already existing beliefs and practices and felt under no obligation (or regulation) to change. Given the above characteristics, it would not be unfair to describe teacher education in South Africa as made up of diverse and weak communities of practice and not one strong professional community of practice. Broadly, it was the lack of a strong hegemonic community of practice of teacher educators that undermined the production and efficacy of the NSE.

If teacher education in South Africa is composed of weak communities of practice, then those professional bodies that exercise tight control over standards setting and quality assurance such as accountancy, medicine and engineering provide an example of strong communities of practice. Strong communities translate standards into curriculum, pedagogic and assessment practices with high levels of interpretive agreement. One reason for this is that these professions function as exclusive, self-referential epistemic communities; they are closed, self-regulating homogenous systems in which development of standard-setting, curricula, assessment and pedagogic practices does not require reference to an outside constituency - making agreement on the core competencies and identity of a particular profession simpler.

Professions such as accountancy, engineering and medicine have clear, precise, codified standards with strongly specified content (Harley and Parker, 2006). Over the past ten years, these professions have extended their standards into new domains that have a strong emphasis on ethics: on the values, attitudes and behaviours of members of the profession. These new domains demonstrate the increasing emphasis within professions on the importance of making regulative discourse explicit. Whereas in the past, tradition, hierarchy and authority were taken for granted and standards could focus primarily on describing instructional content, modern societies require that the internal moral order of the profession be made more transparent and accountable. This transparency of moral order
also reflects a change in the patterns of desire that characterise a profession. Although not a focus of this paper, the desires of members of a community are a part of what constitutes the identity and practices of the community. Doctors ought to believe in the values of the Hippocratic oath, care for their patients and avoid harming them. Doctors should be persons of integrity and honesty. However, if greed flourishes, these commitments are likely to be undermined. Or, if doctors act as though their primary obligation is to other members of their community of practice and not to the patients they serve, then accountability is likely to be weakened.

The exclusivity of professions expressed through strongly classified boundaries that limit access to membership of the profession also provide the assurance of competence: to qualify as a doctor or an engineer is to undergo an arduous and rigorous process of apprenticeship, initiation, disciplining and examination leading to attainment of a level of sufficient expertise to be permitted to practice. Professional communities of practice reify the exclusiveness of expertise and elitism. This may indicate a latent contradiction between exclusive and democratic communities of practice. Robert Dahl (1989, 1998) refers to effective participation, voting equality, enlightened understanding, control of the agenda and inclusion of adults as some of the key conditions to be met for a society or organisation to be democratic. If exclusive communities cannot fulfil these criteria, it implies they are undemocratic.

We can now formulate two major challenges facing the implementation of an NQF in South Africa:

1. In order to achieve commensurable interpretations of generic standards, and to translate these generic standards into particular practices within specific fields, there have to be communities of practice with sufficient internal consensus on core interpretations or translations to produce 'enhancing' or 'enlightening' modes of curriculum, pedagogy and assessment. This requires a 'double-translation from the 'generic' to the 'specific' and from the 'real' world of practice to the 'ideal' or virtual world of the classroom. Each translation creates a discursive gap where power, desire, ideology and rationality interplay either facilitating or impeding deliberative agreements on standard-setting and quality assurance and on curriculum, pedagogy and assessment. The most effective communities of
practice are found in the professions with their self-sustaining patterns of power-relations, desires, ideology and rationality. These exclusive professional communities of practice with their strong identities and boundaries are able to participate actively in the broader NQF community and to adapt their pedagogic discourse to fit in with the NQF. There is, however, a risk that 'what is' persists and the profession avoids transformation into 'what ought to be'.

How can SAQA ensure that exclusive communities of practice are transforming their beliefs and practices in ways that are consonant with the values and objectives of the NQF?

2. It is much harder to identify inclusive communities of practice. Some inclusive communities of practice will have emerged from the SGB and NSB processes. Other examples will have emerged from economic sites where associations of people engaged in similar trades or practices construct a community for example in cabinet-making, fabrication and other occupations such as hairdressing, cosmetology and homeopathy. Communities may emerge based on common interests within and between educational institutions, for example, associations of sociologists and historians. These inclusive communities with their weaker boundaries and identities will struggle to be self-sustaining insofar as they lack the characteristics that make exclusive communities self-sustaining: strong and stable power-relations, ideologies and patterns of rationality and deliberation.

How can SAQA promote the creation and sustainable development of inclusive and effective communities of practice?

Communities of practice and the South African NQF

The strong emphases given by SAQA to stakeholder inclusivity and participation and to the transparency and accountability of its practices are indicators of SAQA's commitment to democratic values and practices. It is not unreasonable for SAQA to believe that these commitments and practices would lead to the emergence of democratic communities of practices, which would achieve consensus on how best to translate the generic standards into specific pedagogic practices.
Granville (2001) notes that the NQF, by focusing solely on statements of specific and critical exit level outcomes, encourages great flexibility and autonomy for sectoral interests in the development of unit standards and qualifications. The result is a very high number of unit standards and qualifications. The South African approach places a high premium on accurate language. Given the multiplicity of unit standards and qualifications, the discriminating element between all standards and qualifications is the language used to describe them. However, consistency and reliability of language usage cannot be assumed. On the contrary, given the diverse backgrounds of the stakeholder constituencies, experience suggests that disagreements will likely be the norm.

In the absence of homogenous exclusive communities where consistency and reliability of language usage can be assumed how does one go about building a common language to mediate the movement from standard/qualification to curriculum to syllabus to learning programme? Any attempts to counter the diversity that comes with inclusivity by further specification of standards, especially in regard to content, is likely to lead to contestation as those with different interpretations resist the imposition of the standards of ‘others’. Nor can one adopt a laissez-faire approach where communities of practices are left to their own devices. What is needed is some kind of balance between prescription of standards by the Authority (SAQA) and the autonomy of communities of practice to interpret these standards and translate them into everyday practices.

To return to an earlier analogy, SAQA at the apex of the NQF plays a similar role with regard to implementation of the objectives of the NQF as the Constitutional Court plays with regard to the juristic implementation of Constitutional values. There is however a crucial difference in the nature of their authority. As final arbiter or ultimate judge, the authority of the court is expressed through prescriptive judgements or edicts to which there is no further appeal. The legitimacy of the court depends on the juristic logic underpinning its judgements. In contrast, the authority and legitimacy of SAQA depend on the democratic consent and agreement of its participant stakeholders.

Building a democratic nation
Once again, we are drawn to the intimate interconnections between building a democratic nation and building an NQF. So far, we have concentrated on the democratic aspects of education, it is useful to look at the connection from the
'other side' and explore the educational aspects of democratic nation-building. One way of doing this is to provide a sketch of a debate between three of the most renowned philosophers of our time. The debate itself reflects three positions on the possibility of enlightened consensual democracies based on rational deliberation. These positions have resonance with our discussions above of the NQF.$^{30}$

Habermas is a public intellectual passionately committed to promoting a rational universalism in political and moral questions. As Pensky comments:

“The central claim of Habermas's theories is that the institutions based on the communicative use of human reason, from our moral institutions to the institutions of the democratic constitutional state under the rule of law, are reasonable and not merely the contingent consequences of historical circumstances.” (Habermas, 2001: ix).

Habermas shows how the development of the nation-state in the 19th century expanded the parameters for the implementation of human rights and democracy and made social integration possible in a context where the bonds of ancestry and dialogue were breaking down, and modernisation and colonialism were disrupting the social, political and economic fabric of societies (Habermas, 2001: 18). The great achievement of the nation-state was its ability to hold the spirit of the people, a universalising democratic constitutional state and a market economy in a constitutive tension that led, in its most beneficial manifestations, to the social democratic welfare states that emerged in western Europe after 1945 (Ibid: 16). The success of the nation-state, claims Habermas, depended on its ability to manage three forces that hold society together: solidarity, money and administrative power (Ibid: 154).

The advent of the 21st century has seen the nation-state rapidly losing its effectiveness and relevance as the globalisation of market economics is accompanied by the emergence of supra-national organisations such as multi-national corporations, the World Trade Organisation, the United Nations, The European Union, The International Monetary Fund, the World Bank and various

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regional trading and development associations. These supra-national organisations are able to escape democratic accountability and 'national' regulation and operate in an anarchic international arena that allows for massive inequalities, unfair trade regimes, large-scale poverty and violence.

Habermas claims these excesses can only be restrained by global institutions and regulations that are underpinned by a legitimacy emerging from popular processes of collective will formation through political participation and basic human rights (Ibid: 76). The emergence of a European public sphere and political culture embracing human rights and democracy intimates the possibility of supranational politics catching up with globalising markets and developing sufficient 'technologies of governance' to domesticate them (Ibid: 52). This possibility rests on the evolution of large-scale active membership of civil society organisations that have the capacity to call global agents to account (Ibid: 57). For Habermas, a cosmopolitan universal solidarity based on rational communicative action in a democratic public sphere is the only hope humanity has of taming the wild beasts of a global marketplace.

Habermas provides a clear and succinct genealogy of the 'communicative idealisations' that underpin his universalising pragmatism:

- a common objective world
- the accountability of subjects
- the unconditional validity of truth and rightness claims, and
- the implicit orientation to discursive justification.

These idealisations are presupposed by speaking and acting subjects and explain, from a participant's perspective, the 'operations' that actors must accomplish when engaged in communicative action and rational discourse (Rehg & Bohman, 2001: 36). These 'unavoidable presuppositions of argumentative practice' are foundation stones for Habermas's re-thinking of the enlightenment project, where solidarity and progress towards social and personal emancipation can be realised through a 'purposive reason' capable of abstracting from specific historical contexts and constructing through communicative action a constitutional democracy under the rule of law.

Habermas' account is equally pertinent to the NQF and communities of practice. It is the bringing together of universalising communicative values and particular
communities of practice that strengthen social cohesion and expand inclusion. It is through purposive reasoning that we are able to achieve a balance between sufficient individualisation for self-realisation (of a person, profession, disciplinary field or institution) and sufficient relatedness for collective projects such as building an NQF.

Unsurprisingly, Habermas' views are contested. One of his prominent critics, Richard Rorty eschews critical theory's universalising tendencies and dispenses altogether with context-transcending ideas of truth, objectivity and universal agreement (Ibid: 42). Rorty wants to replace universal agreement by modest communities of agreement that nurture a mutual provisional understanding through fragile practices of negotiation. For Habermas, it is theoretically and practically possible to improve society through 'critical' theory understood as reasoned discourse (Ibid: 42). For Rorty, belief in the power of theory, however critical, is illusory utopianism that impedes the very goal it seeks; the most we can hope for is a broadening community of agreement oriented towards attaining more happiness by cooperation (Ibid: 47). Rorty favours a contingent pragmatism and an emphasis on practice. Habermas prefers a universal pragmatism and an emphasis on theory.

Habermas' utopian vision of a rational process catalysing emancipatory development is soundly rejected by many postmodernists on grounds similar to those articulated by Rorty. These critics see Habermas as guilty of constructing a meta-narrative, mystifying and reifying reason, excluding multiple other 'irrational' voices and contributing to the maintenance of those very forces of violence and inequality that he opposes. Habermas characterises the alternative vision offered by postmodernism as similar to that of neo-liberalism, offering a life-world of individuals and small groups constituted as nomads who are functionally co-ordinated but not socially integrated (Habermas, 2001: 88). He praises the critical effects of postmodernism with its explorations of exclusions and its challenging critiques of modernity and enlightenment, but he sees it as failing to understand the potential of our present context of a universalising modernity and as guilty of a linguistic idealism that assumes an incommensurability of meaning that undermines communicative action. Hence, postmodernism is unable to distinguish between colonising and convincing discourses; it lacks the criteria to make evaluations necessary for political decision-making (Ibid: 148). How do I argue with others about, for example,
health policy if I do not have criteria that enable me to distinguish between different policy options and strategic actions? A basic commitment to happiness or well-being is too vague to generate criteria and could only cease to be vague if subjected to the very kind of normative reasoning process to which the critics object.

The appearance of incommensurability between Habermasian discourse and the pragmatism of a Rorty or various forms of postmodernism may mislead one into exaggerating differences and obscuring similarities. Politically, they share in the broadest sense a commitment to democracy and the rule of law, and their pragmatisms may be very different, but they would agree on many things with which they disagree (Kantian idealism, Cartesian subjectivity, platonic forms, fascism, racism). For Rorty, critical theorists and philosophers have no claim to a privileged position in democratic decision-making processes of social change on account of their profession. Their discipline, in the absence of normative discourses of truth, objectivity and universal agreement, does not help them play an important socio-political role; critical theorists should eschew a universalising conception of solidarity and settle for much more modest and provisional communities of agreement (Rehg & Bohman, 2001: 52).

In an attempt to chart a middle course between the universalism of Habermas and the particularity of Rorty, Thomas McCarthy concedes the need to contextualise reason, but rejects a strong incommensurability between contexts thereby maintaining the possibility of provisional agreements across different contexts. The practices of reason may not lead to emancipation but they require a normative orientation if they are going to head in the 'right' direction whether this be well-being, happiness or stability. This conception of reason has strong similarities with our earlier discussion of Bernstein's regulative discourse and of the values-laden nature of pedagogic practice and with the purposive nature of communities of practice.

For McCarthy, the agreements on normative orientations required for a deliberative democratic decision-making do not require universal presuppositions, but can be grounded by research into agents and systems of governance in specific contexts. The practices and outcomes of this research as with the argumentation that underlies democratic decision-making may be subjected to similar criteria of evaluation as argumentation in the sciences. A
scientific argument need not be grounded in the counterfactual assent of a 'universal audience' but rather in the potential relevance and contextualisability of the practices and outcomes of scientific argumentation across a variety of contexts (Rehg & Bohman, 2001: 133).

For McCarthy a political decision is a provisional outcome of a process of democratic deliberation that has the ability to produce a decision even when there is no agreement to be had (Rehg & Bohman, 2001: 316). We will continue to have ethical disagreements with practical social and political consequences for as long we differ on how we define key ethical concepts and issues: freedom, equality, respect for the sanctity of life, immigration, abortion, cloning. These do not prevent us, however, from making political decisions provided we have just and legitimate procedures to reach a provisional closure (Ibid: 304).

The relevance of this to our earlier discussion of agreement within and between communities of practice is immediate: disagreement need not mean disarray. Communities of practice can contain disagreements and contested decision-making provided there is a pre-disposition towards researching 'tension-points' and being willing to examine these with 'scientific' rigour.

In the context of schooling, Bernstein (1996) provides insight into how tension-points can be sources of enlightenment or enhancement. Bernstein specifies the 'inclusion', 'participation', and 'enhancement' of pupils as being necessary preconditions for democratic education. Bernstein explains his concept thus:

I see 'enhancement' as a condition for experiencing boundaries, be they social, intellectual or personal, not as prisons, or stereotypes but as tension points condensing past and opening possible futures. Enhancement entails a discipline. It is not so much about creativity, although that may be an outcome; enhancement has to do with boundaries and experiencing boundaries as tension points between the past and possible futures. Enhancement is not simply the right to be more personally, more intellectually, more socially, more materially, it is the right to the means of critical understanding and to new possibilities (1996: 6, emphasis in original).

From Bernstein's perspective, the kinds of tensions discussed in this paper are to
be welcomed as opportunities for 'enhancement', rather than being regarded as problems or weaknesses in our understanding of democracy and education.

A contextualised pragmatism grounds critique in practice itself, so that “…formulated idealisations gain their effectiveness in virtue of their local relations” (Rehg & Bohman, 2001: 137). These idealisations can be located in contexts in ways that are indexical and contestable, rather than universalisable and pre-supposed. They are provisional and partial claims that certain kinds of institutions and practices appear to promote well-being by 'domesticating' administrative forces of the state and economic forces of the market. And that this 'domestication' is inextricably interwoven with a commitment to a rational and moral discourse that is procedurally embodied in institutions and practices.

McCarthy would agree with Habermas that we need to 'domesticate' bureaucracies and markets (Ibid: 422) but he would not share Habermas's optimism regarding the effectiveness of critical theory in resolving specific disagreements or differences. Nor would he agree with the likelihood of a universal moral discourse of justice assimilating the multiple pluralisms that make up human societies. The growing inequalities between wealthy and poor people and strong and weak nation-states mark contested power relations and boundaries that permeate the evolving global fabric of economic markets, administrative agents and cultures. In this global context of exclusion and fragmentation, of distrust and malpractice, McCarthy's 'pragmatic' critical theory provides a nuanced mediation of a set of constitutive tensions embedded in the fabric of society: theory/practice, self/other (narcissism/relatedness), national spirit/human rights, universal/contingent, contextualised/decontextualised. This approach allows for the possibility of rational discussion and negotiation leading to sufficient compromise between different perspectives and orientations to make decisions without full agreement.

**Conclusion**

What are the implications of these theories for constructing a socially inclusive and cohesive NQF? I suggest that McCarthy's pragmatic critical theory offers us a useful theoretical framework especially when supplemented by the theories of Bernstein. We must avoid the siren-call of prescriptive universalism and steer clear of the shoals of laissez-faire relativism. Rather we must chart a middle-way where quality standards are contingent, albeit universalising, guides that are
interpreted by communities of practice in ways that may differ but are not incommensurable. Various organisational models may be appropriate to realising this middle way. One example found in South Africa is an approach that favours a nested framework with generic standardising level descriptors forming the outermost layer within which are contained layers of increasing specificity for qualification descriptors (Bachelors, Masters) and for qualification designators (Bachelor of Science) with an innermost layer for providers to generate programmes leading to specialised qualifications. This model allows some autonomy to the provider within constraints provided by the increasingly generic layers of standardising descriptors.

The generation of these layers of descriptors can be undertaken by appropriate communities of practice enabling these communities to participate in both the generation and interpretation of standards. Through processes of rational deliberation, attunement, consensus seeking, decision-making based on sufficient agreement and a tentative attitude towards the contingency of our beliefs and practices, it may be possible to develop increasingly democratic and inclusive communities of practice participating in standards-setting and quality assurance (Harley & Parker, 2006: 10).

The ideal community of practice achieves a balance between exclusivity and inclusivity - striving towards greater democracy and inclusivity but not at the expense of the necessary competencies that constitute the purpose, meaning and good of the community. From an epistemological perspective, a community of practice is built on a common reservoir of knowledge, skills and values without which it could not exist. The importance of democracy, inclusivity and equality as goals for our social enterprises should not outweigh the importance of the purpose of a practice. For example, doctors ought to be competent if we are to award them our trust and any form of action that puts this competence at stake will undermine our trust and social cohesion and, those participating in standards-setting and quality assurance ought to be competent in the field in which they are operating - implying the majority are drawn from the communities of practice that inhabit the field.

A rational deliberative approach to building a common language and developing increasingly commensurable practices is praiseworthy in its expression of the moral regulative intent of the NQF; it is unfortunately also too ideal and utopian.
The realities of poverty and inequality in South Africa, of different class interests and diverse identities pose serious challenges to this rational approach that lead to suspicion and mistrust. In whose interests is rationality operating? Why should intellectuals and experts have privileged access to standards-setting and quality assurance?

SAQA as the authority overseeing the development of the NQF has to continuously address these tensions. The importance of education and its concomitant levels of competence have to be balanced by the importance of inclusivity and democracy. The interrelatedness of these 'public goods' is captured most clearly by their dependence on processes of initiation and induction into communities. This paper has argued that education and democracy are pre-conditions of each other: one cannot have education without democracy nor can one have democracy without education. If we ask which comes first we are faced with a chicken-and-egg type dilemma. One way of avoiding this kind of Catch-22 is to see communities of practice as the pre-condition for both education and democracy - as the medium within which enlightening and enhancing personal and social practices flourish. In other words, without flourishing communities of practice, the NQF is unlikely to achieve its objectives.

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References


A critical reflection on current qualifications frameworks and possible future directions in Africa

James Keevy and Joe Samuels

Abstract
Qualifications framework development is a fairly recent feature on the global education and training agenda. Across the world many countries and regions are now not only talking about qualifications frameworks, but are either already implementing national, regional and even transnational qualifications frameworks, or at the very least, are engaged in initial exploratory discussions, feasibility studies and drafting of concept documents. The African continent is no exception: South Africa, Namibia and Mauritius are at advanced stages of implementation, the SADC region is considering a regional qualifications framework, Ethiopia is at an early stage of implementation and the Seychelles is well advanced, to mention but a few. Underlying this trend towards qualifications frameworks by governments across the world, including developing countries in Africa, and with support from a range of international organisations such as the ILO, UNDP, EU, World Bank and UNESCO, a critique of qualifications frameworks is also emerging; a critique that has been particularly constructive, during the development and the implementation of the South African national qualifications framework is one case in point. Considering the global trend, and the emerging critique, we use this paper to critically reflect on the current state and possible future development and implementation of qualifications frameworks within Africa.

Introduction
Since the first qualifications frameworks were introduced in the United Kingdom in the mid-1980s, more and more countries have developed their own frameworks. While such developments were initially confined to the Anglophone countries of the Commonwealth, the interest has more recently extended to a much wider range of countries including Mexico and a number of countries in the Middle East, Eastern Europe and the Asia-Pacific region.

31 Paper presented at the 2008 Biennale on Education in Africa organised by the Association for the Development of Education in Africa (ADEA), Maputo, Mozambique, May 5-9, 2008. Sections of this paper are drawn from research being conducted by SAQA for the Commonwealth of Learning that explores the possibility of a transnational qualifications framework within the context of the Virtual University for Small States of the Commonwealth (SAQA & COL 2008).
At a generic level a qualifications framework can be seen as an instrument for the development and classification of qualifications according to a set of criteria for levels of learning achieved (Coles 2006). The OECD (2007:179) definition of a qualifications framework is more comprehensive and adds dimensions of scope and purpose:

A qualifications framework is an instrument for the development and classification of qualifications according to a set of criteria for levels of learning achieved. This set of criteria may be implicit in the qualifications descriptors themselves, or made explicit in the form of a set of level descriptors. The scope of frameworks may take in all learning achievement and pathways or may be confined to a particular sector, for example initial education, adult education and training or an occupational area. Some frameworks have a tighter structure than others; some may have a legal basis whereas others represent a consensus of social partners. All qualifications frameworks, however, establish a basis for improving the quality, accessibility, linkages and public or labour market recognition of qualifications within a country or internationally.

There is increasing activity from international agencies in the area of qualifications frameworks, including the Organisation for Economic Cooperation and Development (OECD), the International Labour Office (ILO), the World Bank and the European Union. In addition countries with “explicit frameworks” (also referred to as first generation NQFs) such as England, Ireland, Australia, New Zealand and South Africa are regularly engaged with other countries and in effect support a general international movement towards the development of qualifications frameworks. The key underlying drivers for this increased interest and activity has been the need to improve people's employability in the emerging knowledge economy, together with increased internationalisation and globalisation of learning and the development of wider regional and transnational labour markets.

In theory the benefits accruing from the careful design and implementation of qualifications frameworks to address specific educational, social and economic issues are considerable, but in practice implementation has often been controversial and attracted strong criticism and resistance. Despite being
apparently valid responses to the issues that were being addressed, some features and dimensions of qualifications frameworks have proved in the translation of theory into practice to be unpopular, costly, time-consum ing, difficult to manage and even unworkable. The learning to be gained from such issues needs to be understood within in the context of a highly complex web of situational factors unique to each framework development. Thus while much can be learnt from past experiences, there are no simple solutions and many issues remain unresolved.

It is against this backdrop of the global trend towards qualifications frameworks, including also African countries that this paper has been prepared to provide a critical reflection that may in some way highlight considerations for future directions in Africa.

**A critical reflection on current qualifications frameworks**

Considering the work of Tuck, Keevy and Hart (2004), Young (2005), Raffe (2005), Granville (2004) and others, eight categories can be identified in the broader NQF discourse that are common to most qualifications frameworks. These are Purpose, Scope, Incrementalism, Policy breadth, Governance, Prescriptiveness, Architecture and Guiding philosophy. These categories are used in this paper to present some of the main critiques of qualifications frameworks followed by considerations for future directions in Africa.

The purpose of a qualifications framework is the explicit, often overt, reasons for the development and implementation of the NQF, usually reflected in its published objectives. While many other features of qualifications frameworks may differ, most have the common purpose of establishing a basis for improving the quality, accessibility, linkages and public or labour market recognition of qualifications within a country and internationally. The *OECD Thematic Group on the Development and Use of Qualifications Frameworks* provides support for the reform and management of qualifications systems and has developed a range of products that might assist any country in developing a general concept of qualifications frameworks. Their report (OECD 2007) identifies the following common reasons for the introduction of a qualifications framework: (1) Create a better match of qualifications with knowledge, skills and competencies and better linking of qualifications to occupational (and broader labour market) needs, present and future; (2) Bring coherence to sub-systems of qualifications, e.g.
higher education, adult learning, school awards and in particular vocational education and training qualifications, by creating an over-arching framework for them; (3) Support lifelong learning (by opening up access, targeting investments and recognizing non-formal and informal learning); and (4) Facilitate the involvement of political actors and stakeholders, especially in vocational education and training.

While one of the purposes of all qualifications frameworks is to communicate, in the sense that they provide a map of qualifications and give some indication of progression routes between levels and between sectors, frameworks whose main purpose is this communication or enabling function and frameworks that have a more overt regulatory role are differentiated. The essence of the distinction is between using a framework to describe the existing system and seeking to effect change using the NQF as the vehicle (Tuck et al 2004). The design features of a qualifications framework are selected according to the purposes of the framework. Thus, in the ensuing review of some of these features and the assumptions, tensions and debates associated with them, it is important to bear in mind the essentially different purposes of national, regional and transnational frameworks. The establishment of an NQF is usually the enactment of national policy, and as a tool for national policy implementation the function of an NQF is usually regulatory, and compliance with its standards is mandatory. A regional framework is usually a tool for harmonisation and communication; it is more likely to have developmental and supportive functions and voluntary participation. A regional framework is usually reliant on information and assurance provided by national frameworks. A transnational framework that serves countries with no national framework is likely to have characteristics of both national and regional frameworks.

The scope of a qualifications framework is the measure of integration of levels, sectors and types of qualifications as well as the relationships between each on the NQF. According to Howieson and Raffe (1999) the scope of a qualifications framework can be defined on three levels:

Unified: all systems are integrated
Linked: separate systems exist, but with common structures for transferability
Tracked: separate systems exist, but with limited transferability between each.

The expansion of education and training systems and the espousal of the lifelong learning agenda have led most countries in the direction of a linked or unified system, or a combination of the two (Tuck et al 2004). The development of a unified, linked or tracked framework is closely related to the purpose of the framework, and therefore also to the problems to be addressed. A qualifications framework with a unified scope is a comprehensive system that integrates all qualifications in all sectors, based on a belief that common principles apply across all types of education and training and all qualifications. Unified systems do not allow for significant sector differences, and sector resistance to “one size fits all” approaches has been vigorous. Linked frameworks recognise the distinctive characteristics and needs of different sectors and show the relationships and comparability between sectors, creating common structures for transferability, while preserving the integrity of existing systems. Tracked frameworks maintain completely separate pathways within the different sectors, with limited transferability. Comprehensive frameworks cover all qualifications, while partial frameworks only refer to some types of qualifications. Young (2003) suggests that the different forms of NQF that exist result from the tension between the desire for comprehensiveness (usually on the part of governments) and resistance, usually from the upper secondary schools and the universities, to the encroachment of their autonomy that a comprehensive framework entails.

There are two primary examples of comprehensive qualifications frameworks cited in the literature, New Zealand and South Africa. Both have experienced problems of implementation. Countries with unification intentions have had to compromise in response to sector resistance. A consequence of deeply embedded philosophical and traditional differences between sectors in New Zealand has been the exclusion from the framework of certain sectors, and thus of certain types and levels of qualifications. In New Zealand compromise has involved the development of a separate but linked system for school qualifications, and a Register of Quality Assured Qualifications to accommodate university qualifications which are not part of the NQF. Experience shows that there is a need to allow for sector differences. Young (2003:232) suggests that “the major lesson from the New Zealand experience [may be] that while it is important to hold on to the long term goals of an NQF, it is also important to
recognise that they will not be realised in the short term and whether they become a reality in the future will depend on many other changes”.

The incrementalism of a qualifications framework is the rate and manner in which the NQF is implemented. Incrementalism includes both the rate (progress/time) of implementation, ranging from gradual to rapid, and the manner of implementation, ranging from phased to comprehensive. Some countries, notably New Zealand and South Africa, have attempted to break with the past through the implementation of comprehensive programme of reform simultaneously across all sectors. This has proved very challenging, and not entirely successful; nevertheless there are still arguments in favour of this approach (Bjornavold & Coles 2006), which maintain the advantages of a comprehensive change strategy, in terms of both stakeholder engagement and the coordination of institutional roles and responsibilities.

The Scottish Credit and Qualifications Framework (SCQF) is generally acknowledged to have been reasonably successful in building a unified framework and effecting some improvements in access, participation, progression and attainment, with a relative absence of conflict (Tuck et al 2004). Nevertheless its development has been incremental, building upon a series of educational reforms over more than 20 years (Raffe 2003). It started as an overarching framework to bring together smaller sub-frameworks that already existed or were being constructed, and later expanded to include qualifications not already in the existing frameworks. Compared with most NQFs, the creation of the SCQF did not include the large-scale development of new qualifications, or the related standards-setting processes, which have been fundamental to the developments of the NQFs in New Zealand or South Africa, where radical transformation of the existing system was a primary aim.

Incrementalist approaches can engender inclusive models since they have the advantage of building on existing practice, and fostering credibility and trust in the system over time. The potential risk with this approach is that sectors that were not involved in the formative stages may be less inclined to “buy in” to a system that might not be perceived as sufficiently customised to their needs. However, in its later stages the development of the Scottish framework was led by the universities, so this is not necessarily the case. Most theorists comparing the fraught implementation of comprehensive frameworks with the relatively
straightforward development of the Scottish framework are inclined to the view that it is a mistake for policy-makers to move too far ahead of current practice, and that the benefits of an incremental approach need to be weighed against the urgency of political agendas.

Raffe (2003) and Tuck et al (2004) concur that “second-generation NQF countries” need to take account of the full sequence of regulation and educational reforms required at sub-system level and not only its latest stage, and might therefore usefully consider adopting an incrementalist approach that concentrates initial framework-building activities in areas that will have maximum impact on the intended social or educational goals, such as expanding vocational education or widening access to higher education.

Policy breadth is the extent to which the NQF is directly and explicitly linked with other measures that influence how the framework is used (Raffe 2003). In earlier studies on the impact of qualifications reform (Raffe 1988 and Raffe et al 1994) argued that the “intrinsic logic” of the modular system with its flexible pathways and incentives to participate was less powerful than the “institutional logic” in which it was embedded. The intrinsic logic refers to the inherent design features of an NQF, and institutional logic refers to the extent to which external systems and policies, including those of specific institutions, are aligned with and supportive of an NQF. Raffe (2003:242) concluded that “[a] qualifications framework may be ineffective if not complemented by measures to reform the surrounding institutional logic, for example, local institutional agreements to promote credit transfer, or encouragement to employers to reflect credit values in the recruitment process”.

The literature also shows that the goals of access, mobility, progression, quality, redress and development, that are often included in the objectives of an NQF, cannot be achieved by the establishment of an NQF alone. These goals require a range of other actions, including appropriate laws and policies, institutions, budgetary allocations, infrastructure development, professional development for teachers and trainers, and provision of learning resource materials.

The governance of a qualifications framework is all the activities that can be seen as purposeful efforts to guide, steer, control or manage institutions, sectors or processes associated with the NQF, including activities that lead to the
development and implementation of an NQF, such as legislation, the role of implementing agencies and funding. Tuck et al (2004) note that an NQF implementation strategy combining intrinsic and institutional logics requires strong central leadership and resources. Government has an essential role to play in providing a framework of policies to support NQF development and to ensure fit with other relevant education policies.

Where countries have established a body with central authority for managing the technicalities of the NQF and for offering advice to government on main policy issues (e.g. New Zealand, South Africa and Hong Kong) the body needs full political and financial support in order to be able to carry out its role effectively. In order to ensure sustainability, and also avoid reliance on government funding only, revenue generation options are considered. Coles (2006) notes that the scope and purposes of the NQF directly affect the costs of implementation and ongoing maintenance. Even if the NQF is essentially conceived as having a coordinating role in respect of existing qualifications and structures, the necessary preparatory work for establishing an NQF (policy analysis, consideration of relevant experience elsewhere, development of options, modelling of the favoured option(s), engagement of leaders of stakeholder groups, specialist task groups, consultation with main institutions and the general public, piloting, establishing a specialist agency) is likely to be costly and must be carefully budgeted for.

The cost of ongoing maintenance is also related to scope and purpose. If the NQF has a role in the major reform of the education and training system, it may require legal status. Moreover, if the agency is also responsible for quality assurance procedures, curriculum and assessment monitoring, reviews of employment standards, and establishing benchmarks against other national and international examples, costs can rise steeply. For example, in Hong Kong in 2007, statutory responsibility for implementing the NQF was given to the existing Academic Accreditation Council. This entailed a lengthy legislative process to change the Council’s name from the Hong Kong Council for Academic Accreditation (HKCAA) to the Hong Kong Council for the Accreditation of Academic and Vocational Qualifications (HKCAAVQ) and dramatically extend its remit, functions, staffing and funding requirements.

The prescriptiveness of a qualifications framework is the stringency of the criteria
that qualifications have to satisfy in order to be included in the NQF (Raffe 2003) and that providers have to satisfy in order to offer NQF qualifications. Prescriptiveness also includes the level of specification and standardisation of documents and processes. NQFs may be situated along a continuum of tight (or “strong”) to loose (or “weak”). Tight frameworks, such as the NVQ framework in the UK and the NZQF in New Zealand, are very prescriptive about qualification design and quality assurance across a range of sectors, if not across all. Loose frameworks such as the AQF and the SCQF are based on consensus-building among stakeholders and focus much more on the practicalities of achieving the framework’s objectives. Young (2005:13) points out that

...governments tend to want to move towards strong frameworks as they provide greater potential leverage both in relation to coordination and accountability. However, the stronger (tighter) the framework, the less likely it will be to achieve agreement, and for the framework to be able to include a wide diversity of learning needs.

Highly prescriptive qualifications frameworks, whose purpose is to regulate quality standards, exert strong centralised prescriptive control over the design and quality assurance of qualifications. This type of system requires legislative authority. Systems that overemphasize central control of quality assurance have been known to create an environment of cynicism, risk the disenfranchisement/alienation of sectors and key players such as academics, and create a compliance culture. Tight centralised control of national quality assurance can become excessively bureaucratic and such systems can become an end in themselves, rather than a means to an end.

Too much central control causes controversy and risk of bureaucratic considerations taking precedence over customer service considerations. However, pragmatism and responsiveness to a changing environment and some elements of central control of quality assurance are necessary for assurance that framework standards are met and stakeholders are protected. Quality assurance is key to the development of public confidence in qualifications, and to the environment of credibility and trust which is essential for the implementation of articulation and credit transfer systems.

Raffe (2003) prefers pragmatism to prescriptiveness, reflecting that a pragmatic
approach to a qualifications framework avoids stringent criteria for admitting qualifications, and it interprets its criteria flexibly. It does not rely purely on technical judgements of level, volume and quality when taking decisions about fitting qualifications into the framework. Instead it takes care, at least tacitly, not to undermine the trust that underpins qualifications, and not to offend powerful groups whose support may be needed to make the framework effective. Such enabling frameworks rely on agreement, their level of prescription is low and they are much less problematic to introduce. However, with very limited prescription, the framework depends entirely on voluntary cooperation and its potential to challenge existing/traditional practice, which may not be meeting the current and future needs of learners, is also limited. No sanctions are imposed on the providers of qualifications who do not comply with common design criteria. As a result many of the barriers to progression are likely to continue to exist.

The Australian (AQF), Scottish (SCQF) and French qualifications frameworks represent different versions of an enabling framework. For example there are three criteria for inclusion in the SCQF: (1) qualifications must be credit-rated (the volume of learning can be measured); (2) qualifications and the credit-bearing components of qualifications must be levelled (assigned to one of the 12 levels of the SCQF); and (3) assessment for the qualifications must be quality-assured. Raffe (2003: 241) describes this as an intermediate point on a scale of prescriptiveness (more stringent than the UK but less stringent than New Zealand), but warns that there is a trade-off between the scope of a qualifications framework and its prescriptiveness. The more prescriptive a framework, the harder it is to cover a wide range of levels, modes and content of learning.

Regulatory frameworks, such as in South Africa and New Zealand, which were created as vehicles for the accomplishment of major aspects of government policy, have a more overtly regulatory role. The turbulent history of these two initiatives and the compromises that have had to be negotiated to secure progress towards inclusivity and integration are well-documented (Young 2003, Allais 2003, Tuck et al 2004, Philips 2003, Forsyth 2007).

The distillation of wisdom from the experience of pioneering countries suggests that if an NQF is unified it cannot be highly prescriptive or tightly controlled (such as the New Zealand system). Within linked frameworks, on the other hand, it appears that tight control of the various sectors by the relevant sector bodies
under the oversight of a unifying body, is a workable approach. Both of these approaches (unified and loose or linked and tight) allow for differences between sectors.

The *architecture* of a qualifications framework is the configuration of structural arrangements that make up the design of the NQF. Examples include the use of outcomes-based qualifications, core skills and level descriptors. A fundamental feature of qualifications frameworks is that they are organised in terms of levels of learning. While most frameworks define these levels independently of the national qualifications that are associated with a level, some are “equating frameworks” based on qualifications. As an example the AQF (Forsyth 2007) classifies 15 national qualifications according to the accrediting sector and to pathways for progression of learning within and between sectors. The two most significant features of the AQF are that there are no numbered levels described independently of qualifications (the criteria for levels are implicit in the qualifications descriptors). Unification between the three sectors is achieved not by eliminating sectoral differences, but by highlighting choice and diversity across sectors (qualifications accredited in each sector offer a choice of learning pathway: a general education pathway, an industry-based pathway and an academic pathway).

Frameworks that are organised according to levels, to which a formal level descriptor, expressed in terms of learning outcomes, is attached, may be described as “descriptor-based” frameworks. The independence of level descriptors from any content or context or processes of learning or institutional setting is a key characteristic of descriptor-based frameworks. The number of levels varies between frameworks and generally reflects the existing qualifications system from which the framework emerged. A recent survey of countries in the Asia-Pacific Region revealed that the number of levels in NQFs in the region varied between five and 11 (Corpus et al 2007). The emerging norm in Europe is for eight levels to be defined.

In regulatory frameworks where qualifications must be referenced to a level in the framework, the framework acts as a tool for quality assurance. For example, in Hong Kong only accredited qualifications may be registered on the framework, and the burden of proof is placed on the provider to demonstrate that the learning
outcomes match the generic level descriptors for the appropriate level on the framework.

Outcomes-based learning has its origins in behavioural learning theory and was popularised in the fields of vocational education and training in the 1980s. Its subsequent application in academic learning environments in schools and universities has been highly contentious, largely because learning outcomes (like level descriptors) are often specified without any reference to any specific content or learning processes. Outcomes-based education has impacted significantly on the roles of the various stakeholders in qualification design. The figure below shows the process of “designing down” in which the programme leading to the qualification is derived from outcomes (specified by industry) and content and methodology (selected by education institutions). The diagram shows graphically a new hierarchy in which education providers are no longer the leaders and standards-setters, and content (or inputs) is no longer the starting point.

Frameworks that have had the fewest implementation problems are those which, in their specification of outcomes, criteria and assessment requirements, have taken the inputs and requirements of teaching programmes into account.

Despite valid criticisms of learning outcomes approaches, and the elusiveness of absolute transparency and objectivity, learning outcomes do provide a firmer basis for comparison than inputs and they enable better articulation between modules and programmes; it is hard to compare qualifications without explicit statements of the broad outcomes. Comparison on the basis of learning inputs, i.e. duration, location, type and content of learning, is less defensible because consistent inputs do not assure consistent outcomes. While there is fierce
criticism from some sectors, especially traditional academic schools and universities, there is also a large body of literature that supports outcomes-based education, and a recent study of European developments suggests that outcomes-based learning is becoming widely accepted (Bjornavold & Coles 2006).

Criteria for validating all types of qualifications for registration on a framework are likely to require qualifications to be described in terms of broad outcomes. This is not to say that all qualifications on the framework must necessarily be fully competency-based, and indeed it may not be considered good use of time and effort to convert all existing programmes and modules to a specific outcomes-based format, especially with a view to divesting them of the specific content and context for which they were designed.

One of the major purposes of establishing a qualifications framework is to promote lifelong learning and enable learners to gain credit for assessed knowledge that can be accumulated (theoretically across sectors) towards a whole qualification. In order to achieve this aim, whole qualifications must be broken down into smaller units of learning (typically modules or courses) and those components measured in terms of volume of learning and level.

It is useful to distinguish between two approaches to the division of learning into components:

- **Modularisation**: usually teacher-led and divides the curriculum into components for delivery
- **Unitisation**: divides assessment into the smallest parts which can be independently assessed and for which credit can be awarded.

A module or course is a small discrete chunk of learning and assessment that is both a component part (or building block) of programme(s) of learning and has its own stand-alone value independent of any programme. Learning is always sequenced and often divides naturally into topics, and into theory and practice aspects that can be further classified as pre-requisite and co-requisite components, and modularisation is in many ways just a formalization of natural sequencing, but modularisation of learning has attracted criticism and
resistance, perhaps because of its association with unitisation, which is a far more radical reduction of learning into weighted components.

For the purposes of a qualifications framework, especially with goals related to mobility, access and lifelong learning, it is essential to be able to identify and compare chunks of learning, independent of the programmes within which they are embedded. While there are strong arguments for “holistic” delivery of programmes of learning, and for the importance of consolidation and synthesis of learning, some divisibility provides a flexible model that meets learners’ access, choice and progression needs, ensures that learners don’t waste any time covering old (or irrelevant) ground. In addition, a modularised programme can be easily adapted in response to environmental changes.

Unit standards-based frameworks have been strongly criticised for their fragmentation of learning. In theory the division of assessment into its smallest components means assessment is completely independent of delivery and learners can start anywhere, progress at their own rate, select and combine units as they require, and sequence their learning to meet their own needs. From pedagogical, curriculum development and education management perspectives, somewhat larger chunks of learning and assessment are more manageable and in practice the acquisition of learning and skills almost invariably depends on particular combinations and sequencing. As a result providers tend to “package” units into modules for delivery purposes, thereby increasing the coherence and structure of the learning and reducing the theoretical benefits. It requires considerable skill and experience to use unit standards to develop of curricula in which learning and assessment are experienced as seamless and synthesised.

Credit systems provide a way of quantifying the learning to be transferred or recognised; they allow the amount of time required for the learning to be described and compared. Credit points are a quantification of the “volume” of learning, or how long it takes a typical learner to achieve a specified chunk of learning. Credits represent notional learning hours: these include all formal and informal learning activities, practical work and practice and all assessment-related activity. A common definition of one credit is 10 notional hours of learning. The Scottish NQF has evolved into the Scottish Qualifications and Credit Framework (SCQF). All qualifications in the SCQF must be credit-rated, which implies that the volume of learning of each credit-bearing component of the whole
qualification must be measured. In Hong Kong, the Education and Manpower Bureau's ambitious attempt in 2005 to gain simultaneous buy-in for a credit accord and the NQF was thwarted by stakeholder resistance based on fundamental differences in the measure of a credit between the funded Higher Education sector and private providers. Importantly, both Raffe (2003) and Coles (2006) consider that credit accumulation and transfer (CAT) systems may be seen as a second-stage process in the incrementalist approach to NQF development.

The guiding philosophy of a qualifications framework is the underlying thinking that implicitly, often covertly, underlies the development and implementation of the NQF. Examples include neo-liberalism, managerealism and vocationalisation. The intellectual roots of the idea of an NQF are most probably located in the competence approach to vocational education which found favour in the UK in the early 1990s and which led to the idea that all qualifications could and should be expressed in terms of outcomes, without prescribing any specific learning pathway or programme. This idea found favour in the context of the emerging neo-liberal economic policies of the day in the UK and New Zealand, which emphasised the primary role of the private sector in economic development. It was assumed that employers would be in the best position to identify training needs and therefore to say what kind of vocational qualifications were needed, by basing them on workplace performance outcomes. This approach effectively marginalised the former key players in vocational training: the unions and the education and training providers, who were seen by the government of the day as offering what their staff could teach rather than what employers in different sectors needed. The major political function of the first qualifications framework in the UK (the NVQ framework) was to provide a mechanism for transferring the control of vocational education from providers to employers. Thus qualifications have become an arena in which a framework is used in the service of powerful political agendas, including social redress and economic reform. The impact of these agendas on a domain that was formerly the preserve of academics and master craftspeople has been immense. It is small wonder then that the implementation of qualifications frameworks has been characterised by the vigorous resistance of educationalists in many parts of the world. Frameworks and their associated systems have introduced a radically different approach to learning, and a bureaucracy and jargon that is perceived as
foreign and alien, and in many respects irrelevant to the former communities of shared practice.

Allais (2007) reflects that the popularity of NQFs over the past 20 years has resonated with the increasing dominance of neo-liberalism, which emphasises market solutions and argues that the state should be pared down. An emphasis under this philosophy on education for human capital and human resource development may partly account for the rise of outcomes-based frameworks that are linked to employment, economic improvement and international competitiveness.

NQFs are also seen as a way of raising the status of vocational qualifications, by showing that they are on the same level on a framework as another qualification and thus establishing that they should be seen as equal by society. This “vocationalisation” is promoted by governments as a means to produce more useful skills and develop the economy. Young (2005) defines this phenomenon as the embracing by governments of the principle of similarity (similarities are more important than differences between qualifications across sectors). He points out that in reality, differences in types of learning, and the skills and knowledge required by different occupational sectors and between qualifications related to general and vocational education remain. He suggests that many of the difficulties in implementing unified frameworks derive from a failure to perceive this fundamental truth, and also that governments embrace the idea of an NQF because it provides mechanisms for accountability and control of providers. He sees the trend on the part of governments internationally to use qualifications as drivers of educational reform as “having less to do with improving the quality of education and more that an NQF provides a government with an instrument for making educational institutions more accountable and quantitative measures for comparing different national systems” (Young 2003).

Allais (2007:68) expands on this theme and sees outcomes-based qualifications as a significant tool to open up markets in education. Instead of it being dominated by the concerns of educators and the academy, education can be opened up to wide range of private providers who can provide programmes that lead to the required outcomes or competences. Allais (2003, 2007) also argues that while the rhetoric of the South African NQF relates to democratic transformation and social redress, the early stakeholders were involved in a
limited project focused on making the South African economy competitive in the international capitalist economy and on bringing the benefits of more jobs and a greater spread of wealth, higher wages and increased skills. Allais (2007:73) describes the outcomes-based qualifications approach to educational reform as a "managerialist-type" reform, and suggests there are a number of key reasons why it has encountered problems:

- the system leads to a spiral of specification that becomes completely unworkable
- over-specified outcome statements do not provide a basis for curriculum design, because they do not specify knowledge
- the nature of curriculum knowledge is such that it needs to be acquired in educational institutions.

Possible future directions for qualifications frameworks in Africa

Qualifications frameworks are drivers of change that have profound effects on education systems. Qualifications frameworks influence the way education institutions are organised and how they operate; they blur the traditional boundaries between sectors and types of institutions and can effectively shift the balance of power between stakeholders. As a result great care needs to go into the development of such a powerful instrument with its huge implications for social and economic development. Young (2003) identifies three major problems for the implementation of qualifications frameworks: over-complex approaches, over-ambitious visions and top-down strategies. Ideally then, implementation should be based on simplicity of design and incremental vision and should encourage local initiatives. Some general principles for the design can be derived from this advice. Lessons drawn from the experiences of the best-established frameworks seem to suggest the following broad principles:

- Avoid extreme standardisation by allowing for sector differences, building on existing practice (but challenge relevance and outmoded approaches), avoiding prescriptiveness and “spirals of specification”, and encouraging differentiated provision.
- Facilitate communication and relationship-building by promoting trust and credibility, incentivising participation, balancing the interests of stakeholders, valuing traditional domains and expertise, and developing workable systems for CAT and RPL.
- Develop quality assurance systems that are enabling and enhance “home-
grown” quality improvement by facilitating the recognition and sharing of good practice, promoting relevance and quality of qualifications, and balancing theory and vision against pragmatism and expediency.

The starting point for the development of a qualifications framework is current understanding of existing key qualifications and their relationship to each other. Most frameworks derive from considerations of what already exists, but some frameworks have “thrown out the baby with the bathwater”. Existing qualifications can provide important benchmarks, and since level descriptors are usually developed without reference to a specific knowledge area, and can be quite abstract and technical, typical or well-known qualifications provide valuable reference points in the framework architecture.

An enabling framework can provide broad parameters and developmental support, challenge outmoded programmes and practices and encourage engagement between stakeholders and partners. Programme development can be led by education providers, building on existing qualification systems. Implementation of the framework can be incremental, allowing for trust and credibility to develop over time. The inclusivity of the framework depends entirely on the extent to which participation is perceived by stakeholders to be essentially beneficial. An enabling framework needs to allow for sector differences, learner diversity and different teaching and learning approaches and methods.

It is useful to learn from the experiences of other countries and guard against the risks associated with unitisation of learning and criterion-based assessment, especially the risk of assessment procedures becoming unmanageably detailed and unwieldy and programmes of learning becoming dominated by assessment. In the establishment and implementation of a new qualifications framework, consideration needs to be given to a number of transition issues including whether to require accreditation of all participating institutions at the outset, with the risk of delaying the implementation of the NQF, or whether to provisionally accredit all existing reputable institutions and commence an audit regime to confirm ongoing accreditations over a longer period of time. Similarly there are decisions to be made about the approach to various categories of qualification, such as whether all existing qualifications should be required to meet the validation criteria prior to registration on the framework (which may, for example,
require conversion to outcomes-based modules), and how to handle international qualifications.

**Concluding comments**

As this paper is presented the South African NQF is undergoing radical changes after being subjected to various reviews over the past ten years. According to the soon to be promulgated NQF Bill, the new NQF will be a linked framework, made up of three distinct sub-frameworks: a sub-framework for trades and occupations, for higher education and another for general and further education and training. Considering that the South African NQF is now being overhauled, and keeping the extensive critique of qualifications framework presented in this paper in mind, the obvious question that comes to mind is why do African countries, various regions on the continent, and possibly the continent as a whole, continue to consider the development of qualifications frameworks? In our view, and based on our experience in South Africa, a number of African countries, the Southern African Development Community, and working within the Commonwealth and in Europe, the main reason for the continued global move, is that qualifications frameworks continue to offer much to both developed and developing countries and regions.

The main challenge is that these potential benefits are often negated through weak implementation and unrealistic expectations of what qualifications frameworks can achieve. There is no doubt that the African continent stands to benefit from the development and implementation of at least two previous generations of qualifications frameworks. In developing a new vision for qualifications frameworks in Africa there is no doubt that new mistakes will be made, there is however no sense in repeating the mistakes already made. The realisation of the age old saying that “fools rush in where angels fear to tread” needs to be avoided at all cost as more and more African countries move towards qualifications frameworks. Time and effort needs to be taken to engage with critical debates, while humble and incremental strategies have to be given time to mature.
A critical reflection on current qualifications frameworks and possible future directions in Africa

References


National Qualifications Frameworks: Insights from South Africa

Shirley Walters and Samuel BA Isaacs

Preamble

During the last thirty years, National Qualification Frameworks have emerged as an attempt by the state to 'manage' the relations between education, training and work. Drawing on South African experiences of thirteen years of development of a competency and outcomes based National Qualifications Framework (NQF), this paper highlights areas of greatest contestation and achievement; and our identified priorities for the future. (For details of our NQF’s development we refer people to the SAQA website where a number of analytical and descriptive documents can be found.)

We argue here for a view of NQFs as works-in-progress and as contestable artefacts of modern society, which can provide an opportunity to address, in a modest manner, aspects of lifelong learning that contribute to economic development, social justice and personal empowerment. We stress the need to recognise that, like any educational innovation, the context within which the NQF is developed is a primary consideration, which includes the ways in which politics and pedagogy give it particular shape.

Introduction

From the early years of the twentieth century, the relations between education, training and work have become increasingly complex and contested. One example of such contestation is apparent in discourses around Competency Based Training (CBT) and the relationship between this form of training and more classical forms of education that dominated the curriculum of schooling in Europe for hundreds of years and traces of which still remain (Bernstein, 1996: 82 - 90).

During the last thirty years, competency based National Qualification

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32 This paper was presented at the Conference “The European Qualifications Framework linking to a globalized world”, Brussels, 29-30 January 2009. This paper draws on an article by Ben Parker and Shirley Walters “Competency based training and national qualification frameworks: insights from South Africa”, Asia Pacific Education Review Volume 9(1), February 2008.
Frameworks (NQFs) have emerged as an attempt to 'manage' the relations between education, training and work and, unsurprisingly, have been highly contested. South Africa provides an intriguing example of how a confluence of global influences were indigenised and adapted to meet national objectives and how, after thirteen years of development, the architecture and practices are being reshaped.

South Africa's NQF, which was conceived and established in the transition to a post-apartheid democracy, embodied many of the aspirations of the time, above all, transformation of the apartheid education system through an NQF that addressed access, redress, portability and progression and enabled people to become lifelong learners (Allais, 2007: 225). Given the idealism of the times, hindsight understands the impractical idealism of the model and of the qualifications and standards setting processes, which emerged as policy was implemented. This paper traces how, in the South African case, in the 1990s, an indigenised version of competency based training (CBT) became the dominant political discourse guiding educational reform and was 'implanted' in the education and training system through the creation of an NQF managed by the South African Qualifications Authority (SAQA) in concert with government, Sectoral Education and Training Authorities (SETAs) and other stakeholders.

Before exploring the particular NQF issues, we will present an illustrative snapshot of some of our specific context to assist you in understanding where we are coming from, and what the similarities and differences in our various contexts may be.

**Context matters**

A key observation in a middle income country like South Africa is the very large proportion of young people. The demographic profile is diametrically opposite to that of most of the developed economies, often referred to as the 'north`. Our country is very diverse in terms of geographic regions, ethnicities, languages, levels of poverty and wealth. It is therefore important to stress that even within our own country we have to be alive to the different approaches to education and training provision that may be required to meet the needs of the 48 million people. A quick illustration is given via a map of South Africa and its provinces:
South African population: age profile

51% of the South African population is below the age of 25. In comparison with a country such as UK, the young population is much higher and the old population much lower. This age feature of countries of the south is well illustrated by a comparison of the ages of a basket of more and less developed countries\(^\text{33}\).

Figure 1: Age Groups 0 to 14 and 60 plus as % of total population in 2005

In addition, life expectancy at birth in South Africa in 2007 was 50\(^\text{34}\). This compares with UK figures for 2004-2006 of 77 for men and 81 for women\(^\text{35}\). These figures indicate the very different constituencies for school education and adult education in the different countries. How do (or should) the very different age profiles of our populations impact our thinking about lifelong learning and NQFs?

Given South Africa’s history, racial differences are key in analysis of its statistics. The term ‘population group’ is used to denote the 4 racial subgroups of the population, which are Black African, Coloured, Asian and White. We follow this convention, and an age analysis by population group is revealing:

Age by population group

The above demonstrates that the youth of the population is as a result of the youth of the Black African population. The age distribution of the other population groups is relatively even.

Employment and unemployment

South Africa is regarded as a middle income country with a per capita income around US $3600, in the same category as Argentina, Brazil, Russia, Turkey and Venezuela. The South African economy displays elements of both development and underdevelopment, sometimes characterized respectively as the 'first' and 'second' economies. In the former, a small but growing proportion of the population enjoys a standard of living comparable with that in the industrialized world while in the latter there are significantly high levels of poverty.

With regard to poverty, recent estimates indicate that more than 45 percent of the population is living below a conservatively-estimated national poverty line (R354 per month). Poverty is also distributed unevenly by race, gender and region. For example, the proportion of black South Africans living on less than US $1 per day was estimated recently at just under 13%; the corresponding figures for coloured, Indian and white South Africans were respectively 3.6%, 3.1%, and 0.4% respectively. Regionally, using the same measure of poverty, the incidence of poverty varies from 2.7% in the Western Cape to 15% in the Eastern Cape and 18% in Limpopo.

Vast inequalities in the distribution of income and wealth represent a formidable challenge and remain an important constraint to growth and an important factor in
addressing problems of social cohesion. South Africa is one of the most unequal countries - as with poverty, the pattern of inequality manifests itself in its racial, gender and regional dimensions. In addition, a new trend of intra-black inequality is manifesting itself in the post-apartheid era. Underlying the poverty and inequality challenges is a high level of unemployment. The unemployment rate varies between 25 and 40% depending on the measure used. Unemployment is highest amongst black Africans (32%), and women (31%), and in rural areas.

This provides a glimpse into the context within which we are working to build the NQF and strengthen lifelong learning for the majority of the population.

**The indigenisation of Competency Based Training and the development of South Africa's NQF**

14 years after the election of South Africa's first democratic government, South Africans have become all too aware of the difficulties of education change posed by the challenges of transforming the legacies of Apartheid: the persistence of inequalities, learners lack of access and success, weak management practices and poor teaching practices. Our collective failure to produce significant successful change is all the more depressing because of the dazzling array of our transformative policy interventions. - South Africa has a strong and progressive constitution and comprehensive policy and regulations focused on achieving freedom, equality and human dignity. One of the major education policy initiatives of the newly elected government was signalled by the promulgation, in October 1995, of the South African Qualifications Act, which formally established the NQF. At the time, the NQF was seen as a key instrument for transformation. In 2001, however, the Minister of Education, set up a process to review the NQF. Six years later, the Ministers of Education and Labour had, in September 2007, issued a Joint Policy Statement (MoE and MoL, 2007a), which concludes the NQF Review process.

A new NQF Act has just gone through parliament and is waiting the President's signature to be enacted. This early and lengthy review process indicates ongoing intense political contestation surrounding the NQF and SAQA and their role in the transformation of South African education and the ways in which we can best understand different forms of learning and the relations between them (Allais, 2007: 34, Lugg, 2007: 182).
The overarching objectives and vision of the NQF were forged over a period of 10 years starting in the late 1980s and were shaped by a confluence of external and internal dynamics (Allais, 2007: 72, Lugg, 2007: 46). The key external influences came from western developed countries where changing modes of economic production were placing increasing emphasis on the importance of a skilled flexible labour force, which was thought to require an integration of education and training and which lead to the emergence of NQFs (of particular importance were the New Zealand, English and Scottish models) (Mukora, 2006: 26). Internally, there were economic and political imperatives prioritising a need to move away from the racial segregation of apartheid education, which excluded the majority of the population from access to education and training opportunities, towards an integrated education and training system promoting equity and development (Allais, 2007: 221, Parker and Harley, 2007: 18).

As part of an overall strategy to foster a culture of lifelong learning, SAQA focuses on ensuring the development of an NQF that is underpinned by systemic coordination, coherence and resource alignment in support of South Africa's Human Resource Development Strategy and the National Skills Development Strategy. The objectives of the NQF (which remain in the new Act) are stated in the SAQA Act: 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, contribute to the full personal development of each learner and the social and economic development of the nation at large.

South Africa's NQF was conceived as a comprehensive and unified ladder of learning with multiple pathways enabling learners to move from one field of education to another and to progress up the ladder. Those excluded from educational opportunities in the past would be given access onto a rung of the ladder through recognition of their prior learning and experience (RPL). In addition to its focus on setting standards through pegging qualifications onto rungs of the ladder, SAQA has had responsibility for the overarching coordination and evaluation of the quality assurance, undertaken by Education and Training Quality Assurance bodies, of the programmes that lead to qualifications and of the providers of those programmes.
All South African qualifications are included on the NQF, both those that were developed prior to the NQF (historical qualifications), and those developed through SAQA's standards setting structures (new qualifications). Education and training providers submitted their historical qualifications for registration on the NQF between 1998 and 2003 and had to align with NQF requirements, which included an outcomes-based format intended to provide a basis for comparability of learning achievements that would create a platform for mobility, portability, progression and RPL.

The use of an Outcomes Based Education (OBE) approach to standards setting has its origins in the CBT movement. In the early 1990s, South African educators and policy-makers drew strongly on developments in CBT in England, America and Australia. Broadly, CBT is an approach to vocational and occupational training that places emphasis on what a person can do in the workplace as a result of completing a programme of training where competency refers to knowledge, skills and values required to perform a specific occupation. Drawing on this approach, the idea emerged and took hold in what has become an international movement amongst governments, that competence could be expressed in the outcome statements of a qualification without '…prescribing any specific learning pathway or programme." (Young, 2005: 5).

In the South African debates, there was a concern that CBT could be too 'behaviourist' and 'atomistic' and narrowly focused on specific 'items' of skills performance. The fear was that knowledge and skills would be understood as referring only to performances that can be observed and measured thereby excluding the 'interiority' of the learner and reducing assessment to a checklist approach of 'correct behaviours'. A policy decision was made in the mid-1990s, to use the term 'Outcomes Based Education' to ensure a more holistic and 'constructivist' view of learning that would not reduce competence to only the observable but would include the consciousness and conscience of the learner (Moll, et. al.: 2005: 78-115, Moll, 2002: 7). With respect to psychological theories of learning this marked a shift from the behaviourism associated with the work of Skinner, to the constructivist theories of learning associated with Piaget and Vygotsky (Moll, 2007).

Currently, SAQA's operational structure is configured around three key strategic areas, namely standards setting, quality assurance and the electronic
management of learner achievements through the National Learners' Records Database (NLRD). The key instrument in standards setting is the design of qualifications standards, which are expressed through outcome statements. Qualifications can be based on 'unit standards' which are 'units of learning' with specific learning outcomes but smaller than a full qualification. These units range in time demand from 20 hours of learning up to 160 hours of learning. Both qualifications and unit standards are registered on the NQF. The achievements of SAQA in its implementation of the NQF from 1997 to 2007 in relation to standards setting include:

- By July 2007, 74 SGBs were operating, and 787 new qualifications and 10,988 unit standards had been registered. In addition, there were 7,092 provider-generated qualifications recorded on the NQF (of which 492 were new qualifications, and 6,600 were historical qualifications).
- By July 2007, 7.5 million learners' achievements were registered on the NLRD and there were 23,990 providers accredited for 6,683 qualifications. There were 31 accredited Education and Training Quality Assurance bodies (of which 25 are Sectoral Education and Training Authorities).

A comparison between “historical” qualifications developed by providers and “new” qualifications developed by SGBs after the NQF was established shows a significant increase in qualifications available at NQF levels 3, 4, and 5. The highest level of activity has been in Manufacturing, Engineering and Technology. Provider-generated qualifications are registered, in the main, at levels 5 and above. By contrast, unit standards have been registered primarily from levels 2 to 5.

Joint implementation plans have been entered into enabling Sector Education and Training Authorities, professional bodies, government departments and other bodies such as the Independent Electoral Commission to establish SGBs to generate qualifications and standards that meet their particular needs. By July 2007, over 35 joint implementation plans had been established. These included a broad range of partners and cover a variety of standards and qualifications including: Local Government and Water Services SETA, Mpumalanga Government, Services SETA, Financial and Accounting Services SETA, Health and Welfare SETA, National Department of Arts and Culture, Independent Electoral Commission, Mining Qualifications Authority and the National Treasury. The impact of an outcomes led qualifications framework on qualifications and
quality assurance in higher education and in schooling has been mixed. In the case of higher education, institutions have become more aware of quality assurance issues and most have instituted quality assurance management systems and have done some standardising of their programmes and qualifications. The light-touch approach adopted by the Council on Higher Education and the Higher Education Quality Committee to outcomes and the developmental approach to quality assurance reviews and audits has encouraged academics to scrutinise their own curriculum, pedagogic and assessment practices without impinging overly on their academic autonomy, although some would express concern at the increased administrative loads now required as part of curriculum development and programme management.

The recent history of the schooling system is more complex. The specific interpretation of outcomes based education, which took hold in SA in the mid-1990s, informed the development of the NQF and of the school curriculum. However, the dominance of OBE was soon challenged within schooling and, in the last five years, there has been an increasing emphasis placed on providing detailed curriculum guidance, professional development of teachers and national external assessments. In higher education and schooling there are causes for serious concern about quality - especially the vast divergences in quality of provision, which suggest that our nascent quality managements systems are proving ineffective in addressing the weaknesses of the system.

In the field of occupational learning, weaknesses are most apparent in the persistence of both high levels of unemployment and high levels of skills shortages in key areas of the labour market, which lead to the establishment, in 2006, of the Accelerated and Shared Growth Initiative for South Africa (ASGISA) and the Joint Initiative on Priority Skills Acquisition (JIPSA). Part of the explanation for this ineffectiveness lies in a lack of systemic coherence and collaboration between the role players and of clear differentiation of their roles and responsibilities. For example, the uptake of unit standards based qualifications is low. There are, however, myriad potential explanations for this failure, which attribute responsibility to different role players. Could it be that the Sectoral Education and Training Authority system, which should be the main channel for the flow of learners into unit standards based occupational qualifications has not functioned efficiently? Or is it the conceptual design model
used by SAQA? Or perhaps, it just takes time for new kinds of qualifications to become established.

Implementation of the NQF has clearly been affected by the climate of uncertainty created by the lengthy review process, and the differences between standards setting and quality assurance practices across the three knowledge fields have impeded progress towards the NQF objectives. The release of the Joint Policy Statement (JPS), in September 2007, by the Ministers of Education and Labour attempts to address the challenges described above and is intended to mark the beginning of a new phase in the development of South Africa's NQF (MoE and MoL, 2007a).

The two major changes to South Africa's NQF are moves away from 'standardisation' to 'differentiation' and away from an up-front, design down and prescriptive approach to standards setting to a practice-based, design-up and descriptive approach. There will be a shift from an 8 level to a 10 level NQF to accommodate greater differentiation in higher education. The 8 level framework is open-ended and allows for all masters, doctoral, and post-doctoral qualifications to be registered at level 8. The original conceptualization tried to address the issues of articulation, access and progression at the lower levels of the NQF and wanted to avoid unnecessary prescription at the higher end where learners with masters degrees and higher should be in able to manage their own career development. Higher education lobbied consistently to have a 10 level framework with discrete levels for masters and doctoral degrees and - for the first degree to be awarded at level 7 and not at level 6 (as is the case in the 8 level framework). The standards setting and quality assurance functions carried out by SAQA will shift to three Quality Councils: the Quality Council on Higher Education (NQF Levels 5 to 10); the Quality Council for General and Further Education (Umalusi) (NQF Levels 1 to 4 - the schooling system and technical colleges); and, the Quality Council for Trades and Occupations (occupational qualifications: NQF Levels 1 to 10). This will allow for the emergence of different sub-frameworks shaped to the needs of each distinct knowledge field and its associated forms of learning.

The major changes to standards setting and the design and delivery of programmes and qualifications are likely to occur in the field of occupational qualifications. Currently, occupational qualifications are integrated with no formal
distinction between different forms of learning, in future, they will contain three components: General knowledge and theory; General and occupationally relevant practical skills; and, requisite work experience. These components can be learnt and assessed separately in different sites; their achievement will be recorded formally and will count towards certification of a unit standard or qualification made up of specific sets of components (DoL, 2007b: 3).

The development of occupational qualifications and unit standards will be informed by the development of a curriculum, which will structure knowledge, skills and values into a meaningful process of developing occupational competence through selecting, sequencing, pacing and assessment and includes classroom activities, practical activities and workplace experience and a strong emphasis will be placed on the role of external national assessments in quality assurance (DoL, 2007b: 5). The key shift here is that the process of curriculum development begins with work place practices rather than with outcome statements. The perception that outcome statements are developed in isolation from workplace practices needs to be challenged as the persons that are drawn into the standards-setting processes are all drawn from expert practitioners. The issues relate to who sets the standards and is reminiscent of the debates about who develops the curriculum.

The government expects these changes to make the system simpler and more efficient by recognising different forms of learning in the different parts of the education and training system. Broadly, this is move away from a top-down model that tried to use OBE as a prescribed 'common ground' applicable to all education and training towards a bottom-up model that allows for differentiation and sees the NQF as a 'common ground' that will be constructed slowly and incrementally.

Underneath the surface: a brief overview of key debates that have informed the development of South Africa's NQF

In South Africa, the early ambitious dreams of what could be achieved through national qualifications frameworks have been replaced by more modest views of NQFs as frameworks of communication that grow incrementally. Parker and Harley (2007: 18) draw a distinction between two archetypes of NQFs that distinguish between frameworks that describe and coordinate ‘what is’ and frameworks that try and prescribe ‘what ought to be’, with the former being
favoured by developed countries and the latter by developing countries. The descriptive frameworks of developed countries develop incrementally towards 'common standards'. By contrast, the normative frameworks of developing countries tend towards a radical rupturing with the past and are intended to transform education and training systems. The review of South Africa's NQF marks a shift from a normative approach to a descriptive approach to standards setting.

The initial impetus for the development of NQFs was focused strongly on articulating academic schooling with vocational or occupationally oriented education, and education and training more generally with the economy. This has been supplemented, in the last decade, by an increasing need for a free flow of intellectual capital and skilled labour and a growing economic need to commodify and massify education and training. This tramples on traditional autonomies and vested interests leading to contestation over the meaning and purposes of qualifications and the curriculum, pedagogic and assessment practices associated with them. Developing communicative articulating frameworks, which enable a free flow of intellectual capital and skilled labour is an exercise in harmonisation and standardisation - creating rules of recognition and evaluation by which diverse qualifications can be compared and categorised as having x, y, and z in 'common'. Whether one approaches this with a 'transformative' and prescriptive approach to reform (by diktit) or an incremental and generative approach (by recognition of 'good' practices), the target remains harmonisation and/or standardisation.

Access, redress, mobility, portability and progression all depend in some or other way on the assumption that it is possible to recognise and evaluate "something" that is comparable between different qualifications or different forms of learning. The original design of South Africa's NQF located this function in the learning outcomes of a qualification. Whether a qualification was discipline-based and achieved through an institution or craft-based and achieved through workplace experience, the learning outcomes embedded in the qualification were supposed to be 'learning - mode' neutral and could therefore be used as a 'proxy-function' to map one set of knowledge, skills, and values onto another.

It is this aspect of South Africa's NQF that has been most contested. At the heart of these debates lie two very distinct understandings of learning processes and
their outcomes, which are grounded in the debates between behaviourist and constructivist views of learning. The latter extol the esoteric nature of learning: knowledge, skills and values can only be acquired through initiation into 'worthwhile practices and grammars' of a specific knowledge discourse (Ensor, 2003: 330). This takes time and a conducive environment, motivated and intelligent learners and appropriate curriculum, pedagogic and assessment practices. From this perspective, outcome statements are 'formal' rather than substantive standards and provide little specification of the selection, pacing, sequencing, progression and evaluation criteria that will characterise the curriculum and there is no indication of appropriate depths of content knowledge and levels of cognitive demand (Allais, 2003: 308). While this allows for a significant degree of autonomy over the curriculum, it presupposes that educators can read the criteria in a way that is meaningful and 'aligned with' the meaning intended by the designers.

From a behaviourist perspective, outcome statements are descriptions of observable and measurable behaviours. However, because learning can't be captured by simple descriptions of behaviour, outcome statements become increasingly specified (Allais, 2007: 272). The risk is that what is supposed to be a platform for public communication and participation instead becomes a domain of esoteric jargon understood only by experts - leaving learners, providers and employers struggling to make sense of basic matters like curriculum and assessment. Trying to prescribe quality up front through ever increasing levels of specification and complexity is a doomed enterprise, which assumes that outcome statements are transparent descriptions of 'competence'. A design down approach, which begins with outcome statements, is oriented away from actual curriculum, pedagogic and assessment practices towards policy and design criteria. Approval of qualifications becomes a matter of compliance with technical regulations rather than a fit-for purpose practice oriented approach. As indicated earlier there needs to be a closer scrutiny of those involved in the design of outcome statements and the extent to which they are involved in curriculum development and implementation. It may very well transpire that a significant part of the problem resides in this area.

In recent South African debates, emphasis has been placed on a distinction between 'competency standards' and 'academic standards'. Competency standards are linked to job descriptions and their associated skills sets, which are
expressed through outcome statements. A person who has a qualification and designation as a 'plumber' must be able 'to do the job' and can have their performance evaluated against a set of 'performance/outcome statements'. Although these descriptions of practices can never be 'thick' enough to capture everything we expect of a person who has certified occupational or professional competence, they do provide a 'rule of thumb' sufficient for the purposes of a rather crude performance management tool.

While competency standards speak to skill sets and job description/performance measurement indicators, 'academic standards' relate to domains of knowledge and the curriculum and assessment practices by which they are achieved. The thinness of outcome statements in relation to these institution-based educational practices prevents them from playing a similar measurement and grading role. Confusion abounds when an NQF attempts to construct overarching 'qualification standards' to bridge the divide and describe knowledge domains, curriculum and assessment practices, skill sets and job descriptions in a common language. There is a necessary impossibility about these endeavours; however elaborate our languages of description we cannot create a 'perfect picture'. Outcome statements are not the same as outcomes or competences. Ironically, within current debates in South Africa, academics are defending idealism (the intrinsic worth of knowledge) by grounding their standards in real educational practices, while their counterparts in the occupational learning system are defending realism (skills outcomes) by grounding their standards in the ideal world of design policy and tools. This suggests the importance of a strong distinction between mastery of a body of knowledge certified by a qualification and the achievement of a set of competencies certified by a professional or occupational designation.

Building opportunities for life-long learning requires a clear understanding of 'comparability' and 'transferability' and reiterates the importance of initiatives such as credit accumulation and transfer and recognition of prior learning, which are understood to have the potential to improve access, progression, mobility and portability - nationally and internationally. What instruments, tools and practices can be used for comparability? Moving away from outcomes implies moving towards different approaches to recognising and evaluating different 'units of comparability'. By themselves, specifications of curriculum content and of assessments do not avoid the conundrums of interpretation.
If we can no longer pre-specify the 'unit of comparability', how do we begin to establish a framework for developing communicative models that articulate different forms of learning? We believe that the best way to address these challenges is through research driven policy, which informs the political and organisational shape of the NQF. In the South African case, there is already a considerable body of research on learning and on the NQF that can provide a foundation for future research. Two theoretical approaches that have become prominent within this research draw on Bernstein's (1996: 169-180) account of different knowledge fields and the power and control relations between and within these fields and on Lave and Wenger's (1991: 53) notion of communities of practice as learning communities which emerge in work places.

Although we are not advocating the use of these two particular theorists, we are suggesting that their already existing productive use in South African research, indicates that it is possible to conceptualise a vantage point from which to develop languages of description to explore the development of quality management systems and the role of qualification frameworks within these systems. Recognising differences between the fields, understanding the nature of their boundaries and hence the possibility of boundary crossings will inform how we develop an integrated approach to a national qualifications framework with articulations that enable comparability between different forms of learning and the different knowledge fields within which learning takes place and between these fields and the world of work.

There have been some suggestions, within South African debates, that the boundaries between the academic field and the 'everyday' field, between school and street knowledge, are very strong and that institutions, curriculum and assessment should be the primary foci of qualifications design and quality assurance. There is a particular emphasis on the importance of institutions as bedrock of quality education and training. This is obviously correct when applied to schooling and higher education. However, many occupational qualifications are delivered by non-institutional providers or in the work place, thus raising questions about approaches to quality assurance and development in non-institutional settings. Although the knowledge field of occupationally oriented education is far more context specific and delivery is less institutionalised, this does not mean that this non-academic knowledge field is content-less, nor that curriculum, pedagogy and assessment are less important. Rather than
dichotomising and demonising the everyday knowledge field, we should be researching curriculum, pedagogic and assessment practices in these fields to better understand how we can improve quality. Although, the existence of different knowledge fields and communities of practice does make agreement and articulation difficult to achieve, it does perhaps, make it all the more worthwhile.

Some insights on Competency Based Training and National Qualifications Frameworks from South Africa's experience

South Africa's experience illuminates the importance of coherent and systemic implementation and the slow nature of educational transformation. Qualifications frameworks can play an important role in the transformation of education and training system, provided that they are seen as a platform for communication and coordination rather than an arena of contestation and confusion. South Africa's NQF has already made some progress towards achieving its objectives and the changes proposed by the new NQF Act should further enhance the efficacy and efficiency of the NQF. Amongst other benefits, NQFs should enable: the development of relevant and appropriate qualifications, which address national and personal needs; improvements in quality assurance systems; and, monitoring and evaluation of progress towards national education and training objectives.

The NQF introduced new language, procedures and processes, which some found opaque and complex. Systems have continued to be simplified and streamlined in response to this and the NQF is now `coming of age` with citizens more familiar with its workings. However, we are aware that not enough has yet been done to develop 'navigational tools' to assist the population across all age groups to find their way. Guidance and counselling across the system is the next area that requires our concerted attention.

A particularly important achievement of setting up the NQF has been the development of a world-class electronic management information system, the National Learners' Records Database (NLRD). Given the fact that the collection, management and analysis of data present huge challenges in developing countries, the NLRD has been recognised as a replicable model for building effective and efficient databases for similar applications. (For completeness,
Appendix 2 at the end of this paper provides a succinct overview of the NLRD).

After 13 years of development the South African NQF is seen as an important reference point for new national and regional qualifications frameworks that are developing in many parts of the world. We are intimately involved in the exploration of the Southern African Qualifications Framework, South African experience indicates that qualifications frameworks should be built cautiously, modestly and incrementally. Development should have a strong experimental scientific approach in which failures or falsifications are seen as evidence. (For completeness, a brief account of SAQA's involvement in international partnerships is provided as Appendix 1 at the end of this paper).

South Africa's initial move to privilege CBT or OBE as the template for the whole education and training system through the use of outcomes statements as an up-front, prescriptive and design-down approach, which was intended to create a 'communication's platform' for portability of learning between different knowledge and occupational fields, has not succeeded. The schooling and higher education systems did not 'buy-in' to the approach, nor has South Africa's skills development system prospered. South Africa's deepening skills crisis, which is 'blamed' by many politicians and business leaders on disjunctures between schooling and higher education on the one side and the economy and labour market on the other side, has been exacerbated by the massive decline in apprenticeships and other types of work based learning. The number of apprenticeships has declined from a high of 80 000 per annum in the mid 1980s to 5 000 in the mid 2000s. South Africa's NQF has not met the expectations of business with respect to improving the supply of appropriately trained skilled labour or intellectual capital nor, the expectations of labour with respect to increasing access to educational and occupational opportunities. Far from contributing to the development of a lifelong learning system, some critics say that the NQF appears to have impeded South Africa’s progress towards these objectives.

The reasons for this failure lie in factors internal and external to an outcomes based NQF. Key amongst external factors was an underestimation of the weaknesses of institutions and the lack of competent educators and trainers inherited from Apartheid. Key amongst the internal factors was conceptual confusions and contestations over what was meant by competences and
outcomes (and forms of learning underpinning their achievement) and how they might best be described in qualification statements and used for quality assurance. Central to both sets of factors was a lack of clarity about the purposes of the NQF with stakeholders having very different perspectives and objectives ranging from the state's perspective of an administratively driven quality management system that could steer the education and training system towards its economic and political objectives to organised labour's view of the NQF as a portal to lifelong learning with strong emancipatory and empowering objectives.

NQFs are best understood as a works-in-progress and as contestable artefacts of modern society, which can contribute in a modest way to how a society manages the relations between education, training and work by finding 'common ground' between distinct forms of learning and their articulation with work place practices. This can best be done through a strong research driven collaborative approach to NQF development that seeks 'means of portability', ways of enabling boundary crossings, of improving quality and relevance and of understanding better, different forms and sites of learning. There is no doubt that NQFs can become divisive and make little, if any contribution, to life long learning or educational reform. This is not pre-ordained, however, as NQFs can provide an opportunity to address, in a modest manner, aspects of lifelong learning in ways which contribute to economic development, social justice and personal empowerment.

We welcome this opportunity to talk and network with colleagues, to build partnerships which can add to our collective understandings of the intellectual, pedagogical and political challenges that we all face, and to strengthen our institutions which aspire to attainment of greater social justice for the majority of girls, boys, women and men.
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APPENDIX 1

International Partnerships

James Keevy

Since NQF development was first considered in South Africa, an emphasis was placed on partnerships between, initially the South African Department of Education, and later on the South African Qualifications Authority, and a range of international counterparts. While funding form the mainstay of these partnerships in the early years, notably with the European Union, and the Canadian International Development Agency, the partnerships matured in later years to include projects that were of mutual benefit to South Africa and the international partner. In this regard the development of the National Learners’ Records Database (with CIDA) and the study on the impact of the South African NQF (with the EU) stand out as two pioneering initiatives that have subsequently drawn interest from various parts of the globe. More recently SAQA has partnered with international agencies to assist in qualifications framework and quality assurance related projects, including the Commonwealth Secretariat (for research into teacher qualifications), the Commonwealth of Learning (for the development of a transnational qualifications framework) and the Southern African Development Community Secretariat (for regional benchmarking and the development of the SADC regional qualifications framework). Through the United Nations Development Programme and the Italian Contribution to the Education Sector Development Programme in Ethiopia, SAQA has also been to contribute significantly to NQF development in the Seychelles and Ethiopia respectively. Closer ties have been built with the OECD through the international initiative on the recognition of non-formal and informal learning, and the Caribbean Community (CARICOM), through the recognition of teacher qualifications. Today SAQA is an active partner and contributor in NQF related developments continentally and internationally.
APPENDIX 2

The National Learners' Records Database
Yvonne Shapiro

At only nine years old, SAQA's National Learners' Records Database (NLRD) has already proven itself to be world-class, and has been called upon to assist several other countries as they contemplate the development of similar systems.

The NLRD is a misnomer: before it was developed, its sponsor, the Canadian International Development Agency (CIDA), needed a quick name to include in its project charter, and the name stuck. While this name does at least put learners at the centre of everything, the NLRD is in fact a massive system rather than simply a database: it is the integrated electronic management information system of South Africa's National Qualifications Framework (NQF), and should more accurately be named the “NQFMIS”. But be that as it may.

The two main functions of the NLRD are the macro one, which is to provide policy makers and decision makers with comprehensive information on education and training, and on labour market supply; and the more micro, or personal, one, which is to track the paths of individual learners, providing them and their employers with proof of qualifications obtained.

Developed in modular fashion, so that further information needs can be met as they arise, the NLRD has, since its inception, accommodated South African qualifications and unit standards and learners' achievements of these, and has more recently been expanded to accommodate professional designations and learnerships. With ever-increasing learner numbers flowing into the NLRD from all of South Africa's Education and Training Quality Assurance bodies (ETQAs), SAQA is in a position to perform various analyses of this information, to verify the achievements of learners, and to ensure that the uptake of the qualifications and unit standards registered on the NQF is understood.

An example of such analysis is a key publication of the NLRD: the report, Trends in Public Higher Education in South Africa, launched by the Minister of Education each time it is produced. She recently used this report to highlight the fact that, from the mid-nineties to the mid-'noughties', the number of graduates in the
available pool in South Africa grew from approximately half-a-million to 1.18 million, with the number of black people in the pool increasing from one in four to one in two. She added, however, that “the depth of the historical legacy of apartheid damage and distortion is evident in the simple fact that the majority of black graduates are in the social sciences and not in the engineering sciences and technology.” Another important trend shown by the report is that, while the number of black people and women in the pool has increased dramatically, the majority of these do not undertake postgraduate studies, and the vast majority of Masters and Doctorates are held by white people, especially men.

Analysis of the NLRD data on the uptake by learners of the new NQF qualifications is currently in progress. Preliminary results are that the NQF field showing the highest uptake is Manufacturing, Engineering and Technology (with 58 000 learners recorded on the NLRD to date), its most popular qualification being the National Certificate: Introduction to Mining and Minerals, which provides skills in mining operations - essential for South Africa's extensive mining industry. The Services field has the second-highest number of learners (40 000), its most popular qualification being the National Certificate: Tourism: Guiding, developed to enable the creation of innovative and exciting guided experiences, and highly relevant to the tourism industry in Southern Africa.

A further publication of the NLRD, the searchable database of the content of all qualifications and unit standards on the NQF, is entirely web-based. The colourful and user-friendly search utility accesses records in seconds, and these can be printed or saved in summary or in detail. Subscribers also have the facility to download these records, in their entirety, into their own databases and to update these regularly.

In total, the NLRD contains records of 8 million learners and their achievements; 51 000 assessors; 31 000 providers of education and training (large and small), and their accreditation to offer qualifications and unit standards; 829 new NQF qualifications (and a further 325 that completed their cycles without being reregistered); 8 000 qualifications that existed before the NQF and were submitted by their providers and added to the database; 9 500 new unit standards (and a further 4 200 that completed their cycles without being reregistered). If all of the text and numbers contained in this system were to be printed out, they would cover hundreds of thousands of pages.
South Africa is in the process of setting up a national Human Resources Database, to track key labour market issues, especially skills provision and skills development. The Joint Initiative on Priority Skills Acquisition (JIPSA) commissioned research into whether the NLRD should, in fact, become this database. It was found that, while the supply aspect of the labour market is indeed the core business of the NLRD, the demand aspect is not; thus, it was rather recommended that the NLRD should be used as a basis and model for how the HR Database should function, and should be a key contributor of information to it. SAQA has committed to supporting this process.

The NLRD is also helping Statistics South Africa to pilot a method for declaring national data systems to be official statistics, in terms of the South African Statistics Quality Assurance Framework (SASQAF). Statistics South Africa usually declares specific reports (rather than entire data systems) to be official statistics, but has risen to the challenge of SAQA's request that the NLRD should be declared thus.

A key challenge experienced by the NLRD (in line with similar challenges worldwide) is that of facilitating the relationship between people and the information that they manage - assisting the NLRD's data suppliers to understand the requirements of the system (the NLRD Load Specifications) and to submit robust data. To this end, some creative solutions have been developed, including Edu.Dex, a comprehensive data-testing system used by the data suppliers themselves; a Minimum Standard for data submissions; and league tables measuring their compliance with this standard and their performance.

As part of its assistance to ETQAs, the NLRD is engaged in a three-year project to offer intensive assistance to the Higher Education Quality Council (HEQC) of the Council on Higher Education (itself an ETQA), to gather information concerning its 100 Private Higher Education Institutions and load this onto the NLRD. To this end an information system, the HEQCIS, which has been designed and built by an IT service provider, is hosted by the NLRD on a SAQA server, and the HEQCIS Manager is stationed within the NLRD Directorate. The NLRD Load Specifications, Edu.Dex and Minimum Standard have been modified for this system and rolled out to these institutions.

The NLRD runs a service whereby learner achievements can be verified. This
consists of several options, the main ones being that individuals can contact SAQA concerning their own records and receive a free transcript of their records held on the NLRD, and subscribing organisations can request third-party verifications of the learning achievements of prospective or current employees, for any number from one to hundreds of thousands of records.

A related project was recently completed for South Africa's Department of Public Service and Administration (DPSA), which submitted its entire employee list to the NLRD for matching and then producing aggregated statistics of how many employees were qualified at which levels and in which fields. Work is also being done for the Department of Labour's project, Employment Services of South Africa (ESSA), matching data from its database with verification data from the NLRD, thereby providing acknowledgement from SAQA for all the matched records in the ESSA database published by the DoL.

The NLRD has a staff complement of 18 people, eight of whom are engaged in the two-year Information Administrator learnership and gain their employment experience as the NLRD's specialised data capturers. They study the National Certificate in Datametrics concurrently. The third intake has just successfully completed the learnership, and the fourth intake is due to commence during February.

SAQA staff and external service providers jointly ensure that the NLRD is well maintained and supported, that database administration is of the highest quality, that the required enhancements and developments are correctly specified and implemented, that disaster recovery measures are available if required, and that the NLRD system continues to function robustly.
Lessons from the South African National Qualifications Framework
Samuel BA Isaacs

Overview of the SANQF

When our SANQF was legislated in October 1995, it was the first piece of education and training legislation promulgated by our first democratically elected government. It was significant also in that it was enabling legislation as opposed to prescriptive legislation. This on its own presented the South African Qualifications Authority (SAQA), a statutory body established in terms of the SAQA Act of 1995, with challenges to establish the SANQF which was one of the first generation qualifications frameworks. The two international bodies that we could easily learn from at that time were the New Zealand Qualifications Authority and the Scottish Qualifications Authority. Other important systems' learnings came from Canada, Germany, Ireland and England. The concepts underpinning a national qualifications framework (NQF) had to be developed and communicated. Policy and regulations had to be developed in democratically legitimated ways. Given the transformation imperative of the South African context, this proved no easy task. Organisation and systems building at SAQA was not an easy task. The historical trajectories that pushed South Africa towards transformation also pulled it back. There were many NQF skeptics. A constant refrain at consultative meetings were variations of the following questions:

- Where in the world are NQFs working?
- Where are the international comparators?
- How much do NQFs cost and is it worth it?

At the initial stage of developing and implementing the SANQF in 1997, (the SAQA Board was appointed in May 1996, had its first meeting in August 1996, and the first staff member appointed in March 1997), we had to find an acceptable and accountable way to proceed with building both SAQA and the SANQF. To do this, I borrowed the title of Paolo Freire and Miles Horton's book, “We make the road by walking”, and introduced the metaphor, “We will make the NQF Road by walking reflectively, accountably and boldly”. This metaphor recognised the social constructedness of NQFs, while at the same time placing intellectual

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36 Paper presented at a conference on the Norwegian NQF in Bergen, Norway, 23-28 January 2010. Annexures have not been included but are available on request.
scrutiny, democratic participation and accountability, and leadership at the core of the SANQF's development and implementation.

At the very onset we realised that resource and funding constraints were critical determinants for the success or failure of the SANQF. The three necessary conditions for success were stated as democratic participation, intellectual scrutiny and resourcing (especially the aligning of financial, organisational and institutional resources). Throughout its existence SAQA has endeavoured to be an honest broker in working with SANQF stakeholders and has always striven to take intellectual scrutiny (in its various forms such as academic scrutiny, international comparators and world-class best practice) very seriously. This deep integrity has stood SAQA in good stead as it faced the many challenges in developing and implementing the SANQF, and will continue to do so in the future.

From an operational point of view, the following three inter-related sub-systems were required:

- Standards Setting
- Quality Assurance
- Electronic Management Information System

Annexure 1 gives a graphical representation of our initial system and structures. Each of these sub-systems has its own inherent challenges. When these were linked to our historical trajectory and immediate context, policy choices had to be made and accounted for. We did this through two sets of gazetted regulations: The National Standards Bodies' (NSB) Regulations (March, 1998) and the Education and Training Quality Assurance Bodies' (ETQA) Regulations (September, 1998). We did not require a separate set of regulations for our electronic management information system, (which we called the National Learners' Records Database, NLRD), as this was covered in the two sets. These regulations defined the processes and structures that would be used to develop and implement the core deliverables of the SANQF, namely the three sub-systems referred to above.

The key issues that emanated from these three sub-systems were the:

- Democratic participation of stakeholders
- Integration of education and training
- Separation of standards setting and quality assurance
• Exit level outcomes and assessment criteria
• Academic freedom and autonomy
• Power shifts and contestations among various stakeholders and role-players
• Sustainable organisational capacity and resources to lead and manage the processes

The SANQF has been extremely well documented and researched and I can make a comprehensive bibliography available for those wishing to look at the fine detail of how these issues impacted on its development and implementation. However it was the power shifts and contestations and the strategies to recognise and manage these that proved the most challenging. The SANQF was barely operational at the end of 1998 and already the call for its review was being mooted in some sectors but for different reasons. SAQA's ability to lead and manage processes in this climate was severely constrained by funding and other resourcing difficulties. To illustrate this point, SAQA was receiving at that time approximately twenty percent of its budget from the state and eighty percent from international donors. The European Union was a significant funder and a disproportionate amount of senior management time was spent on fundraising and ensuring its proper stewardship and SAQA's sustainability. The Ministers of Education and Labour announced a review of the SANQF in 2001. The review report was tabled in 2002 for public comments by 30 October 2002. A response document was tabled by the Departments of Education and Labour in July 2003 for public comments by October of the same year. The review process remained unconcluded until a Joint Policy Statement was issued by Ministers of Education and Labour in November 2007 and new legislation, the NQF Act (2008), was signed into law in February 2009 and became effective 1 June 2009. The review of the SANQF had taken an official period of seven years but its effect on its development and implementation extended from at least 2000 to the present, as we worked through the uncertainty created by the review process and the transition from the provisions of the SAQA Act to the NQF Act. After our fourth democratic elections in 1995 the Department of Education has been split into the Department or Higher Education and Training (which includes the Skills Development section of the Department of Labour) and the Department of Basic Education (which deals with schools). This new environment brings significant opportunities to better manage, and in some instances resolve, the key issues affecting the SANQF. Annexure 2 gives a snapshot of the review process. The
role of SAQA and the three Quality Councils under the NQF Act are given in Annexures 3-12.

This new architecture of the SANQF and its structures under the NQF Act attempt to resolve the issues previously stated and we are hard at work to ensure its success.

A significant change in the global environment has been the development of second and third generation qualifications frameworks (See Annexure 13 for a categorisation by Arjen Deij of the European Training Foundation). The global phenomenon of formal national, regional and transnational qualifications frameworks effectively means that no country or region can ignore them. A country has to engage with them and if it does not have a formalised NQF, it has to make its qualifications' arrangements transparent to its citizens and global partners for a variety of reasons from lifelong learning through to good governance and international trade. NQFs are an attempt at finding a convenient shorthand to describe complex education and training systems in a similar way in which macro-economic indicators describe national economies. One of the successes of SAQA has been the establishment and development of the NQF discourse in South Africa. The SANQF is alive, debated, contested and used in South Africa. It is increasingly being understood as a framework for communication, co-ordination and collaboration across education, training, development and work. In South Africa it is seen as an important policy for advancing lifelong learning. The recent OECD Report on the recognition of non-formal and informal learning, which includes South Africa, is very insightful in the progress we have made in this regard.

SAQA's role as the apex SANQF body in the further development and implementation of our NQF is pivotal to ensuring access and success for all South Africans wishing to achieve nationally recognised and international comparable quality qualifications.

**Key lessons learnt**

When I reflect on the development and implementation of our SANQF over the past fifteen years, I think we have learnt the following lessons:

1. It is important to understand the purposes for developing and maintaining
an NQF in your context, because it provides the vision and raison d'etre for it.

2. Understand the limitations of NQFs. Far too many people have unrealistic expectations of what can be achieved through qualifications frameworks alone.

3. Take intellectual scrutiny most seriously because the credibility and effectiveness of your NQF depends on it. NQFs should not be seen as purely technical instruments to be implemented in overly bureaucratic and technicist manners.

4. Active stakeholder and role-player participation is essential for building the relationships that facilitate collaborative networks that make shared understandings, shared meanings and shared strategies possible. In South Africa this has led directly to our current understanding of the SANQF as a framework for communication, co-ordination and collaboration across education, training, development and work. To this end SAQA, as custodian of the SANQF, has had to work exceedingly hard and carefully at relationship building in partnership with all role-players and stakeholders over the past 14 years.

5. Communication and advocacy are essential for informing the public of the value-add that the SANQF offers them. This function requires significant resourcing which is often overlooked in favour of the more visible operational activities required.

6. Recognise the power shifts and contestations. Finding viable and reasonable resolutions to power struggles can go a long way to advancing an environment that supports lifelong learning and is conducive to quality learning and credible qualifications.

7. The direct involvement of professional bodies has been a vital component of the SANQF. New understandings of professional designations, and the entrance of professional bodies in a previously excluded sector, have been of great benefit to the system as a whole.

8. The inclusion of non-formal and informal learning in an NQF is always going to be a challenge, but cannot be ignored. Through involvement in initiatives like that organised by the OECD we need to collectively find new ways to address this key challenge that forms a critically important part of an NQF.

9. NQFs are about systems change and change is not easy in most circumstances. When we come to education and training systems change
we have huge inertia to overcome in order to effect change. A particular thorny issue is curriculum development and change. This is extremely contested terrain. The SANQF, because it respected the academic freedom and autonomy of institutions, did not seek to involve itself in curriculum development as a whole but restricted itself in standards setting to the exit level outcomes and assessment criteria for qualifications (unquestionably a part of curriculum development). The power shift to national standards setting bodies and standards generating bodies (however well-conceived and consulted) proved too difficult to manage for a number of reasons. Chief reasons were that SAQA had limited resources to manage these bodies effectively and that traditional sectors resented having to subject their qualifications to this wider scrutiny by other sectors which they regarded as non-expert for their sector. A second thorny issue was the accreditation of existing and newly formed statutory bodies as education and training quality assurance bodies with powers to quality assure education and training institutions and providers. The resolution of these two issues was the establishment of three quality councils with both standards setting and quality assurance functions for their respective sectors. Within this new environment sector-specific approaches are now being accommodated, including the preference for a curriculum-based approach preferred in the schooling and higher education sectors. This accommodation has diffused the contestations of using learning outcomes within South Africa.

10. International networks and relationships were most helpful in enabling us to reflect deeply on our NQF policy and practice. Participating in international research initiatives on NQFs has also been a mutual enrichment of both the SANQF and the international NQF discourse.

Qualifications frameworks have introduced new thinking when it comes to the recognition of learning - this new thinking will continue to challenge traditional approaches and will in all probability be overtaken by new developments in the future. While NQFs are certainly not panaceas, they have proven to respond well to the challenges of globalisation and increased migration of highly skilled professionals. The more than one hundred countries and at least five regions developing qualifications frameworks bear testimony to this.
SAQA's journey of maturation has been marked by the metaphors we use for our work. From 1996 to 2006 we made “the NQF road by walking reflectively, accountably and boldly”. During 2007, we took inspiration from sculptor Orlando de Almeida's work “Moving into dance”. The work is described as a “sculpture of seven dancing figures, representing harmony, fluidity and change - symbolic of the transition that has taken place in the country”. Thus the metaphor of “moving into the NQF dance” was conceived. The vision became the “NQF dance with all role-players in harmony, fluidity and change, enabling the dance of lifelong learning”. We are beginning to experience the greater partnership in the NQF dance in the areas of advocacy, communication, researching work and learning, career guidance and counselling, and in ensuring quality learning. Our focus is on the learners and on quality learning.
How are we doing in relation to NQF objectives? Measuring the impact of the South African NQF
Heidi Bolton and James Keevy

Abstract
This paper attempts to articulate some of the current thinking around conceptualisation of the South African National Qualifications Framework (NQF). It puts forward the idea of the South African NQF as a relational principle - an organizational principle facilitating relational thinking about the education and training system as a whole, and how its constituent parts relate to each other and to development and the world of work. The paper draws on Engestrom’s (1987) idea of an activity system where the NQF is described as a complex system constituted by a number of other, linked activity systems. The NQF incorporates but is far from being limited to being a register of qualifications. Its goals are to: (1) create an integrated national framework for learning achievements; (2) facilitate access to and articulation and progression within education, training, and career paths; (3) enhance quality in the system; and (4) facilitate redress of past unfair discrimination - all of which have the higher aims of lifelong learning, and personal and economic development in the country. While these objectives have remained constant, the form of the South African NQF has shifted over time. The paper sketches some of the understandings of the South African NQF articulated over the 15 years of its existence - conceptualizations which may be analytically distinct but inter-relate in practice. The article draws on the concepts of pedagogic device (Bernstein 1996), socio-material (Fenwick 2010), and what has been termed ‘third generation cultural-historical activity theory (CHAT)’ (Hardman 2008; Olvitt 2010) to assist development of analytical categories for measuring the impact of the NQF, or, how South Africa is doing in relation to achieving NQF objectives.

Introduction
Since the emergence of the concept in the 1980s, National Qualifications Frameworks (NQFs) have been and continue to be developed in most countries across the globe (Tuck 2007). Early conceptualization of NQFs was based on twin ideas, one being the English competence-based model where learners are assessed according to competences they can demonstrate (Keevy and Bolton 2011). It is also founded partly on the Scottish outcomes-based approach of the 1990s (Young 2005). In this approach aimed-for learning outcomes shape
learning itself. It has been argued that strong divisions between academic and vocational systems create barriers to learning, and that there is a need to consider alternative and more integrated models (Ibid.).

It has also been argued that original thinking around qualifications frameworks was situated in the context of emerging neo-liberal policies emphasizing the primary role of the private sector in economic development (Allais 2007), and that this thinking is related to the shift within the vocational sector. These ideas were closely associated with Anglophone countries such as England, Scotland, Wales, the Republic of Ireland, New Zealand, Australia and South Africa, and to a lesser extent, also with France (Keevy et al 2011).

It appears however that conceptualization of NQFs means differing things in different communities of practice. Some systems have used NQFs to embed learning outcomes within education and training systems. For those involved in lifelong learning an NQF can be a reference point through which lifelong learning-related discourse is prioritized and resourced. Employers generally see NQFs as opportunities to own and influence workplace learning in such a way that better prepares workers for employment than is the case without NQFs. For the private education and training sector NQFs can be seen as means to increase its role in economic development. Measurement of related developments and benefits associated with these approaches needs research.

The scope of frameworks as registers of qualifications may differ from being broad and covering all learning pathways and achievements in a system, to being more narrowly confined to particular sectors such as initial education; adult education and training; or vocational education (Organisation for Economic Coordination and Development (OECD) 2007). Whether all-encompassing or narrow and sectoral, all qualifications frameworks are seen as establishing bases for improving the accessibility of qualifications; linkages between qualifications; and their recognition by the labour market and public within a country or between countries (Ibid.).

Today over 130 countries and at least four world regions are developing qualifications frameworks (International Labour Organisation (ILO) 2011). While these developments were initially confined to the Anglophone countries of the Commonwealth (with the exception of France), they have now extended to a
wider range of countries including some in South America, the Middle East, Eastern Europe and the Asia-Pacific region (see Burke et al 2009, Chakroun and Castejon 2010). In addition, there is increasing NQF-related activity within international agencies with education-training-labour agendas such as the Organisation for Economic Co-operation and Development (OECD), ILO, the World Bank and the European Union. Many countries with 'first generation' NQFs (such as England, Ireland, Australia, New Zealand and South Africa) regularly engage with countries developing NQFs, thus supporting global advance of national, regional and even transnational qualifications frameworks.

There have been useful period-based groupings of qualifications frameworks (Tuck et al 2004; Coles 2006). Raffe (2009) adapts a typology initially developed by Allais (2007), suggesting three types of purposes for NQFs. First, a communications framework takes an existing education and training system as its starting point and aims to make it more transparent and easier to understand, typically in order to rationalise it, improve its coherence; encourage access; and highlight opportunities for transfer and progression between education and training programmes. Second, a reforming framework while also taking an existing system as its starting point aims to improve it in specific ways, for example by enhancing quality; increasing consistency; filling gaps in provision; or increasing accountability. It typically has statutory or regulatory roles. Third, a transformational framework is one in which a proposed future system is used as the starting point. Qualifications are defined as they will appear in a transformed system, without explicit reference to existing provision. Such a framework typically uses learning outcomes because outcomes allow specification of qualifications independently of existing standards, institutions or programmes.

The South African NQF does not fit neatly into any of these categorizations for a number of reasons. It has contained elements of each type since its inception; differing qualities have come to the fore at different times. While in its early days there were elements of transformation such as the radical changes in basic education and vocational training, parts of the existing system such as Higher Education remained largely in place. Currently the South African NQF is widely viewed as a comprehensive mechanism to facilitate increased communication, coordination and collaboration in the system (see for example SAQA 2010a, 2010b). Importantly it is a dynamic entity, simultaneously played out by a number of differing actors and organizations. It would be inaccurate to say that the South
African NQF has been through successive (distinct) versions (Allais 2009). It is evolving over time: its ongoing implementation builds continually on related developments. The current paper draws on Engestrom's (1987) idea of activity systems where the South African NQF is described as an activity system constituted by a number of other, linked activity systems. At different times in the 15 years of its existence differing developmental threads have gained prominence; it is argued that useful elements of these components remain, while problematic elements have been either cast aside, or are in the process of being, and are likely to continue to be, refined in an ongoing way.

Given the variety of purposes for which NQFs have been designed, their complexity, the range of general perceptions around associated policy interventions, and the extent to which they are prevalent and growing, an urgent need to build on existing research into their impact is acknowledged (see for example work by SAQA 2003, 2005; Scottish Executive 2005; Allais 2009, ILO 2010; Taylor 2010). NQFs require considerable resources; for the purposes of accountability states need to know whether or not associated policies are having desired results. The impact of initiatives associated with the South African NQF needs to be assessed; to do so it is necessary first to clarify its nature and purpose.

In the present paper three sets of theoretical concepts are put forward in an attempt to address the questions What is the South African NQF? And how could its impact be measured? The article builds on a recent sketch of conceptualisations of the NQF in the country in the 15 years since its inception (Keevy and Bolton 2011), based on experiences gleaned by the South African Qualifications Authority (SAQA) in overseeing the South African NQF. The current article draws on the concepts of pedagogic device (Bernstein 1996), socio-material (Fenwick 2010), and what has been termed 'third generation cultural-historical activity theory (CHAT)' (Hardman 2008; Olvitt 2010) to deepen understanding of an NQF as a relational principle. The paper uses this theoretical base to suggest the idea of the South African NQF as a key mechanism for systemic coherence and to assist regarding assessment of the impact of associated activities. It is argued that if the theoretical concepts are used at sufficient levels of generalization, they could be utilised in the analysis of initiatives associated with a range of NQFs in differing forms, as well as the related beneficiary gains and challenges.
Evolving understandings of the South African NQF

The South African NQF has been described as an ambitious project, a set of policies forming part of those designed “...to address the educational, social, and economic problems caused by apartheid [past policies enshrining separate and unequal development]...” (Allais 2009: 139; see also Lugg 2007, French 2009). It was designed to be one of the tools of educational, social, and economic transformation (Republic of South Africa (RSA) Departments of Education and Labour 2002), a means of creating an “integrated national framework for learning achievements” and enhancing quality, access, mobility and progression in the education and training system in the country (RSA 1995: 1), including especially for those disadvantaged under the apartheid political regime.

The six-year review of the NQF spanning the years 2001 and 2007 ushered in a suite of new legislation associated with the NQF Act of 2008 (RSA 2008a-d). Although there have been sweeping changes in the organizational structures of the NQF, importantly its objectives remain to: (1) create an integrated national framework for learning achievements; (2) facilitate access to and articulation and progression within education, training, and career paths; (3) enhance quality in the system; and (4) facilitate redress of past unfair discrimination - all of which have the higher aim of lifelong learning, and personal and economic development in the country (RSA 2008c:13). Perhaps the biggest single change comprises the shift from an up-front, design-down, prescriptive approach towards one of greater differentiation, practice-based starting points, and a design-upwards descriptive approach (Walters and Isaacs 2009:14-16). Centralised standard-setting and quality assurance functions have moved to three Quality Councils: one overseeing General and Further Education and Training; a second Higher Education and Training; and a third Trades and Occupations. Importantly, this differentiation occurs within a greater context of integration, articulation, and collaboration between sectors.

Distinct understandings of the South African NQF between 1998 and the present are noted elsewhere (Isaacs 2011; Keevy and Bolton 2011); each of the ideas are touched upon or expanded briefly here.

Existing conceptualizations of the NQF

The NQF is widely perceived in the country as a register of qualifications, where a grid of specified conceptual levels and types serve as a map for the positioning of
qualifications and relationships between them (Keevy and Bolton 2011). This understanding has been and continues to be understood and implemented: this register (comprising three sub-frameworks) serves as a template to guide development and classification of new qualifications (RSA 2008c, ILO 2011). The idea is that the positioning of individual types of qualifications in the register aids learner mobility vertically between qualifications spanning levels increasing in conceptual complexity, and horizontally from one type of qualification to another. In this understanding learner mobility is not facilitated by NQF levels in isolation; NQF levels are used in conjunction with associated policies relating to mechanisms for alternative access and to the articulation of differing parts of the system.

Understanding an NQF as a register of qualifications however narrows its potential and has been described as 'technicist' (Isaacs 2011). It could lead to a limited approach with an emphasis on systems for data management (Isaacs 2011). In the narrowest sense this approach uses an NQF as a scaffold with enabling mechanisms for horizontal and vertical progression, and data to illustrate, monitor and evaluate these movements. In its early stages while the South African NQF was thus viewed it was also seen to be a device for (socio-economic) transformation (Allais 2009). The legacy of apartheid had left the country a skewed and largely dysfunctional system that privileged few while disadvantaging many; it urgently required transformation. An NQF as a register of qualifications could certainly not achieve these ends. The idea can nevertheless be seen as being nested: it remains a thread in broader conceptualizations.

The conception of an NQF as a comprehensive system (Keevy and Bolton 2011) is similar to if broader than that which sees the entity as a register of qualifications. The South African NQF is broad in that it encompasses the whole system for education and training, and is linked to development and work. A central body (the South African Qualifications Authority) coordinates three Quality Councils that oversee the sub-frameworks for General and Further Education and Training; Higher Education; and Trades and Occupations respectively. Still, the NQF is more than an inter-connected set of registers.

Recently the South African NQF has been referred to as a mechanism to facilitate communication, coordination, and collaboration in the system for education, training, development and work (Parker and Walters 2008; SAQA 2010a, 2010b).
Bernstein's (1996) concept of a pedagogic device is useful for deepening understanding of the NQF as a relay, both as message (what is relayed) and communications-relaying device (mechanism for relaying information). These ideas are expanded in the next section.

The idea of the NQF as a social construct (Walters and Isaacs 2009) where “we as social actors in society not only theorise about, construct and implement it [an NQF], but we also enable, actively change or work against it” (Isaacs 2001:124) is also current. It has been pointed out that as a social construct, the NQF is inextricably linked to power struggles (Keevy 2005). Fenwick's (2010) concept of socio-materiality, a useful example of which is Engestrom’s (1987) cultural historical activity theory (CHAT), is used here to broaden understanding of the NQF. It links the ideas of the NQF as a register of qualifications, a comprehensive system, and a communicative and coordinating mechanism to a broader analytical framework that makes possible articulation of its complexity in such a way that opens it to analysis.

Three sets of theoretical tools are sketched here in an attempt to illustrate the NQF as an activity system made up of other inter-connected activity systems, and to open it to analysis in order to assess its impact. The theoretical frames are, in sequence, Fenwick's (2010) socio-material; Engestrom's (1987) activity system; and Bernstein's (1996) pedagogic device.

**Socio-materiality and NQFs as activity systems**

Socio-material theory (Fenwick 2010a, b, c) is useful for conceptualizing and measuring activities related to NQFs in that it does not view individuals and social process as being distinct, in contexts that are separate from them. What appears to be a context, and the individuals and actions that are part of these 'assemblages', are continuously acting on each other. Fenwick (2010a:130) draws on the concepts of “co-emergence” and “mutual specification” to elaborate the idea that individuals and contexts are inseparable. The idea is that when two entities are associated, they begin to imitate each other in some ways (Varela et al 1991, cited in Fenwick 2010a). A series of dynamic, nonlinear interactions produce “emergence” (Davis and Sumara 2006, cited in Fenwick 2010a: 130), or the understanding that in (complex adaptive) systems and phenomena, events and actors are mutually dependent, mutually constitutive, and actually emerge together in dynamic ways. No clear lines of causation can be traced from these
interactions to their outcomes, because at any given time unrealized possibilities are present in a system. Further, what emerges - whether learning, practices or other objects - is specific to the system from which it emerged; it changes if it migrates to another system. 'Coupling' changes or “co-specifies” participants, creating new transcendent entities that could not have been achieved independently (Fenwick 2010b:108).

The idea of a body of theories described as socio-material has been articulated in relation to sets of theories articulated as complexity theory, cultural-historical activity theory, actor-network theory, and others (Fenwick 2010b). Fenwick (Ibid.) draws links between these approaches, suggesting firstly that they tend to take whole systems (including human and material elements) as the units of analysis. Fenwick (Ibid.) suggests secondly, that research conceptualized on the basis of these theories focuses on tracing the formations, and ongoing stabilization and destabilization of elements. Third, this approach conceives of human knowledge and learning as being embedded in material action and inter-action (or intra-action).

The development of cultural historical activity theory (CHAT) across 'three generations' is well documented (see for example Hardman 2008; Olvitt 2010). Vygotsky's (1978) work on the cultural mediation of actions through cultural artefacts, signs, symbols and tools is seen as being central to this development (Ibid.). Olvitt (Ibid.) drawing on Virkkunen and Kuutti (2000) shows how Leontiev (1978) took these ideas further, pointing to how individual action is not only culturally mediated but also historically situated. Leontiev (1978) distinguishes between individual (goal-oriented) and collective (object-oriented) activity; he locates actions relating to goals and objectives in the social contexts of activities which include division of labour (Hardman 2008). Engestrom's (1987) idea of an activity system is seen as 'third generation' CHAT: it situates human activity in context, showing how individual action is transformed into 'collective objects' through interaction with community and how the division of labour impacts on individuals in collective activity (Hardman 2008). The activity triangle in Engeström et al. (1987, see Figure 1) shows a network of relationships between individual understanding and action, and its socio-cultural context: rules; community; divisions of labour; mediating artefacts (Olvitt 2010).
Hardman (2008), Mukute (2009), Masara (2010), Olvitt (2010), Mukute and Lotz-Sisitka (2011), and others have used this activity triangle to illustrate the mechanisms of how the actions of individuals or individual institutions are, as Olvitt (2010: 76) puts it, “bound up in networked interactions with other activity systems”. Engestrom’s (1987) activity triangle provides a theoretical idea of what 'activity' incorporates; the two-way arrows show the dynamic nature of the nodes of the triangle and allow for the idea of what Engestrom refers to as expansive learning - a useful tool for the study of new learning in the workplace (Hardman 2008; Olvitt 2010) and elsewhere in the NQF activity system. The actions of individuals represented at the uppermost tip of the triangle are situated within contexts in which power relations and rules impact on the subjects' actions (Wells 1999 cited in Hardman 2008); the actions of individuals could be substituted for the actions of organizations for study of aspects of an NQF.

Further, the illustration of the inter-linked nature of activity systems in Olvitt (2010) is useful for analysis of NQF-related activities and their impact. Figure 2 on the following page provides an example of potential analytical categories for the analysis of NQF-related progress regarding alternative access.
Expanding the analytical categories in an activity system: pedagogic device and related concepts

To deepen the analysis of NQFs Bernstein's (1996) concept of the pedagogic device and related ideas can be used to 'fill in' or expand the analytical categories afforded by Engestrom's (1987) activity system. An example of the success of this type of combination has already been aptly shown in relation to research into pedagogy (see Hardman 2008). Concepts linked to the pedagogic device are particularly useful as explanatory tools when analysing how artefacts and rules mediate activities in an activity system.

Pedagogic (or andragogic) communications are often viewed as neutral
“carriers”, as “relays for ideological messages and for external power relations”, or “a relay of skills of various kinds” (Bernstein 1996:39). While the focus in many studies is on the message that is relayed, Bernstein's (Ibid.) concept of the pedagogic device comprises theorizing around the relay itself. He distinguishes between 'the relay' and the 'relayed', both of which it is argued are key for understanding the South African NQF.

Just as in language where potential meaning is created via the device of language (the carrier), and what is carried (the relayed communication or message), so is pedagogic potential realized through a pedagogic device (the carrier) and the pedagogic communication itself (Ibid.:40). As there are relatively (but not entirely) stable rules that govern language devices, so are there (perhaps more unstable) rules in the operation of pedagogic devices. Bernstein identifies three interlinked types of rules that operate in relation to each other. The workings of these 'rules' could potentially be used to explain how activity systems rules and artefacts mediate individual or institutional activity in NQFs.

One type of rules at play in Bernstein's (1996) pedagogic device comprises recontextualising rules. Here any particular pedagogic discourse (teaching and learning in the school or higher Education classroom; vocational training programme; workplace) is a principle for the re-ordering of other discourses: it takes an activity from its original site and re-creates it within a pedagogic site (Ibid.). For example policies, principles, knowledge and skills are recontextualised or 'translated' - interpreted, taught and learned differently - in different contexts. Physics in Higher Education Institutions is recontextualised and transformed into Physical Science within schools. The call for 'increased relevance' in vocational education is a call for more direct recontextualisation from the workplace. There are 'rules' or principles underlying any recontextualisation (see for example Hoadley 2005); an examination of the recontextualising rules operating at any pedagogic site has potential to expose the power struggles at play in relation to that site. Recontextualising occurs across differing fields:

Bernstein (op.cit.) distinguishes between the official recontextualizing field (ORF) - comprising state departments and agencies - and the pedagogic recontextualizing field (PRF) constituted by education and training institutions. If there is only an ORF, there can be no institutional autonomy. It is argued that in
South Africa while NQF-related legislation is aimed at coordination between components of the ORF and the PRF, there remains considerable space for the PRF to influence pedagogic discourse: there is thus potentially a degree of autonomy and struggle over pedagogic discourse which could be tracked. In an authoritarian state it is likely that recontextualization between the ORF and the PRF would by highly controlled by the ORF.

A second set of rules operating in the pedagogic device, distributive rules “regulate the relationships between power, social groups, forms of consciousness and practice” - they “distribute forms of consciousness through distributing forms of knowledge” (Bernstein Ibid.: 48). The distributive rules of the NQF as a pedagogic device shape relationships between power, social groups, forms of consciousness (ways of thinking) and practice - they influence who is included in and who excluded from access to particular ways of thinking and doing (Ibid.). Bernstein (1996:43) distinguishes “thinkable” (known and validated knowledge) and “unthinkable” (not-yet legitimated knowledge): access to the “unthinkable” is particularly highly controlled. Management of the unthinkable is thus usually carried out by “higher agencies of education” (those individuals who have been 'legitimately pedagogized') while the thinkable is managed at lower levels. Distributive rules shape who has access to the 'thinkable' and the 'unthinkable'. Understanding of distributive rules created intentionally or unintentionally by any policy set is of key important for the development and implementation of an education and training system. Tracking the distributive rules associated with the recontextualising patterns in any NQF activity system would be key for NQF impact-related investigation.

A third type of rules making up the pedagogic device, evaluative rules involve measuring or assessing the criteria transmitted in pedagogic settings. If the pedagogic device is a “symbolic ruler for consciousness”, a system for “creating and controlling the unthinkable” as well as the 'thinkable', continuous evaluation is key for its pedagogic practice (Bernstein 1996:50). It is expected that in interrogating aspects associated with NQFs, analysis of the recontextualising rules at play between differing parts of and actors in the system, and the relationships between particular sets of recontextualising, distributive, and evaluative rules would potentially aid understanding regarding who is being regulated; what consciousness is associated with this regulation, and for whom; who is included and who excluded; and what the consciousness enables, for
whom. In an activity system comprising multiple networked activity systems with a range of types of stakeholders there is potential for a variety of types of recontextualisation with differing distributive rules. The theoretical concepts elaborated here have considerable analytical potential for evaluation of a wide range of NQF sub-systems in relation to stated NQF objectives.

**Concluding comments**

This paper has sketched briefly some of the conceptualizations behind NQFs is general, and some of the existing understandings of the South African NQF in particular. It has tried to show that the ideas of the NQF in the country as a register of qualifications, a comprehensive system, and a mechanism for enhancing communication, coordination, and collaboration are 'nested' and complementary. Further, they are narrower than the conceptualizations afforded by the sets of conceptual tools proposed for generating analytical categories for measurement of the impact of the NQF in this paper. Fenwick's (2010b) concept of the socio-material is useful for understanding the mutual relations of subjects, objects and their environments. It points to a need to consider the impact of the NQF more in terms of 'key constituent strands', 'nested layers' and 'moments of impact' (such as workers and employers in dialogue; work beyond the academic-vocational split); and moments of the (desired) systemic coherence or 'relational moments' (including working articulation points; new doors opening) than in relation to the imposition and measuring of rigid structures. Engestrom's (1987) networks of activity systems with their subjects and objects mediated by rules, community, divisions of labour, and artefacts potentially generate useful analytical categories for the study of NQF sub-systems and their impact. Bernstein's (1996) pedagogic device with its recontextualising, distributive, and evaluation rules provides useful tools to expand analytical categories provided by the concept of activity systems. Further, social roles associated with some of these categories could be acted out from a variety of positions from 'accepting', to 'ironic' (resistant), to 'reformist' (wanting to modify) and 'revolutionary' (wanting to change)(Hacking 1999). In analysing the inter-related components of the NQF, it would be worth seeking sites of 'mutual action' (Waghid 2007) or cohesive 'communities of practice' (Wenger 1998).

In some ways the socio-material and activity systems concepts on one hand, and the idea of a pedagogic device on the other differ considerably: Bernstein's (1996) ideas are premised on the notion of social structures and the relationships
within and between these structures. Subjects are distinguished clearly from contexts; analytical categories stem from binary opposites. *Socio-material theory* on the other hand is based on the idea of fluidity and ongoing change. Webs of elements are considered within whole systems. Entities and their contexts - and the elements of which they are fashioned - are not seen as being distinct, but are mutually constitutive. Attempts have been made in the current paper to show how the ideas can nevertheless be used in complementary ways. Structuralist criticisms (see for example Harker and May 1993) have been contested convincingly (see Bernstein 1995; Bolton 2005, 2010): it has been shown that several of Bernstein's binary opposites can generate wide ranges of sub-categories on continua (see for example Bolton 2005, 2010). Both sets of concepts potentially bring the considerable value of linking macro and micro-level elements in a systematic way. Both enable high levels of abstraction, thereby creating potential for comparative work. This facility alone is extremely valuable for complex conceptualizations such as NQFs, since it potentially enables relating diverse components. Importantly, it is argued that theory underpinning the NQF needs to rise above the constructivist-critical realist divide - what Fenwick (2010d) refers to as the 'knowledge wars'. Multiple world views underlie conceptions of knowledge. Attempts have been made to show how each of the three sets of concepts could be used in an inter-linked way, and be useful for making sense of how people are able to use and move through systems. Threaded throughout the concepts discussed is the understanding of the South African NQF as an underlying organizing principle, a *relational principle* according to which each sub-part of the system for education, training, development, and work needs to look inwards towards its own quality and standards, and the relations between these aspects and the world beyond itself. According to this principle each component of the system also needs to look outwards at other components with which it interacts, and how it shapes those elements. An NQF itself is analytically separable from the organizations realizing it, and from approaches associated with it (such as the use of learning outcomes, unit standards, level descriptors, and the like): these aspects do not constitute it. What is important in the measurement of the impact of an NQF or its sub-parts, is whether the implementing organizations and approaches adopted are achieving the goals and relations desired. What remains now, is to test some these ideas through empirical research.
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End note

Trevor Coombe

This volume is a fitting tribute to an exceptional servant of South African education and training.

SAQA has more intimate and wide-ranging relationships with all role-players in education and training than any other body. For fifteen years Samuel Isaacs has been the public face of SAQA and the fulcrum around which such relationships have revolved. It is an extraordinary achievement to have operated so long in this role while building and retaining the confidence and trust of this massive and endlessly diverse community.

Samuel first enunciated his mantra fifteen years ago, at SAQA's enthusiastic national (and international) launch conference in Johannesburg: “We will make the road by walking reflectively, accountably and boldly”. This was simultaneously a declaration, a pledge, a motto and an expression of hope for an organisation that was still to take shape, in pursuit of a vision whose aspirations far exceeded its visible means of support. It is typical of the man that this declaration begins with the word “We”. The creation and realisation of the NQF has, for Samuel, always been about “us” - the broad community of NQF actors and participants - collectively assuming responsibility and acting thoughtfully, responsibly and creatively.

The task has been formidable. From the outset until today Samuel's resolve, and the resolve of his team, has been tested, often to the limit. If his resolution ever wavered he never let on.

Samuel's exceptional personal qualities and accomplishments made him the right person to lead the NQF project. Before 1994 his career path had been unusually rich: he had been an electrician, electrical contractor, company MD, electrical industry leader, technical college lecturer, adult educator, ordained Anglican priest (a permanent vocation, concurrent with others) and Director of Pentech's Centre for Continuing Education. Samuel's astonishing depth of technical, business, professional, organisational, pedagogical, academic, clerical and social experience has combined with an analytical mind and a gift for
reasoned advocacy and respectful persuasion. His empathy, reassuring
demeanour, winning manner and gift for team building match his frankness,
insistence on high performance, toughness, tenacity, moral clarity and integrity.
All these qualities have been harnessed to his passionate desire to open wide the
doors of lifelong learning to all.

Few South Africans could span so many disciplines and engage with so many
education, training and workplace constituencies on the basis of direct personal
knowledge. Samuel and the NQF project were made for each other.

South Africa's NQF was “forged in the baptism of fire of the democratisation of our
society”. 37 Two theatres of struggle, in industry and education, produced the ideas
that combined in the South African NQF concept. Samuel was deeply involved.
After the basic policy frameworks had been laid down Samuel was a member of
the NQF task team which contributed to CEPD’s Implementation Plan for
Education and Training. When the South African Qualifications Authority Bill,
1995 was being debated in the first democratic Parliament, Samuel was asked to
lead the Ministerial Committee for Development Work on the NQF which reported
in December of that year. When the first SAQA board was appointed in May 1996
Samuel was appointed its chairperson. When SAQA appointed its first executive
officer in March 1997 Samuel vacated the chair and took up the challenge of
bringing the NQF into being.

He has done so with distinction. SAQA has become an exemplary public body,
embodying its CEO's professionalism and integrity, an “investor in people” and a
monument to team-building, public engagement, service provision and
transparency. No doubt SAQA has had its flaws and committed errors of omission
and commission, but any just assessment would consider the magnitude of its
task and the circumstances under which it has been called to operate. If SAQA
were Samuel's only legacy it would be substantial. But the NQF itself is a national
institution, the work of thousands, led by SAQA. In all likelihood the NQF will be a
fixture on the South African scene for a good fifteen years more, despite its

37 Samuel Isaacs and Mokubung Nkomo, “South Africa's National Qualifications Framework:
reflections in the Seventh Year of the SAQA”, in Gari Donn and Tony Davies (eds.) (2003),
Commonwealth Seminar held in Wellington, New Zealand, February 2003. London:
Commonwealth Secretariat, pp. 78-93.
travails, controversies and uncertainties. It has framed so many of South Africa's debates on education and training, contributed so much of the vocabulary and syntax of the South African discourse, influenced so much practice, that it is impossible to imagine what South African education and training would have been like without it.

The road is still being made as we walk. A Green Paper offers new perspectives and possibly some new directions, but it does not say, “Turn back, abandon the journey.”

The metaphor of the road is from the mind of the Spanish poet Antonio Machado. In translation the poem reads like this:

Wanderer, your footsteps
the road, and nothing more;
wanderer, we have no road,
we make the road by walking.
As you walk you make the road,
    and to look back
    is to see that never
    can we pass this way again.
Wanderer, there is no road,
    only traces on the sea. 38

“Never can we pass this way again.” Human institutions wax and wane. The challenge is before us. If we aspire to leave more than traces on the sea it is for us all to ensure that we pave our way with the best that SAQA (and all who have worked with SAQA) have laid down, even as some old paths are retraced and new vistas open up.

Samuel Isaacs will no longer be in the vanguard, organisationally speaking, but he will be on the road as always, making his inimitable contribution with good sense and good humour. He has deservedly received many accolades. As he

leaves the leadership of the organisation he has done more than anyone to create and sustain, through good times and ill, the accolade this humble man might most value would be: “Well done, thou good and faithful servant.” Well done indeed, Sam, and thank you.

Trevor Coombe is an internal consultant in the Department of Higher Education and Training and the Department of Basic Education. He has worked with Samuel Isaacs in various capacities for almost 20 years.
### Acronyms and abbreviations

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
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<tbody>
<tr>
<td>ABET</td>
<td>Adult Basic Education and Training</td>
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<tr>
<td>ADEA</td>
<td>Association for the Development of Education in Africa</td>
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<td>ANC</td>
<td>African National Congress</td>
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<td>ANTA</td>
<td>Australian National Training Authority</td>
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<td>AQF</td>
<td>Australian Qualifications Framework</td>
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<tr>
<td>ASGISA</td>
<td>Accelerated and Shared Growth initiative for South Africa</td>
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<td>CAT</td>
<td>Credit Accumulation and Transfer</td>
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<tr>
<td>CBE</td>
<td>Commander of the British Empire</td>
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<tr>
<td>CBT</td>
<td>Competency Based Training</td>
</tr>
<tr>
<td>CCERSA</td>
<td>Committee Colleges of Education Rectors of South Africa</td>
</tr>
<tr>
<td>CEDEFOP</td>
<td>European Centre for the Development of Vocational Training</td>
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<td>CEPD</td>
<td>Centre for Education Policy Development</td>
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<tr>
<td>CERI</td>
<td>Centre for Educational Research and Innovation</td>
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<td>CFC</td>
<td>Consultative Forum on Curriculum</td>
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<td>CHAT</td>
<td>Cultural Historical Activity Theory</td>
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<tr>
<td>CHE</td>
<td>Council on Higher Education</td>
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<td>COL</td>
<td>Commonwealth of Learning</td>
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<td>COSATU</td>
<td>Congress of South African Trade Unions</td>
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<td>COTEP</td>
<td>Committee on Teacher Education Policy</td>
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<tr>
<td>CTCP</td>
<td>Committee of Technical College Principals (CTCP)</td>
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<td>CTP</td>
<td>Committee of Technikon Principals</td>
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<td>CUP</td>
<td>Committee of University Principals</td>
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<td>DoE</td>
<td>Department of Education</td>
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<td>DoL</td>
<td>Department of Labour</td>
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<td>ECD</td>
<td>Early Childhood Development</td>
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<td>esATI</td>
<td>eastern seaboard Association of Tertiary Institutions</td>
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<td>ETDP</td>
<td>Education, Training and Development Practitioners</td>
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<td>ETQAs</td>
<td>Education and Training Quality Assurers</td>
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<td>FET</td>
<td>Further Education and Training</td>
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<td>FETC</td>
<td>Further Education and Training Certificate</td>
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<td>Acronym</td>
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<tr>
<td>GET</td>
<td>General Education and Training</td>
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<td>GETC</td>
<td>General Education and Training Certificate</td>
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<td>Higher Education and Training</td>
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<td>HEQC</td>
<td>Higher Education Quality Committee</td>
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<td>HETC</td>
<td>Higher Education and Training Council</td>
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<tr>
<td>HKCAA</td>
<td>Hong Kong Council for Academic Accreditation</td>
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<td>HKCAAVQ</td>
<td>Hong Kong Council for the Accreditation of Academic and Vocational Qualifications</td>
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<td>HRDS</td>
<td>Human Resources Development Strategy</td>
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<td>HSRC</td>
<td>Human Sciences Research Council</td>
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<td>IEB</td>
<td>Independent Examinations Board</td>
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<td>ILO</td>
<td>International Labour Organisation</td>
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<td>IMWG</td>
<td>Inter-Ministerial Working Group on Education and Training</td>
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<td>INSET</td>
<td>In-service Education and Training</td>
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<td>IPET</td>
<td>Implementation Plan for Education and Training</td>
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<td>ITBs</td>
<td>Industry Training Boards</td>
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<td>JIPSA</td>
<td>Joint Initiative on Priority Skills Acquisition</td>
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<td>LCF</td>
<td>Learning Cape Festival</td>
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<td>LSEN</td>
<td>Learners with Special Education Needs</td>
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<td>NCHE</td>
<td>National Commission on Higher Education</td>
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<tr>
<td>NCTE</td>
<td>National Council for Teacher Education</td>
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<tr>
<td>NEPAD</td>
<td>New Partnership for Africa's Development</td>
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<td>NEPI</td>
<td>National Educational Policy Investigation</td>
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<td>NGOs</td>
<td>Non-governmental Organisations</td>
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<td>NICD</td>
<td>National Institute for Curriculum Development</td>
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<td>NICE</td>
<td>National Institute for Community Education</td>
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<td>NILLD</td>
<td>National Institute for Lifelong Learning Development</td>
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<td>NLRD</td>
<td>National Learners' Records Database</td>
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<td>NSBs</td>
<td>National Standards Bodies</td>
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<td>NTB</td>
<td>National Training Board</td>
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<td>NTSI</td>
<td>National Training Strategy Initiative</td>
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<tr>
<td>NUM</td>
<td>National Union of Mineworkers</td>
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<tr>
<td>NUMSA</td>
<td>National Union of Metalworkers of South Africa</td>
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</tbody>
</table>
NQF  National Qualifications Framework
NVQ  National Vocational Qualification
NZQF  New Zealand Qualifications Framework
OBE  Outcomes-based Education
OBET  Outcomes-based Education and Training
OECD  Organisation for Economic Cooperation and Development
ORF  Official Recontextualizing Field
PILLDs  Provincial Institutes for Lifelong Learning Development
PRESET  Pre-service Education and Training
PRF  Pedagogic Recontextualizing Field
QA  Quality Assurance
QCA  Qualifications and Curriculum Authority
QCs  Qualifications Councils
QPU  Quality Promotion Unit
RDP  Reconstruction and Development Programme
RPL  Recognition of Prior Learning
RQF  Regional Qualifications Framework
RSA  Republic of South Africa
SAARDHE  South African Association for Research and Development in Higher Education
SACATE  South African Council for the Accreditation of Teacher Education
SADC  Southern African Development Community
SANQF  South African National Qualifications Framework
SAQA  South African Qualifications Authority
SCQF  Scottish Credit and Qualifications Framework
SERTEC  Certification Council for Technikon Education
SETA  Sector Education and Training Authority
SGBs  Standards Generating Bodies
UNDP  United Nations Development Programme
UNESCO  United Nations Educational, Scientific and Cultural Organisation
UWC  University of the Western Cape
ZMT  Zone of Mutual Trust
SOUTH AFRICAN QUALIFICATIONS AUTHORITY ACT
NO. 58 OF 1995

It is hereby notified that the President has assented to the following Act which is hereby published for general information:-

ACT

To provide for the development and implementation of a National Qualifications Framework and for this purpose to establish the South African Qualifications Authority; and to provide for matters connected therewith.

(English text signed by the President.)
(Assented to 28 September 1995.)

BE IT ENACTED by the Parliament of the Republic of South Africa, as follows:-

Definitions

1. In this Act, unless the context indicates otherwise-
   i. "Authority" means the South African Qualifications Authority established by section 3;
   ii. "company" means a company or close corporation registered under any law, which provides education or training for its employees or clients;
   iii. "Director-General" means the Director-General of Education;
   iv. "Minister" means the Minister of Education and, for the purposes of sections 4(2), 4(3), 4(4), 4(5), 4(6), 5(1)(c), 11, 13(2), 14 and 15(2), the Minister of Education in consultation with the Minister of Labour;
   v. "National Qualifications Framework" means the National Qualifications Framework approved by the Minister for the registration of national standards and qualifications;
   vi. "organised teaching profession" means an organisation or union which is a member of the Education Labour Relations Council established in terms of the Education Labour Relations Act, 1993 (Act No. 146 of 1993), and is recognised by the Minister for the purposes of this Act;
vii. "prescribe" means prescribe by regulation; (x)
viii. "qualification" means the formal recognition of the achievement of the required number and range of credits and such other requirements at specific levels of the National Qualifications Framework as may be determined by the relevant bodies registered for such purpose by the South African Qualifications Authority; (iv)
ix. "registered" means registered in terms of the National Qualifications Framework; (iii)
x. "standard" means registered statements of desired education and training outcomes and their associated assessment criteria. (ix)

Objectives of National Qualifications Framework

2. 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.

Establishment of South African Qualifications Authority

3. There is hereby established a juristic person called the South African Qualifications Authority.

Constitution of Authority

4. (1) The Authority shall consist of a chairperson who shall be appointed in terms of subsection (2), such members as shall be appointed in terms of subsections (3) and (4), and an executive officer who shall be appointed in terms of subsection (7).

   (2) The Minister shall appoint a person of experience and expertise in matters relating to the functions of the Authority, to be the chairperson of the Authority.
(3) The Minister shall appoint the following persons as members of the Authority, in the manner provided for in subsection (4)-

a. one member nominated by the Director-General;
b. one member nominated by the heads of provincial education departments;
c. one member nominated by the Director-General: Labour;
d. one member nominated by the National Training Board;
e. two members nominated by the national organisations representing organised labour;
f. two members nominated by national organisations representing organised business;
g. one member nominated by the Committee of University Principals established by section 6 of the Universities Act, 1955 (Act No. 61 of 1955);
h. one member nominated by the Committee of Technikon Principals established by section 2 of the Technikons Act, 1993 (Act No. 125 of 1993);
i. one member nominated by the national body representing teachers' college rectors and recognised by the Minister for this purpose;
j. one member nominated by the national body representing technical college rectors and recognised by the Minister for this purpose;
k. one member nominated by national organisations representing colleges other than teachers' colleges and technical colleges and recognised by the Minister for this purpose;
l. one member nominated by national organisations representing the adult basic education and training sector and recognised by the Minister for this purpose;
m. one member nominated by national organisations representing the early childhood development sector and recognised by the Minister for this purpose;
n. two members nominated by the organised teaching profession;
o. two members nominated by national organisations representing lecturers and trainers and recognised by the Minister for this purpose;
p. one member nominated by national organisations representing the special education needs sector and recognised by the Minister for this purpose;
q. not more than six members appointed by the Minister at his or her discretion;
r. not more than two members co-opted by the Authority at its discretion and recommended to the Minister for appointment.

(4) For the purpose of seeking nominations as contemplated in subsection (3), the Minister shall give notice in the Gazette of his or her intention to appoint members of the Authority, and shall request any body or organisation in the fields referred to in subsection (3) to submit the names of persons who, on account of their experience and expertise in matters relating to the functions of the Authority may be suitable candidates for appointment as members of the Authority and in submitting the names of candidates due recognition shall be given to the principle of representivity.

(5) For the purpose of the nominations contemplated in paragraph (n) of subsection (3), not more than one nomination shall be made by any one organisation or union.

(6) A member of the Authority excluding the executive officer, shall hold office for such period which shall not exceed three years, as the Minister may determine at the time of his or her appointment, and a member may be re-appointed for one further term of office when his or her initial term of office expires.

(7) The Minister shall, in filling any vacancy, take the provisions of subsection (3) into account.

(8) The members contemplated in subsections (2) and (3), shall, with the approval of the Minister, appoint a competent person to be executive officer on such conditions of service as may be determined by the Authority with the approval of the Minister, granted with the concurrence of the Minister of Finance.
Functions of Authority

5. (1) Subject to the provisions of subsection (2), the Authority shall-

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
   bbb. the accreditation of bodies responsible for monitoring and auditing achievements in terms of such standards or qualifications;

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;

b. advise the Minister on matters affecting the registration of standards and qualifications; and

c. be responsible for the control of the finances of the Authority.

(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 subsection (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;
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.

Functions of executive officer

6. (1) The executive officer shall-
   a. be responsible to the Authority for the execution of its functions in terms of this Act;
   b. supervise the officers and employees of the Authority; and
   c. be the accounting officer of the Authority charged with accounting for moneys received, payments made and movable property purchased by the Authority.

   (2) The executive officer shall be assisted in the performance of his or her duties in terms of subsection (1) by such officers and employees of the Authority as the executive officer may designate for this purpose.

Powers of Authority

7. (1) a. The Authority may establish committees and appoint persons who are not members of the Authority to the committees.
   b. The Authority shall appoint the chairperson of every committee.
   c. The Authority may dissolve or reconstitute a committee.
   d. The Authority may delegate any of its powers, excluding the powers referred to in this section, to any of its committees, but shall not be divested of a power so delegated and may at any time withdraw such a delegation.
   e. The Authority may amend or set aside any decision of such a committee.

   (2) The Authority may resolve disputes relating to the performance of its functions referred to in section 5.
The Authority may acquire and dispose of assets.

The Authority may cause research to be done which it considers relevant to the performance of its functions.

The Authority may perform any other function which the Minister may designate which is relevant to the National Qualifications Framework.

Meetings of Authority and committees

8. (1) The meetings of the Authority or of a committee shall be held at such times and places as the chairperson of the Authority or the committee, as the case may be, may determine.

(2) The proceedings of the Authority or of a committee shall not be invalid by reason of a vacancy on the Authority or the committee, as the case may be.

(3) If the chairperson of the Authority or of a committee is absent from any meeting of the Authority or a committee, as the case may be, the members present shall elect from among themselves a person to preside at that meeting.

(4) The Authority may prescribe rules relating to the procedures at its meetings or at the meetings of a committee, including the quorum for such meetings.

Vacation of office by members of Authority

9. The chairperson or any member of the Authority referred to in section 4(3) shall vacate his or her office if-

a. his or her estate is sequestrated or he or she enters into a compromise with his or her creditors;

b. he or she is detained as a mentally disordered person in terms of any law;

c. he or she is absent from three consecutive meetings of the Authority without leave from the Authority;
d. he or she resigns by giving notice in writing to the Minister; or

e. he or she, during the course of his or her term of office, is found guilty of an offence and sentenced to imprisonment without the option of a fine.

Funds of Authority

10. (1) The funds of the Authority shall consist of-

a. moneys appropriated by Parliament for the achievement of the objectives of the Authority;

b. moneys received by the Authority by virtue of the regulations made in terms of section 14;

c. moneys obtained by means of loans raised by the Authority with the approval of the Minister, granted with the concurrence of the Minister of Finance;

d. donations, contributions or royalties received by the Authority; and

e. interest on investments.

(2) The Authority shall employ its funds to defray expenses in connection with the performance of its functions.

(3)

(a) The Authority shall in each financial year, at such time and in such form as the Minister may determine, submit a statement of its estimated income and expenditure for the ensuing financial year to the Minister for approval.

(b) The moneys contemplated in subsection (1)(a) shall be employed by the Authority in accordance with the approved statement referred to in paragraph (a), and any unexpended balance shall be carried forward as a credit to the following financial year.

(4) Subject to the provisions of subsection (3)(b), the Authority may invest any portion of its funds in such manner as the Minister, with the concurrence of the Minister of Finance, may approve.
The Authority may charge or waive fees—

a. for the granting of any registration or accreditation; and
b. for any services provided by the Authority.

Officers and employees of Authority

11. The Authority may, subject to the conditions of service determined by the Authority with the approval of the Minister and the concurrence of the Minister of Finance, appoint such officers and employees as the Authority may deem necessary for the performance of its functions in terms of this Act.

Allowances and remuneration of members of Authority and committees

12. The chairperson, every other member of the Authority and any person appointed as a member of a committee under section 7(1) who is not in the full-time service of the State may, in respect of services rendered by him or her in connection with the affairs of the Authority or a committee, be paid by the Authority—

a. such travelling, subsistence and other allowances; and
b. in the case of the chairperson of the Authority, such additional remuneration, as the Minister with the concurrence of the Minister of Finance may determine.

Auditing and annual report

13. (1) The books of account and financial statements of the Authority shall be audited at the end of each financial year by the Auditor-General.

(2) The Authority shall not later than six months after the end of each financial year submit to the Minister a report in such form as the Minister may determine on its functions during that financial year, including an audited balance sheet and a statement of income and expenditure.
(3) The Minister shall table copies of the report, including the balance sheet and statement of income and expenditure referred to in subsection (2), in Parliament within 14 days after the receipt thereof if Parliament is in ordinary session, or, if Parliament is not in ordinary session, within 14 days after the commencement of its next ensuing ordinary session.

Regulations

14. The Authority may, with the approval of the Minister, make regulations relating to-

a. any matter which by this Act is required or permitted to be prescribed;

b. the moneys payable to the Authority in respect of matters referred to in section 10(5)(a) and (b); and

c. any other matter the regulation of which is necessary or expedient to give effect to the provisions of this Act.

Transitional provision relating to existing bodies

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.

(2) No body contemplated in subsection (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.

(3) This section shall not apply to any body established by a private law of a university.

Short title

This Act shall be called the South African Qualifications Authority Act, 1995.
NATIONAL QUALIFICATIONS FRAMEWORK ACT
NO. 67 OF 2008

[Assented To: 17 February 2009]
[Commencement date: 1 June 2009]
[GN 576 / GG 32233 / 20090522]

as amended by

Higher Education Laws Amendment Acts 26 of 2010
[with effect from 7 December 2010]

ACT

To provide for the National Qualifications Framework; to provide for the responsibilities of the Minister of Higher Education and Training; to provide for the South African Qualifications Authority; to provide for Quality Councils; to provide for transitional arrangements; to repeal the South African Qualifications Authority Act, 1995; and to provide for matters connected therewith.

[Long title substituted by s. 15 of Act 26/2010]

PREAMBLE

WHEREAS the advancement and recognition of learning is an essential attribute of a free and democratic nation and a prerequisite for the development and well-being of its citizens;

WHEREAS the National Qualifications Framework has been developed and implemented in terms of the South African Qualifications Act, 1995;

WHEREAS the National Qualifications Framework has won wide acceptance as the principal instrument through which national education and training qualifications are recognised and quality-assured; and

WHEREAS a review of the implementation of the National Qualifications Framework has necessitated changes to the governance and organisation of the framework so that its objectives may be more effectively and efficiently realised,
BE IT THEREFORE ENACTED by the Parliament of the Republic of South Africa, as follows:-

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1. Definitions

In this Act, unless the context indicates otherwise-

“board” means the board of the SAQA established by section 14;

“Council on Higher Education” means the Council established in terms of section 4 of the Higher Education Act, 1997 (Act No. 101 of 1997);

“education institution” means an education institution that is established, declared or registered by law;

“Gazette” means Government Gazette;

“GENFETQA Act” means the General and Further Education and Training Quality Assurance Act, 2001 (Act No. 58 of 2001);

“Higher Education Act” means the Higher Education Act, 1997 (Act No. 101 of 1997);

“learning” means the acquisition of knowledge, understanding, values, skill, competence or experience;

“level” means a level contemplated in Chapter 2;

“Minister” means the Minister of Higher Education and Training;
[Definition of “Minister” substituted by s. 8 of Act 26/2010]

“NQF” means the national qualifications framework contemplated in Chapter 2;

“part qualification” means an assessed unit of learning that is registered as part of a qualification;
“PFMA” means the Public Finance Management Act, 1999 (Act No. 1 of 1999);

“professional body” means any body of expert practitioners in an occupational field, and includes an occupational body;

“professional designation” means a title or status conferred by a professional body in recognition of a person’s expertise and right to practise in an occupational field;

“qualification” means a registered national qualification;

“quality council” means a Quality Council contemplated in Chapter 5;

“QC” means a quality council;

“registered” means registered on the NQF by SAQA in terms of Chapter 4;

“relevant Minister” ………
[Definition of “relevant Minister” repealed by s. 8 of Act 67/2008 ]

“SAQA” means the South African Qualifications Authority contemplated in Chapter 4;

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

“sector” means a sector of education or training, as the case may be, for whose sub-framework a QC is responsible;

“Skills Development Act” means the Skills Development Act, 1998 (Act No. 97 of 1998);

“skills development provider” means a skills development provider contemplated in section 17 of the Skills Development Act;

“sub-framework” means a sub-framework contemplated in Chapter 2;
“This Act” includes the regulations;

“Umalusi” means the council established by section 4 of the GENFETQA Act.

2. Object of Act

The object of this Act is to provide for the further development, organisation and governance of the NQF.

3. Application of Act

(1) This Act applies to-

(a) education programmes or learning programmes that lead to qualifications or part-qualifications offered within the Republic by-

(i) education institutions; and

(ii) skills development providers; and

(b) professional designations,

subject to the limitations prescribed in this Act.

(2) Every qualification or part-qualification contemplated in subsection (1) must be registered on the National Qualifications Framework in accordance with this Act.

[S. 3 substituted by s. 9 of Act 26/2010]

CHAPTER 2

NATIONAL QUALIFICATIONS FRAMEWORK

4. Framework

The NQF is a comprehensive system approved by the Minister for the
classification, registration, publication and articulation of quality-assured national qualifications.

5. Objectives of NQF

(1) The objectives of the NQF are to-

(a) create a single 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.

(2) The objectives of the NQF are designed to contribute to the full personal development of each learner and the social and economic development of the nation at large.

(3) SAQA and the QCs must seek to achieve the objectives of the NQF by-

(a) developing, fostering and maintaining an integrated and transparent national framework for the recognition of learning achievements;

(b) ensuring that South African qualifications meet appropriate criteria, determined by the Minister as contemplated in section 8, and are internationally comparable; and

(c) ensuring that South African qualifications are of an acceptable quality.
6. Framework levels

(1) The NQF is organised as a series of levels of learning achievement, arranged in ascending order from one to ten.

(2) Each level on the NQF is described by a statement of learning achievement known as a level descriptor.

(3) A level descriptor, referred to in subsection (2), provides a broad indication of learning achievements or outcomes that are appropriate to a qualification at that level.

(4) Level descriptors must be developed and determined, as provided for in section 13(1)(g).

(5) There is one set of level descriptors for the NQF.

7. Sub-frameworks

The NQF is a single integrated system which comprises of three co-ordinated qualifications sub-frameworks, for-

(a) General and Further Education and Training, contemplated in the GENFETQAAct;

(b) Higher Education, contemplated in the Higher Education Act; and

(c) Trades and Occupations, contemplated in the Skills Development Act.

CHAPTER 3

RESPONSIBILITIES OF MINISTERS

8. Responsibilities of Minister

(1) The Minister has the overall executive responsibility for the-
(a) NQF;

(b) SAQA; and

(c) QC for General and Further Education and Training, the QC for Higher Education and the QC for Trades and Occupations contemplated in Chapter 5.
   [Para. (c) substituted by s. 10 of Act 26/2010]

(2) The Minister must-

(a) consider advice from SAQA or a QC in terms of this Act;

(b) determine policy on NQF matters in terms of this Act and publish the policy in the Gazette;
   [Para. (b) substituted by s. 10 of Act 26/2010]

(c) publish guidelines which set out the government’s strategy and priorities for the NQF, and which may be updated annually;
   [Para. (c) substituted by s. 10 of Act 26/2010]

(d) provide funds from money appropriated by Parliament for SAQA to enable it to fulfil its functions in terms of this Act;

(e) after considering advice from the SAQA, determine the sub-frameworks contemplated in section 7 and publish them in the Gazette; and
   [Para. (e) substituted by s. 10 of Act 26/2010]

(f) determine by regulation in the Gazette, the process by which a dispute involving the SAQA or a QC must be resolved, and any matter relating thereto.
   [Para. (f) substituted by s. 10 of Act 26/2010]

(3) The Minister must-

[Words preceding para. (a) substituted by s. 10 of Act 26/2010]
(a) advance the achievement of the objectives of the NQF contemplated in Chapter 2;

(b) uphold the coherence and public credibility of the NQF;

(c) encourage collaboration among the QCs and between the QCs and SAQA.

(4) The Minister may perform any other function consistent with this Act.

9. ........

[S. 9 repealed by s. 11 of Act 26/2010]

CHAPTER 4

SOUTH AFRICAN QUALIFICATIONS AUTHORITY

10. Continued existence of SAQA

The SAQA that existed immediately before the commencement of this Act, continues to exist as a juristic person under the name of the South African Qualifications Authority.

11. Objects of SAQA

The objects of the SAQA are to-

(a) advance the objectives of the NQF contemplated in Chapter 2;

(b) oversee the further development and implementation of the NQF; and

(c) co-ordinate the sub-frameworks.

12. Accountability of SAQA

The SAQA is accountable to the Minister.
13. Functions of SAQA

(1) The SAQA must, in order to advance the objectives of the NQF-

(a)

(i) perform its functions subject to this Act; and

(ii) oversee the implementation of the NQF and ensure the achievement of its objectives;

(b) advise the Minister on NQF matters in terms of this Act;
   [Para. (b) substituted by s. 12 of Act 26/2010]

(c) comply with policy determined by the Minister in terms of section 8(2)(b);

(d) consider the Minister’s guidelines contemplated in section 8(2)(c);

(e) oversee the implementation of the NQF in accordance with an implementation framework prepared by the SAQA after consultation with the Qcs;

(f)

(i) develop a system of collaboration to guide the mutual relations of the SAQA and the QCs, after consultation with the QCs and taking into account the objects of the SAQA contemplated in section 11 and the regulations contemplated in section 33; and

(ii) resolve disputes regarding the QCs;

(g) with respect to levels-

(i) develop the content of level descriptors for each level of the NQF and reach agreement on the content with the Qcs;
(ii) publish the agreed level descriptors in the Gazette; and

(iii) ensure that they remain current and appropriate;

(h) with respect to qualifications-

(i) develop and implement policy and criteria, after consultation with the QCs, for the development, registration and publication of qualifications and part-qualifications, which must include the following requirements:

(aa) The relevant sub-framework must be identified on any document relating to the registration and publication of a qualification or part-qualification; and

(bb) each sub-framework must have a distinct nomenclature for its qualification types which is appropriate to the relevant sub-framework and consistent with international practice;

(ii) register a qualification or part-qualification recommended by a QC if it meets the relevant criteria;

(iii) develop policy and criteria, after consultation with the QCs, for assessment, recognition of prior learning and credit accumulation and transfer;

(i) with respect to professional bodies-

(i) develop and implement policy and criteria for recognising a professional body and registering a professional designation for the purposes of this Act, after consultation with statutory and non-statutory bodies of expert practitioners in occupational fields and with the QCs; and

(ii) recognise a professional body and register its professional
(i) collaborate with its international counterparts on all matters of mutual interest concerning qualifications frameworks; and

(ii) inform the QCs and other interested parties about international practice in the development and management of qualifications frameworks;

(k) with respect to research-

(i) conduct or commission investigations on issues of importance to the development and implementation of the NQF, including periodic studies of the impact of the NQF on South African education, training and employment; and

(ii) publish the findings of the investigations referred to in subparagraph (i);

(l) with respect to records of education and training, maintain a national learners’ records database comprising registers of national qualifications, part-qualifications, learner achievements, recognised professional bodies, professional designations and associated information;

(m) with respect to foreign qualifications, provide an evaluation and advisory service consistent with this Act; and

(n) with respect to other matters-

(i) inform the public about the NQF;

(ii) perform any other function required by this Act; and
(iii) perform any function consistent with this Act that the Minister may determine.

(2) The SAQA must submit, on or before 30 June in each year, to the Minister an annual report which includes the financial statements and audit reports.

14. SAQA board

(1) The SAQA is governed by a board.

(2) The board comprises-

(a) 12 members appointed in their personal capacities by the Minister;

[Para. (a) substituted by s. 13 of Act 26/2010]

(b) the chief executive officer of the SAQA contemplated in section 19, who is a member by virtue of his or her office; and

(c) the chief executive officer of each QC contemplated in Chapter 5, who are members by virtue of their offices.

(3)

(a) The Minister must appoint members, from the nomination process contemplated in subsection (4), in such a manner as to ensure, insofar as is practically possible, that the functions of the SAQA are performed according to the highest professional standards provided that at least two members must be appointed from the nominations made by organised labour.

(b) To ensure that the functions of the SAQA are performed in the manner contemplated in paragraph (a), the members appointed must-
(i) be broadly representative of the education and training sectors and related interests;

(ii) have thorough knowledge and understanding of education and training;

(iii) appreciate the role of education and training in the reconstruction and development of the South African economy and society;

(iv) have known and attested commitment to the interests of education and training;

(v) have knowledge and understanding of qualifications matters and quality assurance in education and training; and

(vi) be competent to undertake the governance and oversee the financial affairs of the SAQA.

(c) Due attention must be given to the representativity of the board in terms of such factors as race, gender and disability.

(4) The Minister must invite nominations for the appointment of members by notice in the Gazette, from-

(a) persons involved in education and training;

(b) organisations involved in education and training;

(c) professional bodies;

(d) organised labour;

(e) organised business; and

(f) organisations representing community and development interests.
Any member-

(a) holds office for a period not exceeding five years; and
(b) may be reappointed at the expiry of his or her term of office, but may not serve for more than two consecutive terms of office.

The Minister must appoint one of the members as chairperson.

The members must elect a deputy chairperson from amongst their number.

15. **Vacation of office by board member and filling of vacancies**

A member must vacate office if he or she-

(a) resigns by giving written notice to the chairperson, or in the case of the chairperson, to the Minister;
(b) is absent from three consecutive meetings of the board, without leave of the board;
(c) is declared insolvent, is removed from an office of trust by a court of law or is convicted of an offence for which the sentence is imprisonment without the option of a fine; or
(d) is declared unable to manage his or her personal affairs by a court of law.

The Minister may, in accordance with the Promotion of Administrative Justice Act, 2000 (Act No. 3 of 2000), remove a member of the board at any time before the expiry of the member’s term of office-

(a) on the grounds of misconduct, incapacity or incompetence; or
(b) for any other sound and compelling reason.
(3) A vacancy on the board must be filled by appointment in accordance with section 14.

(4) The Minister may, in accordance with the Promotion of Administrative Justice Act, 2000 (Act No. 3 of 2000), dissolve the entire board-
   (a) if the board fails to perform in terms of this Act;
   (b) if there is a total breakdown in the relationship between the board and the Minister; or
   (c) on any reasonable grounds.

16. Committees of board

(1) The board may establish one or more committees which must perform such functions as the board may determine.

(2) A committee may co-opt a person who is not a member of the board but the board must consider the criteria contemplated in section 14 when it appoints such a person to a committee.

(3) The board must appoint one of its members as chairperson of a committee.

(4) A member of a committee is appointed for such period as the board may determine.

17. Meetings of board and committees

(1) The board must meet at least four times a year at such times and places as the chairperson may determine by notice in writing to the members.

(2) The chairperson must convene a meeting of the board-
   (a) within 14 days of receipt of a written request signed by at least one third of the members of the board; or
(b) if requested by the Minister to convene a meeting.

(3) If the chairperson and deputy chairperson of the board are absent from any meeting of the board, the members present must elect one of their number to preside at that meeting.

(4) The board must make rules relating to the procedure at meetings of the board and its committees, including the quorum for such meetings, and any other matter necessary or expedient for the performance of the functions of the board or its committees.

(5) The proceedings at a meeting of the board or a committee are not invalid by reason only of the fact that a vacancy exists on the board or committee, as the case may be, at the time of such meeting.

(6) The board and its committees must keep minutes of their proceedings and decisions which when confirmed must be open to scrutiny by an interested person subject to the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000).

18. **Allowances and remuneration of members of board and committees**

A member of the board and a member of a committee who is not in the full-time service of the State may, in respect of services rendered by him or her in connection with the affairs of the board or committee, as the case may be, be paid by the SAQA such allowances and, in the case of the chairperson of the board, such additional remuneration as the Minister, with the concurrence of the Minister of Finance, may determine.

19. **Appointment of chief executive officer and staff**

(1) The board must appoint a chief executive officer for the SAQA.

(2)
(a) The board must appoint such number of employees as it considers necessary for the performance of the SAQA’s functions.

(b) The board may delegate the function referred to in paragraph (a) to the chief executive officer of the SAQA subject to such conditions as are consistent with the relevant provisions of the PFMA.

(3) The SAQA is the employer of the chief executive officer and other employees.

(4) The board must determine the remuneration, allowances, subsidies and other conditions of service of the chief executive officer, subject to the approval of the Minister with the concurrence of the Minister of Finance.

20. Functions of chief executive officer

The chief executive officer-

(a) is responsible to the board for executing the functions of the SAQA in terms of this Act;

(b) must assign responsibilities and supervise the employees of the SAQA; and

(c) is the accounting officer charged with accounting for monies received, payments made and property purchased by the board.

21. Funds of SAQA

The funds of the SAQA consist of-

(a) money appropriated by Parliament;

(b) donations and contributions received by the SAQA;
(c) money received by the SAQA in respect of fees charged for services;

(d) interest received on investments; and

(e) any other income received by the SAQA.

22. Alienation and encumbrance of property

The board may not without the prior approval of the Minister, granted with the concurrence of the Minister of Finance, sell, exchange or otherwise alienate the immovable property of the SAQA.

23. Financial statements, audit and annual report

The Minister must table in Parliament the annual report, including the financial statements and audit report of the SAQA, within one month after receipt thereof, if Parliament is in ordinary session, and if Parliament is not in ordinary session, within one month after the commencement of the next ordinary session.

CHAPTER 5

QUALITY COUNCILS

24. QC for General and Further Education and Training

Umalusi is the QC for General and Further Education and Training as provided for in the GENFETQAAAct.

25. QC for Higher Education

The Council on Higher Education is the QC for Higher Education as provided for in the Higher Education Act.
26. QC for Trades and Occupations

The QC for Trades and Occupations is provided for in the Skills Development Act.

27. Functions of QCs

A QC must, in order to achieve the objectives of the NQF-

(a) perform its functions subject to this Act and the law by which the QC is established;

(b) comply with any policy determined by the Minister in terms of section 8(2)(b);

(c) consider the Minister’s guidelines contemplated in section 8(2)(c);

(d) collaborate with the SAQA and other QCs in terms of the system contemplated in section 13(1)(f)(i);

(e) develop and manage its sub-framework, and make recommendations thereon to the Minister;
   [Para. (e) substituted by s. 14 of Act 26/2010]

(f) advise the Minister on matters relating to its sub-framework;
   [Para. (f) substituted by s. 14 of Act 26/2010]

(g) with regard to level descriptors-

   (i) consider and agree to level descriptors contemplated in section 13(1)(g)(i); and

   (ii) ensure that they remain current and appropriate;

(h) with regard to qualifications for its sub-framework-

   (i) develop and implement policy and criteria, taking into account the
policy and criteria contemplated in section 13(1)(h)(i), for the
development, registration and publication of qualifications;

(ii) develop and implement policy and criteria, taking into account the
policy and criteria contemplated in section 13(1)(h)(iii), for
assessment, recognition of prior learning and credit accumulation
and transfer;

(iii) ensure the development of such qualifications or part
qualifications as are necessary for the sector, which may include
appropriate measures for the assessment of learning
achievement; and

(iv) recommend qualifications or part qualifications to the SAQA for
registration;

(I) with regard to quality assurance within its sub-framework-

(i) develop and implement policy for quality assurance;

(ii) ensure the integrity and credibility of quality assurance;

(iii) ensure that such quality assurance as is necessary for the sub-
framework is undertaken;

(j) with regard to information matters-

(i) maintain a database of learner achievements and related matters
for the purposes of this Act; and

(ii) submit such data in a format determined in consultation with the
SAQA for recording on the national learners’ records database
contemplated in section 13(1)(l);

(k) with regard to other matters-

(i) conduct or commission and publish research on issues of
importance to the development and implementation of the sub-framework;

(ii) inform the public about the sub-framework;

(iii) perform any other function required by this Act; and

(iv) perform any function consistent with this Act that the Minister may determine.

[Subpara. (iv) substituted by s. 14 of Act 26/2010]

CHAPTER 6

PROFESSIONAL BODIES

28. Co-operation with QCs

Despite the provisions of any other Act, a professional body must co-operate with the relevant QCs in respect of qualifications and quality assurance in its occupational field.

29. Recognition by SAQA

A statutory or non-statutory body of expert practitioners in an occupational field must apply in the manner prescribed by the SAQA in terms of section 13(1)(i)(i) to be recognised as a professional body in terms of this Act.

30. Registration of professional designation

A professional body that is recognised in terms of section 29 must apply to the SAQA, in the manner determined by the SAQA in terms of section 13(1)(i)(ii), to register a professional designation on the NQF.

31. Information

A professional body must, in consultation with the SAQA-
(a) maintain a database for the purposes of this Act;

(b) submit such data in a format determined in consultation with the SAQA for recording on the national learners’ records database contemplated in section 13(1)(l).

CHAPTER 7

GENERAL PROVISIONS

32. Delegation

The SAQA and the QCs have the power to delegate any of their functions to a committee, any other body capable of performing the function or an employee, but a delegation-

(a) must be in writing and available for inspection on request by a member of the public;

(b) must specify the terms and conditions of the delegation;

(c) must be consistent with this Act and the Act by which the relevant QC is established;

(d) must be accompanied by sufficient funds to perform the function;

(e) does not exempt the SAQA or the QC, as the case may be, from responsibility for the function; and

(f) does not prevent the performance of the function by the SAQA or the QC, as the case may be.

33. Regulations

(1) The Minister may make regulations regarding any matter that this Act requires or permits to be prescribed.
(2) The Minister may make regulations regarding-

(a) allowances and remuneration of members of the board or a committee contemplated in section 18; and

(b) generally any ancillary or incidental administrative or procedural matter that it is necessary to prescribe for the proper implementation or administration of this Act.

34. **Conflicting interpretation**

In the event of a conflict in interpretation between this Act, the Higher Education Act, the Skills Development Act and the GENFETQA Act, this Act must be given preference.

35. **Saving**

The Higher Education Qualifications Framework promulgated by the Minister in Government Notice No. 928 dated 5 October 2007 in terms of section 3 of the Higher Education Act remains the sub-framework for higher education as contemplated in sections 7(b) and 8(2)(e) of this Act unless amended in terms of section 8 of this Act and section 3 of the Higher Education Act.

36. **Transitional arrangements**

Despite the repeal of the SAQA Act contemplated in section 37-

(a) the members of the SAQA appointed in terms of the SAQA Act who are in office immediately prior to the commencement of this Act must fulfil the functions contemplated in section 13 until a new board is appointed by the Minister;

(b) the NQF, approved by the Minister as contemplated in the SAQA Act, continues to exist to the extent that it is consistent to this Act and must, where necessary, be amended by SAQA to ensure consistency with this Act;
(c) the regulations made under the SAQA Act continue to exist to the extent that they are consistent with this Act until they are repealed by the Minister by notice in the Gazette;

(d) a process or action which was started in terms of the SAQA Act prior to the commencement of this Act must be concluded in terms of the SAQA Act unless such process or action is inconsistent with this Act;

(e) a policy made under the SAQA Act continues to exist to the extent that it is consistent with this Act until it is withdrawn by the SAQA;

(f) subject to any applicable law, an employee of the SAQA who was employed immediately prior to the commencement of this Act continues to be employed in terms of this Act;

(g) the conditions of service or service benefits of employees of the SAQA which were applicable immediately prior to the commencement of this Act continue to exist until changed by the board; and

(h) all assets, rights, liabilities and obligations of the SAQA that vested in the SAQA under the SAQA Act, continues to vest in the SAQA.

37. Repeal of law

The South African Qualifications Authority Act, 1995 (Act No. 58 of 1995), is hereby repealed in its entirety.

38. Short title and commencement

(1) This Act is called the National Qualifications Framework Act, 2008, and comes into operation on a date determined by the Minister by notice in the Gazette.

(2) Different dates of commencement may be so determined for different sections of this Act.
South African Qualifications Authority
Postnet Suite 248
Private Bag X06
Waterkloof
0145

Tel: +27(0)12 431 5000
Fax: +27(0)12 431 5147