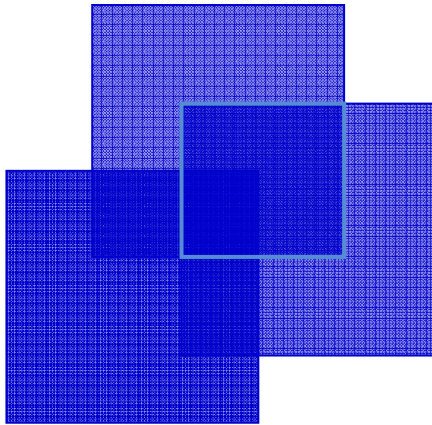




International
Labour
Office
Geneva

2010

**ILO Skills and Employability Department
NQF Country Study - e-version**

**The changing faces of the South African
National Qualifications Framework**

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Skills and
Employability
Department

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First published 2010

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ILO Cataloguing in Publication Data

Allais, Stephanie

The changing faces of the South African national qualifications framework / Stephanie Allais ; International Labour Office, Skills and Employability Department. - Geneva: ILO, 2010

1 v.

ISBN: 9789221242444 (web pdf)

International Labour Office; Skills and Employability Dept

occupational qualification / skill certification / vocational education / vocational training / South Africa R

13.02.2

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Foreword

According to an ILO survey, some 70 countries are in the process of developing or implementing some kind of a qualifications framework. A framework is intended to improve understanding of qualifications (degrees, certificates, or recognition of experiential-based learning) in terms of the information they convey to an employer about prospective workers' competencies. Frameworks are also intended to explain how qualifications relate to each other and thus can be combined to build pathways within and across occupations and education and training sectors. Many countries are trying to improve the relevance, quality and flexibility of their education and training systems, and many of them are looking to qualification frameworks as a tool for bringing about this reform. Development of national qualification frameworks (NQFs) are also motivated by the emergence of regional frameworks, such as in Europe or in the Caribbean, which aim to help employers and institutions of higher education recognize the equivalency of qualifications earned in different countries. With these goals in mind, the development of NQFs has been widely supported by multilateral and bilateral agencies.

However, very little has been documented about the effectiveness of NQFs in bringing about change in skills development systems or about their actual use by employers, workers, and training providers. In 2009, the ILO's Skills and Employability Department launched its Qualifications Framework Research Project to study the impact and implementation of NQFs in developing countries to help fill this knowledge gap and to be able to provide more evidence-based advice to member States.

The research programme, comprising some 16 country case studies and a review of academic literature on the NQFs, provides an international comparison of the design and purpose of NQFs in developing countries and an empirical analysis of their use and impact based on the experience of those involved in their design and use. The study aims to understand to what extent establishing an NQF is the best strategy for achieving a country's desired policy objectives, what approaches to qualifications frameworks and their implementation are most appropriate in which contexts and for which purposes, what level of resources (human and other) and what complimentary policies might be required to achieve the policy objectives associated with them, and what might be a realistic assessment of the likely outcomes.

This paper is one of five case studies conducted as part of the research and appears as a chapter in Employment Working Paper No. 45 done in 2009, *Learning from the first qualifications frameworks*, which consisted of: Chapter 1 on the National Vocational Qualifications in England, Northern Ireland and Wales, written by Professor Michael Young (Emeritus Professor at the Institute of Education, University of London); Chapter 2 on the NQF in Scotland, written by David Raffae (Professor of Sociology of Education, University of Edinburgh); Chapter 3 on the NQF in New Zealand, written by Dr. Rob Strathdee (Head of School of Education Policy and Implementation at the University of Wellington); Chapter 4, written by Leesa Wheelahan (Senior Lecturer in Adult and Vocational Education, Griffith University); and Chapter 5, written by Stephanie Allais (now postdoctoral fellow at the University of Edinburgh). A companion Working Paper (No. 44) (Allais et al. 2009), *Researching NQFs: Some conceptual issues*, addresses some of the fundamental conceptual issues involved in research on NQFs in order to broaden the debate about their role in skills systems. A full analysis of the new case studies and the policy lessons derived from them was published in 2010 as *The implementation and impact of National Qualifications Frameworks: Report of a study in 16 countries*, which, along with other background reports and publications, can be found on the Skills and Employability Department website's theme of ILO research programme on

implementation and impact of NQFs at: http://www.ilo.org/skills/what/projects/lang--en/WCMS_126588/index.htm.

As a Research Associate in the Skills and Employability Department in 2009, Dr. Stephanie Allais has led the development of the research and overseen the country studies. Professor Michael Young has served as senior research advisor, and Professor David Raffe gave advice and support to the project. The research programme has been carried out in cooperation with the European Training Foundation. I would also like to thank Jo-Ann Bakker for preparing the manuscript for publication.

Christine Evans-Klock
Director
Skills and Employability Department

Acronyms and abbreviations

ABCE	Adult Basic Certificate of Education
ANC	African National Congress
COSATU	Congress of South African Trade Unions
EQF	European Qualifications Framework
ETQA	Education and Training Quality Assurance
FET	Further Education and Training colleges
GDP	Gross Domestic Product
GTZ	German Technical Cooperation
HEQC	Higher Education Quality Council
HEQF	Higher Education Qualifications Framework
NECC	National Education Co-ordinating Committee
NGOs	non-governmental organizations
NLRD	National Learner Records Database (SAQA's)
NOPF	National Occupational Pathways Framework
NQFs	national qualifications frameworks
NSBs	National Standards Bodies
NSC	National Senior Certificate
NTB	National Training Board
NUMSA	National Union of Metalworkers of South Africa
OFOs	Organizing Framework for Occupations
NVQs	National Vocational Qualifications (England and Wales)
PALCs	Public Adult Learning Centres
QCTO	Quality Council for Trades and Occupations
SAQA	South African Qualifications Authority
SETAs	Sectoral Education and Training Authorities
SGBs	Standards Generating Bodies
UNDP	United Nations Development Programme
VET	vocational education and training

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The changing faces of the South African National Qualifications Framework

1. Introduction

The NQF in South Africa was an attempt to address the educational, social, and economic problems caused by apartheid. While qualifications frameworks seem to be driven by similar concerns in many countries around the world, the extreme inequality of the South African education system under apartheid, as well as the extreme social and economic inequality in South Africa, the inefficiencies of the economy inherited from apartheid, as well as its rapid liberalization after re-entry into the global economy, made the NQF take on extraordinary significance in South Africa (Allais 2007b; Mukora 2006).

It has been seen internationally as one of the most, if not *the* most, ambitious qualifications frameworks. It aimed to replace all existing qualifications in the country with a set of new qualifications designed by new structures; this was intended to ensure the overhaul of all learning programmes and curricula. At the same time, it was hoped to lead to new provision and new institutions, as well as to many individuals getting qualifications based on knowledge and skills that they already had. Its designers and supporters hoped that by getting groups of stakeholders to create new qualifications and unit standards (part qualifications) consisting of learning outcomes, a qualifications framework could contribute to solving educational, social, and economic problems.

Support for the NQF at its inception was described as “extraordinary” (Manganyi 1996, p. 5). Unfortunately, despite its noble and unquestionably worthy goals, its implementation has been fraught with problems. Shortly after implementation got underway, contestation and criticisms emerged (Allais 2003; Ensor 2003; Muller 2000; Breier 1998). A review was commissioned in 2001 by the two departments responsible for the NQF: the Departments of Education and Labour. The report of this review refers to a “broad malaise of discontent with SAQA and the NQF” (RSA Departments of Education and Labour 2002, p. 143) and highlights the frustrations of many involved in implementation, the alienation caused by the proliferation of jargon, the perceptions of a burgeoning bureaucracy, and general confusion. However, the changes proposed by the review were not made official, and a few years later, the Departments of Education and Labour produced another document, with different proposed changes. These again did not become policy. After a long period without resolution, in 2008 a new Act was passed, which substantially changed the NQF as well as the organizations responsible for it. It is possible that it might be about to be changed yet again, before these changes have even been implemented.

While on paper its objectives remain the same, the Chief Executive Officer of the South African Qualifications Authority (SAQA) states that “Early ambitious views of the NQF have been replaced by more modest views of NQFs as frameworks of communication that grow incrementally” (Isaacs 2009).

The story of how the NQF developed is complicated and contested. There are various accounts of the complex structures which were created, the complex relationships and power dynamics that emerged and played out, and different analyses of its problems as well as its strengths and weaknesses. It has inspired a series of PhD studies and academic publications, as well as lengthy commentaries and analyses. This short case study cannot claim to capture the details and nuances of the NQF to the satisfaction of a South African audience. However, the South African NQF has been influential within Southern Africa and elsewhere (Chisholm 2005), and it continues to be seen as an important qualifications framework internationally. This study, therefore, aims to provide a description and analysis of the design and implementation of the South African NQF, discuss some of the problems which were experienced, and briefly speculate about some lessons that can be learnt from the South African experience. It is drawn primarily from published research as well as official documents. In a few instances I have drawn from my reflections and experiences as a participant in the unfolding policy drama.

Structure of the paper

The following section provides the background and context. Section 3 then explains the origins of the NQF in South Africa. Section 4 discusses the design and implementation of the NQF, followed by Section 5 on the impact and achievements. Finally, Section 6 provides analysis and lessons.

2. Background and context

By far the most important factor influencing the introduction of the NQF in South Africa is the legacy of apartheid, from the point of view of education, as well as broader social and economic questions. The apartheid legacy is important in understanding why the NQF took on such significance in South Africa, but also, in understanding the persisting problems of the South African education system. The NQF was seen as part of the transition to democracy which was formally inaugurated with 1994 elections, following negotiations between the liberation movement and the apartheid government. The bulk of this section therefore explores apartheid and its legacy, after a brief introduction to some key features of South Africa as a country and its education system. However, notwithstanding the importance of understanding the context which influenced the South African NQF, as will be seen below, the design of the South African NQF was very similar to the New Zealand model, as well as the National Vocational Qualifications (NVQs) in England and Wales. In other words - although the reasons for introducing the NQF are based in the apartheid legacy, the design was more a product of policy borrowing than a locally-designed policy to respond to local conditions.

*South Africa*¹

Situated at the southern tip of Africa, the Republic of South Africa borders both the Atlantic and Indian oceans, and is bordered to the north by Botswana, Namibia, and Zimbabwe, to the east by Mozambique and Swaziland, and surrounds the tiny independent Kingdom of Lesotho. South Africa is known for its diversity in cultures, languages, and religious beliefs. Eleven official languages are recognized in its constitution, with English being the most commonly spoken language in official and commercial public life, but only the fifth most spoken home language. The population is estimated at about 47 million.

By UN classification, South Africa is a middle-income country with good resources, well-developed infrastructure, as well as strong financial, legal, communications, energy, and transport sectors. South Africa contributes 38 per cent of sub-Saharan Africa's Gross Domestic Product (GDP), and its nine largest cities alone account for about 24 per cent of Africa's GDP. However, these statistics may be misleading. South Africa also has the dubious distinction of having the highest Gini coefficient in the world - in other words, the highest levels in inequality. Deeply-entrenched poverty, illiteracy, unemployment, and loss of human dignity among the majority of the population coexist with economic wealth, scholastic achievements, and a 'first world' lifestyle on a par with the richest countries in Europe.

Forty-five per cent of South Africans live below the nationally-determined poverty line. The vast majority of people are poor. Unemployment levels are extremely high (between 25 and 45 per cent, depending on whose notion of unemployment is used). According to the United Nations Development Programme ((UNDP)'s development index, the probability of not surviving past age 40 is 31 per cent, the adult illiteracy rate is 17.6 per cent, 12 per cent of people do not have access to clean water, and 12 per cent of children are underweight for their age. South Africa is ranked 121 out of 177 countries by the UNDP Programme Human Development Index. South Africa also has very high levels of crime, particularly violent crime. HIV/AIDS levels are very high.

Apartheid gave rise to one of the most unequal and racially-segregated societies in the world. Although the democratic government which came to power in 1994 has overseen a comprehensive set of legal, political, economic, and social reforms, and South Africa has a widely-regarded progressive constitution and other legal frameworks, the legacy of apartheid has not been easy to deal with. Inequality remains pervasive and persistent because apartheid was not just a political process of disenfranchising the black majority, but it also denied them access to education, and systematically closed off or distorted their participation in the economy.

South Africa has many refugees from poorer neighbouring countries, including many immigrants from the Democratic Republic of Congo, Malawi,

¹ Sources for this section are: <http://www.gov.za> [5 May 2009], <http://www.southafrica.info> [11 June 2009], <http://www.worldbank.org> [18 Mar. 2009], and <http://www.undp.org> [6 June 2009]. Figures from 2009.

Mozambique, Zimbabwe, and others, representing a large portion of the informal sector; although many of them are believed to be skilled and qualified.

South Africa is a popular tourist destination, and a substantial amount of revenue comes from tourism. South Africa also has a strong mining sector, as well as an automotive industry. Agriculture remains important, and chief exports include maize, fruits and vegetables, sugar, and wool. The South African rand is the most actively-traded emerging market currency in the world.

The South African education and training system

In 2007, there were 14,167,086 learners in formal education in South Africa, with 85 per cent being in public schools, 2.5 per cent in private schools, 761,087 in public higher education institutions, 320,679 in public further education institutions (vocational education), 292,734 in public adult learning centres, 289,312 in public early childhood development centres, and 102,057 in special schools (RSA Department of Education 2009). There are also large numbers of learners in private vocational institutions and workplace training, but official records are not available.

There are 26,065 schools in South Africa, the vast majority of which are public. Independent schools number 1,086. Officially, ten years of general education are free and compulsory in South Africa. What free education means in practice is that it is possible in theory to be exempted from school fees. Nearly all schools charge fees, with the recent exception of some of the poorest schools being declared fee-free. Many state schools charge fees much higher than some of the cheaper private schools, although there are also a small number of extremely expensive elite private schools. In practice, most people pay substantial fees and expenses relative to their income levels.

Nonetheless, educational enrollments in primary education are universal. Ninety-eight per cent of children complete grade 7. However, the quality of primary education is extremely varied, with the majority of schools being of poor quality, and South African learners performing very poorly in international tests, even relative to much poorer countries (Fleisch 2008). No qualification is currently issued at the end of junior secondary school, despite the fact that this is the end of free and compulsory education.

Large dropouts from the school system start to occur around year 10, and increase dramatically, so that the cohort that finishes senior secondary education is much smaller. For example, in 2007, the latest year for which detailed statistics are available, 1,171,323 children were enrolled in grade one. In the same year (in other words, not the same cohort, but the numbers are nevertheless indicative), 564,775 students wrote the final school examinations. Of those, 368,217 passed, in other words, obtained a Senior Certificate, although only 85,454 obtained the minimum requirements to be able to apply for university entrance (RSA Department of Education 2009).

At the end of secondary education, the National Senior Certificate (NSC) is issued, on the basis of a national examination as well as a small component of school-based assessment. The certificate is issued by Umalusi (the Council for Quality Assurance in General and Further Education and Training), on the basis of examinations which are set by the Department of Education and a small

Independent Examinations Board (which operates mainly in independent schools).

South Africa has 23 universities, including universities of technology (formally technikons). Some of these are well regarded internationally. Most of these universities have numerous campuses, as they are the product of mergers of the previously-divided apartheid universities. 127,154 students obtained degrees and diplomas from higher education institutions in 2007. Universities issue their own qualifications. There are also private and internationally-franchised universities and institutions offering post-school certificates - 77 institutions are listed as registered by the South African Government.²

There are 50 Further Education and Training (FET) colleges. These institutions overlap with the last three years of schooling (that is, senior secondary school), but also offer post-school level qualifications, although these are generally not considered higher education. Like the universities, these are multi-campus institutions, being the result of mergers of the over 150 institutions that used to exist. College qualifications are issued by Umalusi on the basis of examinations set by the Department of Education.

There are a large number of private providers in vocational education. These range from institutions offering international qualifications such as City and Guilds, to large distance education institutions, to individuals who offer customized training. Although efforts have been made to regulate this sector through a fledgling accreditation system, there are few coherent records. Umalusi lists 449 accredited private FET colleges,³ but there are many many more institutions operating in the country. Many of them are accredited by Sectoral Education and Training Authorities (SETAs), but there are also believed to be many which are unaccredited. Institutions generally issue their own qualifications, except where they are linked to international franchises, or in some cases where qualifications are issued by (currently changing) sectoral quality assurance bodies.

Registration and accreditation of educational institutions are important issues in South Africa, as there are many dubious providers, and “fly-by-nights” which exist only to enroll learners and take their fees. However, as will be seen below, systems for registration and accreditation are new, evolving, and as yet imperfect.

South Africa has fairly high levels of illiteracy, as well as many adults with very low levels of education. Adult education is offered through Public Adult Learning Centres (PALCs), as well as non-governmental organizations (NGOs).

A skills levy is supposed to encourage workplaces to conduct training or send their staff for training, but statistics on this are not easily accessible in terms of actual training conducted.

² <http://www.education.gov.za> [10 June 2009].

³ <http://www.umalusi.org.za> [10 June 2009].

Apartheid

The apartheid system in South Africa, described as “the most notorious form of racial domination that the postwar world has known” (Thompson 1990, p. 189), was officially established in 1948. The segregationist policies of the previous settler governments were consolidated with greater “singlemindedness, consistency, and ruthlessness”, as unwritten customs were enforced by legislation (Muller 1969, p. 481). Laws were passed governing almost every aspect of social life, ensuring that different ‘racial’ groups remained separate, and confining black people to small parts of the country, designated as ‘black homelands’. Officially, these ‘homelands’ were the national homes of all black people, including those ‘resident’ in ‘white South Africa’ (ibid.; Denoon and Nyeko 1984).

Education policy was central to apartheid. Education was used to reinforce lack of democracy, as well as social and economic inequality, by destroying and denying access to education; by providing poor quality education to most black people; and by controlling the content of syllabuses to reflect the interests of the apartheid state.

In 1953, the Government passed an Act to institutionalize inferior education for black people, which came to be referred to as ‘Bantu education’. Hendrik Verwoerd, the then Minister of Native Affairs, but later Prime Minister, notoriously said, in introducing the Act, that “there is no place for [the Bantu] in the European Community above the levels of certain forms of labour” (extract from Verwoerd’s speech in the Senate, 7 June 1954, quoted in (Rose and Tunmer 1975, p. 266)). This Act closed schools providing education to black children previously run by churches or NGOs, or took them over as State schools, so that they could only teach the syllabus which the Government deemed fit for black people, explicitly designed for them to be, in Verwoerd’s words, ‘hewers of wood and drawers of water’. Further education Acts introduced a highly-centralized and authoritarian system of control of the syllabus, the employment of teachers, and the admission of learners (Lodge 1983).

The essence of apartheid education was to provide separate education for different race groups, to indoctrinate all children with ‘Christian nationalism’, and to provide inferior education to black children, to prepare them for a role as inferior citizens and workers (Kallaway 1988). Separate schools and universities were created, not only for the different ‘racial groups’, but also for different ‘ethnic’ groups within the black community (Muller 1969). There were thus 18 separate education departments, leading to a system which was fragmented and inefficient, as well as being characterized by extreme inequality and inefficiency. There was a discriminatory hierarchy of financing, resources, facilities, and quality (Hartshorne 1985). The Government spent ten times more per capita on white children’s education than on black children’s (Thompson 1990). Education was compulsory for white children, but not for black children, few of whom made it past primary school. Black teachers were poorly trained, poorly paid, and taught in very inadequate schools. The State attempted to further reduce expenditure on black education by shortening the school day for black students to enable teachers to teach double shifts, and under-qualified female ‘assistants’ were employed in the place of properly-qualified teachers (Lodge 1983). These measures increased enrollments of black children in primary schooling - more people would get less education, and this education was designed as an important part of social control (Hyslop 1993).

‘Bantu education’ was widely regarded as an attempt to subjugate black people (Buckland 1981; Kallaway 1988). Syllabuses “stressed obedience, communal loyalty, ethnic and national diversity, the acceptance of allocated social roles, piety, and identification with rural culture” (Lodge 1983, p. 116). The white minority who had access to a better education also experienced authoritarianism, particularly in the history syllabus, which has been described as “designed to perpetuate an Afrikaner Nationalist interpretation of South African history” (Lowry 1995, p. 106). Other subjects were also designed to service apartheid ideology: for example, the geography syllabus and textbooks gave official recognition to the apartheid landscape and described African agriculture as “primitive, irrational, subsistence-oriented and based on low-level technology” (Drummond and Paterson 1991, p. 66). Vocational programmes were weak and of very low status, seen as a last choice even for weaker learners, although a fairly robust apprenticeship programme, available only to white men, trained artisans in key state enterprises (Allais 2006).

The economy which the African National Congress (ANC) Government inherited was equally problematic. South Africa had been relatively isolated from the global economy, partly due to economic sanctions, and the self-reliance philosophy of the Afrikaner nationalists. The State was widely viewed corrupt, authoritarian, and untransparent, as well as inefficient, and probably bankrupt (Marais 2001; Bond 2000).

Finally, for the purpose of this study it is worth noting that although the South African apartheid State was brutal in its repression of opposition, and organizations and people were banned, and people were arrested and killed, nonetheless strong and robust civil society organizations developed in South Africa. The main one was the ANC, which was banned, and operating from exile, with many of its leaders in prison. Also important were allies, the South African Communist Party, also banned, and the Congress of South African Trade Unions (COSATU). There was a strong and vibrant community of NGOs, many of which were involved in education in various ways, and there were many youth, student, and other progressive organizations, organized broadly into what was called the United Democratic Front.

The transition to democracy

In 1994, South Africa underwent what has been described as a miracle transition. Through constitutional negotiations, South Africa managed to move from the iniquitous apartheid system to a constitutional democracy with one of the most progressive constitutions in the world. Free and democratic elections took place where many had expected civil war.

South Africa achieved democracy and reentered the global economy in a period of a strong neo-liberal consensus against the welfare state (Desaubin 2002). Re-entrance into the world economy meant a rapid and dramatic liberalization of the South Africa economy, led by the new democratically elected Government, to the surprise and dismay of its trade union and communist allies (idem; Bond 2000; Marais 2001). Various reforms were implemented to facilitate marketization. As is the case in many transitional countries, therefore, the South African transition was characterized by a dual transition from an authoritarian and racist system to democracy on the one hand, and from a complex but partially-centralized and isolated economy to a liberalized economy on the other.

During the early 1990s, when ‘talks about talks’, and later formal negotiations were taking place, activists involved in education attempted to develop alternative education policies, anticipating that the new democratic government would inherit an education system which was “complex and collapsed”, with “high levels of adult and matriculation illiteracy, dysfunctional schools and universities, discredited curricula and illegitimate structures of governance” (Chisholm 2003, p. 269). The ANC-led liberation movement, as it started to prepare itself to become a government, needed a way of overhauling the fragmented and unequal apartheid education system, and a way of ensuring that education played a role in overhauling the economy and reducing social inequalities, but was increasingly aware of a lack of state resources to put into such a project. What was needed was an education policy which could overhaul the apartheid education system without increasing the size of the state, in a participatory, unifying, and democratic manner; which dramatically increased the supply and quality of education in general, but of vocational and technical education and training in particular; and which could ensure that vocational education played a role in improving the country's economy; and which did not cost too much. The miracle transition needed a miracle education policy. The NQF seemed to be that policy.

3. The NQF: Origins, influences, and purpose

The NQF became an important part of the transition to democracy. It was established as an emblem and an instrument of the single national high-quality education and training system that democratic South Africa aspired to create (RSA Departments of Education and Labour, 2002, p. 5). The idea of an NQF became a point of convergence for different groups, resonating with organizations across the political spectrum, and obtaining support from educationalists in many different communities, starting with organized business and labour, but including formal schooling, training, and, to some extent, higher education. It seemed to articulate the concerns of a diverse range of contemporary thinking on education and training policy.

The idea of an NQF emerged in negotiations between trade unions and business about industrial training in the early 1990s, shortly prior to the transition to democracy. Its origins lie in the unions’ concerns about the poor education provided to black people; the difficulties faced by black people in accessing education; the racist job reservation system which denied qualifications and jobs to competent black people; and concerns from both industry and the apartheid state about low levels of skills in the workforce and labour market (Allais 2003; Ensor 2003; Cooper 1998; Badroodien and McGrath 2005; Mukora 2006).

Industry, labour, and the apartheid State all agreed that the low levels of education and skills of the workforce in South Africa were hampering the development of the economy as well as preventing individuals from rising to higher levels in the workforce. As in many countries, some of the ideas which

have come to be popularly associated with post-Fordism⁴ seemed to offer alternatives both to command economies and neo-liberalism, based on achieving a certain type of education and training system (Desaubin 2002; Lugg 2007; Kraak 1994). The belief was that the low level of skills in South Africa was the main barrier to achieving a strategic edge in the global economy, and a highly-skilled labour force able of achieving flexible specialization was seen as the solution (Von Holdt 1991; Samson 1999, Mukora 2006).

Within the labour movement, the origins of this policy position came from the National Union of Metalworkers of South Africa (NUMSA). Desaubin (2002), Spreen (2001) and Lugg (2007) trace the origins of NUMSA's engagement with education and training policies to specific challenges in the metals industry in the late 1980s, characterized by massive industrial restructuring and the introduction of new technologies. NUMSA, engaging with counterparts in Australia, developed an analysis of how low levels of skills in South Africa and the crisis-ridden education system were barriers to the development of what was described as post-Fordist production systems (Desaubin 2002; Lugg 2007). Post-Fordism was understood to be a co-determinist system approach to increasing productivity and prosperity, whereby a more skilled labour force contributed to 'intelligent design', and benefited from the ensuing higher wages and success of industry (ISP 1994).

The analysis coming from Numsa was very much based on conditions in metal industries. There was much debate within the broader labour movement, as very different organizational and industrial approaches were dominant in different sectors. There was dispute about the likelihood about South Africa moving to post-Fordist production, as well as the supposed benefits of such a move, as well as whether South Africa had indeed ever really had Fordist industry, and the applicability of post-Fordist ideas to other sectors (Mukora 2006). But, the broad ideas pushed by Numsa gradually became adopted as official policy of the labour movement.

There was general agreement that poor pay and lack of career opportunities for black workers were a problem in all sectors of the economy, and policies aimed at breaking down barriers to education and training, as well as linking the world of education and the world of work, had broad appeal. The fact that black workers often were denied promotion because they lacked formal qualifications, despite their experience and skills, created wide support for the idea of giving people certificates based on their existing skills and knowledge.

⁴ I use the term 'post-Fordism' guardedly, although it is frequently invoked in education policy discourse, because the term represents a complex and divergent body of knowledge and analysis: in some instances, theories about production and industrial organization; in others, macroeconomy, culture, and politics. It is sometimes used descriptively, while others use it prescriptively to advocate changes they think should be made. It is often linked with arguments for flatter workplaces, which are seen by advocates of this approach as inherently more democratic, and in which workers are seen to have greater autonomy and scope for initiative. Still others seek it as part of a change in the regulation of social conflict, with declining scope and effectiveness of collective bargaining, resulting in a shift from to private and individualized forms of welfare consumption.

Ideas about competency-based education and outcomes-based education entered South Africa in this context. Like many progressive movements globally, Numsa picked up ideas about competence, thinking that they would support their goals by ensuring relevance and promoting flexible specialization, which was seen as the route to a highly-skilled, mobile workforce, and therefore international competitiveness (Allais 2007b, Lugg 2007). The belief was that a clear relationship between skills, grading, and wages would allow workers to move up a career-path through the provision of training modules accredited by tripartite bodies (ISP 1994, p. 67). In a complex process, with much disagreement and debate along the way, this idea became official policy in the liberation movement. The debates converged on the recommendation for "...a national vocational qualifications system fully integrated with formal academic qualifications" (NECC [3] 1992a, p. 41).

At the same time, the apartheid state had started thinking along similar lines (Mukora 2006). Various commissions emphasized the failure of the education and training systems in meeting the needs of the economy, as well as the impact of technological changes, which would further increase skills shortages. These commissions also recommended a competency-based modular approach to training, with industry-based systems of accreditation controlled by employers, and a reduced role for the State (McGrath 1996).

The National Training Board (NTB) set up by the apartheid State, which included organized business, organized labour, and specific Government departments, was where the various groups came together, and consensus was developed around the idea of an NQF prior the election of the first ANC Government in 1994. French (2009, p. 23), in a commentary published by SAQA, argues that "considerable faith was placed in international and local advocacy and in the persuasiveness of arguments without evidence". Representatives of both business and labour borrowed ideas about competency-based education from Australia and qualifications frameworks from New Zealand. The unions were primarily influenced by the Australian approach to competency-based education (Cooper 1998; Samson 1999; NECC 1992b; Spreen 2001; Lugg 2007). A very influential representative from business, from the mining firm Gencor, had been influenced by the New Zealand qualifications framework, and drew on it explicitly in the discussion (Badroodien and McGrath 2005). The representative from the Private Sector Education Council explains that the National Vocational Qualifications (NVQs) in the United Kingdom, Robert Mager's ideas about criterion referenced instruction, and the 1992 Mayer Report on Key Competencies in Australia influenced his thinking (Vorwerk 2004). They all agreed that formal education and training institutions in South Africa were responsible for low levels of skills and poor productivity. In this context, a system which focused on outputs was argued to meet both the economic and social needs of the country and the development needs of the individual. They jointly reached the conclusion that a national framework of learning outcomes, compiled into qualifications and part qualifications, would address their various concerns (Lugg 2007; Spreen 2001).

The idea of an NQF was proposed as a mechanism which could create sense and coherence out of the fragmented education and training system, but also which could drive the creation of the desired type of education and training system. Thus, the NQF was seen as the core - or the keystone, according to French (2009), and as a central mechanism through which education and training would be transformed.

A clear and distinctive conceptual model for an NQF was developed in this process, centred on the idea of using a qualifications framework, consisting of levels on which qualifications and part qualifications composed of learning outcomes would be placed, to drive educational reform (Allais 2007b). A small group of individuals, including the representatives of labour and business who had initiated the idea of the NQF, developed detailed proposals of what it would look like (Badroodien and McGrath 2005; Lugg 2007). The model that they developed became the blueprint for the NQF that was created. The key feature of the model was the role of learning outcomes in qualifications. Learning outcomes defined by stakeholders outside of educational institutions and programmes were seen as the central mechanism, which, it was claimed, would enable the realization of the many desired policy goals.

The South African Qualifications Authority (SAQA) Act was passed in 1995 (Republic of South Africa Act No. 58 of 1995). It was the first education and training legislation of the new Parliament elected in the first democratic elections in South Africa. This Act brought the NQF legally into being, with SAQA as the body responsible for developing and implementing it. Implementation began in earnest in late 1997 after senior staff appointments had been made (SAQA 1997, 1998).

As mentioned above, the South African NQF has been widely acknowledged as one of the most ambitious qualifications frameworks in the world, and is marked out from others by its “scale and ambition” and its “perceived centrality to the reconstruction of society in the political and social context of a post-apartheid regime” (Granville 2004). This has been one of its most praised as well as most criticized aspects. Envisaged as a policy to underpin all other education and training policies, the NQF was designed to use qualifications to transform South Africa’s deeply fragmented and unequal education and training system, increase access, make education more democratic, but at the same time, ensure that education played a role in improving the South African economy. Its stated objectives were to:

- create an integrated national framework for learning achievements;
- facilitate access to education and training;
- facilitate mobility and progression within education, training and career paths;
- enhance quality of education and training;
- accelerate the redress of past unfair discrimination in education, training and employment opportunities;
- contribute to the full personal development of each learner and the social and economic development of the nation at large.⁵

But in a sense its purpose, or the hopes which were pinned on it, were broader than this list. It was regarded as a transformative instrument, which would “expand the ways in which people are able to acquire learning and qualifications of high quality” (RSA Departments of Education and Labour

⁵ South African Qualifications Authority Act No. 58 of 1995.

2002). It was to be a mechanism for the integration of education and training, as well as for changing perceptions about the relative value of different qualifications and different types of learning. It was hoped that it would encourage curriculum innovation in response to community and industry demands (Gewer 2001, p. 135). It was also hoped that through the NQF, learning opportunities would be opened for the disadvantaged, and learners would be able to progress through articulated qualification levels and coherent career paths (RSA Departments of Education and Labour 2002). The idea was that qualifications would transcend institutions - because all providers would be offering programmes leading to the same outcomes, the NQF would “remove the obsession with institutional learning as the measure of a person’s worth, because national qualifications will be blind as to where the learning takes place” (HSRC 1995, p. 15).

A major part of the rationale for the NQF was that it was seen as a tool for dramatic change, for, as Young (2005) puts it, a ‘break with the past’ was needed. As SAQA explains,

... the NQF is primarily about systemic change: how a system is put in place that allows for adaptability, flexibility, responsiveness and accountability in setting standards; relevance, quality, creativity and accountability in the design and implementation of learning programmes; ensuring that the qualifications and standards and their delivery are of the degree of excellence that is specified. (SAQA 2000b, p. 7)

However, a commentary on the NQF published by SAQA points out that “...no structure, idea, or intention of the NQF has ever been allowed to be put to the test of scenario planning, in that there is a toughly-imagined examination of the use of its functionalities by actual people in actual situations” (French 2009, p. 62). As we shall see, things did not go according to plan.

4. The design and implementation

The design of the South African NQF, including its types of qualifications, the systems for the development and award of qualifications, notions of learning outcomes, and structures and governance arrangements, have changed over time. The account below starts with an explanation of how the NQF was designed. This is referred to as NQF Version 1.0, or the blueprint. In some senses, this blueprint is still seen as describing the NQF - it is the version which is upfronted on SAQA’s website, and is taught in a series of modules developed by SAQA about the NQF. However, as implementation of the NQF began, some changes to the blueprint were made, and these are referred to below as NQF Version 1.1. The changes are important to understand, as they are often not apparent in official documents, or their significance is underplayed.

As will be discussed below, the NQF underwent a lengthy period of policy review. During this period, some additional changes were made to the NQF, and these are described below as NQF Version 1.2. Very recently, the differences between the Departments Education and Labour were finally resolved, at least enough for a substantially-changed NQF to emerge, described below as Version 2.0. However, just when it appeared to be over, a newly-inaugurated President reorganized Cabinet, with implications which have yet to be fully understood. This will probably result in further modifications to Version 2.0, creating

Version 2.1; it may, however, mean that the NQF will again be substantially changed, resulting in Version 3.0.

The NQF version 1.0 (the blueprint)

The original design of the South African NQF was very directly related to the purposes for which it was created. Outcomes-based qualifications were seen as a solution to many of the educational, social, and economic problems of apartheid. A national qualifications framework that overarched all education and training seemed to be a mechanism that would ensure that learning was 'relevant' and of high quality, produce learners who were competent in the workplace and provide access to those previously excluded, recognize the learning that they had achieved informally, ensure that all qualifications were of equal status, and ensure that assessment was transparent and fair (Allais 2007b).

The key design feature which linked to these purposes was the idea of learning outcomes, developed separately from educational institutions and educational programmes, against which learning would be delivered, assessed, quality assured, and certified. It was thought that using learning outcomes in this way would democratize education because stakeholders would all have a say in the standards (SAQA 2000a). It was believed that knowledge could therefore be democratized and made transparent, and would no longer be the preserve of experts (idem). Thus, the NQF was designed to remove the power of defining knowledge and skills from formal institutions, and to do away with educational institutions as the source of authority on qualifications. They would no longer define the benchmarks of what was worth knowing, nor be the only arbiters of what learners had achieved. In other words, everyone would have a say in the outcomes of educational process, instead of only the experts in a particular field. Educational institutions would, it was argued, be free to choose their own 'content' or 'knowledge', as long as it enabled learners to 'acquire' the outcomes specified (SAQA 2000b). This seemed like an alternative to the highly-authoritarian and prescriptive curriculum approach of the apartheid Government.

But also (and perhaps this is to some extent contradictory with the desire for democratization), this process was seen as a way of ensuring that industry could play a much larger role in defining standards, and also, that employers would come to see investing in training as an important priority.

It was further believed that the creation of independent outcome statements would increase provision of education, because any 'provider' would be able to offer learning programmes against the outcome statements; thus, new providers could emerge (SAQA 2000a, e). Increased provision would lead, it was believed, to increased access.

Outcomes also seemed to be a mechanism for improving quality - because they would specify standards for all educational provision, and all educational institutions would have to meet the standards, thus ensuring that all learners were given education of an equal quality. The outcomes-based qualifications would improve the quality of education as they would indicate to institutions the standard expected of them, and regulatory bodies would be able to check up on what institutions were offering against the prescribed outcomes (SAQA 2000e). Increased supply of education would lead to competition, also improving quality. Further, because the competences that someone had achieved would be transparently specified and available for general scrutiny, it would be

straightforward to decide which competences were applicable in other courses or programmes that a learner wanted to undertake, and there would be minimal duplication, and maximum economic efficiency within the education system (SAQA 2000a).

At the same time, the outcomes-led qualifications framework model was seen as a way of totally overhauling the apartheid education system, because all existing qualifications were to be replaced by the outcomes-based qualifications designed separately from educational institutions. This meant that no existing educational provision would remain untouched - all educational institutions would be obliged to redesign their programmes on the basis of these specified outcomes, or to develop new programmes to meet the requirements of specified outcomes.

Outcomes were also seen as a way of equating learning through formal and non-formal education, as well as knowledge and skills gained through the course of work and the struggle against apartheid. Because outcomes would be developed separately from specific institutions or specific learning programmes, it was thought that they could be the benchmarks against which all learning was measured. As has been discussed above, this was of particular concern to trade unions, who were concerned that black workers' lack of formal qualifications was used to justify the lower pay that they were given in many workplaces, even when they had the equivalent skills (Bird 1992).

Further, it was believed that organizing all qualifications and parts of qualifications on a hierarchy of levels would force society to value types of learning programmes which had historically been of low status, which would increase efficiency and encourage more learners to enroll in vocational programmes (Allais 2007b).

Outcomes-based qualifications were therefore seen as a solution to the educational problems and economic problems of apartheid, and the idea of specifying learning outcomes separately from educational institutions and programmes was the central feature of the NQF which linked its objectives to its design.

Essential to this idea is the notion that outcomes-based qualifications and unit standards can provide clear and explicit statements of competence: "A national qualification will define a genuine competence at a particular level on the National Qualifications Framework" (HSRC 1995, p. 15). SAQA explained that "Outcomes are the qualities ... that are expected at the end of a process of learning. The meaning of outcomes is similar to the concept of competence" (SAQA 2004d, p. 6).

The South African NQF was designed as a highly-comprehensive qualifications framework, covering the entire education system at all levels and in all sectors. The grid of eight levels and 12 fields was supposed to encompass all learning that took place in South Africa - at all levels, in all areas. The 12 fields are shown in Appendix 1 at the end of this paper.

South Africa did not officially adopt functional analysis in the development of unit standards. This could be because conventional competence-based models were seen as narrow, and the people involved in the original design of the NQF were very concerned to create a broader notion of outcomes (French 2009). Also, as the South African NQF was comprehensive, aimed at covering all education at

all levels, it would have been impossible, as many of the unit standards and qualifications developed did not have a direct relationship with specific industries. Nonetheless, detailed requirements and specifications for qualifications and unit standards were created, as well as manuals and guidelines for their development, and these documents used a very similar approach to functional analysis (SAQA 2000a,b,c,d,e).

Allied/supporting strategies

Two important policies were introduced which were closely related to the NQF and had similar aims. The first was an outcomes-based reform of the school curriculum, introduced initially into the primary school, with the intention of later extension to secondary schooling. This was referred to as Curriculum 2005. The second was a National Skills Development Strategy. The latter introduced a payroll levy for workplace training, and set up institutions and structures to oversee this and its related processes. Importantly, it set up sectoral Education and Training Authorities in different sectors of the economy, which were supposed to be important quality assurance bodies for some of the NQF qualifications.

Setting up the structures

As stated above, SAQA, the South African Qualifications Authority, was created through an Act of Parliament in 1995. It was an independent statutory body under the joint oversight of the Ministries of Education and Labour. SAQA saw itself as the body which would oversee the creation of standards - learning outcomes specified in qualifications or part qualifications called unit standards. It created 12 National Standards Bodies (NSBs) - stakeholder-based bodies, which were given responsibility for overseeing qualifications and unit standards in each of the 12 fields of the NQF. Under each NSB, a large number of Standards Generating Bodies (SGBs) were created. The SGBs were comprised of representatives of experts and interest groups (SAQA 2000c, d). SGBs were supposed to develop the outcomes-based qualifications and unit standards for all education and training in South Africa. These would then populate the eight levels and 12 fields of the NQF. Gradually, all previous qualifications would disappear. Only the new qualifications and unit standards would remain, with no institutional relationships, located on a level and in a field, designed by an SGB, and ratified, first by the stakeholder representatives in an NSB, and then by stakeholder representatives in the SAQA Board (the Authority). None of these qualifications would have a direct relationship to an educational provider - they would all be national qualifications.

Educational providers would be accredited by quality assurance bodies to offer programmes leading to specific qualifications. The quality assurance bodies would check up on how well they were doing this, and on whether or not they were assessing learners appropriately against the learning outcomes (SAQA 2000e).

A point which was not made explicit in the early documentation is which institutions would issue certificates - would it be educational institutions or quality assurance bodies?

Assessment was central to the design of the NQF - because of the idea that the outcomes are not linked to a specific programme of learning, and that anyone

can be assessed against them. It was believed that because the learning outcomes would clearly contain the standard to be assessed against, qualifications would have credibility, as is explained in the following quote from an early SAQA publication:

Reliability is ensured in that specified standards, outcomes and competences and their accompanying criteria are the basis upon which assessment is planned and administered. These are a constant, regardless of who is assessing and who is being assessed. Laying down these specifications makes it incumbent upon the assessor to use them as a guide in planning, developing and administering assessment. Because they are specific, known and clearly understood by all who are affected, they act as an in-built mechanism against assessor inconsistency, deviation or error. (Mokhobo-Nomvete 1999)

But, even though it was believed that standards would be specific enough to enable fair assessment, it was still felt that there would be a need for extra measures to ensure that all assessors assessed appropriately. The plan was that each individual assessor, whether based in an educational institution or not, must be registered as an assessor.

As will be apparent in the discussion below, the seemingly simple model became much more complicated as it started to be put into practice.

Getting going: The NQF 1.1.

The structures were put in place, as shown in Appendix 2 at the end of this paper, which indicates the way relationships between the key roleplayers and stakeholders were supposed to work. Perhaps the most significant departure at this point from the original idea was that the SAQA Authority was constituted under the Ministers of Education and Labour, while the original idea had been a joint Ministry.

By 1997, SAQA had created its 12 National Standards Bodies, and many hundreds of SGBs were created underneath them (French 2009). In the following years, quality assurance bodies were put in place. However, some of these, constituted in 25 different sectors of the economy, were created under the Minister of Labour through the Skills Development Act. And two quality assurance bodies were created under the Minister of Education; one for General and Further Education and Training (that is, all education below tertiary education) and one for Higher Education through their own Acts of Parliament. In a significant deviation from SAQA's intentions, the quality assurance bodies under the Minister of Education were given legislative power through their own Acts of Parliament, which meant that they were not empowered to do their work by being accredited by SAQA. The sectoral quality assurance bodies, however, under the Minister of Labour, had to be accredited by SAQA in order to carry out quality assurance.

The eight levels of the NQF were to be described by level descriptors. However, although in 2009 many NQFs exist with level descriptors in place (albeit mainly based on Australian, Scottish, and increasingly, European Qualifications Framework (EQF) level descriptors), in the mid-90s in South Africa, these were not common place. There was much debate about whether descriptors should or could be developed up front, or if instead, they should be developed based on an analysis of the qualifications developed, and the knowledge and skills represented by them. When the South African NQF was

first created, although the existing qualifications were not supposed to be driving it, as they were to be replaced by it, they were used to give an indication of what the levels 'meant' in terms of the qualifications with which people were familiar. So, level 1 was designated as the end of grade 7, or the equivalent end of adult basic education. Level 4 was designated as the end of senior secondary schooling, or the senior certificate. And level 5 was seen as the first level of higher education. Preliminary level descriptors were developed, but not adopted as policy, and much debate ensued over the following years, particularly about which levels in relation to the various higher education qualifications.

The work began: Standards Generating Bodies (SGBs) started to generate standards, National Standards Bodies (NSBs) to ratify them, and the SAQA Authority to register them on the NQF. The first unit standards were registered on the NQF in June 1998, and more followed in 1999 (SAQA 1999). By 2001, SAQA reported that 65 SGBs were registered, and another 100 were described as 'operational'. It also reported that 39 new qualifications and 655 unit standards were registered on the NQF, and 12 Education and Training Quality Assurance bodies (ETQAs) were accredited (SAQA 2001). By March 2002, an additional 48 new SGBs were registered. Ninety-eight new qualifications and 2,413 new standards had been registered on the NQF. Thirty-one ETQAs had been accredited, including all the ETQAs that existed under the 25 SETAs. Some examples of the new qualifications and unit standard titles are provided in Appendix 3 at the end of this paper.

Registration of assessors

As discussed above, the notion of 'registered assessors' was central to the original design of the NQF, as awards of qualifications and therefore assessment was not supposed to be linked to any particular programme of study or institution. SAQA initially pronounced that anyone in South Africa who wished to assess a learner in order for a learner to be granted a certificate had to be registered as an assessor. An assessment unit standard was developed and, according to SAQA's policy, in order to assess any education or training in South Africa, an individual would have to be assessed against this unit standard and found competent. SAQA gave a four-year grace period for this to happen, ending in May 2004 (SAQA 2001).

However, a logical problem presented itself, because in order to be assessed as competent against the assessment unit standard, one had to be assessed by a registered assessor - because only a registered assessor was seen as proven to be competent in the business of assessing, and therefore able to make a reliable judgement. But initially, there were no registered assessors who could have been assessed as competent, because the standard had only just been created. The Education, Training, and Development Practices Quality Assurance body, the quality assurance agency under SAQA that had been designated as responsible for this unit standard, therefore selected a group of 'providers', who were decided to be sufficiently competent to be able to offer training against the standard, and conduct assessment against it.

The decision that assessors must be registered on the basis of having been assessed as competent against the assessment unit standard generated, in certain quarters, created a rush to get registered, and correspondingly, a flurry of income-generation for institutions offering 'assessor training' against the standard. In particular, people working in private providers, people wanting to generate an income through conducting assessment, and people working in

Further Education and Training Colleges, attended assessor training courses, in order to try to qualify. However, despite SAQA's official proclamation, people working in schools and universities did rush down this route.

'Legacy' or 'provider' qualifications

As discussed above, the intention was for the NQF to replace all existing qualifications, and for all qualifications in South Africa to be national, not linked to specific providers, generated through Standards Generating Bodies (SGBs). The NQF would be a repository of these national qualifications, which specified learning outcomes. However, obviously, SAQA did not want to (and, as it turned out later, although it was not obvious at the time, it did not have either the legal or moral authority to) do away with all qualifications currently on offer, when new ones did not yet exist. SAQA therefore decided to register, on an 'interim' basis, all existing qualifications (SAQA 1997).

These qualifications were referred to by SAQA as 'legacy' qualifications, and were seen as qualifications that would be phased out, as soon as the new system of designing and registering unit standards and outcomes-based qualifications was up and running. A transitional period of five years (from 1 Jan. 1998 to 31 Dec. 2002) was decided on, after which the idea was that all these 'legacy' qualifications would fall away (idem).

Thus, as the NQF started to be populated with qualifications, there were two distinct types of qualifications. The one was those developed by institutions, and the other, those developed through the structures of SAQA. This distinction is not immediately apparent - looking at the framework, one would simply see a list of qualifications.

Criticisms emerge

Despite the initial wide support for the broad idea of an NQF, difficulties emerged very quickly. Criticism of the NQF and of outcomes-based education started to develop as early as 1997, where proceedings of a conference on the NQF organized by left-wing education organizations show intense disagreement and predictions of doom for the model (Breier 1998), and the view that the NQF was attempting to contain serious contradictions (Muller 1998; Cooper 1998). Critics described it as "complex and esoteric" (Breier 1998, p. 74), and "large, unwieldy, expensive, complex and somewhat unstable", as well as "out of line with the *modus operandi* of the formal education sector (Ensor 2003, p. 334).

Many people and organizations felt alienated by the terminology and structures of SAQA and the NQF, which were unfamiliar to the traditional concerns of educational institutions (RSA Departments of Education and Labour 2002). Lugg (2007) documents the increasing unease of trade unionists, who were unable to participate meaningfully in the plethora of structures that had been created. A SAQA employee, Nadina Coetzee, describes the implementation of the NQF as characterized by "intense debate, tension and even resistance" (SAQA 2004a, p. 79). Jansen (2004, p. 89) argues that

...the manageable set of good ideas soon found itself engulfed and overpowered by a powerful bureaucratic and administrative apparatus so that the simple founding principles were completely lost to ordinary people.

At the same time, the introduction of the outcomes-based curriculum, known as Curriculum 2005, at grade one level met with enormous difficulties (Chisholm 2003; Taylor 2000; 2002; Taylor and Vinjevold 1999), and there was increasing concern that instead of addressing inequalities between black and former white schools, it was increasing them (Vally and Spreen 2003).

Power relations and contradictory legislation

As mentioned above, when the NQF was first conceived of, it was assumed/hoped that there would be a single Minister of Education and Training, but after the democratic elections, separate Ministries were created for Education and Labour respectively. This separation, and apparently irreconcilable differences between the two Ministries and their respective departments, are widely seen as having contributed to the problems experienced by the NQF (Lugg 2007; French 2009).

By 1998, there was an array of new legislation to transform education and training. These Acts did not always reinforce each other, and sometimes contradicted each other (Allais 2006; French 2009). A large number of new bodies were created, without clear relationships to each other, and, more importantly, without clear specification of their respective lines of responsibility, authority, and accountability. So, for example, legislation gave SAQA the power to register qualifications and standards on the NQF, as well as the power to accredit ETQAs, meaning that, in theory, it should overarch the whole education and training system. But the National Education Policy Act (Act No. 27 of 1997) gave the Minister of Education power to determine a wide range of education policies, such as those concerning curriculum frameworks, core syllabuses and education programmes, learning standards, examinations, and the certification of qualifications. This Act was passed by Parliament after the SAQA Act. As will be seen below, the Department interpreted its mandate as defining all aspects of qualifications for school, adult education, and further education colleges (the entire State formal education system below tertiary education), outside of the structures and systems of SAQA. While the National Standards Bodies were supposed to register standards across all areas of education and training, in practice the Department of Education developed the curriculum in schools, and public colleges continued to offer predominantly Department of Education programmes - in other words, the whole formal education system below tertiary education. Higher education in general also continued to develop its own curricula against qualifications regulated by the Department of Education. Higher education institutions continued to issue their own qualifications.

As could be predicted looking at the diagram in Appendix 2 at the end of this paper, the configuration of quality assurance bodies caused a very serious problem, as any given vocational, technical, or professional qualification or unit standard would fall under two quality assurance bodies - one under the Minister of Labour, and one under the Minister of Education. A further problem inherent in this structural arrangement was that unless an educational provider offered only one type of learning programme, it could potentially be obliged to deal with up to 26 different quality assurance bodies. The plan was for this to be dealt with through memoranda of understanding between different quality assurance bodies, but this proved unworkable for the bodies themselves, particularly because the quality assurance bodies operated in fundamentally different paradigms. Umalusi, the quality assurance body for General and Further Education and Training, operated primarily through an examination system, and refused to engage with unit standards-based qualifications. As explained in

research which I conducted for Umalusi, it declared itself unable to reach memoranda of understanding with bodies whose quality assurance mechanisms it did not trust (Allais et al. 2007).

Parker (2001) argues that the lack of clarity about roles and relationships, as well as the large number of structures involved in the NQF, have absorbed large amounts of energy.

Policy reviews

A review of the NQF was announced in 2000 by the then Minister of Education, who also instituted a review of the outcomes-based curriculum which had been implemented in the primary and junior secondary school system. This was, as many commentators have observed, an extremely short period of time for an education policy to have a chance to be implemented. However, as very briefly described above, clearly, problems were emerging. The Report produced by the international Study Group who conducted the review, based on extensive stakeholder discussions, refers to “widespread anxiety and dissatisfaction among public bodies and stakeholders and in the Departments of Education and Labour” (RSA Departments of Education and Labour 2002, p. 1) as well as a “broad malaise of discontent with SAQA and the NQF” (ibid., p. 143).

The review of the outcomes-based school curriculum got underway quickly and reported by 2000 (RSA Department of Education 2000). The Department accepted that major changes needed to be made to the curriculum, and immediately created the structures and processes to do so.

But the NQF was under the Minister of Labour as well as the Minister of Education, and disagreement emerged about whether there should be a review, and what its nature should be (Lugg 2007). After much contestation about the idea of such an early review, it was defined as a review of ‘implementation’ - in other words, the terms of reference emphasized an investigation into how the NQF was being implemented, and not into the design of the NQF. The release of the report of the review in 2002 was followed by a lengthy period of confusion and inaction on behalf of Government, widely believed to stem from inability of the two departments to agree with each other (Lugg 2007; French 2009). The review team had suggested that both in terms of their analysis of the problems and their ideas about what should be done about them, the Departments of Education and Labour were “mirror-images” of each other (RSA Departments of Education and Labour 2002, p. 33).

Thus, although fairly substantial changes had been recommended, there was no official indication from the Ministers about what changes would be made. In 2003, following public comment, and then a lengthy period of official silence and what has been characterized as “conflicted and secretive discussions” (Lugg 2007, p. 225), the two departments released a *Consultative document*, aimed to signal how the NQF should be changed. This was followed by further public consultation, which again proved inconclusive. The two departments had hoped that this document would in some way reach out to all the different stakeholders, and address their different concerns. In fact, it did the reverse, meeting with almost universal disapproval, albeit for very different reasons (Allais 2007b). The long silence of the two departments *prior* to releasing the *Consultative document* proved to be shorter than the lengthy period of silence *after* the release of this document.

The NQF 1.2. Some changes, as well as continuing with the model during the review period

During the period of ongoing review (2000 to 2008), with no resolution and no policy pronouncements coming from its sponsoring departments, SAQA continued to develop the NQF largely according to its original design. This created the difficult situation whereby over a lengthy period, there was official documentation in circulation suggesting substantial changes; there was recognition that some changes would inevitably happen; and yet business continued as usual. It is difficult to know what else could have been done by the officials in SAQA as well as all the other structures with relationships to the NQF (Umalusi, the Council for Higher Education, the Sectoral Education and Training Authorities (SETAs)) who operated in an uncertain policy environment for many years, and responded mainly to the immediate imperatives of their scope of operation. Thus, Standard Generating Bodies continued to generate standards, quality assurance bodies to accredit providers, and SAQA to register qualifications and unit standards, and so on. As Merlyn Mehl put it, writing in the *SAQA Bulletin*,

...[u]nit standards, qualifications, qualification-sets and qualifications frameworks are more and more rapidly coming off the production line. (Mehl 2004, p. 42)

By March 2005, 696 unit standards-based qualifications and 8,208 unit standards had been registered on the NQF. SAQA maintained the idea of 'setting standards' as a process of determining the learning outcomes to be included in a qualification, separately from an institution or learning programme.

However, although hundreds of qualifications and thousands of unit standards were being developed, by July 2003, only 1,036 providers had been registered by the SETA quality assurance bodies, of the approximately 19,078 providers that, according to SAQA, needed to be accredited, and tiny numbers of learners had been awarded qualifications through the SETAs (SAQA 2004a). Many of the qualifications which had been developed were not located in any quality assurance body - by August 2005, 299 qualifications were referred to by SAQA (officially) as 'orphans'.⁶

Some new changes to the original design of the NQF were implemented in this period. The most significant ones are the continued acceptance of legacy/provider qualifications; the disbanding of the National Standards Bodies; the acceptance that assessors in educational institutions would in the main not be registered as assessors; and the creation by the Department of Education of a qualifications framework for higher education, including two additional levels to the NQF. Each of these is discussed briefly below.

⁶ Presentation by Yvonne Shapiro, Director of the National Learner Records Database at SAQA, at the SAQA ETQA (Education and Training Quality Assurance) Forum, 3 Aug. 2005.

Continued acceptance of legacy/provider qualifications

In contradiction to its earlier deadlines, the period for the registration of 'interim' qualifications was again increased until June 2006 (SAQA 2004b). In 2005, SAQA started referring to 'provider' qualifications instead of 'interim' qualifications, suggesting a shift in how these qualifications were thought of, and perhaps an acceptance that they might start to be a permanent feature of the NQF (SAQA 2005a).

In addition, a major new provider qualification was developed and registered on the NQF. One of the most important qualifications in South Africa, the National Senior Certificate (NSC), (the certificate signifying the end of senior secondary school, and determining access to university) was officially registered on the NQF despite being based on curricula developed by the Department of Education, and not being based on learning outcomes. As a commentary on the NQF published by SAQA admits, this qualification in many ways operates without reference to the NQF (French 2009).

Rejection of the registration of assessors

The notion that anyone who wanted to conduct assessment in South Africa should be registered as an assessor after being found competent against the assessment unit standard was rejected in the two review documents. The suggestion was that anyone who was employed as an educator in an educational institution should not have to meet this requirement - that is, teachers and lecturers (RSA Departments of Education and Labour 2002; 2003). While there was no official policy pronouncement on this matter during the period of uncertainty, certainly there were no mass moves to get accredited in universities and schools, and it seems as if there was acceptance that this requirement would fall away.

The Higher Education Framework and new levels

In July 2004, a framework for qualifications in higher education was released by the Ministry of Education (RSA Ministry of Education 2004). This document, entitled the *New academic policy for higher education*, was the end product of a long process of consultation through earlier versions of the document, and enacted a particular way of resolving the ongoing problems with the NQF. It indicated that the number of levels of the NQF would be changed from eight to ten, in line with the proposals of both the two review documents. It contained draft level descriptors for the higher education levels of the NQF. It also indicated that the Higher Education Quality Council (HEQC) would be the only quality assurance body to operate in higher education, and in addition, that it would assume the function of standards setting. This was a dramatic shift both from the original conception of the NQF, and from many of the proposals of the *Consultative document*, because it made it clear that no other bodies would issue qualifications in higher education. In addition, the framework of qualifications proposed was a framework in the sense of a register of qualification *types*⁷,

⁷ Qualification types refers to, for example, 'Advanced Diploma' or 'Bachelor's Degree', which could be modified by a designator, or Advanced Diploma (Drama), or Bachelor's

which is very different to the original NQF model, which was to contain all the registered, new outcomes-based qualifications.

Structural changes

SAQA (2005b) started implementing some changes to its systems and structures during this time, such as disbanding the National Standards Bodies (NSBs). SAQA (2005b) created an ‘interim’ strategy for standards setting, arguing that these structures could not be recreated in the absence of direction on the future of the NQF.

The number of levels of the NQF was officially increased from eight to ten (SAQA 2006).

The NQF 2.0: Three linked frameworks

Late in 2008, a set of bills were finally drafted to create substantial changes to the NQF (RSA 2008a,b,c,d). The new National Qualifications Framework Act (Republic of South Africa Act No. 67 of 2008) split the NQF into three linked frameworks, and created the basis for three Quality Councils for each framework. The remaining Acts created the two quality councils, and amended the Skills Development Act in order to create the third. The power of SAQA to set standards was removed, and was instead located in these three Councils, each of which seems set about doing this work in ways which are not only substantially different from SAQA’s outcomes-based qualifications, but also different from each other (Umalusi 2007; RSA Department of Labour 2008). As noted by a report commissioned by the South African Department of Labour and the GTZ (German Technical Cooperation), SAQA now has the substantially-reduced role of coordinating between the three Quality Councils which now oversee three separate qualifications frameworks (Heitmann and Mummenthey 2009). Notably, the NQF is now defined as an entity in its own right, and not only in relation to SAQA. SAQA is now only one of four organizations responsible for the NQF. The diagram in Appendix 4, sourced from the report published by the GTZ⁸ and Department of Labour, illustrates the configuration of relationships.

One of SAQA’s roles in the new NQF is to maintain a single set of level descriptors for the NQF. This is supposed to ensure some coherence between the three linked frameworks. As briefly mentioned above, level descriptors were the source of some debate in the initial and ongoing design of the NQF, and were not initially created as official policy, as some argued that they could not be developed in a vacuum. Level descriptors for levels 1 to 4 were created as policy after a few years, and for higher education, much later. Much of the debate was

Degree (Linguistics). But the actual awarded qualifications would be linked to the awarding institution, and based on their prescriptions for subject choices, and their curriculum and assessment policies.

⁸ It is interesting to note, given that policy borrowing as well as international technical assistance continue to play such a dominant role in qualifications frameworks internationally, that all the initial work for the Quality Council for Trades and Occupations (QCTO) has been conducted with funding and support from the GTZ.

about whether the same descriptors could capture sufficiently the essence of different levels in different knowledge areas. Notwithstanding these debates, it would probably be hard to find many people in South Africa, whether in educational institutions or even in the official standards setting structures of SAQA, who in fact have used these documents. While I worked for Umalusi, the Chief Executive Officer, backed by her senior staff, made it clear not only that they did not use them, but that they did not see any meaning in them, or use for them. Standards and levels, as is discussed below, were seen as defined by curricula and the standards of examinations. While these were hotly contested, level descriptors were not seen as useful to resolve the debates. For example, a major debate has taken place about the breadth and depth of the senior secondary school Physical Science curriculum, as well as the standard of the examinations (Umalusi 2007). Level descriptors tend to say things like ‘...broad factual and theoretical knowledge in broad contexts within a field of work or study’, or to talk about the level of autonomy of the learner. None of this helps a body like Umalusi, which has to take decisions about the curriculum and examinations.

The new arrangement brings qualifications much closer to institutions, and moves away from the notion of outcomes-based qualifications as things defined and determined outside of educational institutions. Umalusi, in general and further education and training, works predominantly with qualifications that are broadly specified in terms of numbers and types of subjects, and are accompanied by a curriculum which is developed by an assessment body that also sets and administers an external examination. It sees ‘standards’ as lying within a combination of the quality of that curriculum, the quality and standards of the examinations used to test learners on it, and the quality of the educational institutions offering it (Umalusi 2007). It is important to note that further education here incorporates the vocational education which happens in the Further Education and Training Colleges (FETCs), which are currently implementing new curricula, developed by the Department of Education.

The HEQC works with a framework of qualification types, which specify the nomenclature and relationships of the different qualifications on offer in higher education. It is also involved in a process of creating broad competency statements for different types of degrees. Significantly, both these bodies are not new bodies, but are built on existing institutions that have reputations as well as established relationships, modes of operation, and systems. Both of them, as seen in the diagram in Appendix 4, are constituted under the Minister of Education. Under the HEQC, higher education institutions will continue to issue their own qualifications, and design their own curricula. They will be subject to emerging and still contested quality assurance procedures, but retain their autonomy.

As stated above, legislation which enabled the creation of the Quality Council for Trades and Occupations (QCTO) as a structure under the Minister of Labour was passed, and while the other two Quality Councils are independent statutory bodies, in this legislation the QCTO was seen as a structure within the Department of Labour. This means it has less legislative clout. The fact that it is an entirely new structure means that it does not operate within established modes of operation, established relationships amongst different roleplayers, or histories of traditions.

Initial documents which are publicly available suggest that in some ways it will operate most similarly to the original design of NQF, but with substantive differences. The proposal is that it will base its work on an Organizing Framework for Occupations (OFOs).⁹ This framework will be used as a starting point for the development of occupational curricula. Each qualification on the framework will be linked with a specific curriculum and specific assessment specifications. This is a major departure from the thinking of the NQF, which thought that while outcomes should be specified, curricula should be the responsibility of individual educational institutions. It uses the term 'unit standards', but these are dramatically reconceptualized. While the original unit standards could have any amount of credit and varied from one credit to 90 credits, it will stipulate a minimum amount, to ensure that each represents a substantial amount of learning. Unit standards will be directly linked to curricula, and will be divided into three categories: knowledge, practical, and workplace standards.

What is not clear from the available official documentation, which is not yet finalized, is what the term 'unit standard' means here, and what the role of learning outcomes are, if there are specified curriculum. It appears that 'unit standard' may be closer to what is usually described as a 'module', and that learning outcomes are seen as guides for the development of curricula, but not as defining documents, in the same way as they were in the original NQF. What is not clear, then, is why outcomes need to be separately specified at all, and indeed, whether they will be. Another significant difference, which brings the QCTO model closer to the Umalusi model, is that a national assessment will be specified for each qualification. This can be seen as a reaction to the extremely varied standards of assessment that took place against the unit standards registered on the NQF, as well as the extremely labour- and cost-effective requirements for moderation if all assessment is site-based and designed and conducted by individual assessors (the problems with this idea of quality assurance is briefly discussed further below).

Also proposed is an entry assessment for all occupational qualifications, in which learners have to demonstrate their competence in mathematics and language. This is based on a lack of faith in the formal education system, and weak levels of mathematics and language ability that many learners have, despite having school leaving certificates. Learners who do, and are not found competent, will have to take additional courses, and be found competent before an occupational qualification will be awarded.

Two types of qualifications are proposed: National Occupational Awards, and National Skills Certificates. There is a proposal to have only one qualification per occupation, in a move away from the proliferation of qualifications on the original NQF.

It seems as if, like the original NQF, it is dependent on a range of institutions that need to be created, such as External Assessment Quality Partners. However, there is a clear move to institutionalize assessment, and move away from the notion of purely individual assessors.

⁹ <http://www.labour.gov.za> [10 June 2009].

It's not over 'til it's over: Version 2.1 or 3.0?

However, just when it looked as if the lengthy period of no resolution had ended, things have changed again. A new President was sworn into office in May 2009, and he announced a new Cabinet, with substantial changes for education and training. Instead of a single Minister of education, there is now a Minister of Basic Education, and a Minister of Higher Education and Training. Skills development has been moved from the Ministry of Labour to the Minister of Higher Education and Training. The entire proposed QCTO is now no longer within the Department of Labour (requiring still more legislative changes). Whether this means substantial changes to version 2.0 of the NQF remains to be seen.

A major point of contention has been that the proposed occupational framework¹⁰ will cover all ten levels on the NQF. How this will relate to the Higher Education Qualifications Framework (HEQF), and what an occupational doctorate means in practice, has yet to be seen. Until now, higher education has resisted this. The new structural configuration may provide opportunities to address this problem.

Another point of contention has been the separation of vocational and occupational education: what do the terms really mean, can these two things be separated, and how will it work in practice? Given the intractable debates between the two Ministries, it could be suggested that this separation has had more to do with giving each Ministry a patch in which to play, than based on meaningful analysis of what occupational education is, and how it should work. The Department of Labour was clear that the occupational framework excludes qualifications which lead to professional designations and are subject to specific legislation, and excludes qualifications which include work-integrated learning and are registered on one of the other frameworks¹¹. Concern has been expressed that the new NQF, consisting of three linked NQFs (none of which operate according to the original design), represents a step backward for the vision of integration and parity of esteem, as the gulf between occupational and other qualifications seemed larger than ever. It is to be hoped that the movement of the trades and occupational framework to the new Ministry of Higher Education and Training can bring them together.

SAQA has issued a statement that all qualifications are deemed formally registered until 2012. It is envisaged that in this period, the new structures and systems to oversee qualifications will start to replace the qualifications currently on the framework.

¹⁰ <http://www.labour.gov.za> [10 June 2009].

¹¹ <http://www.labour.gov.za> [11 June 2009].

What the South Africa NQF looks like now (June 2009)

Anyone who looks at the framework on the SAQA website will simply see a list of many thousands of registered qualifications, and 10,258 unit standards.¹² This is a mixture of provider qualifications and the new unit-standards based qualifications which were developed through SAQA's structures. Provider qualifications make up 7,092 of these qualifications, and there are 787 qualifications developed through SAQA's standards generating processes (Isaacs 2009).

The distinction between the two types of qualifications on the NQF is important. The one was those developed by institutions, and the other, those developed through the structures of SAQA. This distinction is not immediately apparent. This distinction is not immediately apparent, and because this difference is not made explicit, it also creates the impression that the NQF is something different to what it is. In this sense, though, the NQF as captured on the SAQA website is a register of qualifications. It is important to emphasize that publicly available information creates the impression that the NQF largely operates according to its original design, whereas clearly, this is not the case. For whatever reasons - and some suggestions are made below - the idea of structures created outside of educational institutions setting learning outcomes as the basis for curriculum development and assessment simply is not the reality in South Africa today.

In another sense, the NQF is the three linked frameworks. The higher education framework is a framework of qualification types. This is what qualifications frameworks seem to look like in many other countries - it gives nomenclature of the available qualifications in higher education, and shows how they relate to each other. The specific qualifications offered by specific institutions fit within these types of qualifications. Umalusi is developing a framework of the qualifications that it certifies. Each qualification is linked to a specific curriculum, and is assessed at least in part through an assessment which is external to the individual sites (schools and colleges) in which teaching and learning takes place. As has been discussed above, the trades and occupational framework has been proposed as a framework of occupational awards and skills awards linked to specific curricula and assessment requirements. It remains to be seen how the Ministry of Higher Education and Training takes this forward.

5. Impact and achievements

SAQA's impact analysis

SAQA is arguably one of the few organizations in the world that has attempted a full-scale impact assessment of the NQF for which it was responsible. This took the form of a large and ambitious project which initiated by SAQA in 2003, called the *NQF impact study*. It was developed as a long-term longitudinal study, with a series of cycles. The first cycle tried to establish

¹² <http://www.sqa.org.za> [4 June 2009].

criteria against which to measure the progress of the NQF. Seventeen indicators were established.

The second cycle tried to establish a baseline against which to measure progress. The 17 indicators were used to develop a survey questionnaire which was administered to a sample of stakeholders. Interviews and focus group meetings were held. An analysis of the qualifications and unit standards registered on the NQF was conducted, and a qualitative analysis of qualifications in three sectors was conducted by an external contractor. The findings claimed some successes, some mixed successes, and some areas with little evidence of impact. While Cycle Three was supposed to report in 2007, it was delayed, probably because of the changes which were being made to the NQF and because of the realization of problems with the design of the study.

Analyzing impact of any policy is difficult, and in the case of NQFs it seems to be extra difficult. Nonetheless, if a policy is to be advocated, instituted, and supported, it should be possible to provide some evidence about its usefulness, and the extent to which it is achieving or is likely to achieve its objectives. The SAQA impact study is a brave attempt at finding a methodology for achieving this, and it has some interesting findings. Nonetheless, it is widely regarded as rather problematic.

As Higgs and Keevy (2007) suggest, many people saw it as a propaganda exercise on behalf of SAQA. They also point out, as I do elsewhere (Allais 2007b) that a weakness of the study was that it did not question the design of the NQF, or its objectives. I have also pointed out that when interviewing people, the NQF was treated as a single entity - it did not separate the qualifications and unit standards designed through the systems and structures of SAQA from the qualifications of providers. More problematically, the interviews only asked people what they thought: whether or not they thought the NQF had had an impact in the areas mentioned. The findings, therefore, reflect more whether the sample of individuals interviewed thought it was a good idea, than whether it had actually had an impact on those areas. For example, it could be asked what is the value of finding that some stakeholders perceive that the relevance of qualifications has improved, when in fact the new qualifications taken up in such low numbers? Or, what does it mean that individuals interviewed feel that the NQF has had a positive effect on programmes, without an analysis of the programmes which were supposedly affected?

Various commentators (for example, Allais 2007b, Oberholzer 2005) note that the indicators were questionable. For example, one of the claimed successes was the number of qualifications that had been registered on the framework. But whether this was in fact really indicative of meaningful success in meeting the NQF objectives was not questioned. The methodology was also questioned, as it was primarily based on interviews with selected stakeholders. Thus, even a commentary published by SAQA refers to the impact study as “...in effect a sustained market inquiry into perceptions of the NQF and practices that have emerged around the NQF” (French 2009).

Achievements and non-achievements

What, then, can be said of the achievements and non-achievements of the South African NQF? French (2009) argues that even though the NQF has not been implemented according to the original design, and despite the many

problems which have beset it, it has shifted thinking about educational quality, curriculum design, and assessment. Of course a statement like this is extremely difficult to test, and it is also not clear that the consequences of this alleged shift are desirable. It is possible that the amount and quality of workplace training has increased, stimulated by the training levy, and by the NQF. Again, though, this has not been researched. SAQA argues that the existence of the NQF has increased awareness about quality assurance in higher education (Isaacs 2009).

The new NQF seems to have moved more to a model which describes what exists, as opposed to a model which tries to propose what should exist, except for trades and occupational qualifications. This may prove in the long term to be beneficial for South Africans and others.

It is to be hoped that the National Learner Records Database (NLRD) will become an important and useful database for the South African education system, although many teething problems have been experienced. Clearly, it is an area that SAQA sees as important for its future, and on which places much emphasis and energy.

However, even the most ardent supporters concede that the NQF has not achieved its ambitious and widely-supported objectives. Why this is the case is discussed very briefly in the following section. For now, the non-achievements (I do not refer to them as failures, as they do not necessarily reflect the failure of the NQF *per se*), are briefly considered.

Clearly, the Government Departments which were responsible for the NQF have not viewed the original model and its associated design features as viable, and, as has been seen above, have dramatically changed them. Of course, this could always be attributed to motives other than objective analysis of the strengths and weaknesses of policy (as is discussed further below). Clearly, the institutional arrangements failed, for a range of complicated reasons. One of the less-disputed ones is the complexity of the initial arrangements for quality assurance, and the large numbers of bodies.

Certainly levels of take-up of the new qualifications which were developed are still very low. In other words, the new qualifications that were created and registered on the framework did not result in a rush of educational programmes designed against them. So, for example, SAQA's 2007/2008 Annual Report says that there are 20 million qualification awards recorded on its NLRD, and only 27,425 of these are against new qualifications, submitted by 16 Sectoral Quality Assurance bodies, against 180 qualifications. This is out of a total of 787 new qualifications which have been registered on the NQF (Isaacs 2009). This means that many hundreds of qualifications which were developed have never been taught, assessed against, or awarded¹³. Whatever the reasons may be (and some are discussed in the next section), this can only be seen as a failure of the model. In addition, 130 qualifications which were registered on the NQF were allowed

¹³ In 2007, 172 unit-standards based qualifications and 2,211 unit standards had awards made against them to a total of 37,841 and 562,174 learners respectively (many of these will be to the same learners - the figures reflect the total number of awards, not the number of awards per learner). Data was supplied by the SAQA NLRD.

to lapse after their official term ended, signalling that no one was interested in offering them, and 2,013 unit standards similarly elapsed, although some were replaced.

The Senior Certificate, awarded to successful candidates at the end of senior secondary school, was widely criticized by universities and industry. Nonetheless, it continued to be the main qualification that young and old South Africans tried to achieve. Its replacement, the National Senior Certificate (NSC), seems set to continue this trend. This seems to imply that despite its problems which are undeniable, and despite the involvement of industry representatives in the creation of the new qualifications, South Africans have yet to be convinced that the proposed alternatives - enrolling in the new NQF-developed outcomes-based qualifications - are better.

SAQA's research in 2005 found that the NQF had had "...minimal positive impact or a mix of positive and negative impact" with regard to portability of qualifications (SAQA 2005, p. 45), and that the NQF had not facilitated credit accumulation and transfer (SAQA 2006). A more recent report produced for the OECD found that recognition of prior learning is not widely implemented, and has taken place only in small pockets (Blom, Parker, and Keevy 2007).

Education and skills levels in South Africa remain very low, and various new Government initiatives have been created to attempt to kick-start skills training. Certainly South Africa's education system remains extremely unequal, and very weak in areas - South African pupils continue to score very poorly on international assessment tests; way below pupils in poorer African countries. The numbers of learners enrolled in vocational programmes at secondary level remain low compared to those in the school system. Clearly, these problems cannot be put at the door of the NQF. It is now widely acknowledged that the objectives of the NQF were too ambitious and that at best, the NQF could be seen as a mechanism which could contribute to the achievement of its objectives (RSA Departments of Education and Labour 2002, 2003; Isaacs 2009). South Africa's educational problems are severe and deep-seated, and any attempts to improve them are going to take a generation to show real results. Defenders of the NQF would argue that it could have made much more of a contribution to them had it been given greater political support, power, and resources. I have argued the reverse - that the NQF has in fact obstructed the achievement of its objectives, primarily by its unwieldy qualifications and unit standards and the dysfunctional quality assurance models which emerged, but also because of how the NQF claimed to be able to solve or at least contribute to the solution of problems, and was positioned as a system that would drive an increase in provision and an improvement in quality, implicitly obviating the need for the State to build and develop educational institutions (Allais 2007a). The existence of the NQF also represents an opportunity-cost in terms, and resources, energy, and focus were diverted away from building institutions, particularly with regard to vocational and workplace education.

6. Analysis and lessons

How can the achievements and problems be understood and analyzed, and what lessons can be drawn from them?

Politics, power, and the economy

Qualifications clearly wield considerable power in any country, and Government attempts to use qualifications to drive educational reform reflect an attempt to shift the priorities of that power. Clearly, deeply embedded power relations are at stake, and may prove difficult to dislodge or even shift. In a discussion document for this project, Young and I (Young and Allais 2009) argue that this embeddedness of qualifications in historically-embedded power is not just an arbitrary product of history; there are real reasons why in most countries qualifications have not been separated from educational institutions where they are achieved (whether individual universities, or government education systems like school systems with centralized curricula) if they are to retain their value.

Official publications of SAQA, as well as presentations and publications by its staff, have argued that difficulties experienced in implementation are indicative primarily of power struggles between the two sponsoring departments and a lack of political and financial support from these departments (for example, Heyns and Needham 2004; SAQA 2004b; 2005a; Isaacs 2006; Keevy 2006; Isaacs 2004).

More specifically, lack of political support from the Department of Education has been attributed by some commentators as one of the causes of many of the difficulties experienced in the implementation of the South African NQF (e.g. French 2009). I have argued elsewhere (2007b) that during the period of policy reviews, the Department of Education made various decisions that could be seen as undermining or even unraveling the NQF, despite the lack of official pronouncement on its future. It could be argued that this started as early as 2001, when the General and Further Education and Training Act (No. 58 of 2001) was passed, creating Umalusi as a quality assurance body that did not have to be accredited by SAQA, and did not accredit learning programmes against NQF-registered qualifications. Certainly, this undermined SAQA's model for the NQF. This does not mean, though, that it represents malice or power politics on behalf of the Department of Education. I have argued, in research published by Umalusi, that the Department of Education insisted on a more viable and reliable approach to quality assurance in the institutions for which it had a direct responsibility (Allais et al. 2007).

A minor, but telling, anecdote illustrates the attitude of at least some people in the Department of Education towards SAQA: qualifications for school teachers which had been developed by SAQA's Standards Generating Body (SGB), ratified by the National Standards Body (NSB), and registered by SAQA, were not approved by the Department of Education for programme funding in universities that wanted to offer them, because the qualifications were seen to differ from official departmental policy (Allais 2005).

Some see the problems as a consequence of the over-bureaucratization of the NQF by SAQA, as well as power struggles between the two departments (Jansen 2004; Keevy 2006). Lugg (2007) argues that the rupture within the NQF reflects

the different and contradictory constructions of the Departments of Education and Labour, and predicts that while the State remains thus conflicted, the practices of the NQF will as well. Mukora (2006) attributes the problems to the origins of the NQF in the dying apartheid State's education and industrial policies, notwithstanding its support from the trade unions. He argues that the post-Fordist model on which it was premised is not applicable to the South African economy.

Transparency

Various researchers have pointed out the problems of over specification and over elaboration that result from attempts to specify learning outcomes separately from educational institutions and curricula (Wolf 1995; Hall and Woodhouse 1999). This is because of the assumption that learning outcomes can be transparent - and therefore, that they can set a clear standard, which people will design curricula from, teach from, and assesses to, in a reasonably similar manner. This assumption may hold true when there are very strong educational institutions with skilled professionals staffing them, who have strong networks and relationships with each other and with industry, but in such cases the outcomes will be very general and quality will be insured in other words through professional judgement (there is still another problem, which I will address below). In other words, the standards *per se* are not transparent, but they specify enough that they can be interpreted within specific communities or professional groups. As Guthrie points out,

... the assumption that human capabilities can be unequivocally described and accurately communicated by means of language is unfounded. So, at best, written competency standards are rough and ready, though useful, guides, and we should be wary of assuming that actual realities of what competence is are reflected in the words used to describe them. Therefore it is not the words that are important but what they *mean*, and the extent to which what they mean is widely *understood*. This intangible nature of competence can present particular challenges – one of the most significant of which is its assessment. This is because there is a tendency to concentrate more on the tangible and the overt and less on the underlying (but possibly more critical) attributes of competence (Harris et al. 1995). (Guthrie 2009)

In the absence of standards being widely understood within the community of professionals, and trusted by the broader community - in other words, in the absence of teachers and assessors already having a good sense of what the standard is - outcome statements do not help, because they are open to very different interpretations. In order to attempt to contain these differences, outcome developers make them more and more specific - but in the process, they get narrower and narrower, and also, longer and longer, and consequently more difficult for curriculum designers, teachers, and assessors, to work with. And, at the same time, they never become transparent. I have demonstrated (Allais 2007b) the extreme form which this took in the South African NQF, down to the much-quoted learning outcome on how to wash your hands. Many of the unit standards registered on the South African NQF are extremely narrow, and nearly all of them are lengthy. This can be seen as one explanation of the low take-up of the NQF-designed qualifications - the sheer practical difficulty of working with such a system.

This critique is not accepted by all. French (2009) argues, for example, that while my research demonstrates that many unit standards are absurd, it ignores the good ones which have been developed. My argument, on the other hand, is

that the design is inherent to unit standards. But whether or not some unit standards are well designed, or are used in specific contexts, it is certainly the case in South Africa that the changes to the NQF have all moved away from the idea of outcomes specified outside of curricula and educational institutions. But even in countries where there are strong institutions and groupings of professionals, and where there are understandings of what the competency-standards or outcomes *mean*, critiques have been made of standards-based models. For example, Australian training packages, widely seen as an example of a successful competency-based training system, have been criticized for being too detailed and unwieldy (Guthrie 2009).

Some researchers have gone further, and argue that a narrow outcomes-based or competency-based approach undermines the knowledge base of educational programmes. Attempting to use this type of approach in general education leads to knowledge being fragmented or undermined, as disciplines and knowledge areas cannot be captured in outcome statements, and cannot be read off them (Allais 2007b; Taylor 2000; Muller 2004). Others have shown how craft knowledge can be similarly undermined by being fragmented into learning outcomes (Gamble 2002, 2004), and that a narrow outcomes or competency-based approach can lead to workers getting narrow and limiting education (Gamble 2005, Wheelahan 2008a).

Clearly, any educational programme contains a notion of learning outcomes, and a notion of competence is key to many educational programmes, particularly vocational and professional qualifications, as well as workplace training. However, it may be that using a notion of competence or learning outcomes in a more iterative way in curriculum development, instead of assuming that competences can be specified on their own, is more useful. This would imply relationships with industry at the level of curriculum development, as well as with educational institutions, instead of focusing on industry involvement through standards setting.

Quality assurance

As was discussed above, there has been agreement that the quality assurance model implied by the NQF is incredibly complex and costly. Umalusi's research has demonstrated serious problems with the quality assurance model that was adopted under the NQF (Allais et al. 2007), showing that the problem was not just that there were too many quality assurance bodies, and that their relationships with each other were not clear enough. It was also that a model of decentralized, institution-based assessment needs to rest on very strong institutions and a culture within which schools and not just elite schools are widely recognized as being serious about standards. For universities, this may prove to be viable in South Africa, if it is accompanied by considerable support and development to the weaker universities which were systematically underfunded by the apartheid State. It may well be that in other countries with better developed and more equal education systems, it is also possible at lower levels of the education system. The original model of the NQF assumed that all assessment could be designed and conducted at each individual site, even for schools and colleges. But South African institutions are of wildly divergent standards, and Umalusi's very small survey of assessment practices proved them to be dramatically divergent. In other words, the outcome statements, notwithstanding all their detailed specifications, were not sufficient to 'hold the standard', to ensure that all assessment was at the same or a similar level.

To solve or tackle the problem of low quality through a system of quality assurance would have required an army of moderators, with extensive subject expertise in the appropriate fields (the very thing which is missing in South Africa), as well as expertise in assessment, and thousands of similarly equipped verifiers to check up on the work of each moderator. But clearly, no country wants to spend more on quality assurance than it spends on provision. So South Africa seems to have attempted to tackle this problem differently - by greater centralized curriculum prescription, and centralized assessments which are external to the individual sites of teaching and learning.

While registration and accreditation processes are important, they proved costly, time consuming, and ultimately ineffective, in the absence of more traditional quality measures such as prescribed curricula and centrally-set assessments, outside of the university system.

A final speculation

The NQF was a creature of its time - the idea of it was picked up as a solution to many complex educational problems, but perhaps it is trying to solve the wrong problems. In South Africa, it was trying to increase access to education and training by ensuring pathways between certificates, and that people who have gained skills in everyday life can get certificates for them. But South Africans cannot access educational institutions because they do not have money to pay fees; because workplaces do not want to offer training to their staff; because children head households where parents have died from AIDS-related diseases; because children do not have enough to eat; because there is no safe, efficient, and reasonably-priced public transport in South Africa; and many other reasons along these lines. When South Africans do gain access to education, in many instances they find schools which are ill-equipped, teachers who are poorly trained and motivated, many university lecturers who never publish research and so on (obviously with major exceptions, as discussed in the introductory session). When learners leave educational institutions, jobs are not readily available, except for a small minority of highly-skilled professionals.

Clearly, qualifications cannot solve these problems. Many of them are problems which the South African Government is trying to solve through a range of different complex interventions. But I would argue that until the daily realities of people's lives improve; until the quality of educational institutions improves; and until the economy starts to significantly create jobs (and obviously these things are linked to each other); putting energy and effort into a framework of qualifications does not seem to be an important priority. That a qualifications framework can play a significant role in solving these problems seems, from the South African experience, to be doubtful. It is to be hoped that the new institutional configuration will allow it to occupy a more realistic position within South African education policy.

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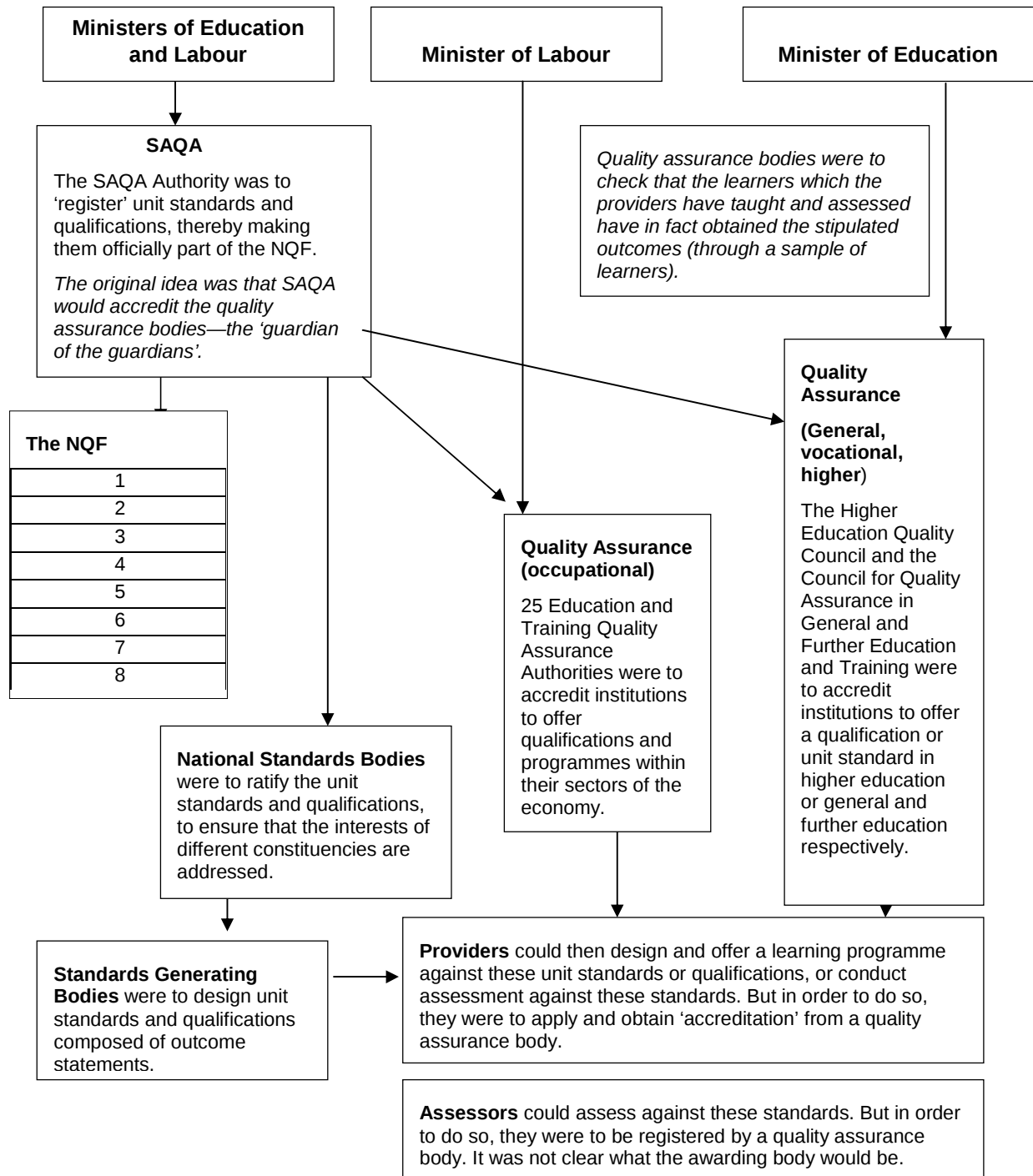
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Appendices

Appendix I: Levels and fields of the original South Africa NQF

Levels	Fields											
	1	2	3	4	5	6	7	8	9	10	11	12
8	Agriculture and Nature Conservation	Culture and Arts	Business, Commerce and Management Studies	Communication Studies and Language	Education, Training and Development	Manufacturing, Engineering and Technology	Human and Social Studies	Law, Military Science and Security	Health Science and Social Services	Physical, Mathematical, Computer and Life Sciences	Services	Physical Planning and Construction
7												
6												
5												
4												
3												
2												
1												

Appendix 2: Original structures and processes designed for standards setting, quality assurance, and provision



Appendix 3: Qualifications and Unit Standards developed through the South African NQF¹⁴

Examples of new qualifications, levels 2 to 5

Examples of level 2 qualifications

National Certificate: Retail Shop Floor Practices
Certificate: Reception Operations and Services
National Certificate in Steel Tube and Pipe Manufacturing (Seamless Hot-Finished or Welded or Cold-Formed)
National Certificate: Air-conditioning, Refrigeration and Ventilation (also at level 3)
National Certificate: Bread and Flour Confectionary Baking
National Certificate: Contact Centre Support
National Certificate: Macadamia production and de-husking
National Certificate: Victim Empowerment and Support

Examples of level 3 qualifications

National Certificate in Quality Checking of Tyres and Tyre Components
National Certificate: Beauty Technology
National Certificate: Cigarette Filter Rod Production
National Certificate: Construction Painting
National Certificate: Fast Food Services
National Certificate: Fast Food Services
National Certificate: Food and Beverage Processing: Oil and Fat Based Product Processing
National Certificate: Jewellery Manufacture in a Mass Production Environment
National Certificate: Seed Processing and Packaging

Examples of level 4 qualifications

National Certificate: Community-Based Language Practice
Further Education and Training Certificate: Manufacturing and Assembly Operations Supervision
Further Education and Training Certificate: Craft Enterprise
National Certificate: Food and Beverage Manufacturing Technology: Spray Dried Food Product Technologist
Further Education and Training Certificate: Real Estate
Further Education and Training Certificate: Pipeline Operations
Further Education and Training Certificate: Victim Empowerment Co-ordination
Further Education and Training Certificate: Community Facilitation in Society and Environment Interactions

Examples of level 5 qualifications

National Certificate: Resolving of Crime
National Diploma: Animal Production
National Certificate: Emergency Services Operations
National Certificate: Maintenance of High-speed Production Processes (Fast-moving Consumer Goods)
National Diploma: Footwear Technology
National Certificate: Information Technology: Systems Support

¹⁴ <http://www.sqa.org.za> [11 Oct. 2009].

Examples of level 1 unit standards

Sweep floors (four credits)

Services: Personal Care

Apply basic fire fighting techniques (three credits)

Services: Transport, Operations and Logistics

Collect a representative groundnut sample (two credits)

Agriculture and Nature Conservation: Secondary Agriculture

Recognize emergency on the farm (seven credits)

Agriculture and Nature Conservation: Primary Agriculture

Show, explain, discuss and analyse the relationship between society and natural environment (four credits)

Human and Social Studies: People/Human-Centred Development

Assist a frail care patient to relieve him/herself using a bedpan (two credits)

Services: Cleaning, Domestic, Hiring, Property and Rescue Services

Apply accurate information about HIV & AIDS to everyday life (two credits)

Health Sciences and Social Sciences: Promotive Health and Development Services

Examples of level 2 unit standards

Collect bulk milk from the farm by means of a milk tanker (eight credits)

Manufacturing, Engineering and Technology: Manufacturing and Assembly

Drive a tractor (ten credits)

Agriculture and Nature Conservation: Primary Agriculture

Switch a high voltage inline switch on and off (two credits)

Manufacturing, Engineering and Technology: Fabrication and Extraction

Demonstrate an understanding of climate and weather in the context of renewable energy (six credits)

Physical Planning and Construction: Electrical Infrastructure and Construction

Apply the basic skills of customer service (two credits)

Business, Commerce and Management Studies: Finance, Economics and Accounting

Pack customer purchases at point of sales (three credits)

Services: Wholesale and Retail

Prepare, cook and assemble hot filled baked potatoes (one credit)

Services: Hospitality, Tourism, Travel, Gaming and Leisure

Clean carpets using the dry powder method (six credits)

Services: Cleaning, Domestic, Hiring, Property and Rescue Services

Examples of level 3 unit standards

Cover rich fruit cake for final decoration (three credits)

Manufacturing, Engineering and Technology: Manufacturing and Assembly

Foundry: Manufacture three dimensional regular shaped wooden pattern equipment (40 credits)

Manufacturing, Engineering and Technology: Engineering and Related Design

Describe ideologies in community contexts (ten credits)

Education, Training and Development: Adult Learning

Demonstrate a basic understanding of the causes of falls of ground (two credits)

Manufacturing, Engineering and Technology: Fabrication and Extraction

Demonstrate basic knowledge of computers (six credits)

Physical, Mathematical, Computer and Life Sciences: Information Technology and Computer Sciences

Respond to hazardous conditions or emergencies (ten credits)

Manufacturing, Engineering and Technology: Engineering and Related Design

Handle and use a shotgun (two credits)

Law, Military Science and Security: Safety and Society

Examples of level 4 unit standards

- Manufacture a green Mozzarella type cheese from coagulated milk (30 credits)**
Manufacturing, Engineering and Technology: Manufacturing and Assembly
- Install an ATM (Automated Teller Machine) (five credits)**
Business, Commerce and Management Studies: Finance, Economics and Accounting
- Manage venomous animals (eight credits)**
Agriculture and Nature Conservation: Nature Conservation
- Demonstrate a fundamental understanding of history, geography, politics and economics as relevant to the South African intelligence context (four credits)**
Law, Military Science and Security: Sovereignty of the State
- Instil in myself a personal marketing culture (four credits)**
Business, Commerce and Management Studies: Marketing
- Commission Very Complex Customer Equipment (ten credits)**
Manufacturing, Engineering and Technology: Manufacturing and Assembly
- Use knowledge of self to make a life decision in the creative world (five credits)**
Culture and Arts: Visual Arts
- Apply biblical models of transformation to perceived needs of the community (four credits)**
Human and Social Sciences: Religious and Ethical Foundations of Society

Examples of level 5 unit standards

- Capture quality sound with a boom microphone (five credits)**
Communication Studies and Language: Communication Studies
- Prepare, cook and serve food in the restaurant (six credits)**
Services: Hospitality, Tourism, Travel, Gaming and Leisure
- Apply fundamental concepts, theories and related values of a selected subject area (15 credits)**
Law, Military Science and Security: Justice in Society
- Demonstrate knowledge of Eastern Africa, Indian Ocean Islands and the maldives [sic] as travel destinations (eight credits)**
Services: Hospitality, Tourism, Travel, Gaming and Leisure
- Establish order in the arts and culture learning environment (five credits)**
Culture and Arts: Performing Arts
- Apply the Arbitration Act in dispute resolution (four credits)**
Business, Commerce and Management Studies: Human Resources

Examples of level 6 unit standards

- Mature and store green beer (10 credits)**
Manufacturing, Engineering and Technology: Manufacturing and Assembly
- Design a computer application for a single-user personal computer for programming with a 4GL (12 credits)**
Physical, Mathematical, Computer and Life Sciences: Information Technology and Computer Sciences
- Study and live holistic Christian Spirituality (12 credits)**
Human and Social Studies, Religious and Ethical Foundations of Society
- Explain and apply the principles of conceptual thinking (10 credits)**
Business, Commerce and Management Studies: Marketing
- Arrange dance productions (15 credits)**
Culture and Arts: Performing Arts

Examples of level 7 unit standards

- Analyse global economic structures (10 credits)**
Law, Military Science and Security: Sovereignty of the State
- Draft amendments to banking legislation (37 credits)**
Business, Commerce and Management Studies: Finance, Economics, and Accounting
- Assess marketability of scripts (10 credits)**
Communication Studies and Language: Communication Studies

Apply the practical aspects of trial advocacy (19 credits)

Law, Military Science and Security: Justice in Society

Examples of unit standards worth only 1 credit each

Maintain basic water quality

Level one, Agriculture and Nature Conservation: Primary Agriculture

Operate a mechanical core drill

Level two, Physical Planning and Construction: Building Construction

Maintain effective working relationships with other members of staff

Level three, Business, Commerce and Management Studies: Procurement

Support and guide the learner

Level four, Services: Hospitality, Tourism, Travel, Gaming and Leisure

Describe the Regulatory Nuclear Safety requirements as applied in nuclear power generating plant

Level five, Manufacturing, Engineering and Technology: Manufacturing and Assembly

Apply relevant Gender Law

Level seven, Law, Military Science and Security: Justice in Society

Examples of unit standards worth large amounts of credit

Administer payment of the proceeds of a mortgage loan in a banking environment: (level four, 59 credits)

Business, Commerce and Management Studies: Finance, Economics and Accounting

Crosswork fancy shape diamond gemstones: (level 4, 87 credits)

Manufacturing, Engineering and Technology: Manufacturing and Assembly

Track animals and identify spoor using difficult spoor (level 6, 60 credits)

Services: Hospitality, Tourism, Travel, Gaming and Leisure

Enhance and develop techniques to cut patterns and designs for footwear ranges (level five, 110 credits)

Manufacturing, Engineering and Technology: Manufacturing and Assembly

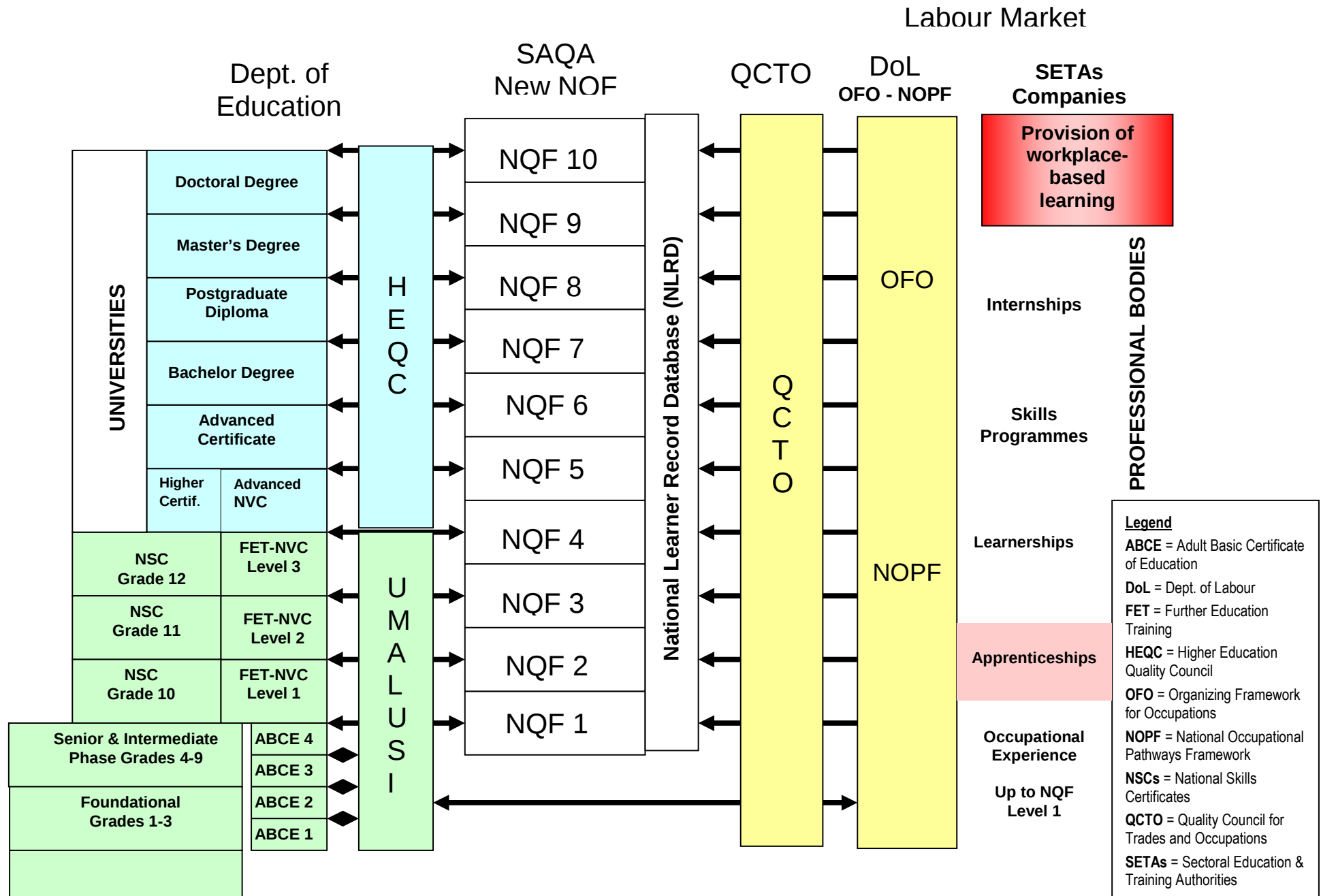
Produce and present an estimative intelligence product (level 7, 60 credits)

Law, Military Science and Security: Sovereignty of the State

Plan and conduct a guided mountaineering experience (level 7, 60 credits)

Services: Hospitality, Tourism, Travel, Gaming and Leisure

Appendix 4: Proposed new arrangements for the South African NQF, adapted from Heitmann and Mummenthey (2009)



Skills and Employabilty Department

**For more information visit our site:
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