



Evaluation and Accreditation Unit

Report on

Accreditation and Monitoring of

Independent Schools

For the Period
01 April 2017 – 31 March 2018

UMALUSI



Council for Quality Assurance in
General and Further Education and Training

EVALUATION AND ACCREDITATION UNIT

REPORT ON
ACCREDITATION AND MONITORING OF
INDEPENDENT SCHOOLS

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CONTENTS

ABBREVIATIONS AND ACRONYMS	3
EXECUTIVE SUMMARY	4
1. BACKGROUND	5
1.1 Strategic objective	5
1.2 Purpose	5
1.3 The scope of the E&A Independent Schools (IS) sub-unit	5
1.4 Legislation underpinning the work of the E&A Independent Schools sub-unit	5
1.5 Accreditation criteria	6
2. THE ACCREDITATION PROCESS	7
2.1 Letter of Intent (LOI) to apply for accreditation	7
2.2 Self-evaluation report and Desktop Evaluation	8
2.3 Site visits	9
2.4 Consolidated Accreditation Reports to Accreditation Committee of Council (ACC)	10
2.5 Accreditation outcomes and letters issued	12
2.6 “Window period”	12
2.7 Improvement reports	13
2.8 Accreditation decision taken after the window period or provisional accreditation	14
2.9 Improvements following a “pindow period”	15
2.10 Monitoring	17
2.11 Stakeholder relations	17
2.11.1 Quality Promotion Meetings	17
2.11.2 Other Meetings with Stakeholders	18
2.11.3 Feedback from schools with regard to the accreditation process	19
2.12 Other Activities	19
2.12.1 Accreditation policy	19
2.12.2 Training	19
2.12.3 Review of the accreditation instruments and site visit approach	19
2.12.4 Home education policy	19
2.12.5 HEDCOM sub-committee on Independent Schools	19
2.12.6 Advocacy	20
2.12.7 Reporting to the Provincial Education Departments	20
3. GENERAL CHALLENGES and RECOMMENDATIONS	21
3.1 Institutions other than Independent Schools offering the National Senior Certificate	21
CONCLUSION	22
Annexure A: Evaluation and Accreditation IS sub-unit organogram	23

ABBREVIATIONS AND ACRONYMS

ACC	Accreditation Committee of Council
A&C	Accreditation and Coordination
CEO	Chief Executive Officer
DBE	Department of Basic Education
CAPS	Curriculum and Assessment Policy Statements
E&A	Evaluation and Accreditation
GENFETQA	General and Further Education and Training Quality Assurance
GFETQSF	General and Further Education and Training Qualifications Sub-framework
HEDCOM	Heads of Education Departments Committee
IAC	Internal Accreditation Committee
IS	Independent School
LOI	Letter of Intent
NAISA	National Alliance of Independent School Associations
NCS	National Curriculum Statement
NQF	National Qualifications Framework
NSC	National Senior Certificate
QP	Quality Promotion
SACE	South African Council for Educators
SBA	School Based Assessment

EXECUTIVE SUMMARY

The Independent Schools (IS) sub-unit is one of the three (3) operational sub-units in the Evaluation and Accreditation (E&A) unit that provides for the quality assurance of provision and assessment through evaluation and accreditation of private education institutions and assessment of private assessment bodies. This entails ensuring that:

- Standards for provision are determined, maintained and strengthened;
- Systems are in place to quality assure the capacity of private education and training providers seeking accreditation to implement qualifications registered on the General and Further Education and Training Qualifications Sub-Framework (GFETQSF), through an accreditation and monitoring process;
- Systems are in place to quality assure the capacity of private assessment bodies seeking accreditation to assess qualifications registered on the GFETQSF.

The IS sub-unit is responsible for the evaluation and monitoring of independent schools offering the curriculum/programmes leading to a qualification registered on the GFETQSF. The National Senior Certificate (NSC) is currently the only qualification registered on the GFETQSF which independent schools may be accredited to offer.

Independent Schools that intend to offer the NSC must be accredited by Umalusi. The accreditation process comprises a number of steps, namely, Letter of intent to apply for accreditation; attendance of a Quality Promotion meeting; self-evaluation; desktop evaluation of the self-evaluation report by Umalusi; site verification visit; consolidation of the reports into an accreditation report; consideration of the application by the Accreditation Committee of Council and their recommendation of an accreditation decision; and approval of the accreditation decision by the Umalusi Chief Executive Officer on behalf of Umalusi Council.

The outcome of an application for accreditation by an independent school can be accreditation, two (2) years provisional accreditation, or no accreditation. If an institution is found not to meet the minimum standards for accreditation at the first presentation of the report to the Accreditation Committee of Council (ACC), it is granted a reasonable period ("window period") to improve on its submission prior to the accreditation decision being made. During this "window period" schools are required to address the conditions that deprived them accreditation. Schools submit improvement reports that are evaluated and presented to the Internal Accreditation Committee (IAC) and then the Accreditation Committee of Council (ACC) for recommendation of the outcome.

This report contains information on the following quality assurance of provision processes:

- Background and legislative information (Chapter 1);
- The accreditation process and activities of the sub-unit (Chapter 2);
- General challenges and recommendations (Chapter 3).

1. BACKGROUND

The report focuses on the evaluation and accreditation of independent schools from 1 April 2017 to 31 March 2018. The report is divided into 4 quarters that make up the financial year (2017/18). Furthermore, in each quarter, the report documents both the qualitative and quantitative data.

1.1 Strategic objective

The independent schools sub-unit is part of the Evaluation and Accreditation unit of Umalusi which falls within Programme 3: Quality Assurance and Monitoring. The strategic objective of the Evaluation and Accreditation unit is to quality assure the private provisioning and assessment of the qualifications registered on the GFETQSF.

1.2 Purpose

The purpose of Programme 3 is to ensure that private education institutions have the capacity to deliver and assess qualifications and learning programmes and are doing so to expected standards of quality. Specifically, the purpose of the Evaluation and Accreditation sub-programme is to provide for the quality assurance of provision through evaluation and accreditation of private assessment bodies and private institutions of education.

1.3 The scope of the E&A Independent Schools (IS) sub-unit

The Independent Schools sub-unit evaluates and monitors independent schools that offer the National Senior Certificate (NSC) and the National Curriculum Statement (NCS) leading to the NSC. This is done through a desktop evaluation and site verification visits. The evaluation reports are consolidated and presented with recommendations to the Accreditation Committee of Council (ACC) for consideration.

The sub-unit is led by the Manager who oversees the work of the sub-unit, and reports directly to the Senior Manager: Evaluation and Accreditation, who in turn reports to the Executive Manager: Quality Assurance and Monitoring. The Assistant Managers report directly to the Manager and are responsible for activities in the accreditation process within the sub-unit. The Administration Assistants assist the Assistant Managers to execute their allocated roles and responsibilities in the accreditation process.

The organogram outlining the reporting structure within the Independent Schools sub-unit is included as Annexure A.

1.4 Legislation underpinning the work of the E&A Independent Schools sub-unit

The *Constitution of the Republic of South Africa* (Act No. 108 of 1996) provides for the establishment of independent education institutions that-

- a. Do not discriminate on the basis of race;
- b. Are registered with the state; and
- c. Maintain standards that are not inferior to standards at comparable public educational institutions.

The *General and Further Education and Training Quality Assurance Act, 2001* (Act No. 58 of 2001, as amended in 2008) stipulates in terms of section 23(1),

The Council must develop policy and criteria for quality assurance of private education institutions.

(2) Any institution that is required to register as –

a. an independent school in terms of the South African Schools Act, 1996 (Act No. 84 of 1996); must comply with the policy and criteria contemplated in subsection (1).

and section 24,

(1) The Council must within 14 days of accrediting programmes in terms of the policy contemplated in section 23 –

a. In the case of an independent school or private centre contemplated in section 23(2)(a) or (c), the relevant head of department.

(2) The notification must indicate if any conditions are attached to the accreditation and the nature thereof."

The National Qualifications Framework Act, 2008 (Act No. 67 of 2008) provides for the establishment of Umalusi as a Quality Council that is responsible for the development and management of a Sub-framework of qualifications at Levels 1 to 4 of the National Qualifications Framework and the related quality assurance processes.

The said Act determines that the Quality Council must, in respect of quality assurance within its Sub-framework –

- i. develop and implement policy for quality assurance;
- ii. ensure the integrity and credibility of quality assurance; and
- iii. ensure that quality assurance as is necessary for the Sub-framework is undertaken.

Other legislation pertaining to the work of the Evaluation and Accreditation Independent Schools sub-unit includes:

- a. South African Schools Act, 1996 (Act No. 84 of 1996);
- b. Policy and criteria for the quality assurance, accreditation and monitoring of independent schools and private assessment bodies (Government Gazette No. 35830 of 29 October 2012, as amended in 2017).
- c. Regulations regarding the criteria for the quality assurance, accreditation and monitoring of independent schools and private assessment bodies (Government Gazette No. 41206 of 27 October 2017).
- d. The National Curriculum Statement Grades R – 12, which includes:
 - The Curriculum and Assessment Policy Statement Grades R-12;
 - The National policy pertaining to the programme and promotion requirements of the National Curriculum Statement Grades R-12 (January 2012); and
 - The National Protocol for Assessment Grades R-12 (January 2012).
- e. Regulations pertaining to the Conduct, Administration and Management of the National Senior Certificate Examination (Government Gazette No. 31337 of 29 August 2008 as amended);
- f. Regulations pertaining to the National Curriculum Statement Grades R-12 (Government Gazette No. 36041 of 28 December 2012 as amended).

1.5 Accreditation criteria

Accreditation decisions are made on the basis of private education institutions meeting minimum standards in terms of the accreditation criteria. The approved criteria for an independent school to offer the National Curriculum Statement leading to the National Senior Certificate are:

- Leadership, management and communication
- School ethos
- Teaching and learning
- School Results

2. THE ACCREDITATION PROCESS

The accreditation process comprises a number of steps, namely:

- Letter of intent (LOI) to apply for accreditation;
- Attendance of a Quality Promotion (QP) meeting;
- Self-evaluation by the independent school;
- Desktop evaluation of the self-evaluation report by Umalusi;
- Site verification visit by Umalusi;
- Consolidation of the reports into an accreditation report;
- Consideration of the application by the Accreditation Committee of Council and their recommendation of an accreditation decision; and
- Approval of the accreditation decision by the Umalusi Chief Executive Officer on behalf of Umalusi Council.

Umalusi acknowledges receipt of an application for accreditation once the independent school has submitted a completed self-evaluation report. The accreditation process can take up to 18 months to complete from submission of an application. A fee (approved by Umalusi Council) is charged per stage of the accreditation process. An independent school may not proceed to the next stage of the process until the payment is verified.

2.1 Letter of Intent (LOI) to Apply for Accreditation

The "Letter of intent (LOI) to apply for accreditation is the independent school's indication of its intent to apply for accreditation. It is an online process, which indicates to Umalusi whether the institution falls within Umalusi's mandate for accreditation. Since accreditation attests to the institution's capacity to offer a qualification or programmes leading to a qualification registered on the GFETQSF, the application must be to offer the National Curriculum Statement leading to the National Senior Certificate, which is currently the only school qualification registered on the GFETQSF. Therefore, only applications from independent schools offering the NSC and the NCS leading to the NSC are accepted.

Independent schools which do not fall within Umalusi's mandate for accreditation are not able to continue the accreditation process beyond this step.

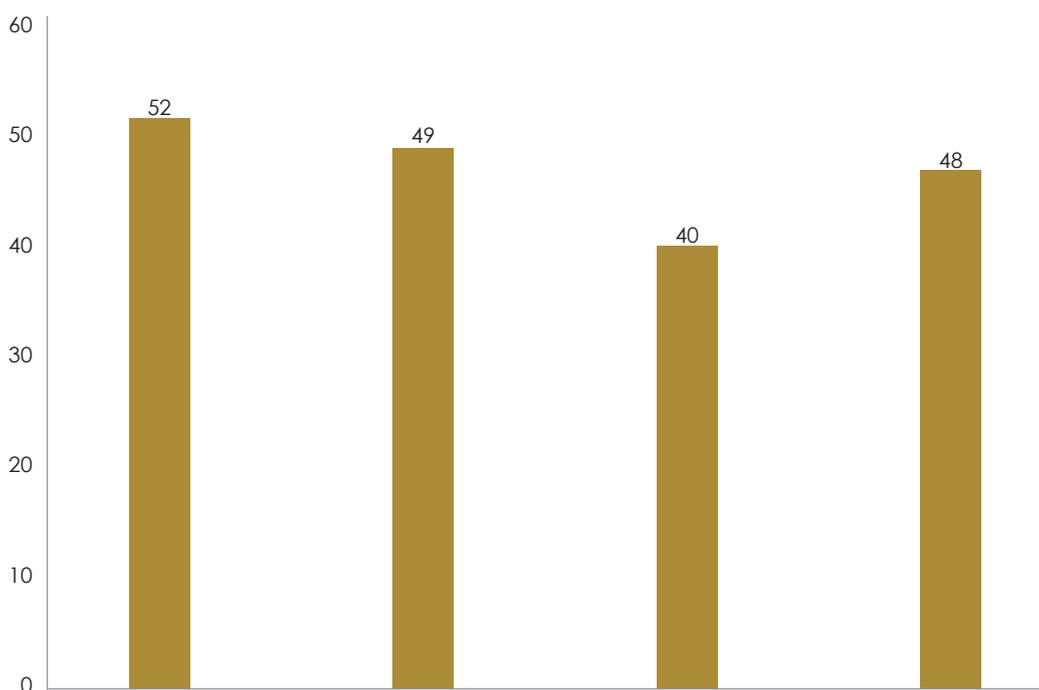
As indicated above, the LOI is a mere indication of an intention to apply for accreditation and may not in any way be viewed as an application for accreditation. In total during the period 01 April 2017 to 31 March 2018, 187 independent schools submitted the letter of intent (LOI) to apply for accreditation. All of these were screened (processed) within 7 days of receipt of payment, as required by Umalusi policy.

Table 1: LOI submitted between 01 April 2017 and 31 March 2018

	Q1	Q2	Q3	Q4	Total
No. of LOI received	52	49	40	48	189
Percentage screened within 7 days of receipt of payment for LOI	100%	100%	100%	100%	100%

Figure 1: Letter of intent submitted per quarter in 2017/18

Letter of Intent (LOI): 2017/2018



2.2 Self-evaluation report and Desktop Evaluation

Following acceptance of the letter of intent to apply for accreditation, independent schools are required to complete an online self-evaluation report and upload an accompanying portfolio of evidence to demonstrate their compliance with the minimum criteria for accreditation. The self-evaluation instrument is only available to an independent school once a representative of the school has attended a Quality Promotion Meeting, during which the entire process and requirements are explained.

Once the self-evaluation report has been submitted to Umalusi, trained evaluators and subject specialists are allocated specific criteria to evaluate online. If the submission of the school is found not to meet the minimum standards, the submission is returned to the school to give them an opportunity to submit further relevant evidence, at the fee approved by Umalusi Council. The submission may be returned to the school a maximum of two times. If the evidence still does not meet the minimum requirements for accreditation after the two additional submissions, the application will be rejected. If the school still seeks accreditation with Umalusi, they will be required to make a new application and pay all the relevant fees.

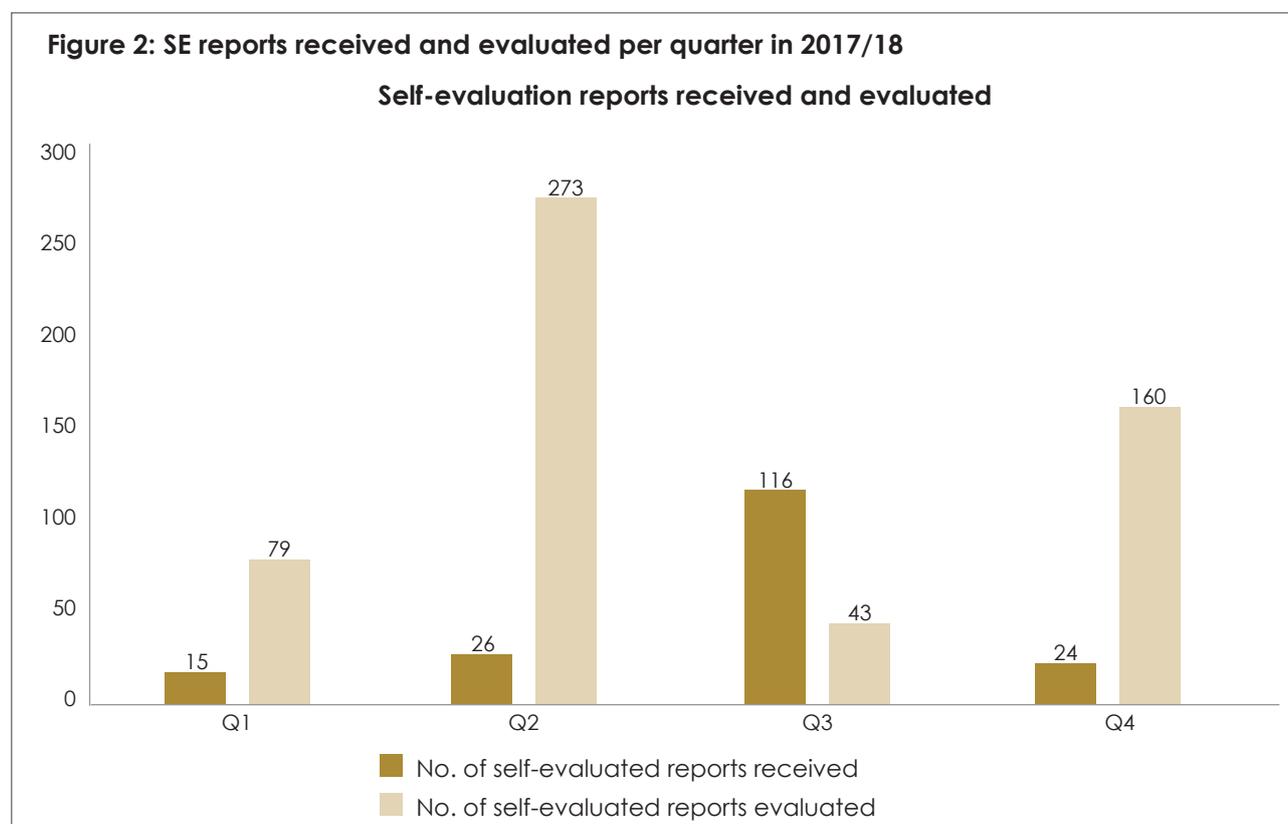
Regulation 26A(1-4) Chapter 5 "Requirements for the registration of independent schools as examination Centres" of the *Regulations pertaining to the conduct, administration and management of the National Senior Certificate (NSC) Examinations* (Gazette No. 31337 of 29 August 2008 as amended) states "In order for an independent school to be registered as an examination centre by either an accredited private assessment body or the state, such a school, besides being registered as a school, must also be accredited by Umalusi." Umalusi will therefore certificate only the learners who sat and fulfilled the requirements of the NSC at accredited independent schools or independent schools that have made considerable progress in their application for accreditation with Umalusi. Since schools were required to have applied and made considerable progress in their application for accreditation by Umalusi by 31 October 2017, the number of self-evaluation reports submitted in quarter 3 is high. The high number of reports evaluated in quarter 2 was to complete evaluation of the reports already submitted in anticipation of the influx of applications expected in quarter 3.

Whilst 503 self-evaluation reports were received in the 2016/17 financial year, only 183 were evaluated, since the majority of the reports were submitted towards the end of the financial year. In the 2017/18 financial year, 181 were received and in total 555 evaluated. This is an indication that most of the schools are now at the site verification visit step of their application for accreditation.

Table 2 below indicates the number of self-evaluation reports received and evaluated during the period 01 April 2017 to 31 March 2018. It should be noted that because processing of applications spans over different quarters, the number of reports evaluated in a specific quarter is not directly related to the number of SE reports received in that quarter.

Table 2: Self-evaluation reports submitted and evaluated between 01 April 2017 and 31 March 2018

	Q1	Q2	Q3	Q4	Total
No. of self-evaluation reports received	15	26	116	24	181
No. of self-evaluation reports evaluated	79	273	43	160	555



2.3 Site visits

The reports written during the desktop evaluation process are used as the basis for the site verification process. Site visits are conducted by trained evaluators and subject specialists to verify the information provided by the school during the self-evaluation process or in the “improvement report” pertaining to policies and procedures, curriculum content and delivery, assessment practices, structures, facilities, and equipment in place at the school.

Even though the evaluation teams are available to conduct the site verification visits, the plotting of the site verification visits is dependent on the availability of the schools. Generally, in the last month of each quarter, most of the four (4) term schools write tests / examinations and prepare marks and schedules for reporting, which makes them reluctant to agree to site visits taking place during those periods.

The statistics below show the fluctuation in the number of site verification visits conducted per quarter. In quarters two (2) (July to September) and four (4) (January to March) more site verification visits are conducted because of more “normal” school days in the school calendar being available for site visits. Notwithstanding the fact that in quarter 4, schools have just reopened and are still settling in, more site verification visits are conducted. Schools are advised during the Quality Promotion Meetings of the evidence that they need to retain on site in preparedness for site visits which will take place at the beginning of the school year.

On the contrary, in quarters one (1) and three (3) “normal” school days are depleted by the June examinations, end of year examinations and public holidays. The site verification visits continue to be conducted during the internal examinations as unlike the end of year examinations, the Principal, staff and learners are available for evaluation.

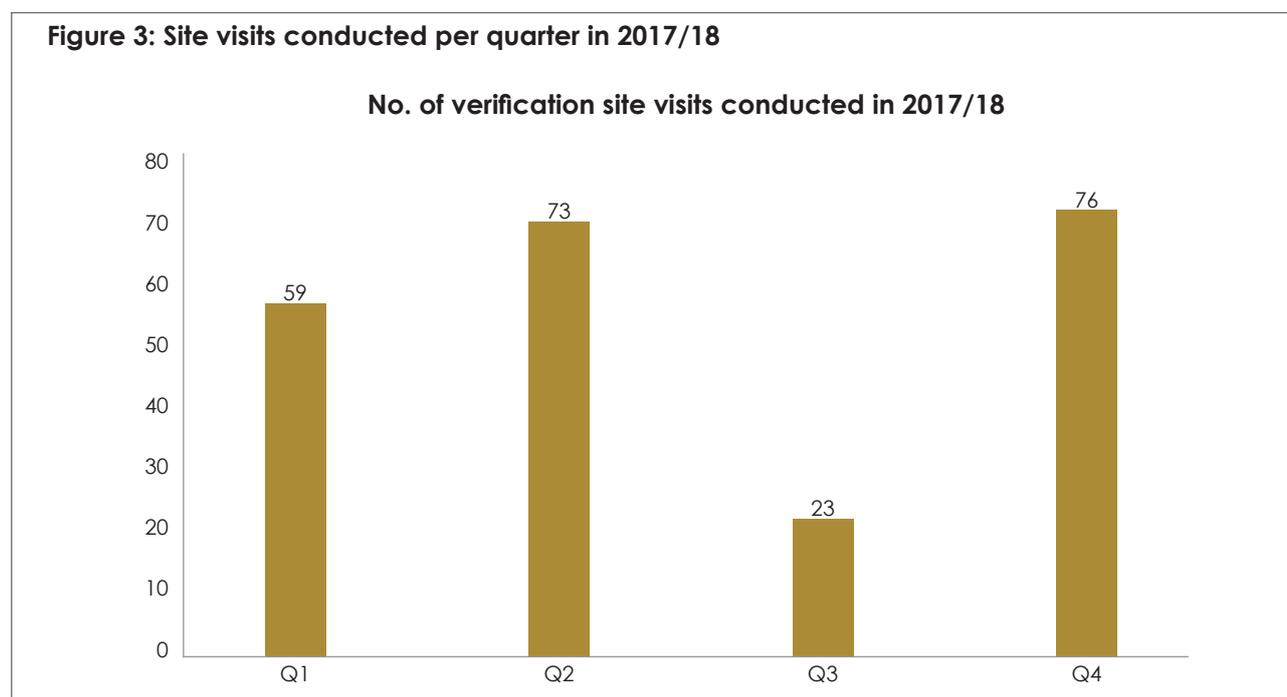
Different sources of data collection are used during the site verification visit. These include lesson observation, interviews with the principal, management, teachers and learners, in addition to verification of evidence. Umalusi is cautious not to cause unnecessary disruptions for the principals and teachers. Since the principal and teachers need to be available at all times for the smooth running of the NSC exams, and the grade 12 learners are not available at the time of the NSC Exams, quarter 3 is the most affected and very few site verification visits can be conducted.

Overall, 231 site verification visits were conducted in the 2017/18 financial year compared to 180 that were conducted in the 2016/17 financial year.

Table 3: Site visits conducted per quarter in 2017/18

2017/18	Q1	Q2	Q3	Q4	Total
No. of verification site visits conducted	59	73	23	76	231

Figure 3: Site visits conducted per quarter in 2017/18



2.4 Consolidated Accreditation Reports to Accreditation Committee of Council (ACC)

The reports written during the desktop evaluation and site verification visit are consolidated into one accreditation report. It is at this stage when all the reports have been consolidated, that a recommendation can be made as to the outcome of the school's application for accreditation. The level of compliance by the school is measured against specific indicators to determine whether the school meets the minimum criteria for accreditation.

The consolidated accreditation reports are moderated and approved within the sub-unit prior to being submitted to the Accreditation and Coordination sub-unit, where they undergo another moderation process. Once accepted, reports are allocated to Accreditation Committee of Council (ACC) members to consider to ensure that the accreditation process is fair and that the decisions are consistent with the evidence found.

ACC members have access to the evidence provided by the independent school, as well as the source reports together with the consolidated accreditation report. Each ACC member is required to write a report on the schools allocated to him/her, with recommendations as to whether to accept or amend the accreditation recommendation by the secretariat (the Evaluation and Accreditation unit), along with supporting reasons for their recommendation

The ACC meets a minimum of four (4) times a year to discuss applications for accreditation. Each member presents his/her findings on the reports allocated to him/her, and the committee makes a decision as to the final recommendation of the outcome of the schools' application for accreditation.

The turnaround time from the submission of the self-evaluation report to communication of the outcome to the institution after presentation of the accreditation report to the Accreditation Committee of Council can be up to 18 months. The following factors may delay the process:

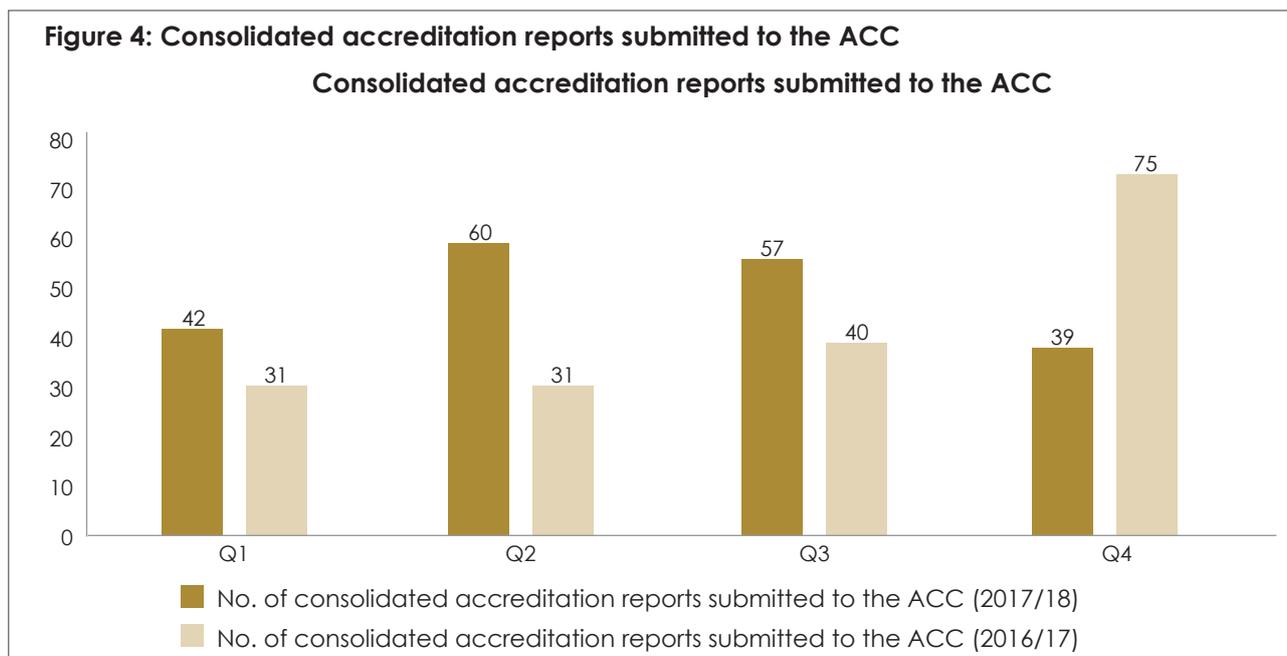
- Sending the application back to the school for further information;
- Non-payment for the site visit;
- The school has not attended a QP workshop in preparation for the site visit;
- Exams taking place;
- School holidays;
- Schools deferring site visits;
- Planning schools in remote areas to be visited at the same time.

However, the unit has made a great effort to shorten the turnaround time between site visit and presentation of the report to the ACC. Generally, a school can now expect an outcome within 6 months of the site visit.

Table 4: IS Reports submitted to the ACC between 01 April 2017 and 31 March 2018

	Q1	Q2	Q3	Q4	Total
No. of consolidated accreditation reports submitted to the ACC (2017/18)	42	60	57	39	198
No. of consolidated accreditation reports submitted to the ACC (2016/17)	31	31	40	75	177

Figure 4: Consolidated accreditation reports submitted to the ACC



The number of accreditation reports presented to the ACC per quarter depends on the number of applications received, most importantly, on the number of site verification visits conducted.

2.5 Accreditation outcomes and letters issued

The Accreditation Committee of Council makes a recommendation as to the outcome of the application of accreditation to the Chief Executive Officer of Umalusi on behalf of Council. Once an outcome has been approved, accreditation letters, signed by the Umalusi Chief Executive Officer on behalf of the Council, are issued to independent schools. Institutions are awarded one of the following statuses:

- Accreditation
- 2 years provisional accreditation
- No accreditation

The table below indicates the number of independent schools granted each status in the 2017/18 and previous financial years.

Table 5: Accreditation status granted to Independent Schools

	2014/15	2015/16	2016/17	2017/18	Total
Total Number of accreditation letters issued	64	144	191	218	617
Accreditation	40	60	118	142	360
Provisional accreditation	15	40	52	65	172
No accreditation	9	44	21	11	85

2.6 “Window period”

Chapter 3 clause 25(2) of the GENFETQA Act states:

“If a private education institution fails to comply with the policy, the Council must

- notify the private education institution in writing and set out the nature and extent of the failure; and
- determine a reasonable period within which the private education institution must comply with the policy.

25(3) further states “At expiry of the period contemplated in subsection (2)(b), the Council –

- a. “must evaluate the steps taken by the private education institution to comply with the policy and take into account any submissions made by the private education institution; and
- b. “may affirm the accreditation of the private education institution or withdraw the accreditation as from a date specified by Council”.

In terms of this legislation, a “window period to improve” is offered to private education institutions that fail to meet the minimum standards for accreditation at the first presentation of the accreditation report to the ACC. Such private education institutions are granted an opportunity to improve on their submission before the final accreditation decision is made. Letters clearly indicating the conditions the institution must meet and the time period in which the conditions must be met are sent to the affected institutions. Institutions must submit evidence of their compliance with the relevant conditions and pay the required evaluation fee prior to the expiry of the “window period”. The submitted evidence is evaluated, and where necessary, an unannounced follow up site visit is conducted to verify implementation of evidence submitted in respect of compliance with the conditions.

2.7 Improvement reports

If a school is granted an outcome of provisional accreditation or a window period to improve, the school is required to address the specific conditions that deprived them of accreditation within a specific time period. Once the school submits evidence in compliance with the specific conditions within the specified period, the evidence is evaluated by evaluators appointed by Umalusi. A follow-up site visit may be conducted to verify the evidence submitted by the school. These submissions are referred to as “improvement reports”. Since follow-up site visits only focus on specific conditions for which schools have already submitted evidence, the site visits can take place at any time of the school year.

The improvement reports are considered by the Internal Accreditation Committee (IAC) prior to presentation to the ACC for recommendation of the outcome. The IAC was established as a first step for review of reports in cases where an institution disputes the outcome of their application. The IAC also considers improvement reports and monitoring reports prior to their presentation to the ACC.

One hundred and 10 (110) “follow up” site verification visits were conducted in the period under review in the 2017/18 financial year compared to thirty-two (32) conducted in the 2016/17 financial year. This is an indication of an improved system and more schools coming through the process.

The number of improvement reports presented to the ACC depends on the number of improvement reports submitted by the institutions, and spans across quarters.

Table 6: Follow-up verification site visits conducted 2017/18

2017/18	Q1	Q2	Q3	Q4	Total
No. of “follow-up” verification site visits conducted	25	30	19	36	110

Figure 5: Follow up verification site visits conducted 2017/18**Table 7: Improvement reports presented to the ACC**

2017/18	Q1	Q2	Q3	Q4	Total
No. of "improvement reports" presented to the ACC	19	30	28	22	99

2.8 Accreditation decision taken after the window period or provisional accreditation

A report on the extent to which the private education institution meets the specified conditions during a window period or provisional accreditation (the "improvement report") is considered by the Accreditation Committee of Council. The ACC considers the extent to which the institution then meets the relevant conditions, and recommends the outcome of the institution's application for accreditation to the Chief Executive Officer of Umalusi for a final accreditation decision on behalf of Umalusi Council. The private education institution may be granted an outcome of accreditation, provisional accreditation, or no accreditation after a "window period", depending on the extent to which the institution meets the relevant criteria. A second "window period" or a "window period" after provisional accreditation may not be granted, therefore institutions which do not meet the minimum requirements for accreditation after a "window period" or provisional accreditation receive an outcome of "no accreditation". Should the institution not submit any evidence during the prescribed period, a report indicating such is submitted, and the outcome of the school's application is then "no accreditation".

Table 8: "Window Period" letters issued

	Q1	Q2	Q3	Q4	Total
No. of "window period" letters issued – 2016/17	0	3	83	21	107
No. of "window period" letters issued – 2017/18	16	4	32	0	52

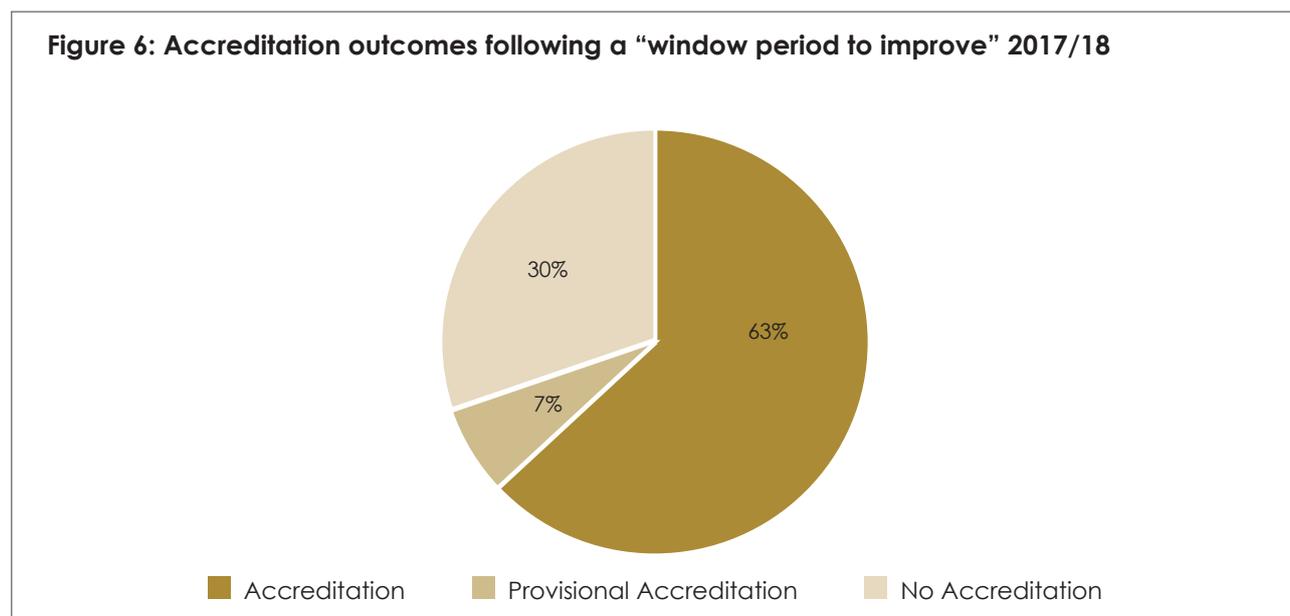
Independent schools that were granted a "window period" to improve

The evidence submitted by independent schools in response to the conditions to be met to meet the requirements for accreditation has shown the extent to which independent schools embrace the opportunity. The timelines given are generally adhered to. Moreover, the unannounced follow-up site verification visits have confirmed that the evidence submitted is a true reflection of the improvement the schools have made. Below is a table indicating the number of improvement reports (the reports on the evidence provided by an independent school following a "window period") presented to the ACC and the accreditation outcomes following the "window period" to improve.

Table 9: Accreditation outcomes following a window period to improve

Financial year	No. of Improvement reports presented to the ACC	No. granted accreditation following the window period	Number granted Provisional accreditation following the window period	No. granted "no accreditation" following the window period
2017-2018	76	48	5	23
	100%	63%	7%	30%

Figure 6: Accreditation outcomes following a "window period to improve" 2017/18



2.9 Improvements following a "window period"

The statistics above directly translate into an improvement in the conditions at schools, thereby improving the offering and environment experienced by learners and staff at those schools. The following are examples of improvements observed at various schools after being granted a "window period to improve".

Table 10: Examples of improvements following a window period

Condition	Improvement Report
Conditions at the hostel must be improved to ensure that learners have privacy, and that rooms are not overcrowded. Soap, toilet paper, and bins should be provided.	<p>The health and safety conditions in the boarding house for both boys and girls have improved. The school has increased the number of rooms. The number of learners in a room was reduced from five (5) to three (3).</p> <p>The kitchen in the boarding house was improved as the school installed an extractor fan above the gas stoves, the gas cylinders are safely stored outside in a built-up lockable cubicle.</p> <p>The ablution facilities have increased and there are soap dispensers, disposable hand towels, and sanitary bins in all the girls' toilets. The bathrooms are well-ventilated, neatly tiled and clean.</p>

Condition	Improvement Report
At least 80% of teachers must hold a professional teaching qualification and current registration with the South African Council for Educators (SACE). Currently 66.67% of teachers are professionally qualified and registered with SACE.	100% of teachers are professionally qualified and registered with SACE.
The odours in the bedrooms emanating from the toilets must be eliminated. Showers or bathing facilities must be provided, as well as cupboards for the storage of boarders' personal effects. The hostels must be revamped to be more habitable for the learners.	The boarding house has been revamped. Lockable cupboards have been purchased, and the ablution facilities have improved. As a result the odour that was emanating from them to the rooms has been eliminated. The boarding house is more comfortable and habitable.
The overcrowding of learners in the foundation phase must be addressed.	The enrolment has been reduced to 25 learners per class in the foundation phase.
Textbooks must be provided to learners in line with the policy of the school.	The school has invested in purchasing textbooks for the learners in all grades and subjects. The textbooks are CAPS compliant and each learner is in possession of a textbook or reader. All textbooks are returned to the school at the end of the year.
Moderation practices should be implemented at the school across all subjects and grades to ensure assessments of the required quality. This must be accompanied by a moderation plan.	Pre-assessment and post-assessment moderation practices are implemented across all grades. The moderation plan is sent to teachers at the beginning of the term together with the school assessment plan. The school based assessments and memoranda are moderated. The phase head conducts the moderation process.
More ablution facilities should be provided for the learners in line with the enrolment of the school.	The school has increased the ablution facilities. They have added 30 more cubicles. The ablution facilities are neatly tiled, well-lit and well-ventilated.

2.6.1 Areas of strength

- 2.6.1.1 Conditions to be addressed that are sent to schools are taken seriously and addressed.
- 2.6.1.2 Most of the schools are granted either accreditation or 2 years provisional accreditation after a "window period".

2.6.2 Areas of concern

- 2.6.2.1 Some of the schools wait until the last day of the expiry date to submit their improvement report.
- 2.6.2.2 Some schools claim to have not received the letters or are not aware of letters as the previous principal had left.
- 2.6.2.3 Some schools wait to be reminded to submit.

2.6.3 Recommendations for improvement

- 2.6.3.1 The importance of addressing the conditions and submitting on time must be emphasised during the Quality Promotion Meetings.

2.10 Monitoring

Compliant independent schools are accredited to offer a qualification registered on the General and Further Education and Training Sub-framework of qualifications and the related curriculum. Accredited independent schools are subject to monitoring to ensure maintenance and improvement of standards. If an independent school is found to no longer meet the minimum requirements for accreditation, the accreditation status may be withdrawn after following due process.

All accredited independent schools are required to comply with the requirements for monitoring at the designated time, determined by the date of receiving the accreditation outcome. Of the 111 schools to be monitored during the period under review, 107 schools submitted monitoring reports. One (1) school which did not submit a monitoring report was sold since its accreditation in 2015 and restarted the accreditation process under a new name. The other schools requested an extension to submit their monitoring reports. Should a school not submit a monitoring report as required, steps to review the accreditation status of the school will be instituted.

Fifty-two monitoring reports have been presented to the Accreditation Committee of Council. The reports received in Quarters 3 and 4 will be presented to the ACC in the new financial year.

Table 11: Independent schools monitored between 01 April 2017 and 31 March 2018

Monitoring of IS	Q1	Q2	Q3	Q4	Total
Total number of schools to be monitored	28	18	17	48	111
Total no. of reports received	27	17	14	49	107
No. of reports reported to ACC	0	0	44	8	52

2.10.1 Areas of strength

- Most of the schools continue to adhere to Umalusi's accreditation criteria post accreditation.

2.10.2 Areas of concern

- It is established that in some cases the number of teachers who are professionally qualified and registered with the South African Council for Educators (SACE) declines after accreditation of a school, resulting in the school becoming non-compliant with Umalusi's accreditation criteria.

2.10.3 Recommendations for improvement

- The professional qualifications of teachers and registration with SACE should be closely monitored by schools.

2.11 Stakeholder relations

2.11.1 Quality Promotion Meetings

Quality Promotion meetings are conducted with schools to explain accreditation criteria and provide guidelines for the self-evaluation and site verification processes prior to submission of the application for accreditation (that is, the self-evaluation report). These meetings are conducted in provinces across the country in line with the letters of intent to apply for accreditation submitted. Attendance of a Quality Promotion meeting is a compulsory step in the accreditation process, prior to a school gaining access to the self-evaluation report.

Table 12: Quality Promotion Meetings held between 01 April 2017 and 31 March 2018

	Q1	Q2	Q3	Q4	Total
Eastern Cape	02	0	0	0	02
Free State	01	0	0	01	02
Gauteng	04	02	01	05	12
KwaZulu Natal	02	01	01	01	05
Limpopo	02	01	0	01	04
Mpumalanga	01	01	0	01	03
Northern Cape	0	0	0	01	01
North West	01	01	0	01	03
Western Cape	02	01	01	01	05
Total no. of Quality Promotion Meetings held	15	07	03	12	37

2.11.1.1 Areas of strength

- Quality Promotion Meetings are conducted throughout the year as and when the need arises in line with applications received from the schools.
- Schools understand the accreditation process and have a clear understanding of Umalusi's expectations following the meetings.

2.11.1.2 Areas of concern

- Some of the schools do not attend Quality Promotion Meetings and therefore remain at the LOI stage because the system will not allow them to submit the self-evaluation report if they have not attended a Quality Promotion Meeting.
- Some of the schools send a person who does not understand curriculum issues, or is not involved in the compilation of the self-evaluation report.

2.11.1.3 Recommendations for improvement

- Schools should be encouraged to send people who understand curriculum issues and will be involved in the compilation of the self-evaluation report to the Quality Promotion Meetings so that they can clearly understand Umalusi's expectations for completion of the self-evaluation report and site verification visit.

2.11.2 Other Meetings with Stakeholders

The Independent Schools sub-unit engages in various activities to establish and maintain stakeholder relations, such as:

- Meetings with the Provincial Education Departments and the Department of Basic Education to discuss matters of common interest.
- Meetings with the organised independent schools' associations to discuss issues pertaining to the quality assurance/evaluation and accreditation of such schools.
- Any other meeting or seminar that may be initiated by the sub-unit and approved by the Senior Manager.

Table 13: Formal meetings held with stakeholders between 01 April 2017 and 31 March 2018

Details	Q1	Q2	Q3	Q4	Total
Provincial Departments of Education	01	04	-	04	09
National Alliance of Independent School Associations (NAISA)	01	-	-	-	01
Total	02	04	-	04	10

2.11.3 Feedback from schools with regard to the accreditation process

2.11.3.1 Positive feedback from most of the schools include the following:

- Professionalism and thoroughness of the evaluators in verifying evidence.
- Friendliness of the evaluators during interviews and the relevance of the interview questions.
- Arrangements leading to the site verification visit.

2.11.3.2 Recommendations for improvement include the following:

- Most of the schools request immediate feedback guiding them on their performance during the site verification visit.
- Some of the schools indicate that one day is not enough for the site verification visit.

2.12 Other activities

2.12.1 Accreditation Policy

The Independent Schools sub-unit has reviewed and amended the *Policy and criteria for the quality assurance, accreditation and monitoring of independent schools and private assessment bodies (Government Gazette No. 35830 of 29 October 2012)*. The reviewed policy was promulgated for comments on 7 October 2016 (*Government Gazette 40337*). The comments were taken into account, the policy amended and submitted to Umalusi Council and the Minister of Basic Education for approval. The amended policy was gazetted by the Minister on 27 October 2017, *Government Gazette 41206 (Government Notice No. 1142)*.

Alongside this process, the regulations regarding the policy were also developed and gazetted by the Minister of Basic Education on 27 October 2017 (*Government Gazette No. 41206, Government Notice No.1143*).

2.12.2 Training

In an endeavour to expand the evaluation teams and establish regional teams to conduct the site verification visits, the Independent Schools sub-unit embarked on a process of recruitment of evaluators across the country. Applications were received, processed and shortlisted for training. Through this process, 123 evaluators and subject specialists were trained and appointed. A bigger pool of ad hoc staff will assist the Independent Schools sub-unit to process the applications from independent schools in a shorter time.

2.12.3 Review of the accreditation instruments and site visit approach

The sub-unit, in conjunction with the Statistical Information and Research unit of Umalusi, has recently reviewed the accreditation instruments which are being piloted prior to full implementation. The new instruments intend to reduce the administrative work of uploading evidence by schools. The site verification approach will also paint an overall picture of the schools' quality of provision by focussing on a wider range of subjects.

2.12.4 Home Education Policy

The sub-unit has been part of the committee reviewing the 1999 policy on home education. One of the key issues discussed was the trend of institutions which operate illegally as schools and bypass registration by the provincial education departments and accreditation by Umalusi.

2.12.5 HEDCOM Sub-committee on Independent Schools

In November 2015, the CEO of Umalusi requested the Director General of Basic Education for the formation of a HEDCOM Sub-committee on Independent Schools to ensure uniform policy implementation of registration of independent schools. The sub-unit participates in the sub-committee and has been involved in the discussion of issues related to registration and accreditation of independent schools.

2.12.6 Advocacy

In December 2017, the sub-unit shared with the public through YFM the difference between registration and accreditation of independent schools.

Two issues of the Independent Schools' Newsletter, *Heartbeat*, were published on Umalusi's website and emailed to independent schools during the 2017/18 financial year.

The sub-unit contributed articles to Umalusi's publication – *Makoya*.

2.12.7 Reporting to the Provincial Education Departments

The status of independent schools is reported to Provincial Education Departments annually, and more frequently on request. The status is reported in terms of "green" and "red" status.

A "green" status indicates that an independent school is compliant with Umalusi's requirements for that particular year. A "red" status indicates that either the independent school has not made sufficient progress in their application to be considered compliant with Umalusi's requirements, or the independent school has been through the accreditation process and found not to meet the minimum requirements for accreditation.

The category of "amber" status was introduced in the third quarter of 2017/18 to cater for schools that are in the Umalusi accreditation process and have not yet met the prescribed minimum standards for accreditation. Such schools have been granted a "window period" to improve on their submission. The assessment body can use their discretion as to whether or not to register such schools as examination centres for 2018. Should the examination centre status be granted, the assessment body is required to take full responsibility and accountability for the examination centre.

The table below reflects the status of all registered independent schools in South Africa, including primary schools and schools offering a qualification other than the National Senior Certificate.

Table 14: "Green, amber and red" status of independent schools per province - 2018

Province	Green Status	Amber status	Red Status	Total
Eastern Cape	98	13	96	207
Free State	23	08	37	68
Gauteng	419	34	679	1150
KwaZulu Natal	142	18	94	254
Limpopo	77	25	50	152
Mpumalanga	63	3	61	127
North West	44	4	21	69
Northern Cape	15	6	11	32
Western Cape	113	6	141	260
TOTAL	994	117	1190	2319

3. GENERAL CHALLENGES AND RECOMMENDATIONS

3.1 Institutions other than Independent Schools offering the National Senior Certificate

The *General and Further Education and Training Quality Assurance Act, 2001 (Act No. 58 of 2001)* in terms of sections 17A(2), and 23(1) and 24 defines the scope of Umalusi's quality assurance processes as institutions registered as independent schools in terms of the South African Schools Act, 1996 (Act No. 84 of 1996); private colleges for further education and training in terms of the Further Education and Training Colleges Act, 2006 (Act No. 16 of 2006), and private centres in terms of the Adult Basic Education and Training Act, 2000 (Act No. 52 of 2000).

In practice, the National Senior Certificate and the National Curriculum Statement leading to the National Senior Certificate are being offered by a number of private education institutions which do not fall into the definition of an independent school and therefore cannot be registered as independent schools. These include distance education providers, online providers, home education, and repeater and second chance centres. Since these institutions cannot be registered as independent schools, they fall outside the legislated mandate of Umalusi, and yet they offer a qualification registered on the GFETQSF.

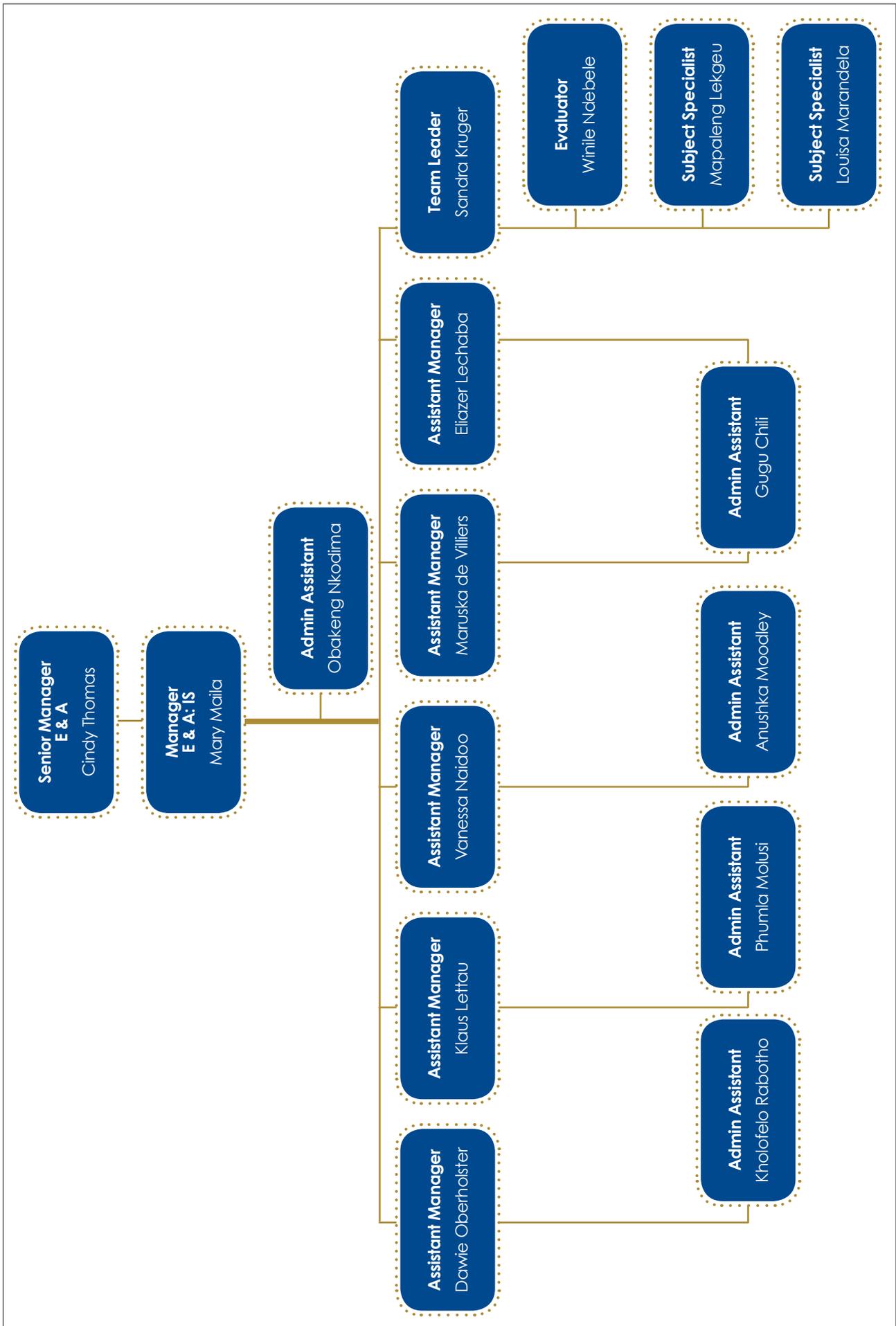
A task team has been established and has presented recommendations on the regulation of Distance Education and Matric Rewrite Centres. Formal discussions are taking place between Umalusi and the Department of Basic Education to determine the way forward with regard to regulation of these types of private institutions.

CONCLUSION

Section 3 of the National Qualifications Act (NQF) No. 67 of 2008 states that every qualification or part-qualification offered in South Africa must be registered on the National Qualifications Framework. All independent schools that offer a qualification that is registered on the GFETQSF are required by law to apply for accreditation with Umalusi. It is in that light that the sub-unit is inundated with applications for accreditation.

The sub-unit strives to ensure quality provision of the qualification registered on the GFETQSF, the National Senior Certificate. The sub-unit prides itself in the 370 schools that have been granted accreditation and 107 schools that have been granted provisional accreditation in the period 2013 to March 2018.

Annexure A: Evaluation and Accreditation IS sub-unit organogram



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