



Council for Quality Assurance in
General and Further Education and Training

Umalusi

**Integrated response to the three sub-frameworks,
gazetted for comment December 2012, and the
green paper on post school education and training,
launched January 2012**

April 2012

Many of our problems are created by ourselves based on divisions due to ideology, religion, race, economic status, or other factors.

The time has come for us to think on a deeper level, on a human level and appreciate and respect our sameness as human beings.

His holiness the Dalai Lama

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Acronyms

DBE	Department of Basic Education
DHET	Department of Higher Education
FET	Further Education and Training
GETC	General Education and Training Certificate, NQF 1
HEQF	Higher Education Qualifications Framework
NASCA	National Senior Certificate for Adults
NC(V)	National Certificate (Vocational)
NIC	National Independent Certificate
NDP	National Development Plan
NQF	National Qualifications Framework
NSC	National Senior Certificate
NSF	National Skills Fund
OFO	Organizing Framework of Occupations
OQF	Occupational Qualifications Framework
QC	Quality Council
QCTO	Quality Council for Trades and Occupations
SAQA	South African Qualifications Authority

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Recommendations emanating from this paper

This section offers the recommendations which Umalusi is making made to address issues arising both from the gazetting of the three sub-frameworks of the NQF and from the publication of the green paper. The list is not exhaustive but does highlight some of the critical considerations as the vision for further education and training (including higher education) in the coming decades is consolidated.

The arguments underlying each of these recommendations forms the substance of this response and provides the reasons for the position that Umalusi takes in respect of the proposals made in the green paper as well as its position regarding the need for the three sub-frameworks as gazetted.

Recommendation 1: The DHET serves the needs of adults while the DBE deals with basic education for children and adolescents

The distinction between the responsibilities of the two departments of education is made in terms of *who* they serve, rather than the forms of learning which they offer.

The division of responsibility for young adults at the borderline between basic education and further education and training requires considerable flexibility and is to some extent contingent on the educational choices made by the individual concerned.

Recommendation 2: The learning needs of adults includes the need for basic education

Adult basic education is identified specifically and separately from other forms of basic education in the constitution. In the view argued in this paper, it forms part and parcel of adult learning needs, and is to be managed by the department responsible for the education of adults, that is, the Department of Higher Education and Training. The adult nature of these learners precludes them from being accommodated in the schooling system. Furthermore, the NDP acknowledges the necessity for a substantive growth in adult education which the state is required to address.

Recommendation 3: A variety of excellent qualifications are required to address the diverse learning needs of adults

The green paper acknowledges the need for a vibrant post-school system that deals with a variety of learning needs. The *National Development Plan* correctly identifies the fact that developing 'a strong set of national qualifications' is the key that allows education to support both personal and economic development. Experience has already shown that a few readily identifiable qualifications carry greater weight than a multiplicity of smaller qualifications which cannot be readily quality assured.

This paper argues that adults have diverse learning needs and must have some level of choice with regard to what they choose to study. Such opportunities must include the ability to secure livelihoods, to gain a basic education, to learn the knowledge and skills required for an occupation. They include vocational education, other forms of further and continuing education and higher education. All these –and more – are required if the vision of lifelong learning, promoted by SAQA is to materialise for ordinary South Africans.

What this means is that the state must fund other qualifications in much the same way as it does the NSC, NC(V) and the N-courses. The GETC for Adults at NQF Level 1 and the National Senior Certificate for Adults (NASCA) as well as the National Independent Certificate (NIC) should immediately gain similar status in the post-school environment, with further qualifications coming on line progressively as the post-school system becomes able to address a greater variety of needs. The support for these qualifications must co-exist with similar support for vocational education and training as well as for qualifications derived through workplace-based learning processes (occupational learning).

Recommendation 4: Given the extent of the need for education for adults, the further education environment – including higher education – the vision for the country should look to both public and private institutional provision as necessary components which work together in creating the diverse, vibrant environment being imagined.

The green paper accords a 'complementary role' to private providers which currently contribute significantly to the area of post- secondary schooling, given that there has been a weakness in state provision. In terms of the provision of intermediate skills for people who have some form of matric, the private providers have clearly filled a gap, and should be encouraged to continue to do so, and to provide the lead in some instances.

The green paper correctly identifies the need to strengthen the public colleges and adult centres, and indicates it will do so by ensuring that the bulk of state funds goes to support learning in state-run institutions. This seems to suggest practices that would discriminate negatively against private institutional provision.

An alternative option would be to allocate funds to institutions which demonstrably produce graduates of high calibre and which are thus clearly offering quality education. In such a system, the choice made by learners would help determine where funding is allocated.

Recommendation 5: Strengthen FET colleges as an institutional type nationally first, and make differentiation a secondary consideration

The necessity of dealing with the full range of adult learning does not require the creation of different FET college types, at least not as an immediate priority. FET colleges should first and foremost be strengthened to deliver the range of qualifications which are identified through their Programme Qualification Mix (PQM). The college sector needs to be educated as to the range of adult learning which they might come to serve, rather than simply being fixated on the N-courses and the NC(V).

Currently the post-school system would be better served if colleges, particularly strong ones, were required to take on adult learning as well. In due course, these adult learning centres within the colleges could gain the necessary autonomy and become satellite campuses or even colleges in their own right.

As the FET college system is strengthened and grows, colleges may choose to specialise in accordance with the needs of the people and the region they serve.

Recommendation 6: The value of qualifications on all three sub-frameworks for the post-school education and training environment require recognition and active support in implementing the qualifications designed to create a diverse adult learning environment

The three sub-frameworks provide three distinct and necessary charters for the educational work required to create a national post-school system. Each sub-framework contributes to a meaningful national system, and all have been created with the presence of the other frameworks in mind. The relevant qualifications on the three sub-frameworks must be taken up in the work of the DHET in order to create that diverse and vibrant, articulated system the green paper proposes.

The immediate imperatives for skills development in order to provide employment and strengthen the economy do need to be serviced, but not at the cost of a more comprehensive vision for the post-school sector which would be of value fifty years from now.

Recommendation 7: Articulation is a process as well as a decision – without the process of establishing the articulation, the decision may not amount to much. Articulation must be worked out in practice

The green paper calls for a 'highly articulated' post-school environment. It would seem more realistic to require a *well-articulated* system that allows progression within and across the sub-frameworks. Proper articulation is not a matter of collapsing

distinctions in education (such as the differences between occupational learning and vocational education), which serve to provide a more meaningful set of learning opportunities than would be the case if such distinctions were to be obscured.

Articulation generally requires to be worked out on a qualification-by-qualification basis, often using curricula to determine the nature of the articulation possible. The establishment of appropriate forms of articulation may even require co-operation between institutions.

It is also worth bearing in mind that, besides the technical aspects of creating the necessary articulation, the social and cultural requirements of moving from school to university, or from school to college may require careful mediation by the receiving institutions.

Recommendation 8: Vocational learning in the form of the NC(V) requires to be addressed by both departments of education

The introduction of the National Certificate (Vocational) signalled the state's intention to offer opportunities to younger learners which would prepare them more immediately for the world of work than the conventional matric qualification did. Its introduction was *also* intended to provide colleges with a reputable qualification to drive the rehabilitation of the colleges as institutions that people would choose to come to. The National Certificate (Vocational) is a valuable young qualification with a positive role to play in education and training. It may need to be offered in different institutions by both the DBE and DHET. This will require inter-departmental co-operation to optimise the qualification.

Recommendation 9: Occupational learning is the responsibility of the Department of Higher Education and Training

Having taken over the mechanisms set up by the Department of Labour, namely, the skills-levy institutions, the NSA and the NSF, the Department is *de facto* responsible for all workplace-based learning, and, through the QCTO responsible for the development of good quality qualifications to make the delivery of intelligent skills development a reality.

Some workplace-based qualifications may also require some institutionally-based support, and this should be located in the college sector, and quality assured by the QCTO. The colleges, however, should not become merely a site for skills development, even if this becomes one of their critical responsibilities. Adult education also leads to employability in the workplace, and education itself is a driver of development.

Recommendation 10: The services of all three quality councils are presently required by the DHET on account of the diversity of learning needs it is responsible for

Each of the three quality councils are empowered to deal with specific areas of learning which are identifiably different, even though there may be areas of overlap at the margins. Each of the quality councils has gone some way towards developing insights and expertise into the needs of developing, managing and quality assuring the qualifications that typify that sector. It makes sense that, for the present at least, the Department harness this knowledge and skill in order to strengthen the proposed post school system, especially since it recognises that the present system is much too small and, in parts, very weak.

This paper recognises that being subject to two or sometimes even three quality assurance regimes may be difficult for colleges, but if these are related specifically to the qualifications, as proposed by the NQF Act, the areas of responsibility become clear enough to all concerned.

Further, this paper acknowledges that organic growth in the post school environment may, in due course mean that certain responsibilities migrate between quality councils: the responsibility for certain qualifications may move from one quality council to another as the internal logic of the new system becomes evident.

Recommendation 11: The identity, integrity and functions of the three quality councils should be respected and used to enhance post school education and training

Given the nature of the entire educational system currently, minimizing disruptions that would sidetrack the quality councils from performing their statutory functions seems best course. Each quality council has well identified responsibilities – developing and managing their sub-frameworks, quality assuring the qualifications for which they are responsible for, stepping into their standard setting functions progressively, and working together to energise access and recognition of learning at the points of overlap. These activities are far more critical to the wellbeing of post-school education and training than making the quality council system bureaucratically tidy.

Recommendation 11: The role of the National Skills Fund must be reconceptualised so that it functions as a National Education and Training Fund

With its parameters more generously determined, the new skills fund is able legitimately to support a much broader range of initiatives that will fund the development of *individuals* rather than skills. The individual's choice, within a broad set of appropriate options, is supported, and then the person returns the investment by participating in the economy, which is the big shift from a narrow focus on skills development. Choices can now include professional study at a university, vocational study at a college, occupational skills and knowledge acquisition in the workplace and at a college, some form of adult learning, whether it is at Level 1 or Level 4 on the NQF, and the revised mandate of the present NSF, would allow these to be seen as legitimate expenditure of the moneys accrued through the levy.

Integrated response to the three sub-frameworks, gazetted for comment December 2012, and the green paper on post school education and training, launched January 2012

Umalusi

1. The green paper in context

1.1. The need for a vision

The formation of the Department of Higher Education and Training in 2009 is the most recent attempt in a series, dating from just before the advent of democracy in South Africa, to forge a single, integrated system of education and training in an environment that understands (and has understood) what that means in significantly different ways. The new Department, which now includes responsibility for adult basic education (referred to as 'adult education and training'), further education and training, higher education and skills development must deal with bodies with divergent conceptions of how best to embody the ideal of a holistic, responsive and flexible education and training environment that served the needs of all who are past schooling age ('post school').

Although this yoking together of all these various institutions is mentioned in the first paragraph of the paper's executive summary, the challenge of accommodating these different visions and of moving towards a more coherent approach to post-school education and training is never really foregrounded and discussed as the single most critical issue that the green paper must resolve in order to deal with the multiplicity of challenges it focuses upon.

The difficulties of creating 'a single, coherent, differentiated and highly articulated' system of education and training, which have been exemplified in the attempts to implement a meaningful National Qualifications Framework, are glossed over and remain unexpressed in the green paper, apart from a proposal late in the paper regarding the management of the quality councils.

The challenge of accommodating the visions of the different institutions incorporated into the Department of Higher Education and Training, and of moving towards a more coherent approach to post-school education and training is never really foregrounded and discussed as the single most critical issue that the green paper must resolve in order to deal with the multiplicity of challenges it focuses upon.

Instead, the paper immediately hones in upon the pressing needs which the Department is required to address, and its extremely ambitious, but unsupported proposals to remedy the situation.

The need for a vision to shape the way forward was so pressing that Umalusi put forward a vision in 2009 for its own guidance and for those institutions with which it is committed to work. Some of the more critical features of that position paper for further education and training are to be found in Section 6.

Two points need to be made before responding more directly to the green paper itself. The first is that the FET sector has been the subject of previous green and white papers, but no reference is made to this history of engagement, giving the reader no sense of where things in the FET college sector may have changed, or remained the same. This omission is a pity because it fails to contextualise the current thinking in a longer trajectory of development (and failure) in the sector.

The second point refers to the need for a longer term vision, which is also not evident in the green paper. It would be important, in any additional work emerging from the green paper, to distinguish between the need to respond to the pressing short-term needs and the necessity of planning for a much longer time horizon. What should the post-school environment offer four or five decades from now? How should it relate to schooling, and to higher education? How will it serve the needs of individuals as well as the demands of a healthy economy? How does one plan for that eventuality even while we deal with the necessities of the present? On these questions, the green paper is silent.

1.2. Post school education and training

The green paper's executive summary indicates that by 2030 South Africa ought to have a post-school education and training environment which:

- Is aligned with South Africa's overall development agenda, and meets the needs of the economy and society as a whole
- Is single, coherent, differentiated and highly (sic) articulated
- Expands access and increases equity
- Provides a range of accessible alternatives for young people
- Accommodates approximately 83% of young people in universities, colleges and 'other post-school institutions such as the proposed community education and training centres'.

The green paper pinpoints a number of significant strategies intended to bring about the necessary changes to the landscape, including a very much more hands-on role for the Department of Higher Education and Training, a different funding model, new relationships with higher education, the Setas (and through them, with business), funding sources, other national departments, the Quality Councils and with students themselves. New initiatives are to include greater co-operation with

universities in terms of college staff development and research, new institutions focused on specifically on the needs of adult learners and an Institute for Vocational and Continuing Education and Training.

The value of having a powerful, progressive further education sector, which includes higher education is beyond doubt, given the extent of the needs spelled out in the green paper.

How the post-school education and training system is understood, however, is critical to its being accessible, differentiated and useful to all South Africans as individuals capable and willing to make educational choices. How the post-school system fits into the larger national planning picture as a whole is just as important: education and training has a vital contribution to make to development, but it can only do so if it is properly understood in terms of the *other* developmental priorities that co-exist and also need to be addressed. This issue is taken up in section 1.4 below.

It is also apparent that different parts of the post-school system would be better geared to assist with certain needs than with others, and yet the green paper fails to make strong and reasoned connections between the sub-systems in the post-school environment and the difficulties they are best suited to address. So, for example, it makes sense to unpack the Ten Year Innovation Plan in a much more considered way in relation to the universities' role in the creation of what the NDP calls a virtuous cycle of growth and development. The FET colleges and the Setas, together with the state-owned enterprises and industry, on the other, are better placed to help where some form of education and training is required to improve labour absorption.

In a sense, the green paper in its present form, seems to have heard the voices of conventional interest and of power groups, but has not yet – except in some rather perfunctory ways – really made room for the voices of the young people whose needs the paper is intended to address, or for older people, who were poorly served before the advent of democracy. How do we draw new communities of learners into self-development – and how do we find the means to listen to them, and to respond accordingly?

How the post-school system fits into the larger national planning picture as a whole is important: education and training has a vital contribution to make to development. Strong and reasoned connections must be made between the sub-systems in the post-school environment and the difficulties they are best suited to address.

1.3. The need for post-school education and training

The need for a post-school system is framed in terms of the numbers of people without further learning opportunities once they have left school, with or without a school-leaving certificate, and the numbers are disturbingly large. The figures cited in the second chapter of the green paper, indicate for just one 7-year cohort (from ages 18 – 24), the 2007 CS population figures stand at 2.8 million. This number in 2012 could, if one extends the cohort from, say, 18 – 30 years, be easily double that number. This group are without new opportunities to extend themselves and do not have work. It is a dire situation to be in, and one where work *and* education together are required to improve the lot of this group of South Africans. The green paper engages in a particular way with this need – it talks about contributing appreciably to overcoming the structural challenges facing our society' and the 'bleak future' – a repeated phrase - mainly through an exponential massification of education. The paper recognises that enlarging the FET system so rapidly runs the risk of lack of quality, and in turn, of credibility.

The figures cited in the green paper are these:

Table 1: 2007 CS: Not Employed, Not in Education, Not Severely Disabled 18 – 24 age cohort								
	18	19	20	21	22	23	24	Total
Unspecified	2,595	2,457	3,786	4,762	4,998	4,054	4,699	27,351
Primary or less	61,056	64,285	70,496	78,564	73,575	75,261	77,425	500,662
Secondary education less than Grade 10	51,192	59,643	73,194	79,050	83,367	81,502	80,649	508,597
Grade 10/Std 8 or higher but less than Grade 12	65,228	94,608	132,158	164,596	176,733	174,325	183,146	990,794
Grade 12/ NTCIII (no exemption)	47,447	65,190	89,292	99,797	100,711	96,139	100,080	598,657
Grade 12/Std 10 (with E)	10,226	13,526	14,778	14,259	16,910	13,869	14,766	98,335
Certificate with Gr 12	2,732	4,025	6,299	8,157	9,672	8,340	7,811	47,035
Diploma with Gr 12	388	1,151	2,464	3,461	6,103	5,733	5,995	25,294
Bachelors degree	188	322	430	1,774	1,460	2,831	2,347	9,352
BTech	6	126	192	312	78	654	414	1,780
Post grad diploma			244	405	400	581	867	2,498
Honours degree			60	220	383	694	337	1,695
Masters/PHD			48	77	110	135	50	420
Total	241,056	305,333	393,441	455,434	474,501	464,119	478,587	2,812,471

Source: Cloete, N. (ed.). 2009. *Responding to the Educational Needs of Post School Youth*. Cape Town: CHET.

The executive summary of the green paper indicates substantive (and explosive) increases in both the numbers and percentages of enrolment in both further and higher education by 2030, just eighteen years from now:

	2011	2030 projections
University enrolments	899 210	1 500 000
% participation rate	16%	23%
	2010	
College and other post-school institutions	326 970	4 000 000
% participation rate	-	60%

In terms of the 2010 – 2011 figures cited in the report, college enrolments are just over one third of the number of enrolments at university (36.36%), while the projected figures for 2030 suggest a reverse of that ratio, with universities providing 37.5% of the learning in further and higher education. This indicates enormous potential for growth in the FET sector, in which both public and private colleges have an important role to play.

Table 2: Analysis of the 2007 CS figures in terms of the level of learning need

Achievement level	Age 18 – 24 (2007) Learner totals		Learning need	Qualification/ or occupational ones
Unspecified	27 351	1 036 610	Adult basic education <NQF Level 1	GETC for Adults
Primary or less	500 662			
Secondary, less than Std 8/ Gr 10	508 597			
Std 8/Gr 10, but less than Std 10/Gr 12	990 794		A matric NQF L2 - 4	NASCA, National Independent Certificate
Std 10/Gr 12, no exemption	598 657		Post school qualification	Further Independent Certificate
Std 10/Gr 12, university exemption	98 335		Higher (or FET) qualification	Higher Certificate Diploma Bachelor's
FE/HE qualification	88 074			
	2 812 470			

What an analysis of this sort reveals is that a third of these young adults need more than just a job, they also need to catch up on the basics of education; a second third, another million people or so, are within striking distance of achieving a matric or some form of school-leaving certificate, while half a million have achieved a matric but without there being further opportunities for self-development or employment either.

It is clear that the quality of schooling itself is the root cause for the loss of young adults in their final years of schooling and for indifferent education for significant numbers of learners, and *must* be addressed as central to the resolution of the larger developmental dilemma. Nevertheless, while this remains the South African reality, further education and training needs to respond to these learning needs as well as those related to performing adequately in the workplaces, for if we as a society do not do so, Verwoerd's vision of black South Africans remaining essentially hewers of wood and drawers of water becomes the lived reality of a post-apartheid society.

It is therefore encouraging that, in terms of the definition provided in the first chapter, the green paper defines 'post-school education' as 'all education for people who have left school as well as for adults who have never been to school but require educational opportunities'. The green paper is, however, more focussed on certain features of the post-school system which are regarded as dealing with the needs perceived as the most pressing, and that is with training preparatory to or in addition to experience in the workplaces. This response recognises the urgency of such needs, but is mindful of the dangers of focussing exclusively on the part of the vision that deals with getting people into work, as vitally important as that is.

A third of young adults need more than just a job, they also need to catch up on the basics of education. Another million people or so, are within striking distance of achieving a matric or some form of school-leaving certificate, while half a million have achieved a matric but without there being further opportunities for self-development or employment either.

1.4. The National Development Plan as a framing vision

The *National Development Plan: Vision for 2030* (NDP) was published on behalf of the National Planning Commission in November 2011, and so became available just as the green paper was being finalized. It is a pity that because of this timing, the green paper was unable to take advantage of its very big picture vision – or 'new story' as the NDP puts it.

The NDP, which expresses a vision for the same period as that covered by the green paper, identifies nine challenges (of which the second is the poor quality of education for most black learners) and eight premises for success.

The premises for success come first in the document, which has an upbeat tenor rather different from the more troubled view in the green paper. The premises are these:

- The active efforts and participation of all South Africans in their own development
- Redressing the injustices of the past effectively
- Faster economic growth and higher investment and employment
- Rising standards of education, a healthy population and effective social protection
- Strengthening the links between economic and social strategies
- An effective and capable government
- Collaboration between private and public sectors
- Leadership from all sectors in society.

The guiding objectives of the NDP are to eliminate poverty and sharply reduce inequality by 2030.

The nine challenges identified in the diagnostic report that preceded the development of the NDP are these:

1. Too few people work
2. The standard of education for most black learners is of poor quality
3. Infrastructure is poorly located, under-maintained and insufficient to foster higher growth
4. Spatial patterns exclude the poor from the fruits of development
5. The economy is overly and unsustainably resource intensive
6. A widespread disease burden is compounded by a failing public health system
7. Public services are uneven and often of poor quality
8. Corruption is widespread
9. South Africa remains a divided society.

In this context, the NDP identifies holistic aims for improving the quality of education training and innovation, which begin with early childhood education (90%+ of children to receive); quality school education with 'globally competitive literacy and numeracy standards'; further education and training that enables people to fulfil their potential, and an expanding higher education sector that is

able to contribute to rising incomes, higher productivity and a shift to a more knowledge-intensive economy, and a wider system of innovation that links key public institutions (university and science councils) with areas of the economy consistent with our economic priorities. The section in which these attributes for future education is outlined acknowledges that sound reforms only begin to bear fruit about six years after the reforms are initiated, which points to the fact that South Africa is much too hasty in the educational reforms it keeps putting in place. The sustained dividends emerge over the long term, a factor we have not borne in mind as we criticise the new qualifications introduced in the past few years.

The NDP's vision for 2030 recognises that achieving full employment, decent work and sustainable livelihoods is the only way to improve living standards and ensure a dignified existence for all South Africans. It also understands that, even as education plays its part, the economy must expand to absorb labour, but that concurrently education outcomes must improve, so must general health, infrastructure and the social safety net. All this must be achieved within a capable state with much lower levels of corruption.

The specific actions required by the NDP in further education and training are these:

- Improve the system of skills planning and shaping the production of skills
- Develop a strong set of national qualifications and support developing a variety of non-formal programmes
- Strengthen and expand the number of FET colleges so that participation rate can grow to 25%
- Gradually expand adult education offered in colleges reaching 1 million learning opportunities a year.

Similar sets of actions are identified for early childhood development and nutrition, schooling and higher education. The plan presents an *integrated* vision of education within a much larger and carefully thought through national development plan. It is against a plan such as this that a vision for post-school education – which includes adult basic education, further education and training, and higher education – must be developed or assessed.

The refreshing quality of the plan lies in its view that, 'while the numbers provide important targets, peoples' views and voices need to be heard, their contributions valued' (2011: p 3). It acknowledges that the fact that too few people work is related to the poor quality of education, but argues that the nine challenges must be tackled in an integrated manner in a way that fosters community involvement and better public service delivery and draws on a higher degree of social cohesion to support growth (2011: 4). The big picture – 'the story' – proposed by the NDP involves creating jobs and livelihoods; expanding infrastructure; transitioning to a low carbon economy; transforming urban and rural spaces; improving education and

training; providing quality health care; building a capable state; fight corruption and enhancing accountability, and transforming the society and uniting the nation. (2011: 5 – 6).

Umalusi's position, as expressed in this paper, is underpinned by and supports the approach outlined in the NDP: while education and training can play a substantial role in underpinning the achievement of the various chapters in the story, the activities in those chapters in turn have a powerful effect on what is possible in education.

2. The forms of education realised in the South African Bill of Rights

South African Constitution, Chapter 2 Bill of Rights

Paragraph 29

1. Everyone has the right
 - a. to a basic education, including adult basic education; and
 - b. to further education, which the state, through reasonable measures, must make progressively available and accessible.
2. Everyone has the right to receive education in the official language or languages of their choice in public educational institutions where that education is reasonably practicable. In order to ensure the effective access to, and implementation of, this right, the state must consider all reasonable educational alternatives, including single medium institutions, taking into account
 - a. equity;
 - b. practicability; and
 - c. the need to redress the results of past racially discriminatory laws and practices.
3. Everyone has the right to establish and maintain, at their own expense, independent educational institutions that
 - a. do not discriminate on the basis of race;
 - b. are registered with the state; and
 - c. maintain standards that are not inferior to standards at comparable public educational institutions.
4. Subsection (3) does not preclude state subsidies for independent educational institutions.

2.1 Basic education

According to a legal opinion offered by Webber Wentzel, it is clear from paragraph 29(1) of the Constitution, that education is divided into two broad categories – the right to basic education (including adult basic education) and the right to further education and training. It is apparent that the right to basic education is not qualified or contingent on availability of resources or subject to progressive realization. The right to further education, however, 'is worded in more aspirational

terms in that the state must...make it progressively available and accessible' (2011: 3.2). So, while the South African constitution, in paragraph 29, accords everyone, including adults, the right to basic education, it also allows for the fact that further education must be made progressively available through reasonable measures taken by the state.

In the interests of taking the debate further, Umalusi proposes that, given the changes in the educational environment as a result of the formation of two departments of education, 'basic education' be defined as pre-primary, primary and secondary education for children and adolescents. Secondary education for adolescents may be of an academic or vocational nature¹, but the overall purpose of both forms of education is similar in that it prepares young people holistically to take their place in a democratic society, and that, furthermore, it prepares them with sufficient knowledge and skill to be meaningfully prepared to enter employment and/or to study further. This learning pathway, which encompasses Grade R, is minimally a thirteen year route that provides the form of education to be regarded as 'basic education' by the State².

Given the extended definition for 'basic education' for children and adolescents, adult basic education would need to be similarly re-defined, allowing for access to further education and training, including the right to study for, say, a National Senior Certificate for Adults or a National Independent Certificate.

While the state is then expected to make basic education available to all young learners, it may be that the age for the end of compulsory schooling be retained as the end of the year in which learners turn 15. This would mean that, although the majority of learners would continue through the last three years of basic education, some adolescents might choose to enter directly into occupational learning at that point.³

¹ The NDP alludes to the fact that technical high schools have a key role to play (2011: 267), and this is an area where the Department of Basic Education needs to re-think its responsibilities also.

² The fact that retention rates remain high up until the last years of schooling - even if the pass rates are not yet commensurate - suggests that schooling up to Grade 12 is generally considered to be the norm.

³ Allowing for a voluntary exit point from basic education at this point, even if it is expected to be for a minority, is a reason for considering some form of formal recognition at the end of Grade 9. The assessment opportunities provided for that exit qualification, a General Certificate of Education, could also be used as a set of powerful diagnostic tools to help counsel learners about their options, something which is not happening properly in schools.

If basic education for children has been extended both before and after general education, which used to define 'basic education', then presumably adult basic education would also need to extend the rights of adults similarly, at least in respect of learning after general education and training

2.2 Further Education

Furthermore, Webber Wentzel (2011: 5.3 – 5.4) is of the opinion that:

5.3 ... the meaning of "further education" is unclear. The one approach is that "further education" extends to all education that falls beyond the ambit of basic education. The other approach is to interpret this term more restrictively, as identifying a specific level or category of education and not everything which lies beyond basic education.

5.4 While the position is not free from doubt, the former approach is, in our view, the better interpretation. As Woolman and Bishop (Nov 2007) state:

[t]he only sensible interpretation of 'further education' in terms of section 29(1) of the Constitution is that it denotes all education after basic education. It seems unnecessary and unwise to provide any further – or more restrictive – definition of the term. It should cover any and all sorts of education that do not fall under 'basic education' or 'adult basic education'. Such education would encompass technical and vocational training as well as tertiary education. It should embrace secondary education and pre-primary education if such schooling is not captured by the extension of the term 'basic education' (at 57 -38).

It would seem from Woolman and Bishop's analysis that the Department of Higher Education and Training ought to have been called the Department of Further Education and Training instead, since this is the more inclusive of the two categories!

Given the two-way distinction made by the Constitution, 'further education' would then comprise everything that is not regarded as basic education: it would encompass, in Woolman and Bishop's terms 'technical and vocational training as well as traditional tertiary education', and, given that the definition of basic education (as practised by the State) excludes adult basic education, further education would especially need to encompass adult basic education, which would remain a statutory obligation of the state – not merely one that could be progressively introduced.

In other words, the Department responsible for further education, in terms of this new definition, would need to understand that its responsibility is threefold: it has an unqualified obligation, which is not contingent on availability of resources or subject

to progressive realization, to deliver on adult basic education (which would range from initial teaching right through to the completion of the equivalent of twelve years of schooling and/or vocational education); it is required to be responsible for 'technical and vocational training' (sic) as well as for higher education and training.

To summarise then, the division of education has already been made in practice, by the division enacted by the creation of the two Departments of Education: this division has been made along the lines of the age of the learners. The first stream is that of schooling for children and adolescents, and represents the State's most basic educational obligation to society. This is unequivocally the responsibility of the Department of Basic Education, and, according to the NDP vision, 'at least 80% of students should complete twelve years of schooling' (2011: 34).

The second stream of education is, in effect all else, and is addressed to the needs of adults. This stream is already *de facto* the responsibility of the Department of Higher Education and Training and includes adult basic education and training⁴, as defined in the Constitution, as well as further education and training – which includes vocational, occupational and other forms of learning, and the higher education sector as well.

In South Africa, the division of education has already been made in practice along the age of the learners. The division of responsibility for young adults at the borderline is complex and needs to allow for some flexibility, dependent on the individual learner's educational choice.

In practice, the division of responsibility for young adults at the borderline is complex and will need to allow for some flexibility. Some young adults may voluntarily choose to exit the school system after they have turned fifteen and then turn to the DHET for further education and training in an occupational direction. On the other hand, it should be understood that candidates who have registered to write the National Senior Certificate (NSC) have three years from the date of registration to complete their schooling, either as a full-time or part-time candidate. If, however, after the three years have elapsed, a person has *not* been able to complete his or her schooling, then that person⁵ passes from the ambit of basic education into the post-schooling environment as it is defined in this Umalusi response. It is also clear that the Department of Basic Education will need to renew its efforts to minimize the number

⁴ The exclusion of the *Kha ri ghude* campaign from the responsibility of the DHET, nor its presence as a campaign addressing adult literacy needs, in any way diminishes the DHET's long-term responsibility vis-à-vis this basic educational right for its adult constituency.

⁵ This distinction allows for a certainty flexibility. For example, a person may register for Grade 12 at the age of 19 or 20 if he/she repeated one or more years of schooling.

of learners hemorrhaging into the post school environment. Nevertheless, any person unable to achieve the NSC, within three years of first registration for the examination, will pass out of basic education and need to be assisted by the Department of Higher Education and Training. In short, in terms of age, there is an area of overlap from 15 to about 20, where one Department or the other will be responsible in accordance with the educational choice made by the individual person.

To sum up then, the purpose of this sub-section of the paper is two-fold: it is an attempt to find a reasoned rationale for how the work of the two departments of education can best be understood within the framework of the South African constitution; and it presents a case for the fact that, if the DHET is responsible for adult learning, it needs to embrace adult basic educational needs from Levels 1 - 4 fully.

2.3 The right to a trade, occupation or profession – occupational education and skills development

South African Constitution, Chapter 2 Bill of Rights

Paragraph 29 Freedom of trade, occupation and profession

Every citizen has the right to choose their trade, occupation or profession freely. The practice of a trade, occupation or profession may be regulated by law.

The Qualifications Framework for Trades and Occupations correctly argues that 'the right to choose a trade, occupation or profession is an empty right unless accompanied by the right to access the education and training required for its practice'. The formation of the QCTO is regarded as following as a consequence of that requirement (2012: 4). This sub-framework reflects the location of the various occupational qualifications on the NQF. An occupational qualification is defined as one 'associated with a trade, occupation or profession, resulting from work-based learning and consisting of knowledge unit standards, practical unit standards and work experience unit standards' and the purpose of such a qualification 'is to qualify a learner to practice an occupation, reflected on the Organising Framework of Occupations (OFO) or an occupational specialisation related to an occupation that is reflected on the OFO' (2011: 96).

The NDP sets some explicit targets for achieving its twin priorities of poverty reduction and sharply reduced inequality in terms of further education and training, occupational learning and entry into the workplace. These include:

- Significantly expand the further education and training sector, with the sector expanding as it improves the quality and relevance of its courses. The sector

should reach a participation rate of 25% by 2030. This implies an expansion from 300 000 at present to 1 250 000 by 2030.

- We propose improving the further education and training graduation rate to 75% by 2030
- Produce 20 000 artisans per year.
- An additional 1 million learning opportunities a year for post-school workers and the unemployed.

These targets, though more manageable than the ones set by the green paper, nevertheless require the kind of work envisaged in the green paper sections on the colleges and the levy-grant institutions and systems. The green paper explains in some detail how the levy-grant system is constituted, what the responsibilities of the SETAs are, what their performance has been like ('patchy'), and how a new, consolidated mandate for them might look.

While there are indications that the DHET is looking for ways to bring the workplace-based training that the SETAs are responsible for more closely into the DHET fold, eg through the Ministerial appointment of SETA board chairpersons, and by ensuring that an identified minimum percentage of the discretionary grant is used in support of public providers (2012: 66) in order to enable them to offer the necessary qualifications and awards (sic). Indeed, the levy-grant institutions 'must fund and support provision in public FET colleges, and universities, especially the universities of technology' (2012: xii). These SETA interventions are seen as mechanisms that would complement the funding provided to the colleges by the fiscus.

Quality skills development is interlaced with the need to strengthen the capacities that adults can only gain from an education. This recognition must then translate into a vision for DHET's work, and underpin a reconceptualization of the role of the National Skills Fund.

One of the important anomalies highlighted in the section on the scope and role of SETA work is the fact that SETAs have had to take on responsibility for ABET, which is a constitutional obligation. The necessity for taking on ABET has arisen from the fact that, should an industry or an organization wish to educate or train persons to move beyond the level of the elementary occupations, then the necessity for some form of general education presents itself. [This is further evidenced by the development of the Foundational Learning Competence programme (FLC) by the Department of Labour and its inclusion as a prescribed requirement in all occupational qualifications at NQF Levels 3 and 4 (2011: 101).]

SETAs are correct in identifying ABET as an area beyond the formal scope of their work, although it impacts critically on their responsibility to train and skill people for

established employers, whether these are business or government. The suggestion offered in the green paper, which is an extremely useful one, is that funding for the acquisition of the fundamental skills needs to come from the fiscus and/or from the National Skills Fund itself. Moneys from the levy should not be allocated to supporting the state's constitutional responsibility. What this does mean, however, is that adult basic education, in its extended sense – that is, from initial literacy through to further education – needs to be understood as one of the DHET's primary responsibilities, alongside vocational and occupational education, as well as higher education.

The recognition that quality skills development is interlaced with the need to strengthen the capacities that adults can only gain from an education must then translate into a new vision for the National Skills Fund. The renaming of the fund, and the creation of an extended mandate is one of the critical outcomes required of this green paper process – and other related processes. From there, the new NSF must take on a substantive *conceptual* role in helping to shape the further and higher education and training. To create value in the national system, money – after all – must follow thought.

2.4 Higher Education

The green paper has an extended chapter on the role of universities in the post-school system, and the NDP concurs on the need for growth and greater innovation in this sector. Higher education, well established as it is, nevertheless struggles with similar issues to those that beset other parts of the education and training system – the retention of students, institutions of greatly varying quality, a shortage of properly qualified and experienced academic staff to drive the desired expansion and improved quality. This last responsibility extends well beyond its own context, as the universities are being looked to for help in the growth and improvement of the rest of education and training as well, specifically through improved teacher education and through strengthening the capacities of lecturing staff in further education too.

In terms of Umalusi's relationship to higher education, its foremost role is to ensure that the National Senior Certificate stabilizes and strengthens so that the qualification sets a standard in which higher education has the necessary confidence. The responsibility for quality in basic education in schools and colleges is foremost amongst Umalusi's concerns: it is aware that a sound basic education for children helps do away with the need for the compensatory mechanisms being so extensively discussed in this paper.

The second area of interest is the value of recognising the NQF Level 5 as a critical transition zone. Level 5 encompasses, amongst other things, the classic post-matric, a form of learning which is both post-school and pre-university. Level 5 is where further education and training has its most important role to play. It allows for a diversity that can service a range of needs – the programmes can be such that they strengthen a wobbly matric, or prepare people for the very different requirements of functioning in a workplace, or they can supplement the learning already achieved

to such an extent that the person gets recognition for it on entering a university programme (in short, the 'post-matric' offered in some schools in preparation for university study). Level 5 qualifications can and will strengthen occupational skills and knowledge already established in the workplace and through institutional learning. In short, Level 5 is a space which creates scope for a modest degree of specialization, whether this is in a vocational field, an occupation or in further academic development.

Level 5, by virtue of the fact that it is *the transition* from basic education to other forms of learning, must by nature be hybrid if it is to deal with the diverse learning needs which the green paper strives to address.

This may mean that the NQF has similar qualifications lodged at Level 5 on different sub-frameworks, some of which will be offered at universities, or through a consensual arrangement by colleges, or by colleges without recourse to university approval. Alternatively, the situation may call for relaxing the requirement that each qualification type be identified uniquely with a single sub-framework: if so, the Level 5 Certificate (whatever it is finally called) can be housed on two, or even all three, of the sub-frameworks, and subject to the appropriate quality assurance requirements for the form which the qualification takes on the relevant sub-framework. The inevitable question is, 'Won't there be overlap?' There will be some, but the intention is to get reputable qualifications on all the frameworks that will allow for formal lines of recognition to be traced amongst them through the mechanisms of recognition of prior learning and credit transfer.

Level 5 qualifications are required to fill the intermediate skills gap that opens up after secondary schooling, especially for those unable to access higher education. This is an area where private provision, alongside the public colleges, has a large contribution to make.

2.5 Vocational education

In the green paper, the term 'vocational education' is defined as 'a middle level of education which provides knowledge and skills to enter the economy through a general, broad orientation in vocational areas, as well as general learning in essential areas such as language and maths'. 'Occupational education' is explained as 'educational programmes that are focussed on preparation for specific occupations, as well as ongoing professional development and training in *the workplace* (2012: 1) The term, 'skills development', appears to have both a narrow and a broad definition, both of which are used in the green paper with the interpretation of the phrase being dependent on the context in which it is used. From the perspective presented in this paper, it should already be apparent that the

notion of 'skills development' should be replaced by the concept of further education and training, specifically as it relates to adults (and to a smallish percentage of adolescents who consciously choose to leave basic education at the end of compulsory schooling).

The QCTO's proposed response to the three sub-frameworks, in its attempt to create a 'common language', points correctly to the fact that, in a successful vocational system, qualifications like the NC(V) will be deeply informed by the requirements of the industries for whom these learners are being vocationally prepared⁶. The paper however quibbles about the nature and extent of the academic content associated with the NC(V), which may not, in some programmes at least, have been correctly judged in the first – and hasty – round of curriculum development which took place in order to get the NC(V) into colleges as an intrinsic part of their rehabilitation. That this is cited as the reason for saying that occupational and vocational qualifications are the 'same' is undercut by another point made by the same paper, namely that occupational qualifications are *workplace-based*, while FET-college qualifications are not. Furthermore, their purposes, while akin, are not identical: occupational qualifications are focused upon qualifying a learner to *practice* an occupation or an occupational specialisation; a vocational qualification such as the NC(V) has a less specific intent, even if it does include practical learning opportunities which should, as discussed above, prepare learners for some of the actual work even as it provides a good conceptual basis underlying the practice. The two are *not* identical in terms of purpose or learning intent, location of learning, or outcome, and it is disingenuous to say that 'there is no reason to distinguish between "vocational and "occupational" qualifications' (QCTO, February 2010 (sic): 6), especially when one considers the nature and the structure of the qualifications themselves as described in the respective sub-frameworks⁷.

While not of immediate concern to Umalusi's position, since it will deal with qualifications only up to the post-school, NQF Level 5 level, the argument for collapsing the distinction between vocational and professional qualifications by asserting that the distinction resides purely in the *level* of knowledge is also open to question. Many people may take a vocational qualification at university and yet never practice as a social worker, a lawyer or as an accountant. They may use the skills and knowledge in a very different work environment – in Human Resources or Management or perhaps by becoming the director of one's own company. There

⁶ Work that Umalusi is undertaking in the Tourism, Hospitality and Consumer Studies areas anticipates the nature of consensual understanding required to develop vocational qualifications or to revise the curricula associated with existing qualifications.

⁷ The qualifications on the Qualification sub-framework for Trades and Qualifications indicates that its qualifications define the learning required to become competent to practice an occupation or an occupational specialization by means of knowledge unit standards, practical unit standards and work experience unit standards. Qualifications on the General and Further Education and Training sub-framework are defined very differently, and certainly serve a different set of purposes.

are admittedly some qualifications where the route to a professional end seems very direct, but this fact does not collapse the vocational-professional distinction.

It is therefore important that, in enunciating its vision, that the DHET retains a very clear sense of the distinctions between the occupational, the vocational and the professional, all of which have their own specific requirements and places of provision⁸. Each of these modes of acquisition is critical to a diversified further (and higher) education and training environment, and need to be supported accordingly. Wherever possible, however, in the interests of articulation and learner mobility, conscious effort must be made to use the valuable overlaps to connect the different streams to one another across the permeable boundaries.

2.6 Adult education and continuing education

Umalusi's view of adult education has already been extensively discussed earlier, so this section is here mainly to register a serious concern about a raft of new and poorly defined terms associated with adult learning. These are 'continuing education', 'community education and training', and in the proposed amendments to the FET Colleges Act, gazetted even before the green paper consultation draws to a close, 'continuous education and training' (as opposed to the 'continuing education' in the green paper) as well as 'vocational education and training'.

It would be preferable to consolidate the idea that the **FET colleges** are responsible for:

- Adult basic education, from Level 1 through to Level 4, a constitutional responsibility that needs support from the fiscus as well as from the NSF as a contribution to the development of knowledgeable and skilful people to constitute the South African workforce, as identified by the NDP
- Vocational education, as expressed through qualifications such as the NC(V)⁹
- Post-secondary education, much of which will be of a vocational nature, though some of it may take place in schools
- Occupational part-qualifications, since the bulk of the learning for these qualifications, by definition, takes place in the workplace
- Livelihood and community education and training; and, in due course –
- Continuing education offerings.

These roles or specialities will be determined by the programme and qualification mix (PQM) that each college takes up in response to the demands of its particular context, but it is, in Umalusi's view, *not* advisable to label colleges differently as a

⁸ It is therefore by no means accidental that the HEQF has three distinct qualification progression routes *with permeable boundaries*, namely vocational, professional and general routes, and that the General and Further Education and Training Qualifications Framework has two of these three, viz the general and vocational streams.

⁹ This qualification may also be encouraged to find a home in technical schools in order to cater for learners in the 16 – 19 age group (a group which the colleges *may* also decide they wish to attract, but they would then need to adapt themselves accordingly).

result of the PQM s they choose. To build the proposed CETCs on the ruins of the PALC system, for example, will almost certainly result in their retaining their third class citizenship status almost indefinitely, especially if they are 'centres' rather than 'colleges'.

The FET colleges need to become a big, identifiable brand in the system, just as schools and the different forms of universities are. What their specialities are is a secondary matter, expressed in their vision and in the nature of their offerings. Splitting the college sector into yet smaller sub-groups at a point where the Department wants to forge a single, powerful educational force is counter-productive.

3. The logical priority of the discussion regarding the qualification sub-frameworks

3.1 The role of the National Qualifications Framework in a unified and integrated education and training environment for South Africans

One of the less relevant debates that the green paper has given rise to, is whether the earlier, 'single' NQF was more unified than the present model with three sub-frameworks constituting the larger NQF. The more relevant question is whether the discussions and the energy expended on challenges around realising the NQF actually move the work of creating a suitable post-school education system forward or not. Discussions amongst the most immediate of the NQF stakeholders in 2011 showed that understandings of what the NQF is and what its role is remain contested, despite the Joint Policy Statement, the NQF Act, and perhaps because of the split in the Department of Education in 2009.

That said, most people would agree that the objectives of the NQF are worth striving for, but in a manner that is intelligent, sensitive to context, able to recognise and adapt to anomalies, and committed to achieving the good expressed in those objectives. Furthermore, the environment requires a judicious building on and expansion of what has been achieved rather than yet another set of major changes which defer the actual work: bureaucratic decisions can thwart the good already achieved. Organic change might mean the NQF landscape of the future looks considerably different from how it is today, but those changes will have been made through decisions affecting sets of qualifications, shared NQF spaces and the welfare of learners in the system.

So, for example, the green paper proposes a fairly radical alternative view of the NQF altogether, one which replaces a framework with levels with a network of qualifications where the individual relationships are negotiated. In reality, such negotiations occur whether the qualifications are located on the framework or not,

as has been evident in the re-working of the relationships between qualification types in the HEQF.

The proposal to create a network of established qualifications into which new ones can be inserted results, in part, from resistance to a too mechanistic a view of the Framework itself. Rigid insistence, for example, on the role that the Level Descriptors play in placing qualifications may mean that learning pathways have to have *more* qualifications than are strictly necessary. So, for example, it would be easier in the adult learning stream of the General and Further Education and Training Qualifications sub-framework to have one qualification at (level 2.5!) rather than two between the GETC for adults and the NASCA and the NIC. Flexibility in the applications of the 'rules' of the use of the Level Descriptors, for example, is less a disruptive proposal than doing away with the Levels altogether.

The alternative ('network') view, like so many of the apparently critical proposals in the green paper, is offered without any full motivation for its being proposed. And while the proposed alternative has positive potential, it is likely to be so destabilising as to throw the whole NQF environment into disarray once more. It is probably better therefore, to live with the NQF in its present form and find ways to 'soften' the management of the frameworks in order to achieve the positive ideals espoused by the NQF.

3.2 The purpose of having sub-frameworks

Placing all adult learning in its various forms as well as occupational training (or 'technical training' in Woolman and Bishop's definition) and higher education (Bishop and Woolman's 'tertiary education') in the post-school system means that further education is a catch-all for a whole variety of *different* forms of education and training, each of which is shaped by:

- who learns,
- what is learned,
- why it is learned,
- where it is learned, and
- how it is learned.

Clearly, not all learning in further education is the same, even if the discussion about the constitutional terms says that it is everything that is *not* basic education for children and adolescents. So for example, what is useful for young adults who left school without completing schooling is not necessarily the same as what an older person needs who urgently wants to acquire the necessary skills to earn a basic wage, nor would it be the same for the person who never went beyond Grade 2. A further education and training system must then deal with all these needs. Ideally it would, as it is stated, in Umalusi's 2009 vision document, be organized so that no-one wishing to learn is turned away.

Moreover, learning that happens in colleges is by nature different from that which happens in universities, and both are different again from the learning that happens in the workplace: all address legitimate learning needs in different places with a different end in mind; what is learned and how it is learned differ too. Yet all these forms of learning now fall under the aegis of the Department of Higher Education and Training, and need to be addressed intelligently.

In a sense, the qualifications lodged on the three sub-frameworks are intended precisely as helpful measures to divide further education – however it is finally defined – meaningfully amongst bodies with different strengths to best manage the challenges in these different contexts. This division of learning amongst the frameworks is a way of ensuring that the various requirements of the system are duly attended to.

Establishing the necessary range of credible qualifications to serve the entire post-school education and training sector is the first and most important step in consolidating the vision for post-school education and training. Institutions can be guided to focus on certain areas and to develop greater expertise in these areas. So, for example, certain colleges may choose to focus on teaching vocational and occupational qualifications, while others might choose to focus on adult education needs as well as short-term occupational training; yet a third may focus on a specific vocational/professional qualification such as nursing. All these colleges need the same standing in the system, and must, in turn, be seen as valuable as schooling on the one hand, and as having a respectable relationship with the world of work and higher education on the other.

Establishing the necessary range of credible qualifications to serve the entire post-school education and training sector is the first and most important step in consolidating the vision for further education and training.

In summary, the allocation of different qualifications to the different frameworks is indicative of:

- a. the varied purposes and natures of the qualifications required to support individual and national learning needs
- b. the likely institutional context in which the learning will take place, and
- c. the nature of the quality assurance regime required for the satisfactory and successful delivery of the qualifications.

3.3 Sub-frameworks and the NQF space

The three sub-frameworks provide three distinct and necessary charters for the educational work required to create a national post-school system. Each contributes uniquely to covering most, but not all of the ground that a post-school system must cover. That there are conceptual overlaps – far from being a 'bad thing' – is a source for re-assurance, for these overlaps point to the areas where the energy for articulation between the sub-frameworks lies. For anyone who has spent even a little time considering the nature of knowledge, it is apparent that the different forms of knowledge lie along a continuum rather than being discrete. And, in fact, there are generic skills required for functioning in the world whether in the workplace or a tertiary institution.

Each sub-framework is the fruit of years of intellectual investment in the notion of creating a meaningful national system, and, to some extent at least, all have been created with the presence of the other frameworks in mind. Every encouragement must be given to the respective quality councils to go ahead and realize their frameworks at this moment where they are all finally being validated through processes of public consultation and debate.

The sub-frameworks provide three distinct and necessary charters for the educational work required to create a national post-school system. Each contributes uniquely to covering the ground that a post-school system must cover. Each sub-framework is the fruit of years of intellectual investment in the notion of creating a meaningful national system, and all have been created with the presence of the other frameworks in mind

It is also worth remembering that, no matter how carefully the sub-frameworks have been constructed, there will be education and training which is either informal or non-formal which nevertheless contributes to the national post-school learning environment. These initiatives are acknowledged in the green paper as part of the bigger picture. Great care must be taken to find a way to recognize worthy contributions to the larger post-school picture and ways of halting unreliable ones. This space, which falls outside of the management of qualifications and part-qualifications responsibilities legislated for the QCs is perhaps part of the NQF space that SAQA needs to take on as part of its commitment to protecting the rights of students. A commitment on SAQA's part to being responsible for oversight of non-formal programmes would help greatly in dealing with one of the specific actions identified in the NDP for strengthening further education and training.

3.4 The resolution of the sub-framework debate as a prior condition to formalizing post school education and training

The actions identified in the NDP for further education and training include improving skills planning and 'shaping the production of skills'; the development of a strong set of national qualifications; dedication to strengthening the capacity of colleges both in terms of enrolments and quality, *and* expanding adult education opportunities (which are noticeably enumerated separately from skills development). The second of these actions points to the necessity for having powerful qualifications identified for use. It is clear also that these qualifications must take both the production of skills and adult educational needs into account, and that colleges must be helped to offer these qualifications of choice so well that the value of this learning is unquestioned.

The three frameworks offer interlinking pathways – general, vocational and professional in higher education; general/basic and vocational pathways in general and further education and training, and occupational qualifications which find common ground with both the vocational and professional. The benefits of having a variety of qualifications, offered in various formats and in a number of different contexts, both public and private, is surely greater in this developmental stage than limiting the options for adults too drastically. After all only some are in employment; many have been out of school and without employment for some time; some may have left school early or not been at all. The majority presumably would see the immediate benefit of employment and an income, and would acknowledge the need for training to make the work safer and more meaningful. Many are also likely to aspire to better work, and require the education to make that possible. These immediate needs and longer term aspirations must be met by the three sub-frameworks and the qualifications offered on them.

Planning the further education and training sector without a commitment to the kinds of learning that the sector will embrace is to plan without a vision at all. For this reason, acknowledging the value and significance of each framework's contribution is necessary before the *how* (mode) of the vision is put into place.

4. Articulation between the three sub-frameworks

4.1 The nature of articulation

In his prefatory letter to the gazette publishing the three sub-frameworks, Minister Nzimande states that 'sufficient articulation of the proposed sub-frameworks has not yet been achieved although the need is recognised in all three draft documents' (2011:4), and requests advice as to how articulation may be improved.

The word 'articulation' is often used without proper consideration of what it means and what it implies for a system. The two meanings for the verb 'articulate' offered in

the Oxford Advanced Learner's Dictionary of Current English are '(1) say (words) distinctly, to speak distinctly (2) connect by joints'. It is really more in the second sense that the qualifications on a framework need to be articulated – by creating the 'joints' or processes by which one qualification will function with another. To continue the analogy a little further, the bones which articulate are *different* and yet need to have some surfaces which work purposefully with and against one another, and this in turn, means that only certain bones can articulate with others. Qualifications on the framework are much like the bones, serving different functions in the NQF skeleton, and it is only where meaningful points of overlap or of logical extension exist that qualifications can be thought of as *articulating* or of having the potential to do so. It is not possible to declare – to say distinctly ('articulate') – that all qualifications of one type *will* articulate 'highly' with all qualifications of another type, and then function as if it were so. The declaration reflects an intent (and in terms of the NQF, the very best intent), but the reality of *making* the connections for existing qualifications is that *work* is required to understand what the nature of the articulating joint is – sometimes, for example, it only makes sense for the articulation to happen in one direction, for example from the National Senior Certificate to the National Certificate (Vocational), but there may be instances where the articulation must allow for a two-way flow of recognition – the articulation between the NC(V) and an occupational qualification in a related field would probably be a case in point. Decisions about articulation are worked out, not declared.

Stating the intent to create the joints in the NQF is the necessary minimum prerequisite, and all the quality councils have done so. The actual *work of creating the connections* is a process of working with actual qualifications to identify *how* the different qualifications will relate to each other.

So, *stating* the intent to create the joints in the NQF is the necessary minimum prerequisite, and all the quality councils have done so; the actual *work of creating the connections* is a process that entails participating QCs and/or institutions to work with actual qualifications to identify *how* the different qualifications will relate to each other. The connections can be made stronger and more meaningful through decisions such as amendments to qualifications policy, curriculum reform, changes to the nature of assessment: these are the places where the nature of articulation is worked out. It is difficult to imagine, at this stage, and at this most generic level of

policy making in the sub-frameworks themselves, how the system might express the articulation between sub-systems of the NQF more clearly.

4.2 Articulation at the level of NQF Level

The challenges which need to be dealt with through articulation also differ with the sub-frameworks. By way of example, the Council for Higher Education (CHE) was required, in setting up its framework, to find a way of bringing a large number of independently developed, curriculated and assessed qualifications into a single framework. The challenge was, in a manner of speaking, to put the same kind of eggs into each qualifications basket, and then to use accreditation processes as a means of ensuring greater and greater levels of comparability among the offerings developed by independent institutions, all of whom put a high value on autonomy. This is not the kind of challenge faced by Umalusi, since the General and Further Education and Training Framework intentionally focuses on the development of a few highly recognizable qualifications at any one level: here articulation is finding where it is possible to recognize and give credit for learning done in one qualification in another. It is also a matter of finding ways to value suitable learning done in part-qualifications and to recognize it in one of the full qualifications on the sub-framework. It is likely that the QCTO will face challenges more like those encountered by the CHE as it tries to establish a common language across its DQPs from different economic sectors all working at a particular level on the NQF, but it may well also need to grasp and quantify the closer kinship of certain qualifications in much the same way as Umalusi does.

The Level Descriptors determined by SAQA are intended to help establish the level at which a qualification should be placed on the NQF, and thus to form the basic means of articulating one qualification with another. To that end, a complex matrix of features has been developed which provide a profile of the nature of the learning and the capacities of the learners presupposed at each level. While the descriptors are helpful in distinguishing levels that are relatively far apart, their usefulness in distinguishing certain adjacent levels is less clear.

The Occupational Qualifications Framework (OQF) is to use the NQF Level as a primary form of demarcation and a critical element in qualification determination. The OQF identifies two forms of qualification based on the amount of learning in each. It then uses the NQF Levels as the means of distinguishing among similar occupational qualifications and/or specializations. This use of the Levels in defining the occupational qualifications, especially in the absence of actual qualifications exemplifying the level of these qualifications, makes the qualifications themselves very abstract to anyone outside of the OQF environment – for example, what distinguishes a Level 4 qualification for, say, an underwriter from a Level 5 one in the same field would not be readily apparent.

In its own engagement with the Level Descriptors, Umalusi has recognized the need to use an array of different measures and processes over and above the Level

Descriptors in establishing comparability between qualifications. The sub-framework policy expresses this position, which has been formulated as a result of intensive investigation of the standards in different but similar qualifications.

While it is conceivable that Level descriptors may be a means of calibrating very large structures such as one NQF against another, and that SAQA may well need descriptors for its work in international arenas, they do not, on their own at least, provide a very satisfactory external measure for saying how alike – or different two qualifications are.

4.3 Articulation between qualifications on a sub-framework

Both the Council on Higher Education (CHE) and Umalusi have chosen to include an additional layer of description to those provided by the Level Descriptors. These descriptions typify the qualifications at the different levels more closely. So for example, the HEQF describes quite generally, but in greater detail than offered by the Level descriptors, what features would help to determine a qualification as, say, a diploma at Level 6. Similarly the five qualification types on the General and Further Education and Training sub-framework are expressed as qualification profiles, which then become embodied when an actual qualification variant is developed. These profiles or definitions are at a very generic level – a Bachelor's degree allows for different kinds of Bachelors depending on the field of study, and a Bachelor of Arts, or Science or Social Work or Law, are all 'nested' within the generic description of the Bachelor's degree. Comparability can thus happen at the level of the type – all bachelor degrees are of a single type – or at the level of the variant, where all BSc degrees would be regarded as more or less comparable (else they would not have been accredited as such). It must be noted that this comparability is determined *within* a particular sub-framework¹⁰.

In terms of managing the development of the General and Further Education and Training sub-framework, these descriptions form an additional set of tools to make the comparisons required to establish articulation.

In a sense, both for CHE and Umalusi, some of these qualification descriptions have been derived from existing qualifications rather than being developed from scratch. They identify the features which help the QC to decide whether a particular variant conforms to the minimum requirements to be identified as a qualification of that type. These qualification profiles serve an additional function, namely of setting parameters for the development of new qualification variants at a level – so for example the NASCA is required to conform to certain requirements which describe the NSC and NC(V) at Level 4 on the sub-framework, and by doing so, help to set a

¹⁰ Presumably all OQF qualifications, say at Level 4, would be regarded as being comparable to one another since all have been registered at that level on the NQF. Similarly the NSC and the NC(V), the NASCA and the NIC, will all be developed in such a way as to be broadly comparable, but not 'the same'.

minimum standard for qualifications of the type, National Certificate, at Level 4 on the sub-framework.

4.4 Articulation between qualifications on different sub-frameworks

By far the most telling challenges will emerge from creating articulation between frameworks, but it is something that can be – and is – done in the national system, even if the process is not always as simple and immediate as one would wish. The development of admissions requirements to various forms of higher education for both the NSC and the NC(V) is a case in point.

With the NSC, the new structure of the qualification (which remains poorly understood) has brought out rumbles about the standard of the matric which were somehow obscured when there were Higher and Standard Grade versions of the school-leaving certificate. Umalusi, as the QC responsible for the NSC, has taken the initiative to work in an informed fashion on ways of improving the standard, which is now a single one for all South African school-goers, an achievement of the national system which is completely overlooked. None of this is to say that the present regulated articulation is satisfactory, but it forms the grounds for sustained and substantive improvement.

In the case of the NC(V), the recipients of the qualification are facing a different struggle, one associated with the introduction of completely new qualifications into an education system. Despite the rather more stringent requirements imposed on candidates passing the NC(V) for admission to higher education, universities are slow in the recognition of the NC(V), an indication of many things – a lack of understanding of the new qualification(s), the palpable differences between the value of the various NC(V) programmes, the unevenness in the delivery of the NC(V) at different colleges and so on. Given that the NC(V) Level 4 has only been taught and examined since 2009, the contribution of the new qualification to the system can hardly be accurately evaluated. Nonetheless, it is already clear that certain of the NC(V) programmes are working really well and have got good uptake in the sectors they were designed to serve, while others still have extensive revision lying ahead.

What is evident in both cases, is that asserting something about the relationship between qualifications does not necessarily make it so, and that it is only through conscientious work that the 'mobility' of the articulation can be improved. The conscientious work makes for the relationships of trust required to ensure that the articulation really does serve all the positive purposes intended.

4.5 The need for choice and other issues affecting articulation

With the spotlight squarely on the policy issues, other aspects of the articulation discussion have not been given attention. Moving from one part of the education system to another is often a profoundly difficult thing to do, especially if there has

been little or no preparatory guidance provided in the first place. The green paper makes mention of the need for much better career guidance before young people make vocational choices as well as the need for proper student support once people enter their studies. Both these factors- poor initial counselling and a lack of student support – have repeatedly been identified as affecting the transition to further or higher education. These delivery issues must be addressed in basic education as well as by further education and training since they affect people's ability to understand and stay in the system.

Post-school education is about choice – and the problem with the current environment is that the options are extremely limited. For example, many young adults go to university because few other possibilities present themselves – were there a variety of options, it could well be that the drop-out rate would decrease as people chose something closer to their interests .

People who were unable to finish school also need choices – they may want to go directly into an occupation and learn the necessary knowledge and skills on the job, in the workplace training workshops and at a college. On the other hand, they may want to have another go at getting a general education – they may want to add to what they already have by gaining extra subjects to qualify for the NIC, or they may need to start with a clean slate and study for the NASCA. Programmes will need to be offered in a variety of different ways to cater for adult learning needs – part-time, full-time, distance, on-line, face-to-face, self-study...

Both the NASCA and the NIC have been proposed on the General and Further Education and Training Framework because they provide different routes for adults wanting to complete their education – often not a luxury, but a necessity in an environment where people risk losing jobs that they have done for years because of new requirements being phased in. Promotion eludes people in the armed services and in other workplaces because they do not have their matric.

The adult stream on the General and Further Education and Training Qualifications Framework expresses the vision that people, longing to read and write, can come into the system, learn, and not be left high and dry after the GETC. Some of these qualifications on the sub-framework are no more than placeholders presently, but they reflect a vision for adult learning, and a committed intent for the system for the long term.

5. Proposals made in the green paper

5.1 The introduction of a new institutional type – the Community Education and Training Colleges

It should already be apparent that while Umalusi welcomes the indication that adult education is recognised as a critical need in the further education and training system, it is not in agreement with the formation of a new institutional type, at least

not at the present, and certainly not ones that would use the public adult learning centres (PALCs) as a nucleus for future growth.

It would be far better to strengthen FET colleges and to have them take in the PALCs in their area than to expect the PALCs to become Community Education and Training Colleges (CETCs). This step would at least begin to prepare colleges for the fact that there is an adult learning stream which will include suitable qualifications from Levels 1 to 4, and that they are the institutions which have been identified to take the diversity of adult learning forward.

The section on the creation of the CETCs, while making reference to the work of a separate task team, is surely one of the most under-developed sections in the green paper. No indication is given of how many are planned, how they will be funded, housed and staffed.

Proposing the creation of such colleges by means of the gazette 34222 of 16 April 2012, even before the green paper process has run its course is surely premature, given the fact that the DHET is supposedly testing the waters of public opinion through the green paper.

Umalusi's concern about the DHET not only proposing Community and Education Centres but also Vocational and Continuous Education and Training Colleges, when none of these terms are fully defined has been more fully unpacked for the DHET elsewhere.

5.2 The South African Institute for Vocational and Continuous Education and Training

While Umalusi welcomes the notion of a strong Institute to support **further education and training**, it notes that the range of functions supposed to be taken up by the proposed institute appears to be huge and to encompass work that should reasonably be done by the DHET itself or by its QCs, as well as by colleges and universities as they work out how their work relates to one another. This matter has also been addressed elsewhere with the Department.

5.3 Altering the structure of the National Qualifications Framework

The green paper proposes a fairly radical alternative view of the NQF altogether, one which replaces the existing framework with levels with a network of qualifications where the individual relationships are negotiated. This proposal results, in part, from resistance to too-mechanistic a view of the Framework itself. Rigid insistence, for example, on the role that the Level Descriptors play in placing qualifications may mean that learning pathways have to have more qualifications than are strictly necessary. Flexibility in the applications of the 'rules' of the use of the Level Descriptors, for example, is less a disruptive proposal than doing away with the Levels altogether.

This alternative view of the NQF, like so many of the apparently critical proposals in the green paper, is offered without any full motivation for its being proposed. And while the proposed alternative has positive potential, it is likely to be so destabilising as to throw the whole NQF environment into disarray once more that it is probably better to live with the NQF in its present form and to find ways to 'soften' the management of the frameworks in order to achieve the positive ideals espoused by the NQF.

5.4 The necessity and roles for Quality Councils in a post-school system – the centrality of quality assurance

At various points in the green paper, the necessity for maintaining and improving quality assurance – in *all* the areas for which the DHET is responsible – is reiterated. It forms a theme throughout the paper, and is often linked with an expressed anxiety about maintaining quality while expanding the system rapidly. The same theme is also present in the NDP. The threat to quality in an overhasty growth phase is not to be underestimated, and without quality, the value and credibility of what has been put in place is immediately open to question.

The threat to quality in an overhasty growth phase is not to be underestimated, and without quality, the value and credibility of what has been put in place is immediately open to question.

The DHET is required to be responsible for qualifications lodged on all three sub-frameworks, and the FET colleges, for which the DHET is responsible, will be expected to offer qualifications from two, possibly three sub-frameworks simultaneously. They may then well be subject to the different quality assurance requirements expressed by the different QCs.

It is clear from the discussion in the green paper that the roles and responsibilities of the QCs, and hence their relationship to the DHET, are far from clear. It is clear, however, that the QCs may take on different roles, for example, in respect of curriculum development, and that the DHET may need to accept and promote the fact that the sub- sectors function in their respective ways.

The four proposals regarding the possible 'rationalization' of quality assurance nationally is yet another of the 'throwaway' suggestions made in the green paper. None of the positions are argued through in a way that reveals the potential or the pitfalls associated with each of them.

Umalusi would argue that the sub-frameworks *already* provide 'sensible and internally consistent organization of qualifications' within highly identified sectors, and that, the second option - viz. of continuing to build the three bodies in their

current forms, with their current jurisdiction of qualifications remaining – is the one which makes best educational sense, given the huge challenges the system already faces. This does not mean that things won't change as the give and take of articulation point to better ways of organizing qualifications and part-qualifications, but for now, the QCs all have their work cut out for them if they are to contribute to a vital and growing post-school further education and training environment.

6. A vision of post-school education and training: Umalusi's view

This section of the paper expresses Umalusi's positive view for a vibrant further education and training environment (which is taken to include higher education), that will meet the various learning needs of South African adults. This system is complementary to basic education for children and adolescents.

The further education and training sector forms a single, coherent system which embraces both public and private provision, and which is underpinned by a range of excellent qualifications. The QCs responsible for these qualifications strive consciously to create the necessary articulation between qualifications even as they strengthen the standards associated with each qualification.

The further education and training sector deliberately and consciously takes responsibility for:

- Adult basic education, from Level 1 through to Level 4, a constitutional responsibility that needs support from the fiscus as well as from the NSF as a contribution to the development of knowledgeable and skilful people to constitute the South African workforce, as identified by the NDP
- Vocational education, as expressed through qualifications such as the NC(V)¹¹
- Post-secondary education, which provides intermediate skills and knowledge, for school-leavers not in a position to access higher education – these would typically be Level 5 qualifications offered at Colleges
- Occupational part-qualifications, since the bulk of the learning for these qualifications, by definition, takes place in the workplace
- Livelihood and community education and training; and, in due course –
- Continuing education offerings.

Further education and training provides all the learning required by adults, whether they wish to learn to read and write, want to study for a matric, need to acquire occupational skills that would go with a job, intend to study in a vocational field or enrol for a university programme. All these are encompassed by a comprehensive

¹¹ This qualification may also be encouraged to find a home in technical schools in order to cater for learners in the 16 – 19 age group (a group which the colleges may also decide they wish to attract, but they would then need to adapt themselves accordingly).

post-school education and training system which turns no person wishing to learn away.

The funding of the further education and training system will come from both the national fiscus and from a newly conceptualised NSF, whose role would become a National Education and Training Fund (NETF). This fund would legitimately be able to support students at colleges and universities – both public *and* private – in their efforts to acquire the skills and knowledge necessary to earn a decent wage and to contribute to the growth of the economy, as envisaged by the NDP.

The funding from the fiscus would need to deal primarily but not exclusively with the state's constitutional obligation to provide adult basic education including vocational education (from Level 1 through Level 4), allowing levy-grant institution funds mainly to support more occupationally-directed and professional education and training.

In order to become the proud providers of further education and training, the colleges require systematic support to strengthen their capacities to take on the new roles assigned to them. The colleges, being a national rather than a provincial responsibility, will look to the DHET for the necessary guidance to become institutions of choice. The green paper provides extensive insight into the kind of strengthening required, but it is certain that the issue of appointing suitably qualified staff and developing the professional competence of existing staff (where required) is of paramount importance. A strong identity is required for the FET colleges and it is therefore inadvisable to make some colleges 'colleges' and others 'centres'. The FET college sector has to become a brand that everyone positively recognises. It can only do this if it offers good quality tuition for high quality qualifications, and produces credible graduates who are welcome in the workplace and other institutions of learning. Given the enormity of the educational need, the state must recognise the contribution made to education by accredited private providers and allow subsidized students to enrol there too.

In terms of quality assurance, each of the three quality councils has a major contribution to make in their respective sectors. There is much that the QCs can learn from one another by working together towards a post-school environment that encourages students and fosters the idea of lifelong learning. It needs to be recognized that each QC stewards a unique sub-framework of the NQF, and that the qualifications each registers have a vital role to play in the expanded post-school system. The QCs will also be expected to work tirelessly in terms of evaluating qualifications and curricula, monitoring the quality of provision, overseeing the integrity of the assessment processes and certifying the achievement of successful learners and generally helping to create greater coherence in the sector. These QC roles supplement those of the DHET as it ensures that the colleges and universities undertake their work well.

In terms of transforming delivery in the colleges, the QCs, the DHET, provincial structures and the colleges themselves all have important roles to play, because, unless these institutions can find creative ways of undoing longstanding negative perceptions, the FET sector will not be able to draw students to the huge variety of learning that is potentially available.

The importance of data collection and management as well as research in sustaining and strengthening the further education and training sector also needs to be borne in mind as the systems are developed.

The work outlined in this section is the contribution which the DHET, the QCs and SAQA, the colleges and the universities can make to realizing the 'new story' laid out in the NDP's vision for 2030. The role of the further education and training, post school sector is one critical one among many, as the NDP reminds us. Best we do it as well as we're able.