Response of HESA to the Green Paper for Post-School Education and Training

This paper presents the position of Higher Education South Africa (HESA) in response to the Green Paper for Post-School Education and Training[1] released by the Minister of Higher Education and Training for public comments on 12 January 2012. In anticipation of the release of the Green Paper, HESA commissioned an expert task team to develop its own perspective on possibilities for an expanded and improved post-school education and training system. The resulting paper was adopted in its final form by HESA in November 2011. The background to the present submission, therefore, is that HESA has already adopted a position in relation to the post-school education and training system (PSET) and its future development, but seeks to augment that position by responding to the specific recommendations, proposals and suggestions made in the Green Paper. The scope of the Green paper, for a start, is considerably wider than HESA's position paper on an expanded post-school education and training system, insofar as the latter addresses the university sub-sector only in terms of:

- Its position in the system as a whole;
- Its relation (present and future) to other parts of the system, and
- Its potential to deploy its own capacity and expertise to assist in the strengthening of other sub-sectors.

The November 2011 HESA position paper *does not* present a view on possibilities for the growth and development of the university sub-sector over the next two decades, its sense of its own priorities for the future, or opinions on matters such as changes to the basis of funding for either students or the universities. These matters are dealt with, by and large, in a separate, but related document entitled *Pathways to a Diverse and Effective South African Higher Education System – Strategic Framework 2010/2020* (attached).

Nevertheless, this submission emanates from a combination of a base paper developed by an expert and the 2011 position paper and was subsequently circulated to all public universities with a request to provide further comments. Further comments were received from the following institutions: University of Limpopo; University of Johannesburg; North-West University; University of Zululand; University of Venda; University of Cape Town; Rhodes University; University of the Witwatersrand and Stellenbosch University. While these comments have, as far as possible, been incorporated in this submission, the more substantial inputs are also submitted as stand-alone

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[1] Hereinafter referred to as 'the Green Paper'.

institutional comments, as many of these inputs are quite detailed and specific instead of being of an overarching nature, which may be very helpful in developing and finalising the White Paper following on the current process.

The purpose of *this* submission is therefore threefold: first, to comment on the vision for the post-school system education and training presented in the Green paper; secondly, to identify areas of agreement and difference between HESA's adopted position on expansion of post-school education and training (PSET) in relation to that advocated in the Green Paper; and thirdly, to respond to the particular suggestions made about the university sector and the system as a whole.

In general, though, while HESA agrees with the broad strategic thrust of the Green Paper, it needs to caution against its apparently broad and expansive 'wish list', without a sense of prioritisation and sequencing that will enable the vision presented in the Green Paper, to be realised.

1. Vision of the Green Paper

The express purpose of the Green paper is to provide 'a vision for the post-school system in South Africa'. In this vision, growth paths for all post-school educational institutions will be linked to government's development agenda as expressed in key policy and strategy documents: the Minister of Economic Development's New Growth Path (2010), the Department of Trade and Industry's (DTI) Industrial Policy Action Plan 2 (IPAP 2) (2011), the Minister of Higher Education and Training's Human Resource Development Strategy for South Africa 2010-2030 (2009), and the Department of Science and Technology's (DST) Ten-Year Innovation Plan (2007) (Green Paper 2012, x).

This theme runs through many parts of the document. References are made in some sections to targets that are derived from the policy documents identified above, such as the need to increase doctoral outputs five-fold and, in Section 10: *Articulation, Collaboration and Co-ordination*, a list is given of those areas of the economy where there will be a drive to increase jobs and where skills are required. Aside from this linking of labour market needs to targets for education outputs, the rationale for linking PSET to development is largely assumed. Perhaps this is legitimate in the context of wide media coverage of South Africa's skills shortages and the impossible constraints these are placing on adequate growth coupled with our significant failure to educate and train the large numbers of young people who could potentially meet these needs.

However, one might have expected that critical components and policy thrusts contained in the documents referred to above, not to mention the National Development Plan, would be unpacked and analysed as part of the framing of a new vision for post-school education and training, and that the different but equally important roles of the various sub-sectors in the system would be spelt out in the context of a clearly articulated relationship between post-school education and training, and social and economic development. This is, in fact, implicit in much of the Green Paper but nowhere is it clearly expressed, even though it lies at the heart of any understanding of how an expanded and differentiated PSET system should function. Furthermore, there is no mention of the White Paper on Higher Education and the extent to which the higher education sector has responded to these imperatives thus far.

The policy documents themselves have, of course, somewhat different emphases. Whether these differences are so great as to constitute different views of appropriate economic growth paths is not a matter for discussion here, but a number of key pointers emerge. The first of these are the somewhat contradictory perspectives they articulate in terms of identifying the real obstacles to growth and development – see below:

> Is it a shortage of jobs for the many unemployed in the labour force, or is it that the unemployed do not have the skills needed to take up jobs that are available? The one is a problem of job creation and the other is problem of education and training. Or is it a combination of the two?

New Growth Path (NGP)

In this document, the primary position adopted is that of job creation. The priority in the New Growth Path is to reduce unemployment in the short term through concentration on a number of labour-absorbing activities: "the new growth path is founded on a restructuring of the South African economy to improve its performance in terms of labour absorption as well as the composition and rate of growth" (MED, 2010: 1). The majority of the areas identified below would require low to mid-level skills with a small proportion of high level skill input:

- Infrastructure
- The agricultural value chain
- The mining value chain
- The green economy
- Manufacturing sectors, which are included in IPAP2, and
- Tourism and certain high-level services. (MED, 2010: 10)

But even from this perspective, the following educational needs are asserted:

> *Improvements in education and skill levels are a fundamental prerequisite for achieving many of the goals in this growth path. General education must equip all South Africans to participate in our democracy and economy, and higher education must do more to meet the needs of broad-based development. The growth path also requires a radical review of the training system to address shortfalls in artisanal and technical skills. (MED, 2010: 19)*

While part of the unemployed labour force may already have the skills to take up jobs in these fields, the majority probably does not, and much of the training needed to prepare workers for jobs that may become available would have to be provided by the FET college sector and SETA-funded providers.

The longer-term strategy will be to "support knowledge- and capital-intensive sectors in order to remain competitive" (MED, 2010: 7).

Ten Year Innovation Plan (TYIP)

By contrast, the Director General of DST, Dr Phil Mjwara says unambiguously in his Foreword to the Ten Year Innovation Plan that its goal is to steer 'our resource-based economy towards a knowledge-based economy' (DST, 2007: x). The text goes on to say:

The key objective of this plan is to articulate a national path of innovation, building on the NSI [National System for Innovation], in support of the transformation to a knowledge-based economy. It describes a future in which South African innovations in science and technology are combating the negative effects of climate change in Africa; fighting crime; producing drugs to combat disease; developing sustainable energy solutions; introducing drought-tolerant, disease-resistant crops; devising "intelligent" materials and manufacturing processes; revolutionising our communications; and changing the work we do and the way we do it. (DST, 2007: 4)

A few pages later comes the following assertion:

This plan is based on the premise that the government's growth targets require a significant investment in innovation, balanced and targeted in accordance with the full range of national priorities. Ultimately, such investment will contribute to more rapid economic and social transformation. By committing to growing the base of scientists and engineers, both in general and in areas offering the most economic potential over the long term, South Africa is investing in human capital that will serve its needs well into the future. By targeting development and new global industries, the country can reduce its dependence on imported technology, and become more self-sufficient in such basic commodities as energy and food. (DST, 2007: 8)

This is not necessarily articulating a different growth path, but focussing on a different level of the economy and a different part of the education system that will feed into it. It usefully highlights the distinct orientations of different educational sub-sectors and the ways in which they can and do contribute differently to development.

> If planning in education is to be linked to planning for the economy, then it needs a sharper focus on the economy than we are given in the Green Paper as it currently stands and a much stronger linking of differentiation in the system to the broad needs of social and economic development.

Furthermore:

> ...in this regard, HESA is of the view that the conversation on differentiation needs to be expanded and clarified. On the one hand, for example, in respect of the university sector, there seem to be too many notions of differentiation, including differentiation according to research, qualification levels, qualification types, and a distinction between well-resourced and under-resourced institutions. On the other hand, the Green Paper provides too few conceptions of differentiation in

the college sector, only differentiating between well-managed and poorly-managed institutions. For the college sector to fulfil its promise, differentiation should also be along the lines of levels and single or multi-purpose focus.

Further, a simple dichotomy between a teaching focus and a research focus is not helpful. There are different types of research, appropriate to different contexts. Research at a university of technology, for example will be different from research undertaken at a traditional university, or at a college, for that matter.

Human Resource Development Strategy for South Africa 2010-2030 (HRDS SA)

The HRDS SA document takes many of the needs identified in the above policies and builds them into its general strategy for human resource development in South Africa for the next twenty years. It situates HRD at the centre of government's broad development objectives and provides empirical evidence for the positions it adopts. This is a tightly constructed document detailing commitments, strategies and actions which place education and training at the heart of the development agenda.

Post-school education and development

So what then is the relationship between post-school education and development? And does the Green Paper provide a clear articulation of this conceptual understanding? The intention here is not to reduce the role of education to simply meeting the needs of the economy in an instrumentalist fashion. An education system must do far more than this, and the Green Paper identifies the many and varied functions of educational institutions in society. There has, however, been a marked shift in global thinking about education, and about higher education in particular: it does not only educate and train members of society, deepen democracy and enrich lives culturally and ethically; it does not only prepare people to take up socially and economically useful positions; it does not only engage in research and produce new knowledge; it does not only engage with its communities; it is also a critical *driver or engine* of development. This is no longer a new idea although it has only recently been fully acknowledged, but even so, its significance is sometimes lost. Education systems are not just agents of human capital formation: when they are able to do that in combination with the production of new knowledge, they become agents of innovation and actively spur broad development in society (Pillay, 2010). The higher the levels of participation in post-school systems, the more (1) income levels rise, (2) income disparities decrease, and (3) social mobility improves. High level skills (especially PhDs) are needed to produce high volumes of new knowledge, which enable society to become more innovative and economically competitive[2]. The writers of the Green Paper promote a knowledge economy (DHET, 2012: 13) but then assert at the end of the document that the driver of the economy is a highly skilled labour force (DHET, 2012: 83).

This is *one* of the drivers of development, but in a knowledge economy, it is new knowledge and innovation that are critical drivers. 'Skills' should therefore not be narrowly understood as skills only for occupations (jobs), but should encompass a much wider conception of low, intermediate and high level skills and knowledge.

This conceptual frame is not consistently or coherently presented in the Green Paper although it is

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[2] This also the perspective adopted in the report of National Planning Commission (2011). See page 262.

vitally important because such a frame allows for an elaboration of the characteristics of different sub-sectors and for a rationale to be developed for the kind of expectations developed for each of them. In other words, this conceptual frame has enormous significance for differentiation in an expanded post-school system. Differentiation is not only important for the development agenda, it is also important for promoting social and economic equality.

Here Pillay is informative: "... differentiation within a high participation system reduces inequality by providing large numbers from a cross spectrum of students with wide-ranging capabilities to prepare for a range of skills and jobs" (Pillay, 2010: 27). In his analysis of the system in Finland, closely linked to national development policy, he gives the example of the following forms of differentiation:

> ... the universities are charged with academic research and education based on it, and the polytechnics with higher education geared to the world of work and research which serves education, the world of work and regional development. (Pillay, 2010: 21)

Together they form the basis for a regionally comprehensive innovation system seen as critical for growth and development.

The exact model for South Africa is part of what needs to be worked out and presented in the Green Paper, but it is absent. The policy documents identify certain areas of potential growth in the economy, but the Green Paper needs to translate these into a rational basis for requiring expansion of the system in the proportions proposed. What are labour market needs in different fields for low, intermediate and high level skills? Without this understanding and analysis, a whole range of unanswered questions arise: why is the magic number of four million proposed for the FET sector and why should universities increase their output of doctorates fivefold? Why should there be a concentration of enrolments in particular areas? What concerns determine how close or distant the relationship is with industry and business, and what considerations shape the design and content of curricula in different sectors and in different types of programme?

In this respect, the HRDS SA document provides a clear picture and logically structured argument from which the Green Paper might benefit. In the Green Paper, the size, shape and character of each sub-sector of the PSET system, and the characteristic programmes associated with each, need to be more sharply delineated and linked to development paths.

The conceptual muddle highlighted above is evident in the incongruent use of terminology, for example the term 'post-school', it seems, has been coined to put a loose conceptual blanket over the functions and responsibilities that the new Department of Higher Education & Training (DHET) has acquired. It is defined on page 1 as referring to 'all education for people who have left school as well as for those adults who have never been to school but require educational opportunities'. Some problems should be immediately evident. Logically 'post-school' should designate a distinction between all categories of educational offering before and after Grade 10. The definition however already includes a category of offering for adults that is strictly pre-Grade 10, and the GP

proposes a new category of institution, a Community Education & Training Centre (CETC), that falls into the former category.

> It would seem that the Ministry is conflating a conceptual category with the less tidy provisions of the new department's mandate, which is a real challenge to coherence of the new 'system', because the needs of, say, the adult learners on the one hand, and doctoral students on the other, are in no way commensurable. A narrower/tidier definition of 'post-school' will go a long way in clarifying the work ahead.

The problems don't stop there, however. One might have thought that 'post-school' supersedes earlier categories like 'higher' or 'tertiary education', but these slip back into the text, as on page 78, where the Green Paper remarks that 'there should be no problem with Umalusi continuing to quality assure qualifications that are part of the post-school system, but are not part of the higher education system'. There are at least two 'systems' here, then, begging the question as to their relation. The concept of 'post-school' must be tightened up before it can become a coherent category for policy.

Further, it does seem rather surprising that the writers of the Green Paper did not draw on some of the many successful international systems for the development of a model suited to South Africa's conditions and challenges. There are examples in both developed and developing countries of highly effective systems that could probably provide us with invaluable models, experiences and lessons, not to mention some idea of the costs and investments necessary to make such systems work well.

2. Green Paper vision of the shape and size of the post-school system

The Green Paper's vision for the PSET system is an inversion from its present shape to a pyramid consisting of a greatly expanded college sector (4 million enrolments by 2030) with a more moderately enlarged university sector (1½ million by 2030). This would raise the participation rate in the university sector from its current level of 16% to 23% with 60% participation in the college sector. FET programmes would be offered in every district in the country with free education offered to poor students up to and including undergraduate study. A new institutional form, the Community Education and Training Centre (CETC) is proposed to 'address the needs of out-of-school youth and adults.' Mobility and progression of students in all sectors would be promoted and access to formal programmes encouraged through recognition of prior learning (RPL). The levy-grant institutions (SETAs) will be encouraged to direct more of their funding to colleges and universities offering formal, whole occupational programmes and less to providers of one year and unit standard-based qualifications that 'do not qualify them to do anything' (DHET, 2012: 16).

An Institute for Vocational and Continuing Education and Training is proposed to develop curricula for colleges, be a centre of excellence for research in the FET sector, conduct research in vocational teaching and learning, develop materials, provide management training, and a host of other things (DHET, 2012: 34-35).

3. Diagnosis of the current system

In the Green Paper, the following analysis of the inadequacies of the current system is presented. The post-school system suffers from inadequate quality, quantity and diversity of provision. The huge number of young people out of school and not in education, employment or training revealed in the FETI/CHET study of 2009 is mentioned in this context. Yet another vulnerable group which seems to have been overlooked is the group of university drop-outs, which swells the number of youth without any viable alternatives.

The system as a whole is described as lacking internal coherence, and there is little external coherence between the system and the labour market. Levels of research and innovation are inadequate and the regulatory system is seen as too complex. SETA quality assurance models in particular have been absurdly complex. The focus on unit standards in the provision of short programmes is judged to be unhelpful and limiting and many one-year programmes supported by SETAs do not qualify learners to do anything. The number of PhDs produced is far too low for SA's needs and in SET fields these should be increased five-fold.

Much of the current diversity in the system is interpreted as 'inequity' that has its roots in the apartheid past and resource shortages are identified as a central reason for historically black universities not fulfilling their primary functions adequately.

HESA would agree with most, though not all, of the elements of this analysis.

4. Sector by sector analysis and proposals

The following synopses are necessarily highly abbreviated but are included to remind readers of key features of Green Paper proposals.

4.1 The college sector

The vision here is of a substantially expanded and diverse public sector with improved throughputs, which is complemented by private providers. The key institution will be the FET college. Colleges will provide vocational and occupational qualifications including those for artisans. The two types offered will be the NCV and 'more focused occupational programmes' (p22). It is not clear at what level these will be pitched but the term post-secondary is not used. For learners who have a matric or its equivalent, a shortened version of the NCV is proposed or even an NCV at level 5, but this would still be *general* vocational qualification. Colleges with capacity might become the site of delivery of Higher Certificates 'under the auspices of universities'.

The low capacity of college lecturers, especially in subject expertise, is seen as the greatest challenge in this sector. Four strategies are suggested here:
- The fast-track development of large numbers of additional lecturers through a DHET based Teacher Development Chief Directorate (including importing experts from other countries);

- Longer-term training of college lecturers at universities;
- Partnerships with employers to keep lecturers in touch with workplaces;
- Better conditions of employment.

> Given the shortages of qualified teaching staff and material resources available for further education and training, the Department should undertake a comprehensive analysis of the feasibility of the various roles contemplated for the FET colleges and proposed Community Learning Centres, to help specify and specialise the role for these institutions in the medium term. A clear focus of this kind is needed to avoid over-burdening these emerging institutions with diverse responsibilities, which would lead to dilution of both purpose and resources. We believe that the primary role of the FET College sector at this stage is to produce intermediate technical and vocational skills.

Learner support is also identified as needing attention. Another four strategies are suggested:
- Developing foundational or bridging programmes into college programmes;
- Providing better general student support services;
- Progressive removal of fees for NCV programmes;
- Flexible delivery including distance, evening and weekend classes.

Existing Public Adult Learning Centres will progressively be changed into Community Education and Training Centres offering ABET, the NSC for Adults and some skills programmes, and an Institute for Vocational and Continuing Education and Training will be set up as mentioned above.

DHET proposes to establish a single information management system for all FET colleges, and to revise the funding approach to reflect a combination of core and enrolment-based funding and a combination of fiscus-derived and levy-grant funding.

> A gap in the above proposals is the introduction of a well-functioning career and academic counselling service. Such a service could do much to inform parents and learners about available learning opportunities and would significantly reduce the drop-out rate from universities.
> Also, the different needs of disparate groups mentioned in the Green Paper must be given attention – those who leave school prior to Grade 9 and prior to Grade 12 make up a significant number and will need specific interventions. Likewise, NSC graduates are not homogenous and each sub-group, including the university drop-outs, will require a specific focus.

4.2 Workplace-based learning
Only one page is given to this sector with a strong focus on using the public service as a training space. HESA supports this idea.

4.3 Universities
The vision for this sector is of moderate expansion (1 500 000 by 2030) to achieve a participation rate of 23% by 2030 which will in part be achieved by growth in the current institutions and in part by the establishment of:
- Two new universities in Mpumalanga and the Northern Cape respectively;

- A health care training facility at the Polokwane campus of the University of Limpopo;
- Expansion of MEDUNSA
- New sites of delivery for teacher education.

The sector is seen as differentiated and comprising "a continuum of institutions, ranging from specialised, research-intensive universities to largely undergraduate institutions, with various levels of research focus and various postgraduate niches at masters and/or doctoral level" (p40). All universities must offer high-quality undergraduate education.

Attention is drawn to the following issues:
- Support should be given to universities offering and mainstreaming four-year UG programmes;
- There should be a good interface between universities, FET and other colleges, SETAs, labour, employers and other stakeholders;
- Redress funding is proposed for poorly resourced institutions;
- Throughput rates must be improved;
- More women doctoral graduates are needed;
- M and D graduate output must be dramatically increased;
- Teaching must be strengthened through provision of resources and funding strategies;
- Student accommodation must be radically improved and expanded;
- The academic profession must be revitalised and renewed;
- The retirement age of academics should be extended upwards;
- Growth in student numbers must be accompanied by growth in academic staff numbers;
- Leadership and governance structures must be reviewed;
- Earmarked funding will be used for key infrastructure funding;
- The costing model of the funding grid should be interrogated as it is seen to bear little relation to the actual costs of teaching;
- More support should be provided at the foundational and entry level;
- The funding formula is currently programme based. There is a suggestion that its revision should include an institutional allocation (for infrastructure and maintenance);
- Government regulation of the fees charged by universities should be considered;
- NSFAS funding should be class- and not race-based;
- There should be free education for the poor up to and including undergraduate levels;
- More teachers should be trained to teach African languages; and
- Students should be encouraged to take at least one (African?) language course.

A national framework for the internationalisation of higher education is needed. By and large, HESA agrees with the above points, with some *provisos* discussed below.

5. HESA's Position Paper on an Expanded Post-School Education System and the Green Paper

5.1 Support

It should be said at the outset that HESA supports the overall strategic thrust of the Green Paper, which is to target the further education and training (FET) sector for major development and expansion.

> The most obvious point of agreement is recognition of the primary need for expansion of this sector to address the education and training needs of youth, and to meet the skills requirements to grow and develop the economy. A second point of agreement is the strategy of identifying and building on existing strength in the sector, and then expanding outwards.

In terms of governing principles, the Green Paper focuses on equity, access and affordability, while the HESA position paper identifies seven principles (HESA, 2011, p. 6 – *Position paper on an expanded post-school education system* – attached).:

- Equity of access, meaning 'the fundamental governing principle for a post-school education and training system must be to enable access to educational and training opportunities further to the level of basic education achieved by any school-leaver irrespective of race, gender, or social and economic circumstances'.
- Quality provision for success, meaning 'the quality of educational provision in terms of facilities, infrastructure, student support and staff capacity should establish the optimal conditions for student success'.
- Operation as a system, meaning 'the institutions offering post-school education and training should operate together as a system. This is a relational requirement – the parts cannot operate as a system unless they relate to one another in clearly defined ways that also indicate the respective roles and responsibilities of the constituent parts'.
- Public and private provision, meaning 'post-school educational opportunities should be offered by both public and private providers, with private colleges seen as complementing the public system and subject to the same quality and other regulatory mechanisms as are private higher education institutions'.
- Mobility and progression, meaning 'in order for post-school education to operate as a system, the mobility of students between and among institutions should be ensured through the development of articulation pathways and credit transfer mechanisms. Curricula for programmes should be constructed with a sufficient academic foundation to allow for further progression, not leading to dead-ends'.
- Geographical distribution, meaning 'institutions should be sufficiently and widely distributed geographically to allow for relatively easy access to some form of PSE in most parts of the country. Establishing landmark institutions in rural areas would be especially important, with staff trained for and attuned to the needs of rural communities'.
- Differentiation, meaning 'a post-school education system would need to be differentiated both vertically and horizontally. Vertical differentiation would be determined by accreditation to offer qualifications up to certain levels, while horizontal differentiation would enable the creation of a "differentiated-for-purpose" college sector with some single and some multi-purpose institutions'.

A number of these principles are embedded in other parts of the text of the Green Paper such as geographical accessibility, quality and differentiation. The HESA position paper and the Green Paper both emphasise the importance of the operation of post-school education as a *system* and the consequent necessity to coordinate governance, particularly in relation to quality assurance councils, if mobility and articulation among sectors are to be realised. Finally, there is agreement on the limited academic capacity of college lecturers and insufficient managerial capacity as the greatest obstacles to expansion of the sector.

5.2 Concerns

The Green Paper lacks clarity of scope and focus. It starts with vision, moves to diagnosis of current challenges and then deals with each sub-sector before discussing over-arching themes (disability, open and distance learning, regulation and co-ordination).

> With this approach many parts of the Green Paper combine vision, description, analysis, targets and possible courses of action in an unrelieved narrative flow that muddles categories and reduces clarity. Many readers in the university sector have found this disconcerting.
> The Green Paper would therefore benefit from greater conceptual and structural organisation including a clear articulation of the objectives to be achieved through a reconstruction of this system.

A related issue is the question of priorities. Almost every proposed strategy is seen as urgent or a priority, but it would be impossible to embark on every aspect of this daunting programme of action simultaneously.

> Proper prioritisation and sequencing of actions into short, medium and long-term interventions should be undertaken to bring clarity and coherence to the planning necessities and possibilities for DHET.

Other concerns are presented below by topic.

5.2.1 Post-secondary education

HESA is of the opinion that the Green Paper needs to take a much stronger position on the need for provision of post-secondary education opportunities outside the universities:

> *...there are hardly any institutions offering the kinds of qualifications in intermediate skills in technical and vocational fields that are sorely needed in the labour market. This is not the domain of the universities, and it is only very partially the domain and level of FET colleges in their present form (Cosser, 2010). In so far as this need is being met at all, it is by the colleges in the private sector.* (HESA, 2011: 3)

At least a third of the three million young people who are out of school, but not in education or employment or any form of training, have already passed the NSC or its equivalent and there are also the many youngsters who drop out of their university studies and then find that they have nowhere to go. In other words, there is a large pool of young people with a relatively high level of academic achievement for whom FET colleges in their present form and with their current offerings are not attractive.

> This is a potentially rich source from which to develop mid-level/intermediate skills that are desperately needed, but it receives scant attention in the Green Paper. The focus in the Green Paper is primarily on the NCV and N courses with far too little attention paid to *post-secondary* provision. The N courses are considered to be post-secondary, but these are limited to a restricted range of fields.

The options that are considered for post-secondary learners include a shortened version of the current NCV and the possibility of developing an NCV at level 5 (DHET, 2012: 23). A little later, the idea of colleges becoming "sites of delivery of Higher Certificates, under the auspices of universities" is mentioned, but this is not quite the rich array of offerings that would significantly alter the range of opportunities for post-secondary learners or tap into their potential.

> HESA proposes a strengthening and transformation of *selected* FET colleges to the point that they offer post-secondary educational opportunities and qualifications that lie somewhere between those offered at present by schools and FET colleges on the one hand, and universities on the other: in particular, something akin to the N qualifications (4-6) and NQF level 5 certificates in technical and vocational fields, including the social sciences and humanities.

Higher Certificates and Advanced Certificates that are directed to the workplace are offered by very few universities and these are ideal qualifications for properly strengthened colleges to offer in fields such as social work, tourism and hospitality, business and commerce and health. For example, the current professionalization of former diploma qualifications in the health sciences in universities will leave a significant gap in the provision of intermediate/ auxiliary health workers which could be usefully filled by this sub-sector. These are also qualifications on a clear progression pathway in higher education for those students who wish to progress further.

> Over time, this could mean creating another stratum of institutions devoted to post-secondary education and would be part of creating a properly differentiated system.

5.2.2 The role of universities in strengthening the college sector
HESA and the Green Paper are in accord that any expansion of the FET sector should build from current strengths. While the Green Paper acknowledges that the universities may play some role in strengthening colleges, they are primarily allocated the task of training college lecturers for the future. This is an important role which the universities will certainly take up and it should also be

understood that this is not a function to be performed by Faculties of Education alone but would require collaboration with faculties that have the kind of specialist knowledge needed for vocational education in, for example, engineering, ICT and business/commerce. But this is not all the sector has to offer.

> HESA's proposal is for the partnering of universities with neighbouring FET colleges in order to engage with them in a number of ways. One of these would be to strengthen the *existing* cohort of college lecturers in addition to training future college lecturers. In this respect, there are two issues that HESA would like to highlight. The first is that when the *academic core* of a sector is identified as weak, then it almost always means poor lecturer *specialist* knowledge. This will not be addressed by giving these lecturers additional *pedagogical* knowledge (although this might also be necessary) but by involving appropriate faculties that have the specialist knowledge required. The second is that when the *managerial core* is weak, then it indicates that the technical specialist knowledge lacking lies in some or all of the following areas: finance and accounting; data management; human resources management; law; student administration. Upgrading and training in these areas of competence and skills should also be the responsibility of the partner universities.

HESA suggests that three objectives may be realised through appropriately targeted partnerships between universities and selected FET colleges:

- The first is the building of academic capacity through the partnering of universities with FET colleges in capacity-building and mentoring roles. Here, comprehensive universities and universities of technology are likely to find the best 'fit' between their programmes and those offered in neighbouring colleges. The advantages to be gained from this kind of partnership lie in the potential to ensure that the college curriculum is better calibrated to progression on the one hand, and together with the broader regional role of the mentor institution, help ensure that the college offers a curriculum in tune with regional needs.
- The second is the building of leadership and managerial capacity, and in this respect, a wide pool of HE institutions could be drawn into partnerships to share their expertise in capacity-building and mentoring roles.
- The third is the development of articulation and progression pathways between institutions including tailored access or bridging courses to improve students' chances of success. (HESA, 2011: 10-11)

In the Green Paper, the strategy for general management capacity development and lecturer capacity development is to be developed by DHET (through the Teacher Development Chief Directorate), and mention is made of 'working with universities' among other bodies to support college lecturers. HESA encourages DHET to take advantage of what the universities can offer in this respect.

> In this regard, the DHET is invited to look at the substantial number of examples of existing partnerships and collaborations between Universities of Technology and FET Colleges (HESA, 2011, p. 11 – 12) in respect of articulation and access, upgrading of lecturer qualifications, curriculum analyses and development projects, which may form the beginnings of a good practice guide (attached).

5.2.3 Differentiation in the college sector

Differentiation in the college sector is mentioned in the Green Paper in terms of a distinction to be made between weaker and stronger institutions, with the councils of stronger institutions to be given greater functions and powers than others. But in terms of their roles, the Green Paper makes no distinction among colleges although we are told that they are varied and diverse.

> As noted earlier, this is quite radically different from the HESA position, which maintains that the sector should be differentiated vertically by qualification levels, and horizontally by purpose, with some single and some multi-purpose institutions (HESA, 2011, p. 6).

For HESA, this is critical in view of the importance it places on the development over time of a distinct post-secondary stratum of institutions that exists independently of the universities. Excluding this possibility while growing the FET and community based colleges by a factor of ten over the next twenty years would seem to place too great an emphasis on developing skills at a relatively low level which will not meet the need for intermediate skills in the economy. This would be a mistake. In fact, only by differentiating this sub-sector will it be possible to avoid the danger identified in the Green Paper "that the FET colleges should be all things to all possible learners, because there are so few alternatives" (DHET, 2012: 10).

6. The university sub-sector

In this section, the particular suggestions, views and positions advanced in the Green Paper in relation to the universities will be addressed.

6.1 Expansion of the university sub-sector

Although the target set for university (higher education) expansion may be seen as moderate compared to that set for the colleges, it is still a growth of more than 50% on current enrolment and has occasioned some anxiety. The new institutions proposed could only accommodate a fraction of the proposed expansion and it is not clear what the consequences will be for the existing universities. At present, approximately 80% of a university's budget goes into the staff bill and that means that any expansion will necessarily entail greatly increased recurrent costs, aside from any building and infrastructure costs necessitated by increased student numbers. One of the ways in which universities around the world deal with this is through the increasing casualisation of academic labour, but this is not only an exploitative option, it also does not serve student interests well in contexts where students require more, not less, attention.

> The new institutions proposed could only accommodate a fraction of the proposed expansion and it is not clear what the consequences will be for the existing universities.

6.2 Differentiation

The Green Paper clearly differentiates the college from the university sub-sector of the system, but in the view of HESA, it pays insufficient attention to differentiation within the college sector. In the

section on universities, however, one of the first topics to be taken up is that of differentiation. HESA supports this principle for the system as a whole, and for its own sub-sector as expressed in the statement that the "university sector should comprise a continuum of institutions, ranging from specialised, research-intensive universities to largely undergraduate institutions, with various levels of research focus and various postgraduate niches at masters and/or doctoral level" (DHET, 2012: 40). It also affirms that all universities should be in a position to offer high-quality undergraduate education. But aside from those two statements, this is in some ways one of the weakest sections of the document in terms of a muddling of categories and thin causal explanations.

i) The characteristics of historically black universities are not just the consequence of historical (apartheid-based) inequities: they may also be the consequences of far more recent practices and processes including the effects of the student market through the choices made possible by NSFAS funding; of weak governance and management in some instances; of cycles of mediocrity that are difficult to break, and of geographical location that brings with it a number of effects that are hard to overcome.

> Nevertheless, redress funds to some institutions to ensure high quality undergraduate programmes, including improved infrastructure for quality teaching and learning, as resolved at the 2010 Higher Education Summit, is supported. Furthermore, the number of renewal projects, re-engineering of the academic enterprise and development at the HBUs should be acknowledged and supported.
>
> However, it should not be a matter of *either/or*, but a matter of *both/and*. If we hope to achieve the optimal functioning of the higher education system, a forward-looking approach, which works towards desirable future outcomes, is also required. This must include a strong development programme for all institutions with clear performance targets that will be monitored.
>
> HESA urges a boldness of approach here, which could transform the system and lay the foundation for greater effectiveness and efficiency, particularly in the light of the ideal of much greater participation rates.

ii)   Desirable differentiation needs to be steered, but there is no discussion here of how the steering mechanisms available to DHET will be used. If one of the characteristics of the differentiated system is that "all universities must offer high quality undergraduate education", then this is where there should be discussion of the use of funding as a steering mechanism to strengthen and incentivise teaching (which would help to reduce the sometimes inappropriate chasing of research funds), of funding to support the development and implementation of four-year undergraduate programmes, and to support the provision of tutoring and mentoring systems. Agreement between DHET and individual institutions about their development trajectories is also mentioned but this is a weak formulation. If planning is to be used as a steering mechanism, then clear targets for performance in particular areas should be set.

iii)   The discussion of the categories of institutions is contradictory: a statement on page 39 asserts that the "differences within each category of institution … are often greater than

those between categories", but on the next page, the current categories are seen as 'useful' and so should remain. This makes little sense.

Despite the differentiation discussion, scant attention is given to the particularities of Universities of Technology (UoTs) and there is no common understanding of the nature and purpose of these institutions. Amongst other concerns, the apparent lack of understanding of the purposes and outcomes of vocationally-oriented qualifications offered at UoTs may lead to under-funding. The staffing, infrastructure and support needs of these programmes are different from general programmes, as are the curricula, and these differences need to be reflected in the funding formula.

The Green Paper uses differentiation in two different senses:

The first is differentiation in terms of *qualification type or mix*. This is the current official sense of differentiation enshrined in legislation, yielding three institutional types – universities, universities of technology, and comprehensive universities. A number of current empirical studies (by CREST, CHET and SANTED) show that these institutions do not manifest a distinctive type of qualification mix. Nevertheless the Green Paper says explicitly that 'The current categories are relatively new, are useful and should remain' (DHET, 2012: 40).

The second implied version of differentiation is by *qualification level* manifest in the statement that, "The university sector should comprise a continuum of institutions, ranging from specialised, research-intensive universities to largely undergraduate institutions..." (DHET, 2012: 40). It is unclear whether this new differentiation refers only to 'universities' proper or cuts across that distinction to refer to all higher education institutions, which would make more sense.

On the same page, the Green Paper proposes the need for "redress funding in the poorly resourced institutions". Here is a new distinction between institutions that are *'well' or 'poorly' resourced.*

Clearly, basing a funding and reward system on all three of these forms of distinction could lead to contradictions, incoherence, or perverse incentives, or all three. The DHET will have to provide much greater clarity on this issue before institutions will be willing to enter into agreements about their development trajectories.

6.2 Supporting students for success

HESA supports the principle that there should be no 'trade-off' between financial support for teaching and for research: that it would be a 'both/and' as implied in the statement that, "The university funding review will be required to make recommendations on the provision of resources and funding strategies to strengthen teaching in universities without in any way reducing the importance of research" (DHET, 2012: 42) rather than an 'either/or'. Although this is the ideal, one would still have to ask whether it is in fact feasible.

i) Elevating the importance of teaching

Good teaching is critical to improving success rates, and there are two issues to be raised here. One is that is that high lecturer to student ratios in some institutions and in some fields will always produce less than optimal teaching.

HESA recommends that a study should be undertaken to arrive at guidelines for staff to student ratios that is differentiated by disciplinary field and level of study. Staff-student ratios cannot be determined on an average – the ratios must be related to the nature of the discipline and its pedagogical requirements

The second issue is that for many academics, the rewards for research (material and professional) outweigh the virtues of spending significant time on teaching. If teaching is to be approached with the same regard as research and elevated to comparable status, then it should be rewarded and incentivised in similar fashion. This is also important in the context of differentiated programmes and institutions. Many programmes in universities in the vocational or career-focussed tracks, and even some professionally orientated programmes, do not have strong research orientations but are more concerned with professional recognition and engagement.

An appropriate system for supporting and rewarding teaching would recognise the different orientations of programmes and perhaps militate against inappropriate chasing after research funding.

ii) Four-year undergraduate degree programmes
There has been much discussion of this issue and little progress for a number of years, but the position advocated in the Green Paper is still not clear. The statement on page 40 that "Universities should be supported in offering and mainstreaming four-year undergraduate degree programmes where necessary" is ambiguous. Does the 'where necessary' apply to the *support* or to the *offering* of the programmes?

All universities would require support for this change, and there would be some dangers if four-year programmes were to be the norm in some institutions and not in others. Universities offering three-year programmes as the norm would have an unfair market advantage over others.

HESA does not at present have a clear position on the four-year undergraduate programme model and this requires further investigation of conceptual, practical and financial factors. Should the four-year programme be introduced, however, it should probably be the norm in all institutions, but in conjunction with flexible curricula that allow students to fast-track on the basis of high performance. Support for students, however, should not be restricted to foundation and entry level: good practice indicates that this has to be extended further into students' academic pathways to consolidate the basis for academic success.

iii) Student accommodation
There is strong evidence to suggest a high correlation between improved student performance and accommodation in good quality residences. The recent revelations of the squalid conditions

under which some students are living in university residences demand immediate remedial action.

iv) Language of instruction

A critical area of support for students that is not mentioned in the Green Paper is in the language of instruction. Students begin their studies with widely varying levels of proficiency in the language of instruction and this is often a major barrier to success.

> Every institution in the post-school sector should be given the means to provide additional language support to students who need it.

v) Academic and career counselling

A significant absence in the document is the matter of academic and career counselling. This needs to be provided throughout the system as our experience is that even students who qualify for university entrance are woefully ignorant when it comes to selecting their study programmes. Inappropriate programme choice is probably a factor that significantly contributes to high levels of dropout and academic failure.

> Prospective students at all levels need to be exposed to career counselling and development advice that will enable them to make appropriate and meaningful decisions regarding programme choices and the careers to which qualifications would lead.

6.3 Support for the academic profession

The proposal that conditions of employment should be improved for academic staff is welcomed by HESA. Private sector enticements that cannot be matched by universities result in the loss of many potential young academics and the modern demands of working in academia no longer make 'quality of life' an adequate compensation. There are a number of programmes and projects, mainly externally funded, that are designed to assist universities to grow the next generation of academics, but support from the state in strengthening these efforts will make a significant difference.

> HESA's work on a *Proposal for a National Programme to Develop the Next Generation of Academics for South African Higher Education* (HESA, 2011) may be a useful resource for conceptualising what is necessary to build a young cohort of academics (attached).

The difficulties of attracting people into the profession and retaining skilled academics also make a flexible approach to retirement of academics critical. In this respect HESA would encourage a bold and explicit proposal to enable such flexibility to include both those academics beyond retirement age and those productive academics who are contributing to the training and education of the new generation of academics, researchers and scholars, subject to the meeting of certain performance criteria. The fragility of this profession is not often acknowledged although it puts the entire knowledge base of the country at risk.

The problem is exacerbated by the remuneration of academics. If it were possible for institutions to align their salary scales closer to those offered by Government and the public sector, then it will be possible for highly qualified persons to move with relative ease between university and public sector employment.

6.4 Funding

HESA assumes that most of the proposals that are made in relation to funding will be addressed in the current funding review. The HESA Funding Project Team will make more specific proposals in this regard via the Funding Task Team of DHET. The suggestions made in the Green Paper imply a shift from the current programme-based allocation of funding to a combination of institutional (infrastructural) funding and programme-based funding and HESA assumes that institutions will be invited to comment on the implications of such a move. Some anxiety has been expressed that this will result in increased allocations of earmarked funding at the expense of general funding.

However, HESA strongly endorses the view that funding has not kept pace with the rising costs of provision of university education, nor with the number of students enrolled, and we are extremely concerned that the State contribution to funding has been reducing quite sharply for all institutions. This funding lag has contributed to an increase in student fees which the Green Paper acknowledges is essential to institutional survival. We therefore do not believe that it is possible to develop a framework for fee-setting in isolation from an overall review of the level of funding for higher education.

Three additional issues require further comment:

i) Funding of work integrated learning

No reference is made to funding of the currently non-funded work integrated learning (WIL) component of formal programmes, which is a serious omission. Inclusion of WIL is a critical component of many programmes and it is relatively resource intensive in terms of assisting students to find placements and monitoring their progress once placed. The difficulties in finding suitable placements combined with the lack of financial support for this activity is leading to the reduction or total exclusion of WIL in some programmes even where this is recognised as diminishing the value of the programme.

ii) The funding grid

There is also an expressed intention to interrogate the current levels of the funding grid. There may well be a need to update the actual costs of teaching in different fields, but making any sudden changes to the proportional weighting of those fields would have far-reaching consequences that should be approached with care.

iii) Student fees

Modern universities and the state constantly have to negotiate the tension between traditional autonomy exercised by the universities and high levels of accountability expected by both the state and the public. One would expect that the higher the level of an institution's dependence on state funding, the lower the level of its autonomy in terms of the independent choices it can

make, or strategic directions it can take. Universities are likely to see any attempt to limit their right to set their own fees as a constraint on their wider decision-making powers. Especially in the context of growth and expansion, setting limits on an institution's right to generate income from fees runs the risk of producing a lowering of quality. Growth combined with restrictions on fees will inevitably have this impact.

6.5 NSFAS

HESA supports the idea that the allocation of NSFAS funding for students should move to a needs assessment that is based on class, not on race. A statement on page 48 states that composition of the institutional allocation has now been changed 'to cover the full cost of study'. At the moment, students apply for NSFAS support and their eligibility is assessed before universities have any indication of the size of the allocation that will be made to them. In other words, they commit themselves to providing financial support to qualifying students who have been admitted only to find that the allocation falls significantly short of the amount needed to fully support these students. Well-resourced universities have been able to make up this shortfall from their own funds, but in other instances, the allocated amount is simply divided up among the students giving each a smaller slice of the cake. The shortfall has been increasing by a factor of more than two year-on-year and at this rate no university will be able to make this up on their own. We hope that the statement referred to above means that this situation has been addressed.

The Green Paper also makes frequent reference to 'free education' for students registering for the NCV, for example. This could create the impression that fees will be abolished. It needs to be made abundantly clear that this means full cost bursaries from NSFAS and not an end to fees.

6.6 Private higher education

The notion that public and private education providers should collaborate more closely is supported, but the Green paper is silent on the parameters for such collaboration. Policy guidelines in this respect are necessary. For example, there are now a number of high quality private providers in the higher education arena, some of whom have highly qualified staff with good research track records. Partnership with public universities should be encouraged to maximise the use of strong academics from the private providers in postgraduate supervisory roles and in collaborative research.

We urge the DHET to undertake a study on potential ways of strengthening the role of private higher education, drawing on information gleaned from the HEQC and comparative lessons from other countries.

7. Workplace-based learning

In the very brief section devoted to this issue much emphasis is placed on what the State, SETAs and the private sector should do in respect of workplace-based learning, but little is said about the role of the educational institutions and about universities in particular. Currently, academics acting as work integrated learning coordinators at many of the higher education institutions are responsible for much of the quality cycle attached to work placements: from preparation of the

students and industry for the placement, securing suitable approved workplace opportunities (industry liaison), monitoring and assessment and the feedback. In most instances, this is an added responsibility on an existing lecturing workload.

> The roles and responsibilities of the education institutions for the various forms of workplace experience should be expanded: it is a key aspect relating not only to the quality of the student's training and development, but also to throughput.

Faculty/departmental Work Integrated Learning (WIL) Coordinators are seen to be a key in the success of the WIL concept. The linkage with the workplace and workplace opportunities, with SETAs, private and public sector companies, government organisations and other work experience providers is important for the successful integration of formal instruction (classroom-based study) and the gaining of relevant workplace experience.

Aside from these general issues, there are specific points to which we would like to draw attention.

i) Terminology

The CHE documents for Institutional Audits and Programme Accreditation (2004) make reference to work-based learning and experiential learning, defining these as follows:

Work-based learning is a component of a learning programme that focuses on the application of theory in an authentic, work-based context. It addresses specific competences identified for the acquisition of a qualification which relate to the development of skills that will make the learner employable and will assist in developing his/her personal skills. Employer and professional bodies are involved in the assessment of experiential learning, together with academic staff.

Experiential learning is a term traditionally used within the former technikon sector for work-based learning.

The HEQF introduced the term 'work integrated learning' (WIL) (HEQF, 2007: pg 9) into a (then) DoE document for the first time. While no formal definition is provided for WIL, one may describe it as 'a period of required work that integrates with classroom study'. The HEQF makes further reference to various other related terms: simulated work experience (for Higher and Advanced Certificates and Diplomas) and a practicum or work-based component (for Bachelor's degrees).

The Green Paper uses several terms that relate to workplace experience and skilling, without providing any glossary/definition of such terms to ensure clarity of understanding by all parties. But to ensure attainment of national skills development goals as outlined in the National Skills Accord (2010), the National Skills Development Strategy III (2011) and the National Development Plan: Vision for 2030 (2011), such definitions are necessary. Terms included in the Green Paper relating to workplace training/learning/education: apprenticeships, learnerships, internships, work integrated learning, workplace-based training, workplace based learning, work experience, workplace experience, structured workplace experience, workshop-based practical learning, workplace learning and on the job training. These terms are relevant in various areas,

from general education through occupational and professional education and skills development. Clarity is necessary to eliminate confusion and provide the basis for common understanding, particularly for the SETA disbursement of grants and levies and to ensure that the necessary quality mechanisms are put in place.

The Green Paper specifically refers to the emphasis placed by DHET on workplace-based learning and work-integrated learning (p 36) without defining these terms or indicating what the substantive difference is between them, leaving these open to interpretation. This is important especially where universities include a formal work integrated learning component in qualifications, which then require placement into approved workplaces, monitoring of structured learning, and assessment.

ii) Internationalisation

In relation to internationalisation (6.11), work integrated learning placements for international students remain an issue, given the SA skills legislation, which makes funding from skills levies only available to South African citizens. This needs to be taken into consideration when SA develops its comprehensive policy on the internationalization of higher education as indicated in the Green Paper. Partnerships with international companies or agreements with SADC/international home countries will thus need to be established to ensure that students in work integrated learning programme are not disadvantaged.

iii) Partnerships with industry

Partnerships between educational institutions and industry are critical but this does not only apply to colleges and universities of technology. Comprehensive and traditional universities also offer programmes with WIL components and need industry linkages. SETA-sponsored partnerships are also relevant in the higher education context, given the opportunity presented by the HEQF to design curricula in conjunction with bodies such as the SETAs, who disburse skills funding. This includes the PIVOTAL grants that are a feature of the National Skills Development Strategy III (2011-2016). In this respect, the range of stakeholders involved will all be far better served by local or regional institutes located at the partner university, like the one recently established at NNMU, than by a centralised SAIVCET.

8. Disability

The proposals made in respect of disability are supported with a few additional *provisos* and suggestions:

- The establishment of a task team to investigate disability related issues within institutions should include stakeholders presently involved in disability units so that best disability practices can be expanded upon in an effective manner.
- To achieve accurate data on disability, standardised categories of disability need to be used. This calls for a standardised definition of disability that is applied at all institutions.
- Most students with disabilities (SwDs) matriculate from specialised education environments (special schools). Often the support structures in place at these schools inadequately prepare

our students for higher education. An example of this is blind students only making use of Braille, when there is screen reader software and technology available. Admission requirements for students with disabilities should also be revised to ensure equitable access to university.

- The move towards a more integrated approach to supporting SwDs beyond issues related to the built environment and assistive technology support should include a call upon stakeholders working within the disability field to actively collaborate within faculties and departments, and across institutions to provide support.

In order to implement these proposals it will be necessary to develop a clear funding model. The suggestions made in the Green Paper in this respect are rather confusing. While mention is made of government subsidy allocation according to SwD enrolment numbers, the suggested differentiated approach to funding implies that funding will not be available to all institutions to the same extent. In effect, more established Disability Units would be denied the opportunity to add to, improve upon and further develop their service delivery. Here, it needs to be noted that students often disclose their disability status only after registration, which could potentially skew calculations of funding required. The majority of established Disability Units, (as reported in the FOTIM research project) continue to have limited funds available to meet the rapidly escalating costs of effective service provision; they are understaffed and have overstretched employees due to insufficient institutional funding.

9. The NQF and quality councils

i) NQF levels

HESA urges caution in response to the suggestion in the Green paper that NQF levels should be removed and replaced with a simple hierarchy of qualifications. This is an issue on which there is a range of opinions and it requires further discussion and investigation. On the one hand, there are examples of qualification frameworks, such as the European Higher Education Qualification Framework (EHEQF) that simply has three levels on which qualifications are clustered: certificates and diplomas, undergraduate degrees, and postgraduate qualifications. On the other hand, it seems that both of the two primary reasons advanced for abandoning levels, are questionable. The first reason is that confusion arises from the assumption of qualification equivalence for qualifications on the same level. But this is an *assumption* that is directly countered by the HEQF itself:

Level descriptors provide guidelines for differentiating the varying levels of complexity of qualifications on the framework. … Level descriptors are thus broad qualitative statements against which more specific learning outcomes can be developed, compared and located. The positioning of two or more qualifications on the same NQF level only indicates that the qualifications are broadly comparable in terms of the general level of learning achievements. It does not indicate that they have the same purpose, content or outcomes (except at the generic level of critical cross-field outcomes), nor does it necessarily demonstrate equivalence of qualifications. (DoE, 2007: 11)

The other reason proffered is that levels operate to restrict the mobility of students moving from one qualification to another. Levels do not impose this restriction; it is the different purposes of qualifications that make articulation difficult, because qualifications prepare students in different ways.

The proposal to remove levels may arise in part from unrealistic expectations of the NQF which no qualifications framework can possibly meet because they are based on a fundamental misunderstanding of the purpose of these frameworks. Their primary function is to provide a register of recognised qualifications arranged in terms of the levels of complexity demanded for the award of the qualification and therefore also showing the possible progression routes for a student from one qualification to another. In such a framework, a Bachelor of Commerce degree is on the same level as a Bachelor of Science degree in terms of complexity of learning achievement, but there the comparison ends. They are not the same, and articulation between them and their respective progression routes is unlikely. Even within the same broad field, articulation is not a given and depends on a programme's orientation and purpose.

A cautionary note regarding articulation – there are other barriers to articulation including attitudinal barriers, especially with regard to colleges. This is compounded by curricular barriers, institutional typologies and structural/financial regimes which place a variety of obstacles in the way of articulation. Articulation will be greatly enabled when the interfaces between institutions, curricula and funding regimes are clarified and simplified.

The CHE is currently developing a framework for qualification standards that will enable much greater clarity about qualifications, their purposes, and their relation to one another. With that in place, it may be that levels will no longer be of much importance and that in their absence, the purpose of programmes will be fore-grounded which will be an advantage.

The Green Paper, however, takes this issue further in proposing to give SAQA the right to question the entry, progression and articulation requirements set by universities, which could well be seen as a direct challenge to their disciplinary authority and autonomy. Movement between different types of programme is not simple and can often severely disadvantage students who do not have the necessary learning blocks or conceptual tools in place. HESA questions whether SAQA would have the expertise (much of it discipline-based) to embark on 'mapping the curricula of qualifications and programmes against each other' (p74). This is a highly complex exercise and there is plenty of evidence to attest to its difficulty. But there is also a question of authority here. SAQA may very well have authority over the NQF and responsibility for the registration of qualifications on the Framework but it has no further jurisdiction over higher education qualifications which are governed by the provisions of the Higher Education Act.

ii) Quality councils

HESA is concerned that there are too many players in the field and this is likely to exacerbate rather than reduce contestation. Nonetheless, it does not think that a single quality assurance authority is a feasible option. When the capacity of the newly established QCTO is taken into account, HESA leans towards supporting option four that sees all quality assurance functions vested in the two bodies (Umalusi and the CHE) that are already well-established and have considerable experience. However, there are real epistemological differences in institution-based and workplace-based learning which may necessitate an additional Quality Council such as the QCTO.

> If the QCTO is retained, the contestations about responsibilities for particular qualifications should be clearly delineated. In the case of the professions for example, there is a long tradition of relationships between professional bodies, the CHE, and universities.
> There does not seem to be a compelling argument for the professions to reside under the QCTO, particularly as this body must take responsibility for the performance of the Sector Education and Training Authorities (SETAs) in order to ensure closer collaboration between education institutions and business and industry.

10.   Concluding remarks and Summary

There is pervasive reservation within HESA about the establishment of new institutions when existing institutions are not yet fully functional. Setting up new institutions is a hard thing to do, and it takes a long time to bed down into something resembling functionality. The Green Paper appears to concede this at times: 'one lesson we have learnt is the difficulty of building new institutions ... (and that) it is better to build on existing institutional strengths and work within the existing systems in order to move forward' (DHET, 2012: 61). The conclusion to be drawn for the post-school education and training system is that there is much to be done before launching new institutions. Getting the colleges right is a huge job; producing more PhDs is a huge job. The Green Paper, however, disregards its own sound advice, and goes on to recommend two new universities, CETCs, and the SAIVCET, over-burdened by diverse and divergent purposes, and too far away from the actual actors concerned – the colleges, their partner universities, and the employers.

HESA is also deeply concerned about the centralisation of functions in the DHET (like a state-run publishing house, or state-developed curricula for the colleges, for example). The point is that we need both centralisation in certain respects, but also decentralisation in other respects. The DHET would need to partner with institutions where capacity already exists. Underlying this reservation is anxiety about infringements on autonomy on the one hand, and the capacity of the DHET to take on these functions on the other. HESA *urges caution about all new developments that involve the development of new institutions, especially when these entail development and control by DHET.* The strategy urged by HESA, and accepted by the Green Paper for college sector developments, should be the watchword for all developments in the post-school sector – *first strengthen the college sector; build on existing strengths.*

Lastly, HESA is concerned that the Green Paper has provided insufficient information on some of the critical issues relating to the proposed post-school education and training system. The following questions need to be answered to guide the quest toward establishing such a system:

- What would be the investment and the recurrent costs of a reconceptualised post-school education and training system? Related to this, what is likely to be the cost of the proposed qualitative leap, and how is it going to be funded?
- What will be the relationship and articulation between the proposed institutions (including single-purpose providers) and existing post-school education institutions?
- How will success be measured? What monitoring systems, indicators, and accountability mechanisms will be used?
- What are the governance arrangements that must be put in place to facilitate the creation of this expanded, coherent and differentiated post-school education and training system?

The answers to these critical questions, which are sadly missing in the Green Paper, are important in determining and guiding the success of the proposed post-school education and training system.

In closing, a summary of recommendations are listed below:

10.1   First and foremost, the work following on the Green Paper process will greatly benefit from setting priorities and developing a sequence of activities and a theory of change. At the moment, the Green Paper is a list of aspirations and challenges resulting in a sense of almost insurmountable problems. The Green Paper seems to lack clarity of scope and focus.

10.2   The lack of clarity on the financial implications of the Green Paper and the ways in which these recommendations are to be implemented bring about uncertainties as to whether the planning process towards realising these goals has been complete. In addition, the lack of a mention of a proper accountability system with regard to the implementation of the Green Paper proposals adds to levels of scepticism on the ability to translate these bold goals into deliverables.

10.3   Clarifying the relationship between the Green Paper and other policy intentions is crucial. The expanded post-school education and training sector must be integrated and aligned with the New Growth Path, the Ten Year Innovation Plan, the Human Resource Development Strategy and the National Development Plan where possible and appropriate.

10.4   The conversation on differentiation at university and college level needs to be expanded and intentions need to be clarified, particularly in relation to point 10.3.

10.5   Planning for the expanded post-school sector should include career and academic support services. This in itself will not only advocate for the college-sector, but could substantially reduce the drop-out rate at universities.

10.6   The needs of the different groups in the post-school sector must be understood and considered. A learner leaving school prior to finishing Grade 9, a semi-literate adult, a young NSC graduate and a university drop-out have very different needs.

10.7   The governing principles of the HESA position paper are broader and deeper than those proposed in the Green Paper. HESA strongly recommends that these principles are adopted.

10.8   The Green Paper does not explicitly deal with a 'post-secondary' target group. HESA is of the opinion that for many NSC graduates, post-secondary qualifications at NQF level 5/6 would be much more attractive than the current NC(V) and N courses offered at colleges.

10.9   HESA strongly recommends that expansion should start with what is already available. This is true for those colleges that have the capacity to expand their current offerings, but also for the institutes/centres already in existence in universities, universities of technology and comprehensive universities.

10.10   The role and responsibilities of universities of technology should be clarified in relation to their contribution to the post-school sector. The nature and purpose of these institutions are different from traditional and comprehensive universities and should also not be conflated with the intended role of the college sector.

10.11   Work-integrated learning should be funded. The success of many programmes hinges on the successful completion of work-integrated learning.

10.12   Funding in general needs attention. Earmarked funding should be limited and greater weight should be given to output funding. However, unless funding for the resourcing of HDIs, as resolved at the 2010 Higher Education Summit, gets urgent attention, this would grossly impact on the current and future quality of their contribution to knowledge generation and teaching and learning. Furthermore, funding has not kept pace with the rising costs of delivery – a review of the funding model is urgent.

10.13   Articulation is a laudable ideal. However, this is not a straightforward or simple process, and the possible barriers to articulation, including systemic barriers such as funding regimes, should be removed.

10.14   HESA welcomes the possibility of a more streamlined and accommodative regulatory environment. Yet, it remains mindful of the fact that another major overhaul on the national level might once again overburden the already change-fatigued higher education community.

10.15   If the QCTO is retained, responsibilities should be clearly delineated to prevent further contestation. Professional qualifications should remain within the domain of the CHE and the professional councils.

11   Additional Sources for Consideration (attached)

11.1   HESA, 2009. Pathways to a Diverse and Effective South African Higher Education System – Strategic Framework 2010 / 2020

11.2   HESA, 2011. Proposal for a National Programme to Develop the Next Generation of Academics for South African Higher Education

11.3   HESA, 2011. Position Paper on an Expanded Post-School Education System

Ends

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