

# Implementation Evaluation of the NQF Act (2008)

Reflections on the draft findings –  
Umalusi

# Reflections on the Report

- The finding that the delineation of roles and responsibilities between DBE & Umalusi is weak is acknowledged
- The NQF Act omits any mention of the Department of Basic Education, and thus some of its power as a central co-ordinating mechanism in the system is reduced
- This leads to fractured and parallel operations in certain instances – e.g. unexpected reviews of qualifications like the NSC (2011) introduction of the “3-stream Model” (2015) or the introduction of new subjects like Mandarin without consultation (2016)

# Reflections on the Report

- The report notes that Umalusi's role in the public system is narrowly focused on examinations
- While this perception is common, Umalusi's mandate in the public space is significant
  - Quality Assurance and Monitoring of SBA
  - Curriculum analyses and approval
  - Certification of learner achievements
  - Research

# Reflections on the Report

- Umalusi's role in the public space is, however, more limited than for Private Institutions
- This arises due to the fact that public institutions are 'deemed accredited' by Umalusi in the GENFETQA Act
- This leads directly to the 'disproportionate costs of compliance' the report finds are borne by independent institutions, since no costs can be levied against the public system, nor can direct QA be undertaken

# Reflections on the Report

- Some factual errors were noted in the report that may have a bearing on the findings:
  - The report compares the NLRD & DBE statistics and finds a mismatch, but the final dataset for certified candidates is housed at Umalusi not DBE
  - The report incorrectly notes that the GENFETQA Act establishing Umalusi was promulgated in 2008 – this was in fact the date of emendation of the 2001 Act
  - Umalusi agrees that articulation opportunities for NC(V) candidates may be lacking or unclear, but the report is incorrect to suggest that NC(V) candidates are enrolling for Trade Tests – this avenue is only available for learners completing the N-Courses (specifically N2)

# NQF Act Successes

- The NQF Act has proved to be a true enabler for the functioning of Umalusi and has clarified roles
- The positions of the QCs and their mandates were clarified and solidified
- The Act provided the impetus for large-scale policy creation around assessment, RPL, and CAT
- Flowing from the NQF Act Umalusi was able to develop and publish the GFETQSF

# NQF Act Challenges

- The NQF Act as a co-ordinating document omits key players (DBE) and does not delineate certain roles and responsibilities effectively enough
- Flowing from this - RPL, CAT and Articulation of qualifications are not always sufficiently robust
- The NQF Act in its current form instructs that all programmes leading to a qualification (even foreign) must be registered on the NQF if they are offered in the Republic – this creates several challenges for Umalusi in managing the sub-framework, such as the potential for a proliferation of qualifications on the GFETQSF

# NQF Gaps

- The NQF Act is silent on verification of qualifications
  - In general it should be the certifying body that verifies qualifications
  - Verifying learner certificates for the qualifications on the GFETQSF has long been undertaken by Umalusi
  - Such verifications are a revenue stream for Umalusi
  - It is not clear if the NLRD can mirror this function, since the detailed certification data is generated at Umalusi, and the NLRD does not seem to be designed as a verification database



# Recommendations

- Factual errors in the report should be addressed with each QC providing specialist insight
- The role of the NLRD in verification should be clarified
- A mechanism to protect a possible against a flood of foreign qualifications being registered on the NQF should be examined
- The co-ordinating role of the NQF should be strengthened and the delineation of responsibilities and functions between different State actors should be better described – Umalusi would like to engage particularly on this issue