



Implementation Evaluation of the NQF Act (2008) Response to the Draft Evaluation Report



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Overall Comments

1. QCTO welcomes the Draft Research Report – although certain findings may be contested, the report nevertheless presents a forthright independent perspective based on analysis and information from stakeholders.
2. The report highlights significant areas which have impacted on the implementation of the NQF. These relate to the complexity of the NQF system, multiple concurrent policy initiatives and inadequate resourcing.




Resourcing of the QCTO

- The report indicates that the key system design objective in establishing the QCTO is the centralisation of qualification development, quality assurance and certification. (this is also articulated in the WPPSET).
- The limited level of funding (low base fiscal grant + 05% SDL grant) has resulted in the QCTO having to follow a delegated model where key functions of qualifications development and quality assurance are delegated to bodies who have the capacity (expertise and funding) to execute these functions.

Resourcing of the QCTO



- The QCTO supports Recommendation 17 - “The QCTO has effectively been expected to execute an unfunded mandate. The expected funding model of the QCTO needs to be reviewed based on a costed implementation plan that provides the likely cost of different options / models. The policy uncertainty on the future role of the QCTO, vis a vis SETAs, should be resolved on the basis of the cost of different options and stakeholders need to ensure that funding aligns to whichever option is selected.”
 - QCTO has developed a Business Case to support the request for additional funding - awaiting DHET response
- Recommendation 18 – “ It is therefore recommended that any centralised model be carefully considered and costed. Variants of such a model could also be formulated that includes of more balanced distribution of powers and functions between the QCTO and SETAs and professional bodies over the short to medium term.”
-  QCTO implementing Vision 2020 to give effect to the centralisation of qualifications development and quality assurance.

Qualifications Development

- QCTO agrees with finding that:
 - qualification development has taken some time to gain momentum – largely due to the delegated model and QCTO lack of capacity.
 - the timelines for the alignment of qualifications are unlikely to be met – process in place as part of Vision 2020.
 - Costs and time for qualifications development are not regulated
 - Slow uptake of “new” occupational qualifications – reluctance to change.
- QCTO is pleased with the survey finding that on average 70% of respondents rate the occupational qualification development process (with respect to efficiency, effectiveness, quality and relevance to industry) as successful or highly successful.



Qualifications Development

- QCTO agrees with Recommendation 19 – “The blanket requirement for a workplace training component in all qualifications and part-qualifications in the OQSF should be reconsidered.”
 - OQSF is being revised - to define key features. Includes reconceptualising the notion of part qualifications and the possible offering of other qualification types.



Quality Assurance

- QCTO welcomes survey results which suggest that the QA system does contribute to improved quality.
- QCTO agrees with the general criticisms regarding Quality Assurance viz. that :
 - Not well understood by many stakeholders
 - Uncertainty as to the strategic direction entrenches instability
 - A lack of consistency in requirements due to large number of QA bodies

NQF successes and challenges



Successes

1. The establishment of the three Quality Councils and the clarification of the roles of SAQA and the Quality Councils.
2. Successes may be claimed within each sub-framework w.r.t access, RPL and articulation. (RPL working well within the OQSF)

Challenges

1. NQF is a construct for managing qualifications and issues of articulation. The NQF becomes bogged down when the NQF becomes a construct to delineate institutional types and create artificial boundaries.
2. Co-ordination and implementation of Articulation and RPL across three disparate sub-frameworks.



Recommendations to improve the NQF



1. The NQF to recognise and accommodate the disparateness of the three sub-frameworks – related policies should not adopt a “one size fits all” approach.
2. The NQF to provide an enabling framework rather than a bureaucratic, rigid and highly legislated framework.
3. The NQF to provide an overarching framework for Education and Training and not used selectively to manage particular aspects of the evolving Education and Training space.