

July 2011

Report back on consultations: Policy and criteria for the quality assurance of independent schools and the accreditation and monitoring of assessment bodies.

Legislative context

The National Qualifications Framework (NQF) Act No. 67 of 2008 provides for, among other things, Umalusi as a Quality Council (QC) for General and Further Education and Training. In essence, the Act makes it Umalusi's responsibility to quality assure qualifications that are located on levels 1-4 of the National Qualifications Framework (NQF). Accordingly, the Act provides for Umalusi to develop and manage a sub-framework of qualifications.

A related Act, the General and Further Education and Training Quality Assurance (GENFETQA) Act No 58 of 2001, as amended, provides for, among other things, the quality assurance in general and further education and training and for control over norms and standards of curriculum and assessment. The notion of control over norms and standards of curriculum and assessment is linked to the expectation for Umalusi to develop and manage its sub-framework of qualifications.

Further, the GENFETQA Act requires the Minister of (Basic) Education to regulate a policy in terms of which Umalusi is expected to quality assure independent schools, accredit and monitor assessment bodies. The policy contemplated in the GENFETQA Act is the subject of this consultative document.

Introduction and background

Subsequent to the receipt of Umalusi' *Policy for the quality assurance of independent schools and the accreditation and monitoring of assessment bodies*, the Minister of Basic Education invited public comments through Government Gazette 33930. The Gazette was released in January 2011.

Some of the key stakeholders that are affected by this policy, associations of independent schools commented on behalf of their member schools. They argued that due to curriculum demands and the size of some of their schools they might not have the time or in some cases, even the requisite competence to provide meaningful and comprehensive comments.

Since 2003 Umalusi has been implementing provisional accreditation of independent schools and private assessment bodies in anticipation of the regulated policy referred to above. Provisional accreditation was intended as a springboard for accreditation, and focused on the capacity of independent schools to enact the intended curriculum; and the capacity of private assessment bodies to administer the assessment of learner achievement in a manner that was credible, fair and reliable.

Following Umalusi's receipt of public comments in accordance with Government Gazette 33930, this document is intended to shed light on how comments were taken into consideration in revising the *Policy and criteria for the quality assurance and accreditation and monitoring of assessment bodies*. While all comments were considered not all were accommodated in the revision and the document provides the necessary explanations. In an effort to facilitate a better understanding of the comments and recommendations, they are dealt with in the same chronology as the policy text.

For details around the comments received, please refer to Annexure A¹

Purpose, focus and scope

The main purpose of this document is to reflect on comments that were received from various respondents in respect of the draft policy for the quality assurance of independent schools and the accreditation and monitoring of assessment bodies.

¹ Please refer to Annexure A for a list of respondents who sent comments and recommendations in respect of policy and criteria for the quality assurance of independent schools and the accreditation and monitoring of assessment bodies. The comments and recommendations were also part of a consultative meeting with provincial departments of education.

Comments and recommendations

Chapter 1 : Definitions

The main recommendation was for Umalusi to include more definitions of concepts or phrases to make the policy text more understandable. This recommendation was taken into consideration in revising the policy text, and substantial changes have been made to the definitions. However, where request were made for definitions to clarify criteria Umalusi has as far as possible explained these in the criteria statements. Umalusi believes that a lot more clarity or detail will be provided as part of the regulations that will follow the Ministerial approval of the *Policy and criteria for the quality assurance of independent schools and the accreditation and monitoring of assessment bodies*.

Chapter 2: Purpose of the policy

This section of the policy deals with the scope of Umalusi's work and the independent schools that fall within the mandate.

Some respondents are of the opinion that Umalusi's interpretation of its mandate is not broad enough, in that it excludes independent schools that are registered² by provincial departments of education but do not offer the National Curriculum Statements.

According to the NQF Act No 68 of 2008, Umalusi, as a quality Council, is responsible for the development and management of a sub-framework of qualifications for general and further education and training as well as the attendant quality assurance policies and processes. Therefore, Umalusi's quality assurance mandate is limited to institutions that prepare their learners for qualifications that are registered on the General and Further Education and Training Qualifications Framework (GFETQF). The legislative requirement of the mandate is that schools that do not offer qualifications registered on the GFET Qualifications Framework are not within Umalusi's scope of work.

The recommendation for Umalusi to include all independent schools in its quality assurance scope was not accommodated when the draft policy was revised for

² The Constitution of the Republic of South Africa (1996), as well as the SASA, 1996, requires all independent schools to register with the relevant provincial department of education. However, not all registered independent schools offer the National Curriculum Statement (NCS) leading to the acquisition of the National Senior Certificate (NSC).

the reasons explained above and because independent schools that offer foreign curricula and qualifications are quality assured and certificated by, in the main, foreign awarding or quality assurance bodies. In the revised policy text Umalusi stresses the fact that the policy applies only to schools offering qualifications that are registered as part of the GFETQF.

Chapter 3 and 4: Comments relating to the accreditation criteria

Chapters 3 and 4 of the draft policy document that was sent out for public comment deal with criteria for the quality assurance and monitoring of independent schools and the criteria for the accreditation and monitoring of assessment bodies and the monitoring of the public assessment system.

In the draft policy document, Umalusi used indicators and criteria to outline the standards expected of independent schools and private assessment bodies applying for accreditation. However, some respondents indicated that the use of both indicators and criteria was confusing. They further indicated that the accreditation criteria and indicators were not articulated in a manner that was measurable or easy to evaluate.

Umalusi considers chapters 3 and 4 to be the most important sections of the policy document as they are intended to set the standard for the accreditation and monitoring. It is mainly for this reason that chapters 3 and 4 were substantially revised.

In a complete departure from the draft policy which provided for criteria and indicators, the revised policy only makes reference to criteria for the quality assurance, accreditation and monitoring of independent schools and assessment bodies. It is envisaged that details relating to the indicators will be explained in the policy directives that are anticipated to follow the regulated policy.

Accreditation processes and procedures

According to some respondents, Umalusi should have clearly spelt out its accreditation processes and procedures. While Umalusi agrees with the need to clearly spell out the accreditation processes and procedures, it is of the view that these will be explained at length in the supporting directives which will be consulted with stakeholders.

General coherence of the policy text

In order to provide more clarity and to enhance the general coherence of the policy text:

- A table of contents and acronyms are now included in the revised policy;
- Definitions were clarified. Additional definitions were provided.
- The layout of the policy text was re-arranged;
- Umalusi's quality assurance approach was simplified and outlined; and
- More clarity was provided in the main sections of the policy text (i.e. chapters 3 and 4). The clarity is in the form of an introduction to the two chapters as well as a clear explanation of the criteria. Further clarity is anticipated in supporting directives.

Umalusi appreciates the valuable comments it has received from various respondents. The comments were helpful in revising the first draft of the policy text. Obviously, it is impossible for all recommendations to be included in the revised policy text.

The second draft of the policy text has been consulted with provincial departments of education as well and will further be posted on the website for more comments from independent schools and their associations. The revised text can be accessed through www.umalusi.org.za Hard copies of the revised policy text will also be sent to independent schools and other important stakeholders that do not have access to the email.

ANNEXURE A: SUMMARY OF COMMENTS³ IN RESPECT OF
GOVERNMENT GAZETTE 33930

March 2011

RESPONDENTS		Comments/Recommendations in respect of:		
		Chapters 1 & 2	Chapters 3 & 4	General comments
1	Accelerated Christian Education (ACE)	Page 3		Page 13
2	iXNA ACADEMY/ EDU-CENTRE	Page 3		Page 14
3	Independent Quality Assurance Agency (IQAA)	Page 4	Page 10	
4	Department of Basic Education (DBE)	Page 5	Page 10	
5	Dunamis Christian School	Page 5	Page 10	Page 13
6	Independent Examination Board (IEB)	Page 6	Page 11	Page 13
7	South African Teachers Union Suidafrikaanse Onderwysersunie (SAUO)	Page 7	Page 11	
8	National Alliance of Independent Schools Association (NAISA)			Page 14
9	Mrs Antoinette Beck ⁴			

³ The full texts from all the respondents are being considered by Umalusi.

⁴ Mrs Antoinette Beck is one of Umalusi's experienced evaluators/Monitors

Name: Respondent	Date: Response	Comments/Recommendation in respect of Chapters 1 and 2 of the draft policy	
		Chapter 1	Chapter 2
ACE	04 Feb '11	<ul style="list-style-type: none"> ▪ There is "...no definition of what a 'recognized assessment body' is". 	<p><u>Purpose of the policy</u></p> <ul style="list-style-type: none"> ▪ GENFETQA Act, 2001 does not limit Umalusi's role to accrediting ONLY the National Senior Certificate (NSC) ▪ This section of the policy is in contradiction to the second bullet under 'Background' that states "Quality Assurance of all exit point assessment of such qualifications." ▪ Umalusi should consider other qualifications in the GENFET band e.g. The ACE School of Tomorrow College Entrance Certificate which is registered with SAQA on NQF level 4. ▪ Provision should be made for schools to choose their international assessment body.
iXNA	04 Feb '11	N/A	<p><u>Purpose of the policy</u></p> <ul style="list-style-type: none"> ▪ Policy is exclusive on two grounds: <ul style="list-style-type: none"> ✓ Academically: The policy in its present form, does not make provision for independent schools that are outside the NSC scope and framework or whose deliverables are proved compliance with the NCS. ✓ Socially: The policy excludes volunteer independent schools (i.e. like iXNA

			<p>Acamedy/EDU Centre) catering for special needs in our communities: faith-based sectors, dysfunctional home, LSEN learners and private initiatives that redress previous inequalities in our communities.</p> <ul style="list-style-type: none"> ▪ This is a selective interpretation and application of the POLICY and, we trust, not the POLICY itself. <p>Recommendation:</p> <ul style="list-style-type: none"> ▪ Amend/interpret/apply the policy to make it more inclusive. ▪ Add provision that will accredit/validate/monitor and certify outcomes of learners from schools that chose alternative LTSM⁵'s service providers.
IQAA	03 Feb '11	<ul style="list-style-type: none"> ▪ Include the definition of assessment products. ▪ Definition of assessment standards includes two concepts and must be defined separately ▪ Separate concepts are: <ul style="list-style-type: none"> ✓ Standard of assessment products ✓ Standard of the conduct of the assessments ✓ Minimum intellectual 	<p>Background</p> <ul style="list-style-type: none"> ▪ Clear and precise <p>Principles</p> <ul style="list-style-type: none"> ▪ IQAA supports the underlying principles. However, "inspection" should be replaced with "evaluation". ▪ Principle in paragraph (5) is strongly supported <p>Purpose of the Policy</p> <ul style="list-style-type: none"> ▪ Umalusi might need to consider including other curricular and qualifications that are equivalent to NCS/NSC ▪ Clarify the notion of "support"

⁵ Learner-Teacher Support Material

		<p>standards to be reached by those under\going each form of assessment</p> <ul style="list-style-type: none"> ✓ Maintenance and improvement of various standards ▪ IQAA is not sure how “enacted curriculum” differs from “intended curriculum” ▪ The definition of “intended curriculum” includes the words “and how they should be examined or assessed”. The definition of “examined curriculum” indicates, however, that parts of the intended curriculum will not be examined or assessed ▪ There seems to be no conceptual difference between “leadership and management” and “leadership, planning and management” as they are defined in the draft policy. Separate definitions seem unnecessary. ▪ “Resulting systems and processes”. Rename this as “Quality assurance of systems and processes” ▪ Provide separate definitions for teaching and learning. 	<p>in paragraph (4).</p> <p><u>Application of the policy</u></p> <ul style="list-style-type: none"> ▪ IQAA strongly supports parts (a) to (f) in paragraph 2
DBE	03 Feb '11	N/A	<p><u>Application of the policy</u></p> <ul style="list-style-type: none"> ▪ Move subsection 2(a-f) of Section 5 to Section 6 on page 8

			<ul style="list-style-type: none"> ▪ Move subsections 3, 6, 7 and 8 to the existing Section 7.
Dunamis Christian School	07 Feb '11	N/A	<p><u>Purpose of the policy</u></p> <ul style="list-style-type: none"> ▪ Policy excludes non-NCS curriculum that is aligned to the NCS
IEB	24 Jan '11	<ul style="list-style-type: none"> ▪ Define assessment committee as follows: <ul style="list-style-type: none"> ✓ Any other structure considered appropriate for the delivery of fair, reliable and valid assessment. 	<p><u>Purpose of the policy</u></p> <ul style="list-style-type: none"> ▪ The statement, Likewise, accreditation assessment bodies must support the independent schools that are enacting the curriculum that they examine or assess is too vague. ▪ It should be replaced with: Likewise, accredited assessment bodies must advise and mentor the independent schools that are enacting the curriculum that they examine or assess, in their efforts to fulfill the requirements of the qualification being assessed. ▪ The levels of accountability, as dealt with in points 6(a) and (b) highlight the potential for confusion: <ul style="list-style-type: none"> ✓ Does the word internal (in 6a) refer to the level of the IEB as it does in 6(a)? If so, then what is meant by the term 'external assessments' needs explanation. ✓ If 'internal' in point (a) refers to school based assessment (i.e. at the level of the school), the term 'internal' is problematic as it is being used to refer to 2 different levels of accountability. ▪ IEB does not design or conduct or directly manage internal assessment at school

			<p>level as it would be illegal for the IEB to dictate to a school when, what and how it should assess learners at school level. Schools have the right to design, conduct and manage their own school based assessment.</p> <ul style="list-style-type: none"> ▪ We suggest that 6(a) and(b) be written as follows: <ul style="list-style-type: none"> (a) The designing, internal and external moderation of external assessments as prescribed in a particular curriculum; (b) Oversight of the management and conduct of the assessment body's external assessments and the site's internal assessments, as appropriate, at the site level. ▪ Regarding subsection 5 (a-d); All points (i.e. (a) to (d)) are unnecessary and confusing. The principle has been stated in the main part of point (5) and that is all that is necessary in a policy document. j
SAOU	04 Feb '11	<p>Definitions</p> <ul style="list-style-type: none"> ▪ Shouldn't assessment standards be assessment instruments? ▪ Define assessment body, education institution and indicators 	N/A
NAISA	24 Feb '11	<ul style="list-style-type: none"> ▪ Define quality assurance and accreditation ▪ Use conventional definition with key words like: teaching 	<p>Umalusi approach to QA</p> <ul style="list-style-type: none"> ▪ This is not clearly spelt out in the document ▪ The approach oscillates between quality assurance to accreditation, inspection,

		<p>and learning experiences, outcomes (skills, knowledge, attitudes and values) content (syllabi), progression and levels of difficulty as well as assessment standards.</p> <ul style="list-style-type: none"> ▪ Then expand definition to include nuances preferred by Umalusi 	<p>validation and monitoring, IQMS and WSE</p> <ul style="list-style-type: none"> ▪ Why would Umalusi wish to align quality assurance in the independent. <p><u>Recommendation:</u> “...a graduated eclectic approach that involves a combination of internal, mentored self-evaluation, external self-evaluation up to the point where full accreditation is awarded. In order to maintain accreditation, a light touch monitoring approach involving the submission of a short report is recommended”</p> <p><u>Quality assurance processes and procedures</u></p> <ul style="list-style-type: none"> ▪ We think that it is important to have processes and procedures spelt out in this document. <p><u>Recommendation:</u></p> <ul style="list-style-type: none"> ▪ A clear outline of the quality assurance cycle detailing processes and procedures for quality assurance of independent schools must be outlined in this document. ▪ We would like to recommend a flow chart showing the flow of processes and procedures from beginning to end. ▪ The duration of the cycle must be clearly specified. We recommend that quality assurance should take place every six (6) years. <p><u>Problem and Purpose of the policy</u></p> <ul style="list-style-type: none"> ▪ Umalusi has adopted a very narrow interpretation of the remit of its quality assurance
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			<p>mandate. This effectively cuts out a significant number of independent schools and puts them in a precarious position.</p> <ul style="list-style-type: none"> ▪ Nowhere in Umalusi's founding act is Umalusi required to operate within the narrow confines it limits itself to in the policy. The only conclusion we could reach as to why Umalusi has chosen to follow this narrow path is that they made an administrative decision to restrict themselves in this way in order to make the task manageable for them. <p>Recommendation:</p> <ul style="list-style-type: none"> ▪ Umalusi must review this decision and deal equitably with all independent schools. <p><u>Problem: Principles</u></p> <ul style="list-style-type: none"> ▪ Some of the statements that appear under the heading Principles, are not principles. A principle is a value that guides action. <p><u>Recommendation</u></p> <ul style="list-style-type: none"> ▪ We recommend that key principles associated with quality assurance be adopted in this policy. They include the following: <ul style="list-style-type: none"> ✓ Consultation ✓ Inclusivity ✓ Transparency ✓ Accountability ✓ Fairness ✓ Quality learning, teaching and attainment ✓ Criteria for measurement ✓ Evidence
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COMMENTS / RECOMMENDATIONS : CHAPTER 3 AND 4

Name: Respondent	Date: Response	Comments/Recommendations relating to Chapters 3 and 4 of the draft policy	
		Chapter 3 :Criteria – Independent Schools	Chapter 4: Criteria – Assessment bodies
IQAA		<ul style="list-style-type: none"> ▪ It is seemingly unwise to apply the IQMS/WSE policies to the independent schools without serious amendment. ▪ IQAA strongly supports paragraph 3 – criteria (a) to (e) 	<ul style="list-style-type: none"> ▪ The use of ‘resulting’ is used incorrectly in criterion (e): Resulting systems and processes. Rephrase the criterion as “Quality assurance of systems and processes”
DBE		<ul style="list-style-type: none"> ▪ Change the heading from Section 6 to Introduction and keep Subsections 1-3 ▪ Start with a new Section 7 just before the correct Subsection 4 ▪ Use Section 2 (a-f) which has been moved from Section 5 as subsection (1) of the new Section 7 ▪ The current subsection (4) becomes subsection (2) 	<ul style="list-style-type: none"> ▪ The current Section 7 becomes the new Section 8 ▪ Use as the first heading, Introduction and keep the current subsection (1) as the new subsection 8 (1). ▪ Start with a new Section 9 just before the current subsection 2 with the heading: Criteria for Assessment Bodies ▪ Start with subsections 6, 7, 8 which have been moved from Section 5 as the new subsections 9(1), 9(2) and 9(3), to be followed by the current subsection 2, “Several broad criteria pertinent to...” as subsection (4)
Dunamis Christian School		<ul style="list-style-type: none"> ▪ With reference to IQMS/WSE , Umalusi should have included the documents with the Government Gazette and Draft Policy 	N/A

IEB		N/A	<ul style="list-style-type: none"> ▪ Rather use the preferred term 'independent' than 'private' ▪ The introductory statement refers to three focus areas whereas there are five areas. Omit the introductory statement.
Mrs Antoinette Beck	3 Jan '11	<ul style="list-style-type: none"> ▪ The policy does not say what will happen to schools which do not comply with accreditation requirements. ▪ Will the schools be de-registered? By whom? After how many attempts to be accredited? ▪ Will the DoE continue to pay subsidies to unaccredited schools? ▪ The policy also does not state how the accreditation will be done. I.e what is the process. Will it still be desktop initially plus site visits? What form will site visits take? ▪ Under Independent Schools – leadership – are you looking at suitably qualified leadership? 	N/A
SAOU		<ul style="list-style-type: none"> ▪ The reason for referring to the IQMS is not clear. Furthermore, the balance of the criteria in this paragraph leans towards the school as institution whereas the emphasis should be more on academic performance. 	N/A

NAISA		<p>Problem:</p> <ul style="list-style-type: none"> ▪ A criterion is a standard by which something is judged. The criteria in this policy are not articulated as standards that will be used to judge each focus area. The indicators are helpful but do not make up for the gap created by lack of explicit standards by which each focus area will be judged. Criteria are central to this policy and therefore need to be properly articulated. There must be a clear logical flow from the focus area to the criterion and on to the indicators. <p>Recommendation:</p> <ul style="list-style-type: none"> ▪ Clear criteria must be developed for each focus area. Some suggested criteria flowing from the criteria we recommended above could be the following: <ul style="list-style-type: none"> ✓ Strategic objectives and a plan to implement the vision and mission ✓ A governance structure appropriate to the school type is in place ✓ The leadership and management is effective in achieving the strategic objectives and plan ✓ The school's articulated ethos permeates all areas of school life ✓ Teaching and learning leads to quality 	N/A
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		attainments ✓ There is appropriate and effective support for learners ✓ The resources are generated, managed and used effectively ▪ Attainments are of a high standard	
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GENERAL COMMENTS/CONCERNS/RECOMMENDATIONS

Name: Respondent	Date: Response		
ACE		<ul style="list-style-type: none"> ▪ We are perturbed that once again Umalusi has failed to engage us in a collaborative discussion of the policy before publication to the general public for comment. ▪ This policy as well as the GENFETQA Act 2001 mandates UMALUSI's quality assurance scope over ALL schools in the GENFET band! Umalusi has not shown how it will deal with state schools. ▪ Ace has had numerous problems with Umalusi's provisional accreditation process ▪ ACE is therefore reluctant to support this policy as it stands. We propose that further consultation with NAISA will produce a better result for ALL independent schools for which the policy is intended. 	N/A
Dunamis		<u>Pilot process – full</u>	<ul style="list-style-type: none"> ▪ Umalusi should deal with

Christian School		<p>accreditation</p> <ul style="list-style-type: none"> ▪ Sampling process that is being discussed is total administrative injustice. Independent schools have been part of the pilot process for 8 years. No need for a further sample of 10 	the fly-by-night factor
IEB		<ul style="list-style-type: none"> ▪ Umalusi should alert key players in the field to the fact that certain documents are being placed on the public domain for comment. 	N/A
iXNA		<p>Umalusi's 'restrictive mandate'</p> <p>'We trust for a positive outcome from NAISA's liaison with the Minister of Basic Education to re-define Umalusi' scope accordingly.</p>	N/A
NAISA		<p>Umalusi needs to arrange a dedicated consultative forum to discuss the draft policy</p>	N/A