CHAPTER 3

MODELS FOR ACCREDITATION

3.1 Criteria for accreditation

This document has as its intention not only to clarify short learning programme provisioning, but also puts forward possible models for accreditation and quality assurance of providers offering such programmes. The document does not propose that separate (and different) accreditation processes and quality assurance procedures are developed for providers of short learning programmes, rather that ETQAs make use of the same processes and as far as possible align such processes with accreditation of providers whose main focus is to deliver only full qualifications. The criteria for accreditation therefore remain intact, but may need to be contextualised when dealing with SMME and emerging providers. This is in line with another of SAQA's documents: *The Equitable Accreditation of SMME Providers of Education and Training*.

The core criteria for accreditation of providers are summarized in *Criteria and Guidelines for Providers* (SAQA, 2001) as follows:

An accredited provider must:

- Define and describe the purpose of the organization, including a description of the vision and the mission of the provider;
- Develop and document a quality management system, including policies and procedures for programme delivery, staff, learners and assessment;
- Develop and document review mechanisms in terms of the implementation of policies and procedures; and
- Maintain management systems, including financial and administrative resources and physical infrastructure of the provider.

3.2 <u>Categories of providers</u>

According to the ETQA Regulations (1127 of 8 September 1998), a 'provider' is "a body who delivers learning programmes which culminate in specified National Qualifications Framework (NQF) standards or qualifications and manages the assessment thereof"

This definition is further refined in *Criteria and Guidelines for Providers* (SAQA, 2001:19) as follows:

"An education and training body, in other words a provider, is not limited to an institution or organisation. Providers can include companies, work-based training centres, a collaboration amongst a range of partners (organisations, institutions,

companies, tuition centres, *RPL* centres, assessment centres, trade testing centres, individuals, community structures) and even some forms of consultancies".

The recording of short courses process discussed in Chapter 1, confirms this description – providers, including providers of short learning programmes come in all shapes and sizes.

In Criteria and Guidelines for Providers, one categorisation of providers include:

- o Providers who only deliver learning, but not summative assessments
- Providers who only deliver summative assessment, not formative and/or diagnostic assessment
- o Providers who deliver learning and manages the assessment thereof.

Another categorisation deals with the programmes offered by the provider:

- Multi-purpose providers who are offering a wide range of programmes covering a variety of learning areas and fields. Typically, these providers would be public and private universities, technikons and Further Education and Training Colleges.
- Single-purpose providers would include providers, which focus on one (and related) fields of learning. This group typically includes large and small providers offering, for example, computer-related training, in-house and work-based learning and would include consultancies.

A third type of categorisation seems to emerge from the short learning programme area:

- Providers who offer full qualifications and short learning programmes based on unit standard-based qualifications and/or non-unit standard-based qualifications for which they are accredited;
- Providers who offer **short learning programmes only**, based on parts of unit standard-based and/or non-unit standard-based qualifications for which they are accredited;
- Providers who offer **short learning programmes** only, not **based on unit standard-based** and/or non-unit standard-based qualifications;
- o Providers who offer a combination, or all, of the above options.

3.3. The 'one provider, one ETQA' principle

All providers, regardless of the sector in which they are active, can be accredited by only one ETQA. It is the responsibility of this constituent ETQA, where the need arises, to establish Memoranda of Understanding with other ETQAs if their providers are offering programmes that fall outside of the primary focus of that ETQA. Memoranda of Understanding (MoUs) may be concluded, for example, in terms of the following:

• Programme approval for programmes offered by their constituent providers which fall within the area of responsibility of other ETQAs

- Joint quality assurance of programme delivery where such programmes overlap with the primary focus of two (or more) ETQAs
- Sharing of responsibilities and expertise.

This is a critical step that must be undertaken by ETQAs to ensure a seamless and integrated education and training sector and should have as its aim to facilitate articulation of learning between sectors and between institutions and qualifications. Not only must these partners ensure that short learning programmes are 'organically linked' to meaningful career pathing and lifelong learning, it will prevent an unmanageable proliferation of disjointed interventions. **Credits awarded through short learning programmes will have no value unless 'partner' ETQAs and providers acknowledge and recognise their value in relation to programmes delivered through multiple modes and at different sites of delivery (refer to Appendix C).**

3.4 Models of accreditation

Accreditation models must be kept as simple as possible. This stems from the acknowledgement that learners, and the public at large, may become confused (and may even be misled), by non-standardised approaches and procedures. Therefore, this document proposes that accreditation and quality assurance of providers offering short learning programmes, remain closely aligned with accreditation and quality assurance processes established for providers offering full qualifications only.

However, it has to be acknowledged that the contexts, as well as the sectors, within which short learning programmes are delivered, differ substantially. There is no one-size-fits-all and each sector and band has to contextualise their needs within the broader framework for accreditation as expressed in the ETQA Regulations (No 1127 of 8 September 1998).

3.4.1 Accreditation models

 Providers who offer full qualifications and short learning programmes based on unit standard based qualifications and/or non-unit standard-based qualifications are accredited through the normal processes and procedures as established by the ETQA. In other words, providers who are accredited for full qualifications, do not need to be accredited separately for short learning programmes derived from full qualifications. Such short learning programmes may include skills programmes, credit-bearing short learning programmes and non-credit bearing short learning programmes.

Quality assurance of such providers by the ETQA may include the quality monitoring measures undertaken by the provider in terms of short learning programmes' relevance to qualifications for which they have been accredited. This may take the form of self-evaluation and self-regulatory measures as prescribed by the relevant ETQA. This means that where providers offer short learning programmes against a part of a qualification for which they have been accredited, the arrangements in terms of teaching and learning, assessment and internal moderation, must be in line with the arrangements for the full qualification. This is to ensure that the credits awarded through such programmes are transferable.

• **Providers who offer short learning programmes only, based on parts of unit standard-based and/or non-unit standard-based qualifications** are accredited through the normal processes and procedures as established by the ETQA. Such short learning programmes may include skills programmes, credit-bearing short learning programmes and non-credit bearing short learning programmes depending on the purpose of the short learning programme

Quality assurance of such providers may include the establishment of clear linkages and relevance of their short learning programmes in relation to full qualifications. As in the case of the previous provider (above), this is to ensure that credits awarded through such programmes are transferable and recognised by other providers.

Note: The term 'accreditation' is inclusive of '**provisional accreditation**'. Provisional accreditation is associated with a particular time limit within which a provider must meet all the ETQA requirements for 'full' accreditation and is therefore a developmental step towards accreditation. Even though provisional accreditation is not separated from accreditation, building in this developmental step, makes it possible to accommodate providers who are offering short learning programmes where no unit standards are available yet, or where short learning programmes have not yet been aligned to formally registered unit standards and/or qualifications.

3.4.2 Non accreditation

• Providers who offer short learning programmes only, not based on unit standard-based and/or non-unit standard-based qualifications

A large number of providers of short learning programmes may fall within this category. This may include providers who are offering product or equipment-specific training or a whole range of other short learning programmes, which fall outside of unit standards and qualifications. These programmes are non-credit bearing in relation to unit standards and qualifications, but are integral to effective workplace practice and a host of other contexts. Generally, it would not be the intention of these learning programmes to award credits, because they have been developed to fulfill in a particular need. This need may very well emanate from WSPs and SSPs. Refer to the following examples:

Example 8:

A training programme is developed for the medical profession, where medical practitioners make use of highly sophisticated pieces of equipment where, if not used correctly, may endanger lives. This type of training is therefore critical for effective workplace practice, but will not bear any credits in relation to unit standards and/or (part) qualifications.

Example 9:

In the information technology sector, product-specific training is offered. Employers want to have the assurance that trainees will come out of the learning programme with real workplace related skills and knowledge. Such training is not directly linked to unit standards or qualifications, but clearly has an important place in workplace practice.

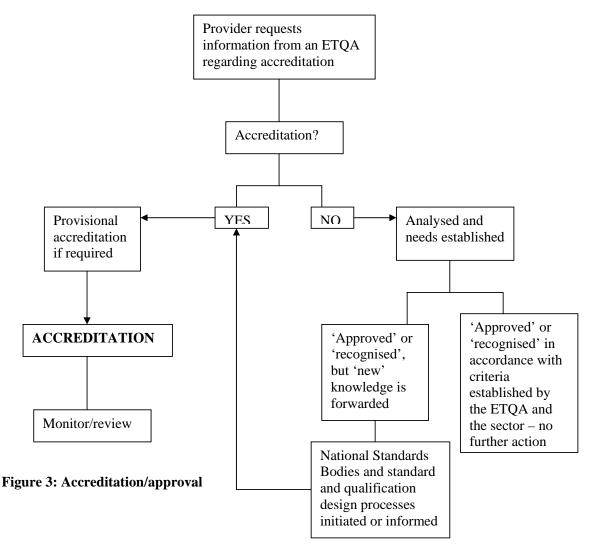
These short learning programmes do not fall within the ambit of the mandate of the National Qualifications Framework (NQF). The NQF is responsible for registered unit standards and qualifications and therefore, ETQAs are mandated to monitor the provisioning of any (part) qualifications for which they have been accredited themselves (refer to 2.1 in chapter 2 of this document). Regulation, and therefore 'accreditation' of providers offering non-NQF aligned short learning programmes is not necessary. However, ETQAs may feel the need to establish processes whereby provisioning of this nature is quality assured within their sectors.

Such providers could be given an alternative status, i.e. an **'approved'** or **'recognised'** provider. The term used to describe the status of such providers is not important – the ETQA will decide what is most appropriate for their sectors. However, care should be taken not to use terms that may have other meanings in the context of education and training. The criteria whereby such approval or recognition is granted, will be established by the particular ETQA. Such criteria may be closely associated with criteria used for the accreditation of formal providers, but this is dependent on the context of the sector. For example, in a sector where a large number of providers offering short learning programmes offer training courses that will not lead to credit, there will be a larger number of providers who are 'approved' or 'recognised' and not accredited. In other sectors there may not be a need for this level of 'status' at all.

There will always be providers of short learning programmes who are offering learning programmes or training courses for which no credits in relation to unit standards and/or qualifications can be granted and which is also not linked to particular Workplace Skills Plans and Sector Skills Plans. As mentioned above, there is no need to regulate such provisioning. It is up to the client (who may include an individual, an organisation or employer) to decide whether a particular provider's services are needed or not. This would constitute a private transaction between the provider and the client and will have no relationship with the granting of public money in terms of skills levies.

However, one important lesson that was learnt through the Short Course Recording process initiated by SAQA in 2000, is that many informal short learning programmes may have relevance to the development of new unit standards and qualifications. Also, because short learning programmes are often associated with 'new' learning emanating from innovative workplace practices, research and studies, a process whereby this 'learning' could be incorporated in unit standards and qualifications, is required.

It is therefore critical for ETQAs and the National Standards Bodies (NSBs) associated with the scope of coverage of a particular ETQA, to join forces in ensuring that such learning, which may at that moment, lie outside of that parameters for accreditation, to bring this into the quality assurance cycle if required. The diagram below describes how this may take place:



CHAPTER 4

POLICY FRAMEWORK

4.1 Introduction

The translation of the NQF objectives into measurable success indicators is increasingly becoming clearer as the system develops. The NQF objective to 'create an integrated framework for learning achievements' finds expression in the place of skills programmes and short courses in the system, i.e. that such learning programmes should lead to credits towards unit standards and qualifications. Likewise, the objective to 'facilitate access to, and mobility and progression within education, training and career paths' links very closely to the purpose of developing and implementing skills programmes and short courses, namely to:

- Increase employability, self-employment possibilities and mobility within a workplace and sector
- Provide flexible access to learning opportunities towards nationally registered unit standards and qualifications

Providers of short learning programmes will be playing a critical role in the achievement of these objectives and will make it possible for employers to train their workforce in a resource-efficient manner. It is also in line with the notion of lifelong learning whereby any individual may, at any time of his/her life, access further education for a range of reasons, including up-skilling, re-training and personal enrichment. It is therefore critical for provisioning of this nature to be quality assured. If not, mobility and articulation of skills and knowledge and access to further education will not be possible.

The 1996 statistics (Statistics South Africa: 1996) regarding the levels of education of economically active adults, clearly point to the fact that workplace education and training is critical to close the skills gaps in this country:

- 6,2% have education levels above grade 12;
- o 16,4% have grade 12;
- 33,9% have some secondary schooling;
- o 7,5% have completed primary schooling;
- o 16,7% have some primary schooling; and
- o 19,3% have no schooling.

Further, within the context of globalisation, and the demand for higher skills, it was found that "between 1970 and 1998 high skilled jobs have increased by nearly 20 per cent and during the same period the number of unskilled jobs fell by a similar proportion" (NSDS booklet: April 2001, p. 7). It is therefore imperative that strategies are put in place to address the need for up-skilling and multi-skilling in a cost-effective way. Short

learning programmes, including skills programmes and credit-bearing short courses, will be able to meet the challenge to supply a better educated workforce.

The Skills Development Strategy (NSDS) and Human Resource Development Strategy (HRDS) therefore foreground the following objectives:

- o To develop a culture of quality lifelong learning
- To foster skills development in the formal economy for productivity and employability
- o To stimulate and support skills development in small businesses
- To promote skills development for employability and sustainable livelihoods through social development initiatives
- To assist new entrants into employment.

(NSDS booklet: April 2001, p.6)

It goes without saying that the large numbers of people currently active in the economy, cannot be removed from the workplace for extended periods of time to be re-trained and up-skilled. Short learning programme provisioning, if it is brought into the quality assurance loop in a systematic and coherent fashion, is pivotal in achieving the objectives of the NOF and of the National Skills Development Strategy. It is therefore important that this type of provisioning is acknowledged and valued. The attention and thought given to the construction of unit standard-based and non-unit standard-based qualifications must include an equal amount of thought to the development of modes of delivery whereby such qualifications may be achieved – this includes short learning programme delivery. In occupationally-based environments, the Skills Development Act makes provision for this through its learnerships and particularly in the context of this document, its skills programmes. Providers offering education and training which cannot strictly be considered to be 'skills programmes', must contribute to such a coherent system whereby all credit-bearing short courses will make it possible for learners to embark on further learning without the need to re-do the part(s) of the qualification for which they have already attained credits.

4.2 Acts, Regulations and Policies

The following Acts, their regulations, Policies and Criteria and Guidelines documents have informed the development of this document:

- The South African Qualifications Act, (No 58 of 1995) and its NSB Regulations (No 18787 of 28 March 1998) and ETQA Regulations (No 19231 of 8 September 1998)
- The Skills Development Act (No. 97 of 20 October 1998), the Skills Development Levies Act (No.9 of 1999) and the Skills Development Regulations and Guidelines
- The General and Further Education and Training Quality Assurance Act (No 58 of 29 November 2001)
- o The Further Education and Training Act (No 98 of 2 November 1998)

- o The Higher Education Act (No 101 of 19 December 1997)
- The draft New Academic Policy (CHE, 2001)
- Guidelines for applying for accreditation as a private provider of higher education qualifications registered on the NQF (CHE)
- Criteria and Guidelines for Providers (SAQA)
- Quality Management Systems for Education and Training Providers (SAQA)

CHAPTER 5

RPL AND LIFELONG LEARNING

5.1 Short learning programmes and RPL

A baseline survey of industrial training in South Africa, commissioned by the Labour Market Skills Development Programme in 2000, (undertaken by the HSRC), highlight the following statistics for training initiated by the Department of Labour between 1982 and 1998:

MACRO OVERVIEW OF TRAINING ACTIVITIES AS RECORDED BY THE DEPARTMENT OF LABOUR, 1982 – 1998

Type of Training	Total number of trainees 1982 -1998
In-Service Training:	
Regional training centres	189 146
Private training centres	1 946 509
Training schemes where levies apply	182 993
Training schemes (Sect 48 of LRA)	92 869
Training of Unemployed and Workseekers	1 282 045
Total number of trainees	3 693 562

 Table 1: Training activities of the DoL between 1982 and 1998.

(Baseline Survey: Oct 2000, p.14)

(These figures do not include what was traditionally known as 'short courses' in terms of management, office and related training, professional development and other forms of training not within the scope of the Department of Labour's initiatives.)

A large percentage of the training indicated in the table above includes non-credentialled training, i.e. training for which no formal recognition was given. Certainly, where formal recognition was given, in most cases, this did not meet the requirements of a full qualification. However, this is not only true for training programmes offered by the Dept of Labour initiatives. Most public and private higher education and further education institutions are offering 'non-formal' courses. Such courses may have been developed with a particular purpose in mind, but did not award credits towards unit standards and qualifications in the past. Learners who have completed such programmes are increasingly requesting that credits be awarded for their learning achieved through short learning programmes. Therefore, these figures above, as well as the requests for credits for certificates awarded for 'non-formal' courses, indicate a desperate need for recognition of prior learning (RPL) whereby people who have undergone in-service and other forms of non-formal training would be given credits towards formally registered unit standards and qualifications on the NQF.

This document does not suggest that 3 693 562 people must be given recognition for prior learning, but it does indicate the extent to which short learning programme provisioning is part of our education and training landscape and that if this is not brought into the system, the emerging education and training system will fail a large percentage of current and new entrants to employment (refer to Appendix C).

5.2 Short Learning Programmes and Lifelong Learning

Lifelong learning is a key objective of the NQF and the National Skills Development Strategy (NSDS). In the NSDS booklet (April 2001, p.11), it is expressed as follows:

"The notion of life-long learning is one of the key principles of the South African Qualifications Authority. It is recognition that individuals should have opportunities for self-improvement at any stage of their lives, be they employed, unemployed or seeking a first job. As the economy grows and develops, so new skills will be demanded and people will need to retrain for them. The provision of opportunities to learn at any age also guarantees second chance opportunities for people, who for a variety of reasons may have 'missed out' [the first time round]".

Opportunities for lifelong learning are therefore a key principle of the emerging education and training system of South Africa. Where this principle is linked to career paths and learning pathways, it becomes even more meaningful for the employer and employee.

CONCLUSION

Short learning programmes have a very particular place in the National Qualifications Framework and in the achievement of the objectives of the NQF. Some of the benefits of bringing this type of provisioning into the quality assurance cycle include:

- □ Articulation and mobility of learners within education and training are enhanced;
- □ Access to education and training is facilitated through flexible pathways to the achievement of qualifications;
- Learners who access education and training through skills programmes are protected through the quality assurance processes of ETQAs;
- □ This approach opens up the possibilities for recognition of prior learning for thousands of learners who completed non-credentialed programmes in the past;
- Short learning programmes are developed and delivered with articulation possibilities in mind, thereby developing a 'seamless' system of access and articulation;
- □ The dynamic nature of short learning programmes could support the setting of standards and the development and review of qualifications meaningfully;
- □ The accreditation of providers of short learning programmes do not differ substantially from the accreditation of providers of full qualifications, thereby avoiding the need for the establishment of 'different' accreditation processes

This document has put forward a systemic approach to provisioning of short learning programmes. Provisioning of this nature is now seen as a necessary and flexible tool to support the Human Resource Development and National Skills Development Strategies that have as their objectives the development of our workforce, in line with worldwide trends, to meet the requirements of globalization and the demands of the twenty-first century.

LIST OF SOURCES

Dept of Labour, 2002. Criteria for Approving Skills Programmes
Dept of Labour, 2001. The National Skills Development Strategy.
Dept of Labour, 2000. A Baseline Survey of Industrial Training in South Africa
Gov. Gazette, 1998. ETQA Regulations (No R 1127 of 8 September 1998)
SAQA, 2001. Criteria and Guidelines for Providers
SAQA, 2001. Quality Management Systems for Education and Training Providers
SAQA, 2000. The Recording of Short Courses
Gov. Gazette, 1998. Skills Development Act (No 97 of 1998)

APPENDIX A: MEMORANDUM OF UNDERSTANDING

MEMORANDUM OF UNDERSTANDING		
As a provider of	short courses,	
acknowledges th the following:	at participation in the recording	(name of provider) g of short courses with SAQA indicates
underpini	ned by its courses can be broug	is committed to the g in this process whereby the standards ht into the SAQA standards setting standards to be registered on the NQF.
		itself to apply for accreditation as a on as the ETQA has been accredited by
•	tion in this process does not me	also acknowledges that
	recorded courses are register recorded courses are accredit the provider is registered by the provider is accredited by ertisement to this effect would be e constitutes fraud.	ed by SAQA SAQA
Signed on behalf	f of Name of provider	on Date
Signature	e Name(please prin	t) Designation
Signed on behalf	f of South African Qualification	ns Authority (SAQA) on Date
Signature	e Printed Name	Designation
* The original of	this document is stored at SA	QA and the provider has a copy.

APPENDIX B: SKILLS DEVELOPMENT REGULATIONS GUIDELINES

(www.labour.gov.za/docs/legislation/skills/regulations/grants/guidelines.htm; 25 Feb 2003).

SKILLS DEVELOPMENT REGULATIONS

GUIDELINES

Introduction

1. The Minister of Labour is publishing Regulations about the skills grants to be paid by Sector Education and Training Authorities (SETAs). These Guidelines seek to explain the Regulations and provide advice to employers and others on how to claim grants.

Claiming grants: general information

- 2. Employers who are up-to-date with the payment of the skills levy can claim skills grants from their SETA. Their SETA is the one to which employers pay their levies.
- 3. Each SETA will decide the dates by which applications for grants must be made. They will let employers know about these arrangements. Employers may also approach their SETA for information.
- 4. Training providers and workers may also seek grants from a SETA. These grants may be given to projects, programmes and research activities if they support the implementation of the sector skills plan that each SETA has developed. Each SETA will publish details about the grants and how to apply for them.

Grants

- 5. There are six types of grants that an employer might claim. These are:
 - a workplace skills grant;
 - a workplace skills implementation grant;
 - a grant towards the costs of learnerships and learner allowances
 - a grant towards the costs of skills programmes;
 - a grant towards the costs of providing apprenticeship training; and
 - a grant towards a programme, project or research activity that helps the relevant SETA to implement its sector skills plan.
- 6. The first two grants for the submission of a workplace skills plan, and for a subsequent implementation report on the training provided MUST be paid by the relevant SETA as long as an employer submits the application correctly on time,

as assessed by the appropriate SETA. The Regulations refer to these as mandatory grants.

- 7. The workplace skills planning grant is fixed as a percentage of the levies paid by an employer. An employer who makes an application on time and in the proper way will receive 15 per cent of the total of the levies s/he has paid. Similarly the workplace skills implementation report will be, in 2001/2, 50 per cent of the total levies paid and in 2002/3, 45 per cent of the total levies paid.
- 8. The other grants are discretionary and a SETA MAY pay these. It will decide the grants it will pay on the basis of the contribution that the skills development activities being proposed will contribute to the implementation of the SETA's sector skills plan. For example, there may be a number of requests for grants to support learnerships. If a choice has to be made between a number of different applications for such grants, the SETA will make its decisions on the basis of the priorities set out in its sector skills plan.
- 9. Each SETA will determine the amounts of all the other grants. Applications for these grants MUST be made and approved by the SETA before any training or other activity starts.

Consultation arrangements

- 10. Before describing each of the grants it is important to stress, that although the majority of grants are made to employers, the need for meaningful consultation between employers and workers prior to grant applications. This is fundamental to the success of the national skills development strategy.
- 11. It is important that employees are consulted about the person(s) to be designated as skills development facilitators, the workplace skills plan and the report on the implementation of the workplace skills plan. It is strongly recommended for organisations with more than 50 employees that a Skills Development Committee is established for the purposes of consultation on training matters. This committee, as a whole, should reflect the interests of employees from all occupational categories in the organisation's workforce. All trades unions that represent 10 per cent or more of the workforce or represent a significant occupational group should be invited to take part in this committee. A trade union that represents 80 per cent or more of the workforce may be the sole representative.

MANDATORY GRANTS

Workplace skills planning grant

- 12. Each up-to-date levy-paying employer may expect a grant from the relevant SETA, if:
 - at least one skills development facilitator is designated by the employer and the name is submitted to the SETA

- a workplace skills plan is correctly submitted to the SETA at the appropriate time (see Annexure A of the Regulations)
- 13. A workplace skills plan is important to:
 - employers to provide a strategic basis for planning the development of the workforce and organisation
 - workers to provide opportunities for enhanced job satisfaction and promotion prospects
 - SETAs to assist in the identification of imbalances in the supply of, and demand for, skilled labour. This information can also be used by school leavers and unemployed people to inform choices about training options
 - the Government to assist in the development and review of the National Skills Development Strategy that must be demand-led and sensitive to labour market needs.

Skills Development Facilitator

- 14. Each employer, after consultation with the workforce, must designate at least one skills development facilitator. For multi-site or large organisations, more than one facilitator might be appropriate. Small employers, with less than 50 employees or with a sales turnover less than that specified in Schedule 4 to the Employment Equity Act (Act 55 of 1998), may wish to designate a skills development facilitator jointly. Employers should provide the skills development facilitator with the resources, facilities and training to enable her/him to perform the role.
- 15. The functions to be performed by a skills development facilitator are to:
 - assist the employer and employees to develop the workplace skills plan
 - advise the employer and employees on the implementation of the workplace skills plan
 - assist the employer to draft the annual report on the implementation of the workplace skills plan (see the details of the next grant)
 - advise the employer of any quality standards set by the SETA
 - act as a contact person between the employer and the SETA, and
 - serve as a resource with regard to all aspects of skills development.
- 16. If a skills development facilitator leaves the organisation, or for any other reason ceases to perform the role, the employer should designate another skills development facilitator and inform the appropriate SETA.

Workplace Skills Plan

- 17. Based on the analysis of business requirements and the skill needs of current staff, the workplace skills plan must define the skills priorities that each workplace will pursue, the training programmes that are required to meet and deliver those priorities and the staff who will be targeted for training -'the beneficiaries'
- 18. Each SETA will provide employers with the application forms to claim this grant, together with details of the dates by which completed forms must be submitted to the appropriate SETA. A SETA may also publish more detailed guidance on how to apply for this grant.
- 19. Each SETA is able to amend the outline design of forms included in the Regulations so that it can collect more sector specific data. A SETA may also simplify the form for organisations with fewer than 50 employees.

Workplace skills report grant

- 20. Employers who are up-to-date with their levy payments can claim a grant from the appropriate SETA if they submit a report each year on the implementation of their workplace skills plan before the date stipulated by the SETA. The form of this report is Annexure B of the Regulations, but a SETA is able to modify this to take account of sector differences. The implementation report is important to:
 - employers and workers to assess the progress that is being made
 - SETAs, to review progress and problems and to assist employers, workers and the sectors as a whole to determine any additional support and advice that might be required
 - Government, to inform the monitoring of progress in addressing skills development priorities and in identifying any problems that might need to be addressed.
- 21. Each SETA will inform employers of the dates by which applications for this grant must be submitted and each may issue additional guidance to assist employers to complete the implementation report.
- 22. Attached to these guidelines is a list of occupations that may assist organisations to complete the workplace skills plan and the workplace skills report.

DISCRETIONARY GRANTS

Learnerships

- 23. Any employer may seek a grant from a SETA to support the implementation of learnerships. Each SETA will determine the level of the grant and details of the grant will be registered with the Department of Labour when each learnership is registered.
- 24. There are two possible types of grants to support learnerships. The first is a grant to offset the costs of implementing a learnership, (e.g. off-the-job education and training provider fees). The second is a grant that may be paid to subsidise the learner's allowance if the learner was unemployed immediately before starting the

learnership. (a section 18(2) learner). The learner allowance must be in terms of the Learnership Determination published by the Minister of Labour on 15 June 2001.

- 25. It is a matter for each SETA to decide how many and which applications it will support. Each SETA will need to make its decisions in the light of the priorities of its sector skills plan and the amounts of money it has available to support learnerships.
- 26. A SETA must inform an employer whether or not it will make a grant before the learnership starts. The SETA will agree with the employer when the grant will be paid, e.g. if this will be in staged payments or only once the learnership is successfully concluded.
- 27. Each SETA will establish and publicise its criteria for approving the learnership grants.

Skills Programmes

- 28. Any employer may claim a grant towards the costs of providing skills programmes. It is for each SETA to determine arrangements for the applications for grants and the amounts. Any application for a grant must be submitted to the appropriate SETA, and approved by it, before the skills programmes start.
- 29. It may be that a person completes a series of skills programmes that result in a full learnership qualification. If the employer receives grants for the skills programmes, the total of the grants that the employer receives must be no greater than the grants s/he would have got had the employee undertaken a learnership programme resulting in the same final qualification.

Apprenticeships

- 30. There are, and will continue to be, apprenticeships, until the Minister of Labour declares a date after which all apprenticeships will become learnerships. It is still open to employers to seek to register apprenticeships.
- 31. Unless otherwise agreed, the appropriate SETA must honour any commitments to pay grants to employers that were agreed by a former Industry Training Board. It is for each SETA to determine and publish the level and criteria for new apprenticeship grants. Any grant must be agreed between the employer and the SETA before a new apprenticeship begins.

Sector Priorities

32. A major function of the SETAs is the implementation of their sector skills plans. In order to do this a SETA may make a grant to an employer, to a training provider or to an individual. For example, a grant might be to finance research or to develop the training infrastructure in a sector. The grants will be determined by each SETA, which will also publish details of how to apply.

APPENDIX C: EXTRACTS FROM 'AN INTERDEPENDENT NATIONAL QUALIFICATIONS FRAMEWORK SYSTEM: CONSULTATIVE DOCUMENT'

The following extracts from the above-mentioned consultative document, released in July 2003, as a joint response from the Departments of Education and Labour to the *Report of the Study Team of the National Qualifications Framework* (Pretoria, April 2002), are relevant to the short courses debate. It is included in this document to highlight the fact that this critical area is still under discussion and that if the recommendations of the *NQF Consultative Document* are accepted, a refocus in terms of short learning programme provisioning may take place. It should be noted, however, that the recommendations in this latest report, do not differ substantially from the position taken in the *Criteria and Guidelines for Short Courses and Skills Programmes*.

Short courses

For several reasons the extensive provision of short courses has proved to be a difficult matter for the NQF system, and SAQA has justifiably given the issue considerable attention. In 2000 – 01 SAQA compiled an electronic record of short courses from information voluntarily notified by providers, in order to understand the nature of short course provision and so far as possible bring it within the ambit of the NQF standards generation and quality assurance processes. A helpful discussion document on *Criteria and Guidelines for Short Courses and Skills Programmes* followed. The following observations are not intended as a detailed response.

The issue of short course provision is unquestionably important. As the SAQA exercise emphasized, this is a very extensive and exceptionally varied component of the national learning system. It makes a significant contribution to the enhancement of personal learning and the national skills base. Many sectors of the economy rely on short courses for the upgrading of employees' skills and professional development. There is therefore a direct link between short course provision and workplace skills plans. Countless citizens take short courses to enhance their own understanding or for cultural enrichment. At the same time, especially in an unmonitored area of provision, citizens may be being taken advantage of by unscrupulous and incompetent providers. SAQA's actions should result in an acceptable taxonomy of short course provision and should ensure that short course providers are assisted to engage appropriately with the NQF quality processes and enable providers to align themselves with the requirements of the Skills Development Act, 1998.

The debate will continue on this complex aspect of NQF implementation. It would be appropriate for SAQA to consider instruments that might be used to improve the protection of consumers against unscrupulous providers. Three matters warrant particular attention.

Firstly, short course provision is linked to the minimum requirement for a national qualification on the NQF since SAQA's current definition of a short course is a course that has a credit value of less than 120 credits (which is considered equivalent to a year of full-time study). By regulation, SAQA requires that a registered qualification should generally comprise 120 or more credits, of which 72 or more must be obtained at or above the level at which the qualification is registered. The Study Team commented:

"[F]or many possible qualifications, especially those achieved in the workplace, the 120-credit requirement is an unnecessary constraint that could impede the design of a qualification that was "fit for purpose"."

The Study Team noted that SAQA's regulations permitted the registration of qualifications of less than 120 credits provided they complied with the general criteria specified in the regulations and with the objectives of the NQF. They suggested that this should be made more explicit and less discretionary, and that bodies responsible for qualifications design be made aware of it and encouraged to design qualifications based on the needs and purposes of learners and stakeholders.

The draft *NAP* document proposed that SAQA consider registering certificates of 60 credits (equivalent to one semester of full-time study) in the articulation column. The document argued that this would speed up the articulation process for experienced learners, including adults, who could benefit from short, intensive periods of study; it would be consistent with international practice; and it would allow providers to offer short, focused programmes that met the in-service or upgrading needs of adult learners.

The draft NAP document reminds us that:

"...progress on the NQF is not directly linked to time served in the education system or to the number of credits attained, but rather to the level of complexity of the learning outcomes attained, irrespective of how long it takes a learner to achieve these, *provided that a prescribed minimum number of credits (notional hours of learning) have been 'clocked up'*."

The departments [of Education and Labour] supports the idea of a prescribed minimum. The status of the term qualifications would be devalued if there were no threshold or a variable lower threshold than the current norm of 120 credits. A credit value in excess of 120 credits (which many qualifications require) does no harm to the status of a qualification, but a permissive approach to credit values lower than 120 would detract from the public awareness that a qualification required a serious commitment of time and sustained engagement in a complex learning task resulting in significantly enhanced learning achievement. Where appropriate, short courses should lead to the achievement of credits toward qualifications (or to complete articulation requirements) but should not by themselves merit the award of a qualification. This matter should be considered by the three QC's [Trade, Occupational and Professional Qualifications and Quality Assurance Council, Higher Education and Training Qualifications and

Quality Assurance Council] when they are established in order to advise SAQA and the Ministers.

Secondly, it is difficult to exaggerate the significance in modern economies of the phenomenon of vendor- and product-specific short courses, especially in the information technology and communications industry. These comprise a distinctive system of provision, a "parallel universe" of training, competency-based assessment and certification that has developed outside formal state provision and regulatory systems. The branded qualifications of vendors such as Microsoft, Oracle and Novell are examples of this phenomenon. These qualifications are outside the NQF and are unlikely to be included in the short term.

A key issue for further discussion would thus be how all-encompassing should the NQF attempt be? The NQF should not and could not be all-encompassing. Learning programmes that do not need to meet national standards are by definition outside of the NQF. That criterion covers a very wide range of cultural, recreational, religious and self-improvement courses, as well as fast-changing vendor-specific courses that are quality assured by the corporate proprietor or licensee.

Vendor- and product-specific short courses appear to represent an important avenue for access to employment, upskilling and job mobility. As a phenomenon it deserves closer study in its own right, both to gauge its impact on the South African economy and to assess its significance for South African education and training. TOP QC and HI-ED QC should take particular interest in these matters, in collaboration with the relevant SETAs.

Thirdly, short course learning may be a valuable route to the acquisition of credits toward qualifications registered on the NQF through the Recognition of Prior Learning (RPL). QCs will need to encourage their aligned ETQAs to fashion RPL protocols relevant to their sectors on the basis of SAQA's RPL policy. They will also need to ensure that each short course that leads to a nationally registered credit is linked to a qualification ladder within a learning pathway, with a credit value representing its contribution to the achievement of the qualification.