

MILITANT MODESTY¹: Communication and impact in the mission of the NQF

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Introduction

In some taxonomies of the NQF the minimal NQF is described as “communicative”, while the most comprehensive and ambitious is described as “transformative”. In this article we use an enhanced notion of communication that sees communication as central, and as something much more powerfully transformative than a minor intervention. Together with “communication”, the notion of “militant modesty” provides a linking motif in this reflection on the very diverse proceedings and background literature of two symposiums aimed at “Maximising the potential of qualifications frameworks”. The symposiums were convened jointly by SAQA and the ILO on 8-9 September 2011.

This article should not be read as a report on the proceedings of the symposiums, and is not intended to do justice either to the collection of papers given as pre-readings or the presentations on these papers. Neither is it a faithful and exhaustive recording of all points made by participants during the two days. While it is certainly informed by all these elements, it should rather be read as a personal reflection by the authors on aspects of the NQF suggested by discussions, debates, concerns and recurring themes throughout the symposiums.

In order to set the scene for readers who did not attend the symposiums, we open with a summary overview of the two days, with reference to the papers and presentations included in this publication. We then move on to a broad reflection on communication, considering why it should not be regarded as a mere starting point in the mission of the NQF. The phrase “militant modesty” is unpacked to make it available as a controlling stance in taking forward communication in the NQF. Much of the debate on communication during the symposiums linked to the problematic of stakeholder participation in the NQF, so we explore the possibilities and limitations of collaboration and cooperation in relation to stakeholder groups. We then move on to a central focus of the symposium: that while the NQF is an enabling mechanism, a qualifications framework should not be expected to address the entire range of challenges relating to employment and skills development. This reality check leads us to consider and critique the notion of impact studies. We discuss whether the very idea of “impact” in evaluation can be seen as an adequate notion for the valuing of interventions, and include an urgent call for the presentation of far more concrete, non-conceptual evidence for the effects and influence of the NQF. A related

¹ “Militant modesty” is an arresting phrase used in a review of the complete works of one of America’s greatest poets of the 20th Century. Elizabeth Bishop is notable for her humility before the unique magic of her art and the demands of the work in hand - but there is nothing modest about the quality of her voice. Indeed, she asserts the aesthetic and moral authority of modesty. It seems to us a wonderfully appropriate description of the kind of stance that NQFs should take, with a recognition of limited roles and possibilities, humility before the challenges, but assertiveness about the importance and value of their work, and steady service in the light of their fundamental reasons for being. “*It’s not that Bishop never says ‘I’, but she seems almost to ration it, in a militant modesty, to no more than its statistically probable occurrence among the other pronouns*” (In Bishop’s own words): “*Modesty, care, ... a sort of helplessness but determination at the same time.*”

Hoffman, Michael, 2011. Mostly middle: poems by Elizabeth Bishop. *London Review of Books* 33.17 September p7-8

undercurrent throughout the symposiums was the issue of the role of theory and research in the work of the NQF, and we include some reflections on this topic. We close by returning to the idea of the “communicative NQF”, and consider some striking developments in communicative action in the new landscape of the SA NQF.

1. Overview of the symposiums

The symposium was repeated on each day, with the first day focusing on the South African NQF for a predominantly South African audience, including representatives from South African employers, organised labour and qualifications and quality assurance bodies. The second day was designed for presentations on emerging NQFs from neighbouring countries, with an audience which included representatives from the SADC region and the African continent.

On both days opening remarks were made by Samuel Isaacs (CEO, SAQA) and Vic van Vuuren (Director, DWT for Eastern and Southern Africa and Country Office). Both talked to the need for a balance between the urgency of skills development in the context of the current economic climate, and the need for careful and sustained long term planning and researched understandings of goals and methods. On Day 1 the focus was on the South African NQF, with discussion generated by a presentation on various ways of perceiving the NQF and its value and impact (Keevy and Bolton). Dimensions of the interaction between national qualifications and labour markets were addressed by Evans-Klock from the ILO, and issues relating to the relevance of qualifications by Castejon. On Day 2 the focus was on progress in the development of national qualifications frameworks in the SADC region; presentations included an overview of NQFs in the SADC region, and inputs on developments in Botswana, Namibia, Zambia, Mauritius and South Africa. A synopsis of the ILO research that has been undertaken on the impact of NQFs in the region was again presented. On both days specific responses to key presentations were invited from organised business and organised labour. Throughout the proceedings delegates engaged in group discussion, report backs and plenary input in response to various prompt questions.

In addition, each day provided an opportunity for information sharing on two projects currently taking place in support of the NQF: the South African NQF Advocacy project, aimed at taking the NQF to the people, and the SAQA-UWC Continuing Education Programme ‘Lifelong Learning and National Qualifications Frameworks: Leaders for Learning’ to be launched in February 2012.

2. Some thoughts on Communication

In this perspective of the “communicative NQF”, we would like to argue that communication is the most powerful function of an NQF.

It sometimes seemed to the developers of early NQFs that while they were committed to flexibility and responsiveness, they could not do their work without legislating strict requirements. This was perhaps especially the case in South Africa, where the NQF was seen as an instrument for transformation from the debased formalism of learning under apartheid to learning that satisfied a range of ideal critical outcomes. The achievement of these outcomes was backed by a complex regulatory regime to “give teeth” to the aspiration. Each requirement was highly rational, but the totality was seen by many as unmanageable and stimulated resistance, withdrawal or desperate efforts to appear to comply.

In the form of the South African NQF subsequent to the new NQF Act of 2008, the central tenets of the original NQF are much more lightly applied. Three quality councils enact sub-frameworks which they deem appropriate to their sectors, but satisfying broad statutory goals. The central authority has lost much of its regulatory power. Some felt that it had been reduced to a “mere” communication and research role, with various minor responsibilities. Instead, however, the enhanced demand for communication looks set to become a far more effective source of power. We will see this later in the article when we look at some of the communicative functions of SAQA.

In nature information and communication systems are what life is all about. Genes, cells, synapses, enzymes are essentially bearers of information: instructions, warnings, design specifications, advice. These lead to sensations, movements, actions, feelings, beliefs. And then there is the brain and the greater mystery of the mind - processors, interpreters, makers of “reality”. This is not at all mechanical, but intensely organic and ultimately spiritual. Information, effectively communicated, changes reality. It cannot do this without some form of power or authority, but its power can lie in the ability to activate and shape the power and authority of other agencies. In the case of an institution like the NQF a statutory responsibility to inquire, inform, enable informed judgements, and communicate these effectively in places where it matters (among workers, learners, educators, directors general) can be much more powerful than managing power-draining direct interventions for which it is not resourced.

3. Collaboration and cooperation between stakeholders

Communication gives power to the NQF. But the NQF is also seen as a ‘relational device’, a mechanism not only for communication, but for cooperation and collaboration across education, training and work². In this view, a central aim is to facilitate relationships between different components of the education and training system.

At a systemic level, this position is reinforced by the ‘*Guidelines on Strategy and Priorities for the National Qualifications Framework (NQF), 2011/12*’ (Department of Higher Education, 14th September 2011), which puts forward the idea of collaboration between the different quality councils responsible for schooling, occupational training and higher education:

The system of collaboration is a fundamental requirement of the new NQF arrangements for which SAQA is responsible (NQF Act, s. 13(1)(f)(i)). The system of collaboration will guide mutual relations among SAQA and the QCs.

As a proposition for a central goal of the South African NQF (and also for regional nqfs), there is certainly support for ideas relating to collaboration and cooperation. As one participant put it, “Everyone agrees that without collaboration, the mismatch between education, training and the world of work will continue and indeed worsen”. But understandings of the nature of the mismatch, and the nature of collaboration through the NQF, are varied. To what degree a qualifications system is responsible for or can address any of the disparities between education, training and work is at the heart of understanding what the NQF as an instrument for cooperation and collaboration can and can’t achieve.

² The phrase ‘Communication, coordination, collaboration for quality in education, training, development and work’ is a key motif in ‘Towards a map of NQF-related research’: Abstracts and summaries for the NQF Research Conference June 2010. The terms ‘a framework for communicating, coordination and collaboration’ is also used as a descriptor for the NQF in Keevy and Bolton’s paper developed for the symposium.

We begin with an indication of some of the views expressed during the symposiums, in relation to areas of challenge in education and training: these have been noted as 'mismatches' in the ETD landscape. We then move on to a discussion of how (and whether) the NQF as a tool for collaboration between stakeholders could address these.

There is a mismatch between the products of basic education in terms of their readiness for vocational or technical training; and in terms of their readiness to enter the world of work.

In the ILO presentation the crucial role of basic education as a platform for further learning was strongly emphasized. Evans-Klock noted one of the guiding principles of the G20 Training Strategy: "Good-quality basic education for all is an agreed goal and an essential prerequisite for further skills development." In discussion this standpoint was endorsed, and problems in SA schooling were identified as having a negative impact on throughput in relation to skills training and the achievement of occupational and professional qualifications. Clearly, though, the improvement of general schooling is an endeavour way beyond the scope of the NQF.

There is a mismatch between vocational and technical qualifications and their related training offerings, the needs of employers in terms of skills gaps, and the needs of learners in terms of job opportunities.

Clearly this is a key area for the NQF as a collaborative project. A qualifications framework should be able to play the role of establishing what one participant termed as "solid bridges" between vocational education, training and skills development on the one hand, and workplace needs and job opportunities on the other: such bridges ensure that workers learn skills that are in demand, and that training interventions are focused on the needs of an industry or a sector. Throughout the symposiums it was recognised that our qualifications and training landscape is characterised by gaps between what is on offer and what is needed – one example brought up was that the number of qualifications which continue to be generated and registered on the NQF is not matched by uptake and delivery of these qualifications in the real world by real learners through real providers and institutions. We do not appear to have successfully used a qualifications framework to (for example) improve labour mobility, match skills to job opportunities, develop sufficient recognition of prior learning and experience mechanisms and so on.

As one speaker put it, however, it was also stressed that, "The potential benefits of training are not realised without job rich-growth." Vic van Vuuren of the ILO noted that in SA 9% growth is needed to address our high unemployment rate of 26%: whether this is feasible or not, the challenge of skills development is to use the sense of urgency generated by these figures to go beyond a "business as usual" approach in order to prepare people for employment or income generating activities. Obviously the NQF of itself cannot create economic growth and the resultant employment opportunities. But the point made by one of the international speakers (and reiterated by many of the speakers from African regions) is that collaboration between stakeholders can at least result in *relevant* qualifications as the drivers of *relevant* training and skills development. In his paper Castejon describes factors such as unemployment, lack of competitiveness and rate of learner dropouts as "signals of irrelevance" in a skills landscape: the potential of an NQF is "to improve the relevance of qualifications and their rate of return to learners". One of the ways in which it does this is through collaboration and coordination between key stakeholders.

There is a mismatch between the ideal of inclusive stakeholder participation in the NQF project, and the reality of sporadic and patchy involvement.

The ILO study of regional NQFs noted that involvement of employers and unions seemed to happen in sporadic and incomplete ways, a perception borne out in the regional presentations. Zimbabwe, for example, noted that where employers have been involved, as in the Manpower body, the standards have currency and those qualified are employed; however, the situation regarding TVET is different and employers are not open to these qualifications. Botswana noted that a key aim of its NQF is to enable industry and providers to develop programmes together, so that the existing fragmented credit system can be harmonized: it is too early to comment authoritatively on the success of this endeavour.

The importance and limitations of stakeholder involvement

Views on what it means to be excluded or included in the NQF were expressed in different ways on both days, with some effort being made to understand what “stakeholder involvement” actually means, in order to use the NQF effectively as a mechanism for collaboration and cooperation.

There is an assumption that everyone understands what is meant by ‘stakeholders’ in the South African NQF. Broadly, stakeholder groupings are assumed to be government (Department of Basic Education and Department of Higher Education and Training), the statutory Quality Councils (CHE, Umalusi and QCTO), SETAs, professional bodies, organised business or industry, organised labour, learners as beneficiaries of the NQF, education and training providers, and education and training practitioners. Ultimately, the primary stakeholder is the public at large comprising learners, holders and users of qualifications.

Already this listing suggests some of the difficulties of discussing ‘collaboration and cooperation’ between stakeholders in any generalised way. For some groupings, representation and authority are legally prescribed, and structures for participation are clearly delineated. But for others, the mechanisms for participation, and the degree of influence or authority which they may exert, are either unclear or contested. Understanding these dynamics for different stakeholder groupings may go some way to envisioning the NQF as a means for collaboration and cooperation more clearly.

Some illustrative examples of these debates are taken from the symposiums. One speaker from organised labour, for example, expressed a sense that labour is excluded from genuine involvement, with only lip service being paid to consultation. In response to this, one of the group discussions focused on differences between levels and types of participation, such as formal participation, technical participation, decision-making participation, workplace participation and so on. The point was made that there is little clarity on what kind of participation is feasible, appropriate and useful in this context; the possibility of revisiting participation models such as those of craft unions who were actively involved in protecting their trades, or professional body models, was raised. Another participant felt that there was a lack of synergy between theories and visions of the NQF, and the institutional bases from which these qualifications would be provided (an echo of frequently noted concerns about the tensions between theory and practice, vision and implementation). She cited the example of the closing down of teacher training colleges, and asked where the provider stakeholder grouping fitted into the NQF landscape. Certainly, if the NQF is to be an instrument of collaboration and cooperation to bridge some of the gaps between work and training, the commitment and inclusion of the provider base is key.

On the first day of the symposium both organised labour and organised employers spoke passionately about the perception that the NQF in South Africa has offered only “false hope”. The voices of employers, SETAs and labour spoke up for a key group: the unemployed and the under-educated (in particular the youth, whose prospects for employment look grim), identified as a beneficiary group in NQF Objectives 2 and 4. There is general acknowledgement that there is little progress in reaching these groups, and it is also clear that a qualification framework cannot in and

of itself 'fix' the factors that have led to the existence of these groups. But the NQF can aim at helping people access employment, through accessing relevant programmes that will address gaps and provide relevant skills. It is here that the collaboration between employers and providers becomes essential, and the NQF through SAQA can facilitate this. Issues raised in this context include the fact that full qualifications are sometimes too much of a long distance and overwhelming goal for many learners – and for many training units in business and industry. Notions which have been onstage in the NQF drama before, such as modules of employability skills and needs-driven short courses, need to be revived in the context of emerging debates on Part Qualifications. These may prove to be a useful vehicle for addressing short term needs and the informal economy. Providers, employers and SETAs have much to contribute to this discussion: some Sector Skills Plans, for example, show that many industries spend a large proportion of their training budgets on short courses and unaccredited training. The reasons for this could be fruitfully explored. While the limitations of short courses are well known, their advantages have been less well documented.

Finally, reaching the ultimate stakeholders in the NQF, the learners and the public, is an unfolding endeavour in which there has been positive progress. Ways in which communication with these groups is being fostered are discussed at the end of this article, along with other interventions in support of cooperation with NQF partners.

4. Reality check

NQFs have their origins in the 1980s: an era of growing optimism among the world's powerful about the rationality of markets, the economic benefits of privatisation and de-regulation and the speed of change from manufacture to services and production delivered by IT. This optimism included high hopes that learning and skills markets could best be supplied by developing guidelines and articulating frameworks that would be more flexible and responsive than centralised, bureaucratically prescribed state provision. School systems should be driven by the demand of the users, not by professional educators, curriculum developers and the like. Even more, post-school training for work and careers should be shaped by employers and workers, not by professional providers. The latter could have a limited role, with kind permission.

Well before the economic events of 2008 and the shaming of hard-line de-regulators, the optimism was seen as folly and hubris by critics. Frameworks setting out targets, objectives and goals in pseudo-business practices have had many unintended consequences: actual increase in centralisation, crippling expenditures in effort and time in accountability, the loss of essential and valuable regulated practices and the general degradation of public space and civil service by denigration and the prioritisation of bottom lines followed by private provision governed by individual or shareholder profit. The opportunities for corruption have been multiplied and have led in turn to a huge increase of often petty and unsustainable regulation. This is the case in public health, transport, municipal services, civil engineering - by no means only in education and training.

It is common knowledge that the neo-liberal market and world managerialism has yielded huge profits and produced excessive wealth and vast poverty. Its failure to provide jobs, especially for the poor, is also well-known. Although globalisation has been thought to promote the standing of the local ("glocalisation"), this has all to do with the fashion of the rich and nothing to do with the poor or the affirmation of community.

For the global South, and for Africa in particular, the de-regulated market has introduced many practices that are singularly inappropriate to developing societies. The undermining of working or emerging practices and of community values has been accelerated, while the glorification of consumerism - of bling - has triumphed among the youth through the power of rich world images. This has profound consequences for the valuing of hard-won knowledge and skills, and favours a shallow sense of entitlement to quick wealth - or at least display.

Southern African countries have responded in different ways to these pressures, most of which have been irresistible. (The question, "What else, how better could we have done under the circumstances?" is certainly difficult to answer in post-apartheid South Africa.) The greatest successes seem to have been the result of maintaining more regulations in the economy than have been fashionable in the rich world. But if things could hardly have been otherwise, they may be made better. Lost opportunities for human development are very difficult to recover, but there is no lack of a sense of urgency among politicians and planners about doing this. In various ways the policy borrowing has meant the adoption of policies with little fit with regional conditions. Perhaps the greatest misfit in the NQF idea is that it was generated in societies with adequate, even good, provision of general education, and made potentially workable systems only for post-school vocational or occupational education. The problem of the effect of poor quality or unrealised basic education surfaced throughout the symposium in various guises – its impact on work-readiness, on educability, on successful completion of training. The need to compensate in Southern Africa for massive numbers of young adults with little or poor general education puts great strains on the system, while leading to a situation where the NQF in itself becomes an unrealistic flag of hope.

There is surely no way back to the old forms of highly planned and prescriptive state provision any more than we are likely to re-instate the old steam engines. This is neither desirable nor possible. But it is very important revive the standing and scope of public provision, to simplify structures and systems so that ordinary people can engage with them without layers of intermediaries. Above all, we need to learn from the mistakes and unintended consequences of ambitious approaches that haven't worked. But we must not repeat the mistakes of prematurely phasing out working practices that have been either successful results of policy, or happy unintended consequences.

One of the main problems of the application of a certain range of business management to national provision of learning has been the proliferation of jargon and abstractions. The pure abstractions of mathematics (or money management) allow for powerful manipulation and for the realisation of what sometimes looks like superhuman achievements. But the mix of systemic, bureaucratic and academic abstractions in education and training systems has increasingly become disabling. Unanchored from actual learners, trainers, teachers and the working of institutions it has seemed to float far from the shoreline where struggling humans dwell and where mutual intelligibility and sensible implementation might be possible.

It is one of the messages of the symposium that this must stop. NQFs need to recognise that they are dependent on the economy's generation of jobs and must focus their energies on enabling roles in this problematic process. They must do everything possible to discourage the idea that they are capable of solving the problems of jobs. They need to look very concretely at ways in which their practices have been enabling of growth in learning and its quality, but also at ways in which they have been disabling - including the problem of totalising their scope and inadvertently discouraging any learning provision which is not in the frameworks. (In this regard, indeed, there were voices from the floor which talked to the need, once again, for more immediately beneficial training interventions which are aimed at lower levels, or do not encompass a full qualification.) NQFs need to work much more communicatively in public provision, and need to be far more productive of knowledge about labour market learning provision and needs than they have been. Perhaps, above all and in response to problems implicit in the first paragraph of this section, they

need appropriate communication, relationships and role division between regulators, stakeholders and providers. It is not only the role of the NQF to talk 'to' others, but to offer mechanisms to enable these different actors to talk with each other. In short, they must become much more effectively communicative, with militant modesty about their roles (in the spirit outlined above).

In amongst all these deliberations on the expectations put onto the NQF, and concerns about what it has or hasn't achieved, or can and cannot achieve, comes the knotty question of impact; and to this we now turn.

5. Impact

Forced prematurely by extraordinary political pressures which put it on the defensive before it had taken shape, the SA NQF moved into a series of premature impact studies. These necessarily focused on market perceptions of stakeholders and did little more than establish that stakeholders thought the NQF was a good idea in principle, with reservations about emerging practices.

Subsequently, the ILO is able to report on a study of the impact of major international NQFs from New Zealand to Scotland and including South Africa. Their findings provided some of the most important input into the symposiums. Put bluntly, they find that NQFs have poor data to support assumptions about impact, but seem to have had little or no impact on their education and training systems. There has been very little uptake of newly-developed qualifications. The use of unit standardised qualification development has been a signal failure. With due reservations about the scope and timing of the research, and some thoughts about the relatively less unsuccessful NQF (Scotland), the ILO team recognises that the picture may change.

Setting aside the possibility that the ILO started with some bias against NQFs, we would like to pose two sets of questions. The first problematises the idea of impact and impact studies. The second, far more seriously and in line with the plea in the previous section, appeals to NQFs to get down to the job of collecting data, information and rich ethnographic pictures of how their work is affecting institutions and practices.

There is something brutal in the term "impact". The brutality is softened somewhat when we talk of the impact of a painting or a poem, as there is when we are "struck" by a thought. But the term is fundamentally a military or ballistic metaphor if it doesn't refer to accidents. It has unfortunately become a fixture in evaluation studies, and needs to be used, if at all and preferably not, with great caution. Evaluation specialists do treat it with caution, reserving it for decidedly long-term studies, hedged with questions about counter-factual possibilities and multiple causalities.

Special reservations have to be placed around impact studies of endeavours with organic cultural intentions. It has proved virtually impossible, for example, to isolate and measure the impact of literacy in a society. Even the failure of a whole system to teach reading is almost impossible to attribute to the impact of a programme, or of teacher training, or of school management. Isolating historical and social variables inevitably falsifies reality.

Having raised this reservation, it must be admitted that NQFs make instrumental claims about their reasons for existence. They aim to promote access to learning pathways that lead to jobs, to facilitate the international mobility of skills, to enable effective quality assurance of learning programmes across sectors, to clarify the learning landscape of a society... and so on. While impact in any of these and other aspirations is difficult to pin down, it is far from difficult to collect evidence of effectiveness and influence. Facts, figures, case studies (in the words of one

participant, which reveal the 'stories' of the NQF) about real people in actual programmes and institutions should provide insight that would enable proper judgements about whether an intervention or system is, on balance, productive or counter-productive - whether it is better that we have than that we don't have it.

Some studies like this have been done, notably by Umalusi. Most point to seriously dysfunctional situations, but not necessarily ones attributable to the NQF as such. Some reveal unmanageable practices and have led to corrective action. But far too little has been done to collect, present and analyse existing information from the millions of lives touched, for better or worse, by the NQF. The result is a pervasive bad press, especially in SA for SETAs. Yet a visit to one of the larger and more successful SETAs will provide a picture of hundreds of dedicated people, strongly believing that what they do is worthwhile - mapping provision in their sector, guiding and approving programme development, helping to solve structural questions in specific trades, strictly quality assuring hundreds of providers serving workers in tens of thousands of companies, administering learnerships, dealing with dysfunctional regulatory situations which limit their authority... and so on. For doing this they are admired, criticised, and sometimes berated by their stakeholders. Annual NQF accreditation procedures govern this work. The system is changing in response to perceived - perhaps real - shortcomings. But as a whole it is vulnerable to an often toxic environment of political rumour-mongering rather than credible communication.

Whatever the case, the design of the NQF almost certainly disables as well as enabling, but this is open to correction. It is simply difficult to believe that the NQF has no impact.

6. Theory, research and information gathering

One of the repeated themes touched on in the symposiums was the insistence that the NQF and its doings should be properly "theorised". This ranged, implicitly at least, from the theoretical foundations of the NQF to the quest for an appropriate theory for the evaluation of the NQF's impact.

We find the use of the notion of "theory" in this context questionable; interesting, but not especially useful. This is not because we do not value the role of "theory" in learning and the development of competence. In fact, we are inclined to subscribe to the radical Nietzschean view that there is nothing but theory. But we don't. Something probably exists outside of theory, but our only sources for understanding whatever this may be are provided by the lenses of theory - among them religious or mythical views of the universe, including for example, the wonderful Khoi theories that so shake our general theoretical perceptions of our world in their assured limitations. In short, if it matters, we are relative realists. All this, by way of necessary genuflection to the real theorists.

What we object to is the use of "theory" for a kind of mystification, usually privileging academic interests and a view of life from the lofty towers of "higher" education. This mystification comes about when it is used without any clarification of its referent. The demand for theoretical legitimacy for the work of the NQF may thus be no more than an abject appeal for recognition from those towers - from which the cognitive concerns of the labouring masses, supposedly served by the NQF, look very tiny.

But "theory" can be clarified. Its uses in the context of the NQF include:

- the general theoretical understandings or conceptual frameworks of everyday life in communities, classes etc.
- the theoretical understandings shaped by a reasonably successful modern schooling
- the theory needed by people seeking occupational or professional advancements, without which there are theory thresholds to the realisation of various potentials - sometimes insuperable gaps to further individual development
- trade theory - the broader and deeper scientific and technological insight that enables intelligent responses to problems in an occupation
- the theory that enables a grasp of further learning in a particular discipline (CALPs)

These forms of theories are very different in character though similar in type. The NQF has a major commitment to the promotion of theory, whether it is to ensure that suitable balances of theory and practice are present in approved curricula, or to go further and require demonstrations of effective integration of theory and practical learning. In this sense, the NQF has no reason for embarrassment about its real commitment to theory and especially theory/practice relations.

However, the nature of theory and its relationship to practice even in these graspable forms is not well understood. Studies of the NQF have raised the question, but have not faced it squarely as far as we know. Within the NQF the need for a right relationship between theory and practice is generally taken as a commonplace, but is not interrogated. However, is it worth investing in interrogation outside of academic dissertations? There may well be no way of getting to the bottom of the issue. There is a rough and ready general understanding of what is meant by theory/practice relations which can and must be interrogated in specific instances. There is, however, no way of ensuring that the theory curriculum fits the practical curriculum only and exactly and also does justice to both theory and practice. (If the theory is fitted too perfectly to practical curricular tasks or “elective” requirements it is neither true to the broader theoretical discipline, nor to the knowledge-needs for growing and applying beyond the practical tasks.) Whether those working in the context of NQFs are sufficiently conversant with the theoretical dimensions of theory/practice relations is a matter for the development of communities of practice in specific trades or disciplines - not for abstract theoretical finesse.

The discussion so far, is, though, a red herring. It does not begin to deal with what might be an adequate theoretical foundation for an NQF or for research into the impact of an NQF. The truth is probably that there is not one. The NQF is necessarily a politically contingent institution dedicated to a range of divergent concerns loosely gathered under clusters of abstractions. (This is, of course, one theory of what an NQF is.) All of the NQFs’ concerns are expressed as secondary abstractions, expressive of assumptions about the way things work. For example, a major theory of an NQF is that a framework - usually seen as a rectangular matrix - is useful for various purposes. One leading purpose is to demonstrate the rationally-established equivalence of different qualifications. Recent claims (valid or not) suggest that this matrix, emphasising vertical mobility, may in some respects be damaging of the uptake of learning programmes most needed by individuals and society - discouraging the pursuit of learning at or below one’s current achieved level. The importance of this example is to show how little we have thought about matrices as representations of learning progression and relationships, and of the relevance of equivalence and progression to vitally lived and used knowledge.

Now it would be possible to examine and test each of the assumptions underlying the NQF and its common practices. In good empirical practice this would require a welcome theoretical concretisation of each assumption into observable or testable hypotheses and the effective testing of the hypotheses. We could unpack the theoretical dimensions of the idea of the matrix, its assumed uses and values. We could then conduct surveys to establish the extent to which the

matrix had been clarifying, developmentally useful, limiting, distorting etc. In an ideal world, this would be admirable. We have touched on its real problems in our discussion of impact studies.

Whether this level of theoretical aspiration is worth following is another question. Most human actions and institutions carry on without being much affected by this kind of investigation. Schools carry on without experimental insight into the question of whether taking the register at the beginning of the day casts a pall over the enjoyment of learning - though the possibility is real. There is a difference between being alert to problems, or following through intelligently on complaints, and engaging in the side-tracks of profound introspection.

At the loftiest level we find the quest for an adequate theoretical foundation for the NQF drawn into the coercive and intimidating academic arena of theories of the sociology of knowledge and knowledge/power relations. This gladiatorial arena with its parade of seraphim and cherubim who have been initiated into the very nature of knowledge, is full of interest to those, including the present writers, who find it interesting but useful only in the very long term. Engaged in by those required to research the work of the NQF, the engagement can look like defensive delaying tactics, if not navel gazing.

For historical reasons, the NQF is a tissue of higher order abstractions worked through into bureaucratic (regulatory) abstractions, expressed in turn in lower order abstractions in some cases. There seem to have been political, structural, constraints - too complex to go into here - why it has not felt free to instantiate the layers of abstractions into specific effects, to engage with actual and well sampled everyday practices shaped or influenced by its work.

One way of expressing what we mean here is to draw a distinction between 'theory' as discussed above, and the necessary research (more simply viewed as information gathering) which of course is needed for various purposes – accountability and funding, long term tracking activities, projections and planning, to name only a few. This is not to deny that any research – and even 'information gathering' - has an implicit theoretical base. But what we are suggesting here is the need to define a different kind theoretical approach which draws on field work and empirical evidence rather than conceptual frameworks only. Research which genuinely describes actual situations (the 'stories' mentioned above) is in fact just as difficult and demanding as discourse-focused research - if not more so.

It is our belief, strengthened by the proceedings of the symposiums, that it is time to gather evidence and information, thickly-textured accounts where possible, about real practices emerging from the NQF in order to inform its communicative role, its concerns with impact, and to feed back into the conceptual discourse of its communities of practice. Without this, the theorizing of the NQF threatens to slip into "ignorance and irresponsibility" and "a preference for engaging with universal problems and foreign utopias..."³

7. Fostering robust communication in the SA NQF

³ "It was their ignorance and *irresponsibility* that he found so annoying, and in such contrast (in the case of intellectuals) with the claims they made on their own behalf. ... their uninterest in the reality of France, their preference for engaging with universal problems and foreign utopias..." (In Aron's own words): "Only the hidden is truly scientific, bumbles the tribe of Parisian philosophizers - none of whom has ever practiced any science at all."
Judt, Tony. 1998/2007. *The burden of responsibility: Blum, Camus, Aron and the French Twentieth Century*. Chicago: University of Chicago Press

A militantly modest upbeat about the increasingly communicative “interdependent” NQF in South Africa is possible because of two presentations in the symposiums. These lit up the proceedings with their enthusiasm about the impressive developments they discussed: the NQF Forum, the incorporation of professional bodies, the work of the NLRD and the Recognition of Foreign qualifications, the Masithethe advocacy campaign and the linked NQF and Career Advice Helpdesk. We look briefly at these.

Ironically - or through the wisdom of the review processes that the SA NQF went through - the NQF seems in various ways more communicative than it has ever been. The irony lies in the fact that in the new NQF Act of 2008 the proudly “integrated” NQF was broken up into three sectoral sub-frameworks for trades and occupations (new), and the already existing quality councils for schooling and universities. This looked to some like the bitter defeat of an ideal. However, by allowing relatively autonomous powers and procedures to the sectoral quality councils, it has been possible for each sector to assert its special perspectives. The new QCTO (trades and occupations) especially creates the opportunity to promote the due recognition of workplace and experiential learning - concerns which tended to be sidelined by the more established schooling and university sectors when there was no clear voice for this sector. The Forum convened by SAQA across the sectors has brought issues and conflicts as well as solid agreement to the surface, which is undoubtedly good for development.

Related to the work of the Forum, the new, formal incorporation of professional bodies into the NQF is a very important move, allowing the recognition of professional designations as well as qualifications. This is essentially, again, communicative action. There are many challenges of definition, relationship and status, but the positive intent has been welcomed in most sectors.

The National Learner Records Database is starting to come into its own as a resource for individuals, but with increasingly powerful sources of information for understanding the availability of skills in the country. Given the widely recognised poverty of our labour market skills analysis, this work must be accelerated, and become a priority for the quality councils.

Guiding and informing the recognition of foreign qualifications has become a major project for SAQA. This requires the growth of complex conceptual insights into the nature of qualifications from different countries, fascinating verification procedures and detective work across strange borders. Although SAQA does not make decisions about the final status of a foreign qualification, it has gained seriousness and scope because the Department of Home Affairs demands its stamp of approval on qualifications linked to work permits. The amount of communication involved in some of the approximately 30 000 qualifications processed each year can be huge.

The Masithethe Advocacy campaign is concerned with the social marketing of the NQF. It has multiple objectives, ranging from informing the staff of the quality councils, SETAs and other NQF agencies so that they can be positive ambassadors for the mission of the NQF, to running numerous radio programmes and participating in education and training fairs around the country. Here there is a particular emphasis on helping learners to access programmes, exercise the educational rights - and understand the processes needed for access to appropriate learning pathways.

Finally, closely linked to Masithethe, is the new NQF and Careers Help Desk - set up just over a year ago. Tens of thousands of inquiries come in every month. These include individual requests about the standing of qualifications and institutional queries about accreditation status or procedures. People having problems with access because of disputes about the status of their qualifications are helped in various ways. People trying to make career decisions are advised

about where to go for more information. And so on. The very concrete problems of real people (not elements in a system) bring to the fore structural problems - often because of officials who misunderstand or misuse the functions of the NQF. These problems bring a welcome whiff of grounded reality about the mission of the NQF. The Help Desk is characterised by an activist spirit, where communication and interpretation are enabled by the NQF, and would scarcely be possible without it. The role of providing useful information which can help potential learners find a pathway into relevant training goes some way to answering the plea of one of the labour delegates, to “speak to us on the ground”.

This, symposium delegates seemed to feel, was what the NQF was really about.

At the same time it is important to recognise the communicative action implicit in the second symposium. There is a new international community, including a specifically African community, of increasingly expert practice regarding NQFs. What is especially interesting here is the development of decidedly individual approaches in each country. Listening to the speakers one was inclined to qualify the idea of “policy borrowing”. There has been abounding advice and influence, but none of the SADC countries involved seemed in any way to have slavishly followed a model. SAQA, representing a pioneering NQF, is doing valuable work in various African countries. Far from pushing some triumphalist model, this work encourages reflective and appropriate development that may learn more from shortcomings revealed in the South African experience.

8. Into the future: Reflectively, accountably, boldly

In his closing remarks for the symposiums, the CEO of SAQA, Mr Samuel Isaacs pointed to the reports from the helpdesk and the advocacy campaign with their examples of access, as illustrative of NQF action. The NQF is not only about access, however, but about the question of access to what? In other words, it is about transformation – changing the system. The urgent needs for access now and better provision for the future mean a constant management of the short-term and long terms perspectives. In SAQA this is reflected in running an immediately responsive career advice service, but also a research programme which will only bear fruit in years to come. Both are priorities, and there is no place for an either / or approach. Change is slow and uncertain, but there are no assured quick fixes. In the face of expectations of dramatic short term impact, Mr Isaacs pointed out that estimates suggested that SAQA had generally cost 0.01% of the education budget in South Africa.

Mr Isaacs ended with a suggestion that we change Descartes’s famous dictum to “we relate, therefore we are”. Developing the relations and communication at the heart of the NQF, we must act reflectively, accountably and boldly. (Perhaps, he thought, we haven’t been bold enough.) At the same time, reflecting on the complexity of action, even communicative action for improvement in education and training, he quoted from Michael Fullan: “In the face of complexity, it’s good to be humble.”

Which brings us back to militant modesty.