



## UNIVERSITIES SOUTH AFRICA

### **NOTICE 303 OF 2016: NATIONAL QUALIFICATIONS FRAMEWORK ACT, 2008 (NO. 67 OF 2008) DRAFT ARTICULATION POLICY (GOVERNMENT GAZETTE NO. 39867, 30 MARCH 2016: UNIVERSITIES SOUTH AFRICA RESPONSE**

This *Government Gazette* on articulation is the third document on articulation that Universities South Africa (USAf) has been invited to comment on, two of which were gazetted: on 14 December 2013 and 27 June 2014. This policy has therefore been some time in gestation; some institutions feel it has taken rather too long to finalise. The present version bears many similarities to its forerunners, and some aspects are drawn directly from them. Unlike its immediate predecessor it is marked 'draft', and carries the sub-head 'for public comment'. Nonetheless it goes further than its predecessors, in two key respects: first, it has clearly responded to critical comments (some, though not all); secondly, it contains a section on 'roles and responsibilities' that has direct implications for the CHE and for provider institutions. In this and other respects it deserves close attention, even though much of it is still couched in very general terms.

It is addressed to all institutions and providers in the post-school system – SAQA, the quality councils, all higher education institutions, colleges, work place and other training centers and other private bodies. Professional bodies and councils should also have been mentioned. The preamble and philosophical underpinnings are familiar from previous documents. In section 3, point 17, pg. 12 under 'legislative mandate', the draft policy outlines what this document purports to be: it is 'a strategic policy which places articulation firmly on the nation education and training agenda', and goes on to say below, under 'purpose and intent', that '(T)he purpose of the articulation policy is to provide overarching principles and policy statements ...', and indeed, what follows is 8 pages of 22 'principles' and 13 'statements' followed by 5 pages detailing 'roles and

responsibilities'. This response will list the 'principles' and comment only on those where necessary, and will comment only on those 'statements' that call for comment.

### **Articulation Policy Principles**

- 1. Meet the needs of the economy.** This principle is intended to 'address the skills shortage directly', perhaps in the hope that the shortages can be assuaged by unblocking the articulation blockages.
- 2. Address ongoing lifelong learning**
- 3. Address unemployment**
- 4. Address inequality and establish systemic flexibility**
- 5. Ensure equity and inclusiveness**
- 6. Programme versus institutional articulation.** This principle enunciates a central feature established earlier, that 'programmes must articulate, not institutions', though in what follows, it seems as if the policy expects *qualifications* of the same type at the same NQF level to articulate, and *institutional agreements* are also expected. This goes beyond current practice by the higher education institutions, which is based on academic judgments of the degree of congruence between the different curricula. Requiring institutions to enter into formal institutional agreements in every such instance is unnecessarily burdensome and may undermine efforts to promote articulation.
- 7. Enable success**
- 8. Address exclusionary practices**
- 9. Value learning outcomes achieved through different routes equally.** The principle here goes on to say that 'similar outcomes' achieved through non-formal and informal learning should be 'recognized and validated'. 'Similarity' is unfortunately an elastic notion, and in higher education at least, it is difficult to support this principle unequivocally. It suggests that if students are granted exemption or advanced standing from courses on the basis of non-formal and informal learning that students would be able to gain qualifications if they have done less work towards the qualification than other graduates. This would flout the principle of fairness.
- 10. The nature of the qualification determines the relevant QC.** This principle is ambiguous. On the one hand it apportions all general schooling qualifications to the GFETQSF; NQF level 5 – 10 qualifications to the HEQSF; and all occupational and vocational qualifications to OQSF; this will in future include all NATED (N) and NC(V) qualifications. On the other hand, it states that 'a QC

may have an extended remit in the sense that they can quality ensure qualifications on NQF levels for which they were previously restricted'. This seems to be a coded way of referring to the border disputes between the quality councils, but hardly seems to offer a decisive way to deal with them.

**11. Parity of esteem.** This is referred to as an 'entrenched principle', and requires that institutions treat one another with collegiality and respect. Elsewhere in the draft policy – for example point 38; pg. 22 - 'parity of esteem' seems to mean that the same qualification offered by different institutions should necessarily be regarded as equivalent. This principle, read with principles 16 & 17, seems to fail to make the distinction between giving credit for work completed elsewhere and giving exemption (where **credit** is given and counts towards the qualification conferred by the receiving institution but where **exemption** allows the candidate to proceed to a senior course in the subject. A course completed at institution "A" may be worthy of credit, but because of content may not prepare the student for the senior course in the subject).

**12. The education and training continuum.** This principle requires that 'All programmes ... must contain general education elements'. What 'general education' means here is not stipulated. In the 2014 policy gazette it was defined conventionally as 'maths, language, physical and social sciences and humanities' (Recommendation 4, pg. 20). Here, it seems to mean something closer to *conceptual content*, since the context makes clear that what the drafters are concerned about is that vocational students be able to progress to higher qualifications. This sense is elaborated on in the first 'statement' (no. 35) on pg. 35, which refers to 'adequate conceptual platforms' in this regard. This is broadly a progressive proposal, but it should not undermine the proper *purpose* of the different qualifications in different paths. The same conceptual domain is pitched at different levels for different purposes: the maths in the diploma programme for technicians is probably not adequate preparation for entry to a degree programme for engineers without bridging, even if that is logically the next rung on the NQF ladder. This is why examination of curricular compatibility remains the best guarantor of 'equivalence'. *The meaning of 'general education' here should be clarified.*

**13. Simplicity.** This refers mainly to duplication of registered programmes. Who is to guard against duplication is unclear - presumably the registering and monitoring QCs. Currently the CHE operates on the basis of a ruling that if programmes differ by more than 50% in respect of their exit level outcomes they should be treated as different qualifications. More information would be

needed about how this principle would be implemented, as it could potentially infringe a fundamental principle of academic freedom and institutional autonomy.

**14. Curriculum and articulation.** This principle contains 2 items to note and that may be of possible concern. The first has to do with curriculum formulation: it states ‘Curriculum design teams in consultation with employer groups must design broad curriculum guidelines ...’ It is unclear whether this is to apply to all programmes across the board; or, as elsewhere intimated, to programmes at NQF levels 4 and perhaps 5 only. This in itself would be a major operation, and it is unclear who bears the responsibility for getting these teams together and ensuring the guidelines get written and circulated. *Scope and responsibility to do with ‘curriculum design teams’ should be clarified.* In our view it would be inappropriate to require consultation with employers for general formative degrees from levels 5-10. In relation to professional qualifications from levels 5-10 it is vital to distinguish between the right of institutions to determine appropriate educational criteria based on general-formative principles and the justified need for professions to provide guidance on requirements for practice. The second item to note here is that each curriculum must henceforth contain a statement on articulation opportunities and possibilities. This will pertain immediately to new programmes, and to all programmes on re-registration. This is current practice in the higher education sub-sector.

**15. Ensure credible and fair procedures and practices for validating learning.**

**16. Compare courses based on credible methods.**

See comment on principle of parity of esteem above. The key issue is the extent to which the content and the outcomes can be matched.

**17. Award credit transfer based on similarity.**

See comment on principle of parity of esteem above.

18. This principle deals specifically with NQF level 4 qualifications.

**19. The curriculum must be modularized.**

*This principle cannot, nor should it, be universally applicable.* Single subject honours curricula are sometimes capable of being ‘modularized’ but in other cases are not. To require the whole system to change to enable articulation is educationally unjustified and is bound to cause major disruptions across the sector.

20. This principle stipulates that all learning components – theoretical, practice and work-based – must be weighted in terms of notional hours and credits.

**21. Standardized admission requirements for similar pathways.** It seems NC(V) holders experience difficulties of access due to differential admission requirements for NSC and NC(V) qualification holders. It will, however, be difficult to standardize requirements, as these will be different for different qualifications, for different qualification pathways, and probably also for different institutions.

**22. Centrality of NQF level 5 qualifications.** The principle states somewhat mysteriously that ‘each of the QCs must develop level 5 qualifications ...’, though these were stated earlier as being the province of the HEQSF. Besides, QCs don’t develop qualifications: provider institutions do.

Three observations on the principles are germane. The first is that there is a good deal of overlap in the principles. The second is that many terms are general and open to different interpretations – ‘general education’ for example. These should be clarified in the final draft. Third, programme compatibility and similarity is strongly foregrounded, and programme differentiation is backgrounded. This seems antithetical to the aims of a differentiated and diverse PSET system as set out in the NDP. If rigorously pursued, this is a recipe for programme convergence and academic drift.

### **Articulation policy statements**

How ‘statements’ differ from ‘principles’ is not clear, nor is their status clear. Many of them repeat what has been listed under the principles, so this part of the response will deal only with two issues of interest or concern to higher education.

1. Statement no. 37, pg. 21: this statement deals with the need for ‘an adequate conceptual platform’ to be provided for qualification holders wishing to move ‘into more advanced levels of study’ (also referred to under Principle 12 above). Exactly what the concern here is unclear. It may be surmised that this is with holders of vocational and technical qualifications that wish to progress to more academic ‘levels of study’. (The draft document does not envisage anyone desiring to move in the other direction, though this is surely at least as likely, and will be problematic for the same reason). As remarked before, conceptual content and level pertain to the *purpose* of the qualification. If one wishes to move to undergraduate or graduate study in the same qualification pathway, this is not contentious. If however one wants to change to undergraduate or graduate study in a pathway with a *different purpose*, this can usually only happen with some or other bridging course that bridges the different for-purpose conceptual content of the new pathway’s pre-graduate curriculum.

Indeed, this is explicitly recognized in the MOUs of many of the inter-institutional agreements already in place. In general, there is insufficient appreciation and acknowledgment in the draft policy of the *influence of qualification purpose on curriculum content and level*, and thus on possibilities for articulation. It is simply not the case that the holder of a qualification at, say NQF level 4, is educationally prepared to articulate to any qualification at NQF level 5-7.

2. Statement no. 37, pg. 21: this statement encourages '(A) more integrated and standardized approach' to programme design at NQF levels 4 and 5, and there should be 'less distinction' between them. It is quite unclear what this means. Is level 4 to be brought up to level 5, or is level 5 to be dropped to level 4? It seems, on the face of it, to defy NQF logic, which *requires distinction* between programmes at different levels. *What this statement means, and who is to be responsible for overseeing this, should be clarified.*

### **Roles and responsibilities**

This section of the draft policy outlines the responsibilities and duties expected of the DHET, SAQA, the three QCs and the provider institutions. The role of professional councils is not mentioned. In general, there is insufficient attention paid to the roles and responsibilities especially in a differentiated postsecondary system. A notable part here is the tight timeframes, generally 12 months from promulgation, which takes no account of the approval processes within universities and the time lag between approval of these and their implementation (calendar and prospectus changes, online applications and the like). In general, the **DHET's** role is to set guidelines, offer guidance, and 'monitor and evaluate'. The draft policy later reports the intention to form a 'dedicated articulation sub-directorate' for this purpose. **SAQA** is to 'determine the criteria for articulation' and to monitor their implementation through the QCs. SAQA is also to 'harmonize and coordinate' their operation. Within 12 months, SAQA is to '(B)uild a well-articulated system' by 'providing guidance on articulation between the three sub-frameworks'.

Within 12 months the **QCs** must 'review all current qualifications to ensure they contain clear articulation routes', or provide reasons why this is not possible. The QCs must also curb proliferation of qualifications by encouraging 'more generic qualifications which provide for curriculum diversification'. This is radically unclear *and must be clarified*; what is it that must be generic and what diverse? Further, the QCs must work with providers to develop new articulation policies, oversee quality assurance, which

now must include articulation. The QCs must (45(g)) ‘require the removal of unnecessary and outdated access policies within the institutions within 12 months of the publication of this policy or on full motivation on a date arrived at in consultation with the Minister’. Who determines what is unnecessary and outdated and what criteria are to be used in making such decisions - the institutions, the QC or SAQA? How does this apply to private providers? Finally, both the QCs and SAQA must, ‘within 1 financial year’, publish ‘articulation policies aligned to this policy outlining the responsibilities of... providers’.

**Providers**, for their part, must develop articulation policies in line with the policy to be developed by their QC as outlined above. These institutional policies must support articulation, RPL and CAT; establish inter-institutional agreements; and establish ‘*intra-institutional* articulation’ between courses, programmes and faculties, ‘anchored in articulation agreements’. Most universities presently have policies in place to guide decisions around articulation, RPL and CAT. However, it is highly unlikely that these policies require institutions currently to establish agreements between courses, programmes and faculties at intra- institutional level. We strongly caution against including this provision in the final policy given the huge administrative burdens associated with efforts to implement this. As long as programmes and courses have different purposes, content and outcomes, it will be necessary for academics to make educational judgments about what is possible with respect to articulation except in a few instances where for strategic needs it is desirable to map possible articulation pathways e.g. in relation to scarce skills. *The Minister should consider these implications before finalizing this policy. What is meant by intra-institutional articulation should be clarified.* Again, as noted above, intra-institutional articulation must recognize that diverse programmes have diverse purposes and that articulation between pathways with different purposes will neither be sensible nor possible.

### **Brief closing comment**

This draft policy remains aspirational in the sense that it expresses hopes for what is to happen rather than by providing a comprehensive framework of implementation and policy levers for achieving them. Nevertheless, the requirements for compliance that are present could be cause for concern and could have direct implications for admission requirements, curriculum stipulation, and programme design; ‘could’, because it should be borne in mind that this policy is devised for the whole post-school sector, and universities would be advised to wait for specific direction, guidance and hopefully consultation from the CHE. And the CHE has in turn to wait for SAQA. In

addition, the draft policy is couched in very general terms, and this response has drawn attention to places where this generality is unclear, or confusing. The policy should also say which aspects the QCs are expected to fill out in their more sector-specific policies.

USAf is concerned about a draft policy that drives programme and qualification **convergence** so single-mindedly at the expense of **diversity**. A differentiated and diverse programme and institutional landscape is a characteristic of all robust and thriving higher education systems, and a necessary feature of a developmental innovation economy. USAf would like to see an articulation policy that places at least equal weight on this core principle of the NDP.

**END**

Contact person:

Ms Jana van Wyk  
Universities South Africa  
Tel: 012 481 2895  
Email: [jana@usaf.ac.za](mailto:jana@usaf.ac.za)