

**HESA RESPONSE TO THE
'CALL FOR COMMENTS ON THE REPORT OF THE TASK TEAM ON
COMMUNITY EDUCATION AND TRAINING CENTRES (CETCs)
GOVERNMENT GAZETTE, VOL. 574.**

1. This Report is the product of a Task Team chaired by Ms Fébe Potgieter-Gqubule, which submitted the Report to DHET a year ago in April 2012. Although the Report has as its main task the design of an expanded post-school sector, the Report deals centrally with adult and community learning, and not directly with higher education (HE). At the heart of the Report is the proposal of a **new institutional model for post-school education**, thus extending the vision put forward in the *Green Paper*.
2. The Report proposes the expansion of non-formal and formal provision to out of work adults and NEETS, and the mechanism for this expansion are the establishment of two new institutional forms:
 - a. **Community Learning Centres** or CLCs (NQF levels 1-3), subsuming existing Adult Learning Centres and ABET;
 - b. **Community Colleges** or CCs (NQF levels 4-5).

The Report goes on to outline two options for configuring the new institutional landscape, a two-tier or a three-tier system, and opts in the Report for a **three-tier** system, on the sensible grounds that lumping CLCs in with the Colleges (FET & Community) would simply 'undermine(ing) existing institutional and human resources capacity' (pg. 91). The proposed new system would then comprise:

- **A Higher Education tier**, as now, with enrolments increased in line with the *Green Paper* and *National Planning Commission* projections for 2030;
- **A Colleges tier**, which would include the current FET colleges plus **nine new Community Colleges**, one for each province (hence nine new institutions), whose duties would include supporting CLCs (*downwards articulation*) as well as providing for university access via two-year postsecondary qualifications which could become HE Certificates and Diplomas (on the model of the American liberal arts community colleges) as well as offering university bridging courses (*upwards articulation*). In other words, CCs are envisaged as overlapping the college sub-sector and HE.

There are two concerns that HESA wishes to flag at this point. The first is that the Task Team has not taken note of the HESA position in the *HESA Post-school Task Team* report on the possibilities and limits of post-school expansion. The present Report is not persuaded by HESA's 'limits to

articulation' argument, which includes a detailed empirically based exemplification of how upwards articulation works in practice. The present Report repeats the misconception that it is 'huge vested interests (particularly in HE) inhibiting easy access' from the existing colleges to HE (pg 41). HESA would like to reiterate, once again, that in taking this position the HE sector seeks to protect the interests of students and the quality of education offered to them, and recommends that the Report writers look again at the arguments presented in the *HESA Post-school Task Team* report.

The second concern is that the Report envisages 'single purpose' colleges (presumably new ones), examples of which, given at various parts of the Report, include: teaching, nursing, agriculture, hospitality, and performing arts. Some of these domains are currently the preserve of HE. The sector trusts that there will be substantial discussion and consultation on the concrete implications before there are moves to the next stage with this part of the proposals.

- **A CLCs tier.** The Report envisages that there would eventually be a CLC in each municipality, with a very wide educational brief spanning non-formal and formal provision, including literacy and ABET, *KhaRiGude*, public education, vocational and occupational courses, as well as community and non-formal education. HESA questions where the trained staff for these institutions is to come from. In addition, the Report mentions in passing that *KhaRiGude* and adult education should move from the DBE, where it presently resides, to the DHET. No clear rationale for this is given, even though ABET qualifications resort with UMALUSI and are clearly pre-post-school.

3. The Task Team plots the way forward schematically for two decades ahead, with the following steps in the immediate future:
 - a. The proposals in the Report should be incorporated into the next draft of the *Green Paper*, which is the *White Paper*. This is almost certainly **premature**. The proposals in the Task Team's Report are still in too general and programmatic a form for placement into the policy format of a *White Paper*. The second envisaged step should come first, which is;
 - b. For a new Task Team to produce **a detailed implementation and funding plan. This should precede any entry of these proposals into a *White Paper*;**
 - c. Establishing the nine new CCs with the potential to overlap the HE sub-sector of the post-school landscape. This proposal needs far greater consideration of its feasibility and desirability, the noble aims it is supposed to support notwithstanding; and
 - d. Piloting the CCs and the CLCs.
4. The Report takes it as given that there will be a vocational education institute (SAIVET) as proposed in the *Green Paper*, and proposes also a new *Adult, Youth and Community Learning Agency*. The Report realises that all this is going to be expensive, and, contrary to the *Green Paper* which envisaged no new money needed from the public purse, states

that implementation of the Report will require ‘additional public funding’ and the ‘increasing of the skills levy’ (both pg. 95). The cost of establishing these new institutions will already be significant; sustaining them so that they can succeed and continue to do so over time will require a considerable recurrent commitment from the fiscus. With HE funding already not keeping pace with enrolment growth, this further envisaged competition for tight public funding is clearly of concern to the HE sector.

5. In summary, HESA would thus like to stress the following:

- a. We **welcome** the initiative to take forward the proposed expansion of post-school opportunities announced in the *Green Paper*;
- b. We are of the view that this Report is a welcome first step in this direction, but we must emphasize that it is far from being in a form in which it can enter the formal policy promulgation process;
- c. We recommend that a **phase of thorough operational planning** be undertaken as next step **prior** to any promulgation in a *White Paper*, since in the ensuing scoping, costing and operationalization, not to mention the development of a new legal framework, we have no doubt that alterations to the basic plan will be required. HESA and the constituency it represents would expect to be centrally involved in this phase. During this phase, the following will also, *inter alia*, require further consideration:
 - i. **The role of HE in the support of the new institutions.** The idea of college-university partnerships, mooted in the HESA *Post-school Task Team* report, has yet to be formally supported. We think that, without a comprehensive support plan, along the lines of the Brazil model, new institutions in the post-school arena will not survive and prosper. This support will take many forms: from the training of lecturers and management personnel, to help with the development of curricula, upgrading of lecturer skills on a recurrent basis and much more;
 - ii. **The integration of adults and youth in the same institution.** Experience in the FET colleges already shows us that students studying for their NSC and older learners do not fit together seamlessly. How will this work in the CLCs where many of the learners will be adults of advanced age?
 - iii. **Articulation.** We believe that concrete experiences with the articulation of college and HE level qualifications, some of which are detailed in the *Post-school Task Team* report, will be a more prudent and effective guide to articulation design than exhortation from social justice first principles, which we support, but do not regard as sufficient to operationalize this complex notion; and
 - iv. Further consideration should be given to the **specific specialised functions of the two new kinds of institutions** – the CCs and the CLCs. Institutional isomorphism can very easily blur their distinctiveness and consequently blunt the contribution of institutions in the post-school sector.

In conclusion: this Report is a first attempt at spelling out some of the speculative proposals regarding adult and NEET educational opportunities mooted in the *Green Paper*, and as such, it should be welcomed. However, by promulgating it in a *Government Gazette* the impression has been created that it is on a legislative fast track. It is HESA’s view that

these proposals are not ready for that. As we have spelt out above, we believe there are many steps to be taken before promulgation will be appropriate. HESA has declared an interest in being involved in the next steps of the process. We look forward to fruitful collaboration with the Ministry and the Department on this critically important issue.

END

17 May 2013.