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FET PRIVATE PROVIDERS SITE VISIT AND VERIFICATION REPORT

UMALUSI

Council for Quality Assurance in General and Further Education and Training

Contents

Executive summary

In accordance with the Further Education and Training Act (No. 98 of 1998) (hereafter referred to as the FET Act), private providers had to register with the Department of Education (DoE) as a precondition for offering further education and training (FET). Subsequent regulations required that providers begin the process of accreditation with Umalusi.

In 2003 Umalusi began developing criteria for provisional accreditation for private providers, and initiated a desktop evaluation process. During 2006 and 2007, a number of providers and their sites were recommended as accreditation candidates on the basis of the desktop evaluations. Subsequently, a process for verification of the evidence submitted was carried out by means of site visits. This is the focus of this report. On the basis of this process, twenty-five private FET provider sites have been confirmed for accreditation by Umalusi.

While accrediting those providers who are already in contact with Umalusi as a result of the site visit process, a central purpose is for Umalusi to build up its understanding of the sector in order to refine its initial model of accreditation and quality assurance. A complex sector with large numbers of providers who range considerably in size, scope and nature may demand new thinking around procedures. There are broad areas of confusion in relation to policy, legislation and responsibility in FET.

Key questions for Umalusi include:

- The need to define the scope of Umalusi's responsibilities in relation to programme and qualification type, and in relation to multi-purpose provision. Private provision covers National Qualifications Framework (NQF) registered qualifications, non-NQF-registered qualifications, and a range of part qualifications, skills programmes and short courses.

- The need to select a model that is useful and implementable for this sector when taken to full scale. A quality assurance model can choose to focus on different features of a system rather than addressing all organisational and delivery elements.

- The need to find ways to manage relationships with the other two quality councils and other quality assurance bodies, especially where there are overlaps in terms of accountability. Agreements on articulation and equivalence, access and progress between different routes, or common understandings of the cross-sectoral components of qualifications need to be reached.

- The need to provide clear guidelines to those providers who must register with Umalusi, in particular around accreditation status.

The report sketches out the current landscape for FET providers in terms of size, shape, nature of delivery and regulatory context. This information is vital to understanding some of the pressures and barriers that private providers face, and to understanding some of the complexities that Umalusi will face in finding a common approach for these providers.

The methodology and instruments used for the process are described in Part 3. Parts 4 and 5 report in detail on the findings of the site visit verification reports and the data capture process for the sample of providers in this phase of the process. These findings illuminate the general comments made in previous sections, and provide a "hands-on" picture of some of the challenges of this sector. The section gives basic information on a number of institutional and other aspects of the sample: for example, the range of programme offerings, enrolments and awards, learner and staff profiles, assessment practices and so on. It also summarises the more nuanced observations on the sample made by the evaluators and monitors, suggesting themes and trends that need to inform future planning.

Part 6 sums up the main characteristics of private FET provision as identified by this process, noting implications for accreditation and quality assurance processes. A menu of options and issues is drawn up for further exploration.

These include:

- Mapping programme and qualifications offerings, and identifying those that are of concern to Umalusi.

- Defining and understanding the nature of quality assurance overlap issues, and developing partnerships to address these.

- In the interests of streamlined and resource-effective procedures, looking at selective approaches using contained indicators for accreditation (for example, minimum institutional requirements, avoidance of duplication, selection of a focus area, using a red flag system). Some of these may only apply to particular components of private provision.

1 Introduction:

Umalusi's approach to quality assurance and accreditation

There are numerous definitions of quality, quality assurance, quality management, audits and controls.

While quality assurance often focuses on the quality of physical products (as in the South African Bureau of Standards), in education and training it focuses on the cycle of learning and teaching and its results: that is, improvement of inputs (the quality of provision) and outputs (the achievements of the learners). The South African Qualifications Authority (SAQA) has described the quality cycle as...

...all the critical points in the quality process, namely:

- The product or outcome: awards; achievement of standards or qualifications; accreditation;
- The inputs: learning provision; programmes; learning and learner resources; life or experiential learning;
- The process: the quality of the learning and assessment interactions; the quality of the monitoring and auditing interactions. (SAQA, 2001, p.15)

Through the General and Further Education and Training Quality Assurance Act, (No. 58 of 2001) (hereafter referred to as the GENFETQA Act), Umalusi currently has statutory responsibility in the General and Further Education and Training bands in two separate but associated areas: quality assurance of providers, and quality assurance of qualifications and assessment.
Umalusi's priority area so far in its existence has been general and further education as provided through public and private schooling. Its primary mechanism has been insights generated by the results of the Senior Certificate as an external and standardising assessment process. However, in line with the richer understanding of the cycle of teaching and learning implied by the SAQA quotation above, Umalusi has also concerned itself with an accreditation approach that focuses on the quality of teaching and learning and not just the end point of results. For example, the full Accreditation Criteria for Private Providers includes an Assessment of four broad areas:

- Leadership and management
- The school ethos
- Teaching and learning
- School performance results (Umalusi, 2007d, p.9)

Criteria in the form of qualitative measures against which the Provider can be measured have been developed in these four areas, and ongoing monitoring will enable Umalusi to report on the quality of provision against these.

Umalusi's current approach to quality assurance, then, has three major elements:

- The curricula that are prescribed for national courses
- The external assessments that test these curricula
- The institutions through which curricula are delivered. (Umalusi, 2007d).

In what ways and to what extent can Umalusi's current approach apply to the private FET sector? Which of these elements are available in the private FET sector? What principles need to be retained, and what adaptations could be made to its model so that Umalusi can carry out its responsibilities to this sector without straining its resources? Are alternative approaches feasible? What are the striking characteristics of the sector that need to be taken into account in developing a viable model for accreditation and quality assurance?

This document offers an overview of the sector, and reports on the information gathered by Umalusi's site visit verification and data collection processes in order to help answer these questions.

2 Private FET:

The landscape

This section gives an overview of the types of organisations and institutions in this category, the nature of provision, and the policy and regulatory environment in which private FET operates.

The FET band by definition encompasses all provision at Levels 2–4 on the National Qualifications Framework (NQF). As Gamble (2003) describes it:

> There are four components to this provision: public and private secondary school schooling, public FET colleges, private providers and industry-based training centres. These four components do not constitute a coherent "system", since there has never been a tradition of co-ordination and planning across these four major components to forge a sense of "system". (p.4)

The focus of this report is on private providers as institutional types for the purposes of accreditation. It should be noted that FET private providers as a sector have not been intensively researched, either qualitatively or quantitatively. There are various reasons for this. State policy and the research underpinning policy have focused on public provision as a priority, and the environment itself does not promote clarity in terms of defining characteristics of the private sector for research purposes (for example, under whose authority providers fall, how the offerings can be classified). While it is generally accepted that there has been substantial growth in the private FET sector since 1990, these figures should be treated with caution until the registration processes have been finalised. In the most recent comprehensive study of the sector , Akojee (2005) points out that the sector has been the subject of "wide-ranging guesstimates of the extent and the importance of the sector" (p.2). The figures he uses are based on the DoE pre-registration process, which estimates a learner headcount enrolment in private FET of 706 884 learners for the 864 providers in the process, with an estimated 4 178 delivery sites (2005, p.20). These numbers exceed those of the private higher education sector and the public FET sector. The rapid growth rate of private FET provision must also be taken into account. These figures are likely to be reviewed once the registration process is complete, and once definitions emerge of what constitutes private FET. It is, however, clear that private FET is a significant sector that can have an important impact on skills development.

The descriptions given here draw on the Akojee study, on Umalusi's internal reports and its interactions with the sector, and the experiential knowledge of various informed individuals involved in the project. They are also guided by the characteristics of the providers in the Umalusi sample, while bearing in mind that the size of the sample means that any generalisations cannot be made with certainty.

Prior to the change of government in 1994, a fair proportion of "non-public" provision was carried out by funded, not-for-profit non-governmental organisations (NGOs) offering a range of programmes such as Adult Basic Education, "second-chance" matriculation for out-of-school youth, or short programmes directed at job-seekers. Once a democratically elected government took power, however, much international funding dried up: the NGO sector has gradually moved towards an organisational orientation for self-sustainability or profitability to varying degrees. A typology for private FET providers developed by the Human Sciences Research Council (HSRC) and applied on the basis of DoE pre-registration figures (Akojee, 2005, p.13) reveals provision ratios of 75% for profit organisations, 14% not-for-profit, and 11% in-house providers. Given that the small Umalusi sample studied for this report also reflects a majority of for-profit providers, these will be the focus of this section; the slightly different dynamics that may affect not-for-profit providers or industry training centres (in-house) will not be explored here.

2.1 AN OVERVIEW OF KEY FEATURES OF PRIVATE PROVISION

Some of the characteristics of private providers in the FET sector can be summarised as follows:

2.1.1 SIZE AND PURPOSE

Providers vary greatly in size, and there are problems finding common criteria for defining size. For example, the criterion of learner numbers per annum means one thing when applied to a full-time course that takes place over a period such as a year; another if the numbers refer to part-time students taking the same course over a longer period; and something completely different if applied to throughput in a two- or three-day course (of which there seem to be a substantial number). Size is linked to purpose, in that many large providers are multi-purpose, and have a variety of sites or organisational divisions for different types of programme offerings, while others are small, single-site providers, targeting a particular type of course and market niche.

2.1.2 CLIENTS

Clients may be corporate organisations or industries themselves, agencies undertaking specifically funded projects (for example, Sector Education and Training Authorities (SETAs) or government departments), or individual members of the public.

2.1.3 LEARNERS

Learner profiles are varied, both across and within institutions. They may include people who have enrolled as individuals, or selected groups of employed or pre-employed learners who have been enrolled for targeted training by employers or companies, or for funded interventions. In addition, they may include post-school learners who already have a senior certificate (or beyond) and are now aiming to improve occupation-specific or technical skills at FET levels, or they may include learners who do not have a secondary school equivalent certification. In terms of race profile, the Akojee study (2005) suggests that the sector broadly reflects the demographic profile of the country: 73% African enrolment, 11% Coloured enrolment, 10% White enrolment and 6% Indian enrolment. This study also suggests that learners in private FET are generally older than the majority of those in public FET, and more often already in employment. (The learner profile for the Akojee study is unpacked on pages 18-23.)

2.1.4 STAFF

The Akojee study (2005) suggests that while most management and administrative staff are full-time appointments, the majority of teaching staff are employed on a part-time basis (59%) (p.37). The Akojee figures for 2002 give the formal qualification figures for staff as 64% with either a certificate or a diploma, 36% with university qualifications, and 17% with a postgraduate degree (p.37). However, requirements for teaching in private FET at the present time are highly dependent on the nature of the courses being offered. Experience in the sector suggests that many providers are more interested in practical experience and expertise in the occupational sector related to a programme than they are in formal teaching qualifications. The nature of provision, in particular the emphasis on purpose-driven short courses, is such that there is also an emphasis on experience in hands-on training, facilitation or mentoring.

2.1.5 PROGRAMMES

The range of programme offerings in the sector is extremely complex. In terms of qualifications, it spans academic school qualifications, vocational qualifications, unit-standards-based occupational qualifications (sometimes linked to learnerships), and what have been termed “legacy qualifications”, which were developed by providers themselves prior to the registration of relevant unit

standards or qualifications. Many providers also offer international or vendor-based qualifications (which are not qualifications as defined in the SAQA sense, with the specified rules of combination). The programmes and qualifications span the twelve SAQA fields of learning, which are as follows:

01	Agriculture and nature conservation	Agric & Nature
02	Culture and arts	C&A
03	Business, commerce and management studies	BCM
04	Communication studies and language	C&L
05	Education, training and development	ETD
06	Manufacturing, engineering and technology	MET
07	Human and social studies	HSS
08	Law, military science and security	LMS
09	Health sciences and social services	HS&SS
10	Physical, mathematical, computer and life sciences	PMCL
11	Services	Serv
12	Physical planning and construction	Plan&C

It should also be noted that some private providers offer programmes outside the FET band, either at NQF Level 1 (for example, the Adult General Education and Training Certificate (GETC), or some occupational NQF Level 1 qualifications), or at NQF Level 5 (for example, N4 and N5 courses, or some NQF Level 5 professional body qualifications, occupational qualifications or part qualifications).

In addition, private providers also offer a variety of short courses. These can be defined in various ways, and encompass a number of different purposes. They may take the form of skills programmes based on unit standards: they are thus NQF-registered and credit-bearing, and can be defined as "part qualifications" in that they could build up to full qualifications. Other short courses may be very specifically targeted at a particular set of skills (for example, office practices or City and Guilds courses) and may not be unit standard based. Some courses, such as those in information technology, may be vendor-specific, and certificated by the vendor (for example, Microsoft courses). Yet other short courses are designed to the requirements of a client or the needs of a specific workplace. It would appear, in fact, that provision of short courses, often needs or market driven, is a primary focus in this sector. As Akojee (2005) points out, "programme duration serves as a significant characteristic feature of private provision" (p.27). The figures in this study showed that 33% of the programmes were between one and seven days, while about 65% were short modular courses of less than six months. The remainder were divided between 6 to 23 months, with only 5% having a duration of two years.

2.1.6 QUALITY ASSURANCE

One consequence of this range of provision is the number of quality assurance authorities private providers have to deal with. Briefly, the quality assurance cast of actors is as follows:

- The DoE, through its own national examinations and moderation sections, through its provincial departments, and through Umalusi's assessment and moderation requirements and procedures, covers the following:
  - DoE: NATED 190/191 (National Technical Certificate) – N1, N2, N3, N4
  - National Certificate Vocational – currently only being introduced at NQF Level 2 (2007), but intended to replace N1-N3
  - GETC Adult (NQF 1)
  - National Senior Certificate (NQF 4)

- SETA ETQAs, any one of 23 SETAs, covering either occupational qualifications in full, (e.g., through learnerships resulting in a qualification), or skills programmes/ short courses against one or a set of registered unit standards. Many providers need to deal with more than one SETA ETQA because of the scope of their offerings. SETA ETQAs have also tended to assure

the quality of the required generic fundamentals (language and mathematical literacy) in a qualification, to very varying standards.

- Professional bodies assure the quality of those qualifications that fall within their mandate, either through external national assessments and/or moderation procedures.

- International agencies certificate and assure the quality of vendor-based qualifications. Frequently this is done through predetermined assessment packages that form part of the courseware.

- Many "legacy qualifications", programmes based on the provider's own certificates, and various short courses (mainly those that are not unit-standard-based) that are not subject to external quality assurance. Providers institute their own internal assessments and monitoring mechanisms.

What this brief overview of key features shows is that there is little uniformity in the sector. Curricula and programme duration are highly variable; assessment and quality assurance are either internal, pre-defined by purchased courseware, or determined by one of a number of possible authorities; institutional calendars and time-frames are put in place according to the nature of the programme, the clients and the availability of the learners (for example, term-based, block release, full time and part time). These and other features all have implications for determining a viable quality assurance approach to private FET providers.

2.2 POLICY AND REGULATORY ENVIRONMENT

In the unfolding of the NQF and its related quality assurance models and agencies, the regulatory terrain for private FET providers has become very complex.

Prior to 1998 private providers were not required to register, and the sector was regulated by two voluntary bodies (the Association of Private Colleges of SA (APCSA) and the Association of Distance Education Colleges (ADEC)). With the passing of the FET Act, however, private providers were required to register with the DoE as a precondition for offering FET education and training. Criteria for registration included financial capacity, maintenance of acceptable standards (that is, comparable to those at public FET institutions) and compliance with quality assurance procedures as defined by SAQA. In 2001, the DoE instituted a pre-registration process. Private providers were then requested to register in terms of the Regulations for the Registration of Private FET Institutions (Government Gazette 25642, 2003). One of these requirements was to initiate the process of accreditation with Umalusi, a process that has been proceeding since 2003. Subsequently the Further Education and Training Colleges Act (No. 16 of 2006) was passed, specifying that private colleges will comply with the requirements of Umalusi. Government Notice No. 518 of June 2006, in addition, specified that, with effect from 1 January 2008, no private providers would be allowed to offer further education and training qualifications that "are not aligned with or registered on the NQF" (p.1). The exception to this requirement is providers that "exclusively offer short skills programmes, as it is not necessary for them to register" (p.1).

As Akojee (2005) points out, "regulation has a dual purpose – to ensure consumer protection as well as to create an enabling environment for the sector to exist" (p.4). In terms of registration per se as a mechanism for recording the existence of colleges, and tracking issues such as company registration compliance and financial viability, registration is relatively straightforward. However, when the more qualitative procedures linked to quality assurance and accreditation are brought in, the situation becomes more unmanageable.

This complexity manifests itself in various ways. First, the legislation governing quality assurance responsibility for FET in the broadest sense has caused some confusion. The GENFETQA Act specified Umalusi as the body responsible for developing a quality assurance framework for the general and further education bands of the NQF; at the same time, however, SETA ETQA bodies were given

statutory functions involving activities that include the accreditation of providers, the evaluation of learning programmes, the quality assurance of learner achievements (including the award of credits and qualifications), and the registration of constituent assessors. Given that most of the occupational and sector-specific qualifications with which SETA ETQAs are concerned fall in the FET band, and therefore form part of provision by FET private colleges, this means that there will inevitably be overlaps of jurisdiction. As multi-purpose providers, many FET providers find themselves in the position of offering programmes and qualifications that fall under the authority of both Umalusi and SETA ETQAs. The registration requirements also demand that all private providers offering qualifications must be accredited by Umalusi in order to be registered by the DoE.

This situation has had various consequences. First, it means that the ETQA regulation stating that a provider cannot be accredited by more than one ETQA contradicts the requirements of other legislation: this has caused some confusion in the field. Second, many providers (sometimes under pressure from clients, or from skills-development-funding modalities) have gone ahead and applied for accreditation with various SETAs. They are thus in the position of having to meet differing accreditation requirements and to go through costly and sometimes confusing procedures for different programmes. The mechanism of memoranda of understanding (MoUs), which was intended to facilitate the relationships between different ETQAs and support to effective delivery, has proved almost impossible to implement, for reasons that will not be explored here.

In addition, there are progression issues for many learners exiting private FET provision: owing to the unclear status of some of the qualifications offered, learners may have problems accessing further opportunities in the public sector and/or in the higher education sector. Blom (2005) has noted that there are perceived difficulties about articulation between unit-standard based qualifications and non-unit-standard based qualifications: "The systemic arrangements to achieve such routes are seen to be neglected by the authorities responsible for systemic coherence" (p.131).

Private providers operate in a quality assurance landscape that is multi-layered, ambiguous and fluid. The range of programmes that can be offered in this sector (in terms of length, purpose, format and various other features) as described above engenders a host of different approaches and quality assurance concerns. It must also be noted that this landscape includes very different models of quality assurance: Umalusi's current model of quality assurance differs markedly from the overall model adopted by the SETA ETQAs. In addition, there is a lack of uniformity in how different SETAs apply this model. Umalusi focuses on curricula and external assessment as a standardising measure, and requires a solid institutional base for those qualifications it is responsible for; SETA ETQAs have adopted a decentralised model that involves individual programme approval, verification of internal systems of assessment and the use of registered assessors. These differences are inevitable, and reflect the nature of the providers, learning systems and learning offerings with which the different actors have primarily been involved. However, in the emerging situation it is clear that incoherent duplication of accreditation is expensive and time consuming to both providers and quality assurance bodies.

A new development that also needs to be taken into account is the proposed Qualifications Council for Trades and Occupations (QCTO). Much work has been done on a revised approach for the design and management of occupational qualifications on the NQF in support of a more streamlined and rational system for implementing and monitoring skills development and occupational awards. These proposals will address new ways of approaching the delivery, assessment and monitoring of the knowledge and theory, practical application, and workplace-based components of occupational learning: the model therefore has a number of implications for quality assurance, and will thereby affect those private providers who deliver part of, or the whole of, NQF-registered occupational qualifications.

It is clear that the current policy and regulatory environment is not at present stable enough for Umalusi to make any final decisions on a quality assurance approach to the sector. Umalusi's current investigations are aimed at informing itself of all the many variables at play, in order to support

meaningful engagement with the players in the sector. Its tasks at the moment are to formulate key questions to help shape its involvement in quality assurance of the sector, and to give guidance to its registered providers.These questions include:

- The need to define the scope of Umalusi's responsibilities in relation to programme and qualification type. Unit-standard based occupational qualifications that will clearly fall under the proposed QCTO and related skills programmes will not be Umalusi's primary concern, although there may be implications for partnerships in relation to cross-sectoral elements of these qualifications. Provider-based qualifications and short courses may need to be categorised in some way that will determine whether any of these are relevant to Umalusi's mandate.

- The need to select a model that is useful and implementable for this sector. A quality assurance model can choose to focus on different features of a system rather than addressing all organisational and delivery elements. Prioritisation questions are key: should the focus be, for example, on minimum institutional requirements, or should the emphasis be on the quality of learner achievements (for example, through common external assessments, through monitoring and evaluation, through sampling) as the need arises?

- The need to find ways to manage issues around articulation and equivalence, such as access and progress between different routes, or common understandings of the cross-sectoral components of qualifications. This involves setting up working relationships with other quality assurance bodies with an interest in FET, or who build on FET.
- The need to provide clear guidelines to those providers who must register with Umalusi, in order to alleviate some of the pressures they face.

In the interests of building up a preliminary view of the providers who will be approaching Umalusi for accreditation, then, we will now turn to an overview of the key trends shown by the data collection and verification process.

3 The site visits

This section reviews the aims, goals, processes and methodology of the site visits that were undertaken to the first cohort of accreditation candidates.

3.1 BACKGROUND

As discussed above, in accordance with the FET Act, private providers were required to register with the DoE as a precondition for offering FET training. In 2001 the DoE instituted a pre-registration process. Private providers were then requested to register in terms of the Regulations for the Registration of Private FET Institutions (Government Gazette 25642, 2003). One of these requirements was to initiate the process of accreditation with Umalusi.

In 2003, Umalusi began developing criteria for provisional accreditation for private providers, and started the process through the model of desktop evaluation of provider portfolios of evidence. Given that many private providers have multiple sites, Umalusi made the decision to accredit per site rather than per provider. During 2006 and 2007 a number of providers and their sites were recommended as accreditation candidates on the basis of the desktop evaluation. The next step in the process is the subject of this section – verification by means of site visits of the evidence submitted by the first cohort of accreditation candidates.

Figure 1: Background information on the provisional accreditation process

Note: Umalusi will accredit providers per site, not as a whole entity.

Number of providers who have made contact with Umalusi for accreditation purposes, but have not yet submitted full documentation	* 320
Number of providers who submitted portfolios of evidence for provisional accreditation	89
Number of sites who submitted portfolios of evidence for provisional accreditation	162
Number of providers who were granted status as accreditation candidates	20
Number of sites who were granted status as accreditation candidates	74
Number of providers selected for the first round of site visits	23
Number of sites selected for the first round of site visits	23+09 satellites = 32
Criteria for sampling for 1st cohort of accreditation candidates	1 head office and 1 satellite (where applicable)

Number of providers who make up the sample in this report	23
Number of sites who make up the sample in this report	23+09 satellites = 32 2 spoilt reports: 30 sites in total

* The number at the time of analysing the data.

3.2 AIMS OF THE SITE VISITS

The primary goal of the site visits was to verify the information submitted by providers in their portfolios of evidence. This entailed the evaluation of levels of implementation and compliance in relation to the claims made in the portfolios. Evaluation was undertaken through a number of mechanisms, including the review of tangible evidence such as written documentation and data systems, observation of various processes, and interaction with key personnel. The procedures for the site visits are described in more detail below.

In addition, there were broader aims for the site visits. These include:

- Establishing relationships between Umalusi and the providers. Umalusi wanted to present itself as the overseeing agency carrying out statutory responsibilities for quality assurance, and as an agency that will be receptive to provider feedback and concerns.

- Gathering information on key contextual issues affecting private provision in FET. Umalusi needed to inform itself of the dynamics, barriers, environmental and regulatory issues that either support or hinder successful and worthwhile provision in this sector. It was hoped that these would inform its own developing policies and procedures for the sector. It also needed to understand the scope and nature of provision, which is extremely varied, in order to build up its own relationships with other stakeholders.

- Developing Umalusi's own institutional capacity through building up a "hands on" familiarity with the sector. On a practical level this will help to refine future rounds of accreditation.

3.3 PLANNING AND PROCEDURES FOR SITE VISITS AND REPORTING

3.3.1 INSTRUMENTS

Instruments developed included:

- Briefing documents and terms of reference for the monitors and evaluators

- The site visit programme: The structured, common programme of events that every evaluator followed on his/her site visit

- The Umalusi presentation: The PowerPoint presentation that the evaluator presents at the start of the site visit, explaining Umalusi's role and the aims and goals of the site visit

- The FET profile: This was completed by the provider, and provided information on motivation for existence, programme offerings, assessment, reporting and certification practices, relationships with SETA ETQAs, learner numbers and profiles, staff profiles, resources and company information
- The verification report: This report was submitted by the evaluator on the basis of the site visit. It sets out the criteria and evidence requirements for the evaluation process, and includes a rating template for the level of implementation in each category of criteria. Categories

are divided into structured questions to enable the evaluator to elicit the information, linked to observation and inspection of various forms of evidence. The categories cover the following aspects of provision:

- Leadership, governance and strategic planning
- Policies, procedures, internal monitoring and review
- Financial resources
- Management information system and reporting
- Staff establishment
- Qualifications and learning programmes
- Instruction and delivery
- Assessment
- Premises and facilities
- Learner access and support
- Marketing
- Client satisfaction

The verification report includes sections for general comments and observations on trends and inconsistencies, challenges, examples of good practice and recommendations. The evaluator makes a general rating according to weighting guidelines for individual categories, and indicates the correlation between the portfolio of evidence and the verification process. Finally, the evaluator either confirms full compliance or not, indicating areas in which compliance has not been achieved.

- The site visit booklet: This has been structured in relation to the verification report, and is the recording instrument for the evaluator's own use. Evaluators take notes during the questioning, observation and inspection processes, and during the interviews and focus groups, as the basis for submission of the verification report. In addition, there is a feedback template to complete, including a self-evaluation form, an incident report form, and an opportunity to make comments and recommendations on the process and the instruments for future refinement.

- The database: This was developed through a commission to an independent contractor to carry out the quantitative analysis of the data collected through the site visits. It is linked to a template to be completed by the monitors for processing by contractor.

3.3.2 Personnel and training

There are two categories of site visit verification personnel, monitors and evaluators, with one monitor to every three evaluators. The monitor has two main roles. The first is to coach and support the evaluators who undertake the site visits; this includes an initial meeting with his/her evaluators to ensure a common understanding of the instruments, accompanying evaluators on at least one site visit, and serving as the resource person through ongoing communication regarding any difficulties or problems encountered. The second role is to quality assure submitted reports, checking for inconsistencies between comments and gradings, and ensuring that motivations are adequately given. The evaluator's main role is to carry out his/her allocated site visits effectively and efficiently, to submit verification reports to monitors, and amend or extend these in the light of feedback from the monitors. All reports are moderated by Umalusi before finalisation.

A total of 32 monitors and evaluators from all provinces were trained in a three-day workshop held from 22 to 24 June 2007. The workshop dealt with familiarisation with the instruments, coverage of the site visit programme, a briefing on the Umalusi presentation to providers, and discussions on how to interact with the various participants in the site visits, especially in relation to the focus groups. In addition, procedures for submitting reports and filling in the contractor forms were given.

During the process two workshops were held with the monitors, Umalusi staff and the appointed final report writers. The debriefing workshop on 8 August 2007 gave monitors an opportunity to report back on the process so far, and to highlight areas or procedures that might need review. The

plenary workshop held on 24 October 2007 included further feedback on these issues. Its key focus, however, was to discuss the broader issues and trends emerging from the reports, in order to inform contextual understanding of the sector for the final report.

3.3.3 Site visit process

As noted in Figure 1, a total of 32 sites were visited during July and August representing 23 providers, some of which have satellite sites.

Evaluators and monitors were allocated various sites in different provinces. The site visit followed a common format, beginning with a presentation on Umalusi's roles and the aims of the site visit. Designated personnel (including Board members) were asked to be present during different times of the day. Question and answer sessions were held in relation to the categories set out in the verification report. Evaluators physically examined evidence such as policy and procedure documents and minutes, and management information systems (MIS) and generated reports were viewed. A physical inspection of the premises was conducted and, in some instances, classes were observed. Focus group discussions based on a structured template were held separately with a sample of staff and a sample of learners (where available). A final interview was held with the principal or CEO. Evaluators then wrote up their verification reports from the notes in the site visit booklet, and submitted these to the monitors for feedback and finalisation. Monitors, in addition, completed the Khulisa template.

3.3.4 Site visit information

Information gathered by evaluators and monitors and recorded in the verification reports and site visit booklets was generally informative and useful. This is particularly true of the open-ended commentary, although it should be borne in mind that this is probably the most subjective and impressionistic form of reporting. It must be noted, however, that some anomalies between what was given in the college profile and what was reported in the verification report were picked up. In addition, scores given against criteria were sometimes inadequately or confusingly motivated; monitors generally tried to follow up these anomalies and clarify score allocations as part of their quality assurance role. The implementation problems around the instruments, reporting procedures, and roles of evaluators and monitors have been recorded by Umalusi in order to help streamline and clarify future processes. Feedback through workshops and reports from monitors will be integrated into a review of instruments and procedures.

4 Data collection

Limitations and findings

Part 4 will deal with the quantitative data generated by the database.
It must be stressed that the sample is very limited and was not constructed for research purposes. While this report uses the data generated by the site visits with confidence that it provides useful insights and illustrates key features of the sector, the sample does not represent the unknown "universe" of private FET providers.

The data yielded through this process must be treated with caution. Some sets of figures are incomplete or implausible, there were a number of nil returns for certain sections and there are anomalies between the documentation submitted and figures on the database. The reasons for this are many. Primarily, confusions in the sector led to different interpretations of some of the categories and descriptions in the instrument (hardly surprising, given that there are different interpretations of accreditation requirement and definitions even amongst quality assurance personnel). Providers did not necessarily fill in data for different types of qualification consistently. Secondly, some of the nil returns suggest that providers simply do not have the data at the level of detail requested, an interesting finding in itself. Thirdly, there are some issues with the data capturing process, in that there are too many opportunities for slippage at different stages of recording and reporting. The data has therefore, been reported on in a fairly straightforward way (that is, cross correlations between sections have not been done, for example, correlating level of staff qualifications with size of provider). Where relevant, distinctive anomalies that raise issues about the figures have been noted. (Please note that the 64 data tables from which this commentary is derived are available from Umalusi.)

This does not mean to say that broad trends cannot be identified. The point of the section below, therefore, is to use the data in an illustrative way, giving a flavour and initial overview of this sector on the basis of the sample.

4.1 TYPE AND NATURE OF PROVIDERS

As an overview, of the 30 sites (representing 23 institutions) concerned, 19 are in Gauteng, 5 in KZN, 2 in Western Cape and 1 each in the remaining provinces (except for Northern Cape where there are none). Although the sample is small, the overall enrolment of the 30 sites was over 34 000 in 2006. The largest college (presumably incorporating many sites) had an enrolment of 8 589 in 2006; the smallest site had under 100 learners.
Providers in the sample can be described as follows:

- Based on overall enrolment figures for 2006, the sample shows the following features:
  - One college with over 8 000 learners
  - Six sites with learner numbers ranging from between 3 000 and 1 000
  - Three sites between 1 000 and 500 learners
  - Two sites between 500 and 300 learners
  - Seven under 300 learners
  - One under 100 learners.

  These figures should, however, be further investigated: nine sites did not provide the information, and there are some implausible anomalies in the figures when compared to other data. In addition, as noted in Section 1, there are problems in asking for enrolment figures without specifying the category of learner (full time, part time, long course or short course). This data then gives only a rough idea of the range of size in the sample.

- Of the overall enrolment at the 30 sites, 8 475 were enrolled in skills programmes or short courses, representing almost 60% of the total of learners.

- Most of the providers are multi-purpose in that they offer more than one programme type, and across the range from qualifications to skills programmes and short courses.]

- Most of the providers are for profit, relying on fees and contracts. Only three claimed donations or grants as a source of income.

- Most of the providers are relatively recently established: only six of them existed before 1990, and ten of them have only been going since 2000.

- The most common reason given for establishment was to meet market demands from the private sector and for opportunities for job training from the public, particularly for those who are not able to, or do not want to, access higher education. Three providers specified a service or community-driven purpose for an identified sector of disadvantaged individuals.

- Most colleges offer face-to-face tuition, with only three working in distance-education mode.

4.2 PROVISION: PROGRAMMES AND QUALIFICATIONS OFFERED

The typology used by Umalusi in its instruments is not without its problems, generated in part by some of the confusions surrounding the status of some qualifications, and misunderstandings by providers about what is meant by NQF registration and non-NQF registration.

One issue is the way in which the twelve fields of learning relate to qualifications. In some instances, it was obvious that providers were unsure where to allocate some of their qualifications or skills programmes (where these are broadly spread across several fields of learning) in tables related to fields of learning. A specific case in point is the Senior Certificate: it appears that some providers saw this as an integrated, separate offering and did not enter it into the data on fields of learning, while others "disaggregated" it into its various fields of learning. In addition, there is still some latent confusion leading to the identification of "general" education (academic education) as part of Field 05, the field of Education, Training and Development. (This confusion has its origin in some earlier problems with the classification of various unit standards and their relevant authorities.) Finally, the instrument left off Field 11 (Services): it would appear, however, that most providers entered the information that might have gone into Field 11 into Field 03, Business, Commerce and Management Studies, as these areas are closely related. This does, however, raise the question of where frequently provided courses that fall under Services (for example, call centres, funeral parlours, project management) have been placed.

It is also difficult to clearly identify how providers have mapped their short courses and skills programmes onto the instruments. While programmes and courses per se are not registered on the NQF, some of these courses are credit-bearing in that they have been developed against NQF-registered standards, while some are not. The instrument only asks whether or not providers offer NQF-registered part qualifications or skills programmes, not how many. The data does not give a clear picture of the scope and extent to which occupational skill programmes (as opposed to occupational qualifications) are offered; this is of concern, as a provider who may be a major player in the skills field appears relatively insignificant in the context of the data, with its emphasis on qualifications. While Umalusi's focus is on qualifications, it still needs to understand the shape and size of the providers with whom it will be dealing.

In spite of these limitations, however, it is clear that the data is sufficient to give a broad indication of the spread of offerings in the sample.

Figure 2: Categories of qualifications and programmes

NQF registered qualifications
DoE: NATED 190/191 (National Technical Certificate) – N1, N2, N3, N4
National Certificate Vocational – currently only being introduced at NQF Level 2 (2007), but intended to replace N1–N3
GETC Adult–NQF 1
National Senior Certificate – NQF 4
Occupational qualifications – range from NQF 1–4
Provider qualifications – legacy qualifications registered on NQF
Non-NQF-registered qualifications
Provider qualifications – legacy qualifications not registered on NQF
Foreign/ international qualifications
Short courses and skill programmes
Part qualifications: could be against NQF-registered unit standards, or could not be
Skills programmes: must be against NQF-registered unit standards (Department of Labour (DoL) definition is that skills programmes count as credits towards a registered qualification)
Short courses that do not lead to the achievement of NQF-registered unit standards

The characteristics of the sample, bearing in mind the data limitations noted above, are as follows:

4.2.1 LEARNING FIELDS

The most popular learning field is Field 3: Business, Commerce and Management studies, with 23 sites offering learning programmes in this field, followed by 17 sites offering programmes in Field 10: Physical, Mathematical, Computer and Life Sciences. It is assumed that providers who offer computer and IT studies (which go across a range of fields) have placed these programmes in this field. The lowest interest is in Law, Military Science and Security, and Agriculture and Nature Conservation, with 2 and 1 sites offering in these fields respectively.

4.2.2 NQF QUALIFICATIONS

These figures represent the number of sites who offer these qualifications, not the number of qualifications.

Figure 3: Number of sites offering NQF qualifications

NATED	NCV	GETC	Senior Certificate	Occupational qualifications	Provider qualifications
7	14	2	6	14	

The following aspects are of interest:

- For the number who state they offer the National Vocational Certificate, it is unclear whether providers are referring to planned offerings in this regard, as the NCV was only introduced at NQF Level 2 in 2007, or whether providers allocated NATED qualifications to this category.

- The spread suggests also that private providers focus more on vocational national qualifications (NATED and NCVs), although the number of providers offering the academic Senior Certificate is not insignificant. However, the number of learners doing the Senior Certificate was not obtained.

- The number of provider-based qualifications (legacy or non-unit-standard based qualifications that have interim registration on the NQF) is also significant, as it illustrates some of the problems

providers have encountered in trying to "convert" their programmes to unit standards. These provider qualifications cover different kinds of business practices, some IT, tourism, marketing and media studies, HR and some mechanical engineering and electronics (Umalusi, 2007a). These qualifications are not currently quality assured, and could require further investigation by Umalusi. How these will fit in with the proposed QCTO is unclear.

- The data on occupational qualifications could be explored further. While 14 sites offer these, we do not know how many qualifications this represents in this sample. A parallel process is currently gathering information that is relevant to this report (Umalusi, 2007a). The number of qualifications (excluding the Senior Certificate) that have been submitted to Umalusi by some of the same providers in this related process was 113, with 59% of these being occupational (in other words, 66 different qualifications), 24% provider-based, and 16% DoE vocational qualifications.

- In related data, nine sites claim to offer learnerships that, by definition, lead to occupational qualifications. However, some providers who offer learnerships are not in the list of those who state they offer occupational qualifications. It may be that they are involved in learnerships through offering part qualifications, and working with other providers – for example, one provider has given the information that it is working with a public FET college on a learnership.

4.2.3 NQF SKILLS PROGRAMMES OR PART QUALIFICATIONS

As noted above, these data are hard to understand because of problems of interpretation. Ten sites in the sample say they offer part qualifications, thirteen offer skills programmes, and nine offer learnerships. However, it is not clear how providers have differentiated between part qualifications and skills programmes. In related data, only seven sites say that their skills programmes are credit-bearing: the anomalies here indicate that there are different understandings of the definition of skills programmes. In terms of the DoL definition, skills programmes must be credit-bearing (which implies that they are linked to unit standards) and lead to occupational qualifications.

4.2.4 NON-NQF QUALIFICATIONS

These figures represent the number of sites who offer non-NQF qualifications, not the number of qualifications.

Figure 4: Number of sites offering non-NQF qualifications

Provider	Foreign	Other
20	6	8

These provider qualifications are legacy qualifications that do not have interim registration on the NQF, and have not been reported to Umalusi in the parallel process noted above. There is some overlap between the "foreign" and "other" categories, as some international (City and Guilds, Pitman's) agencies have been recorded in the "other" category, as well as vendor-based programmes such as Microsoft. Other descriptions in the "other" category are local, such as Financial Management Institute (FMI), University of South Africa (UNISA) qualifications; or international, such as those linked to the Association of Chartered Certified Accountants (ACCA) and the Computing Technology Industry Association (COmPTIA). Many providers offer more than one kind of non-NQF qualification. It should also be noted that some of the international or vendor-based qualifications are not qualifications in the SAQA-defined scope and sense of the term, but could be more accurately described as short-course-based certificates.

4.2.5 Non-NQF short courses

Ten sites offer short courses that are not credit bearing, but there is no direct information on numbers of courses. The assumption is that providers have included international or vendor-based short courses in this category.

4.3 QUALITY ASSURANCE FEATURES

4.3.1 Quality assurance bodies for NQF-registered qualifications

This information was given on the basis of listing those bodies that are "engaged in quality assuring provision at your college". It does not, therefore, distinguish between whether providers are actually accredited (or in the process) by these agencies, or are involved in programme approval processes, or both.

Figure 5: Number of sites and quality assurance bodies for NQF qualifications

Name of quality assurance agency	Number of sites
CETA	3
Council for Higher Education	3
CTFL	2
ETDP	9
FASSET	7
FIETA	2
FoodBev	1
HWSETA	3
INSETA	3
ISETT	11
MAPPP SETA	3
MERSETA	3
SA Board for Personnel Practices	2
Services SETA	10
TETA	1
THETA	7
Umalusi	19
W&R SETA	2
Other (City and Guilds, DTT, DTS)	3

Some trends that can be extracted by the data given by providers are as follows:

- Umalusi is the most frequently used quality assurer, followed by ISETT and the Services SETA.
- Eight sites are quality assured by five or more bodies; two of these using nine quality assurance bodies and one of them using thirteen quality assurance bodies.
- Nine providers are quality assured by only one quality assurance body: two by Umalusi, two by ETDP SETA, two by ISETT and one by CETA.

4.3.2 Quality assurance bodies for non-NQF awards

Figure 6: Number of sites and agencies for non-NQF awards

Name of body or agency	Number of sites
ACCA: Association of Chartered Certified Accountants (international)	2
Adobe Photoshop	1
AHLA: American Hotel & Lodging Association	1
Body Guarding association	1
CAPA	1
CIMA: Chartered Institute of Management Accountants	1
CIS: Chartered Institute of Secretaries	1
City and Guilds	9
COmPTIA: Computing Technology Industry Association (international)	6
Computer Society of SA	1
Eco Training	
Edexcel	1
Exercise and Training Academy	1
FCASA: Foreign Correspondents Association of Southern Africa	1
Financial Management Institute	4
Galileo & Amadeus (international travel agency packages)	2
IATA: International Air Transport Association	1
IAC: Institute of Administration & Commerce	1
ICB: Institute of Certified Bookkeepers	2
ICDL: International Computer Driving Licence	1
Lis Hotel School	1
London Chamber of Commerce	1
Pastel Accounting	1
Pers of SA	1
Pitman's	3
Professional Insurance Institute	1
SA Chef Association	1
SABPP: SA Board for Personnel Practices	2
SAIM: SA Institute of Management	2
Sun Microsystems (JAVA Certification)	1
UNISA (not specified)	1
UNISA Centre for Business Management	1

There was also an indication in this information that SETAs and other band ETQAs quality assure non-NQF qualifications. However, as these were not specified, and as this data appeared muddled, it has been omitted.

What is striking about this information is how many other bodies are involved in quality assurance. These represent both South African and international bodies. Key areas appear to be financial training, computers and computer technology, human resource training and travel and hospitality. It is also apparent from individual providers that, as multi-purpose providers, they are once again in the position of dealing with a number of external bodies.

It should be noted that this table does not represent a common approach by these bodies to quality assurance. Some of the acronyms refer to certificates representing international examinations to which the provider's training courses lead, while others represent actual agencies who engage in quality assurance in a range of different ways.

4.3.3 Recording NQF-registered qualifications on the National Learners' Records Database (NLRD)

The information obtained is as follows:

- Seven sites claim that SETAs record information on the NLRD
- Two sites claim that Umalusi does so
- Three sites have noted this as the role of the provider
- One site has noted it as the role of a professional body

However, a number of nil returns on this question suggest that there was some confusion amongst providers on how to answer this, and whether recording referred only to qualifications or also to short courses and skills programmes linked to unit standards.

4.3.4 Quality management systems (QMS)

Providers were asked which QMS they use, with options such as ISO 9000 and Total Quality Management being provided. There were no returns to this question, which suggests a problem with the data capture process, as it is known that some of the providers in the sample do, in fact, use these systems.

Twelve sites said they used an external consultant to develop their QMS policies and procedures, while seventeen sites claim to have monitoring and evaluation processes in place. Some of the comments relayed in this section suggest that providers are aware that implementing a QMS effectively is a long and developmental process.

Interestingly, the site visit observations in general commented positively on the MIS in place by the majority of providers – certainly a key element of a QMS system.

4.4 ASSESSMENT

The difficulties of defining the type of provision and programmes offered have been noted in point 4.2. The range of possible permutations here mean that most providers can legitimately claim to nearly offer all the forms of assessment specified in the instrument, as the questionnaire did not link this information to particular programme type. What this means, then, is that the data specific to forms of assessment is too broad to be very useful. It is also difficult to make judgements on the appropriateness of the assessment methods claimed without knowing to which programmes or qualifications they apply.

The comments on assessment information therefore focus mainly, though not exclusively, on NQF-registered qualifications. Even within this category, however, there are limitations to the data. Within these limitations the following trends can be noted:

4.4.1 Assessment of NQF-registered qualifications

Twelve categories of assessment were offered, ranging from various forms of internal assessment (summative and continuous), to the use of portfolios, to various forms of external assessment, to observation, demonstration and recognition of prior learning (RPL).

- The most commonly used form of assessment is internal continuous portfolio assessment.

- This is closely followed by internal continuous assessment in the form of exams or tests, observation or demonstration and RPL.

- The least used method is external summative assessment (practical). This last is a significant finding in relation to the need for standardisation of practical application in vocational and occupational training. Without more detailed information, however, it is difficult to generalise whether this means there is too little practical assessment as a whole.

- Three sites claim to use all twelve methods but, in general, most sites cover the methods noted in the second bullet above.

4.4.2 Internal and external assessments

The information on the moderation and verification of internal assessment instruments and results is worrying. Twenty-four sites, by far the highest total, noted that "the provider" moderates and verifies the internal assessment instruments and results. Seven sites claimed that SETAs moderated these. For external assessments of NQF-registered qualifications, the information on who sets these is presented in Figure 7.

Figure 7: Number of sites and agencies for external assessment

An assessment body	The SETA	The industry	A professional body	The provider
6 sites	7 sites	2 sites	8 sites	3 sites

As noted above, however, providers have not included DoE qualifications, specifically the Senior Certificate, in consistent ways, and it is not clear whether they have understood the DoE as an assessment body in this figure.

4.4.3 Recognition of prior learning (RPL)

Of the eight providers who responded to this question, four claimed to offer RPL for NQF-registered qualifications in 2006. For non-NQF-registered qualifications, four providers claimed RPL, but only one of these was the same provider who offered RPL for NQF qualifications.

Given that RPL is itself an emerging field, with very different models and understandings held in different contexts, this data would have to be gathered separately if any conclusions on the state of RPL in private FET were to be made.

4.4.4 The use of registered constituent assessors

In relation to NQF-related qualifications, eight sites did not enter information on this question. Of the remaining 22, 18 said they used registered assessors. In terms of effectiveness, the commentary generally noted that assessors find some of the requirements labour intensive in terms of time and administration.

For non-NQF-registered qualifications, 15 providers use registered assessors. This commentary was, on the whole, more positive, in that the industry expertise of these assessors is useful.

A cautionary comment needs to be made in terms of different understandings of the terms "registered" and "constituent" assessors.

4.5 LEARNER INFORMATION

4.5.1 Enrolments and awards

The figures below give learner enrolment and award figures for 2005 and 2006. However, it must be noted that some learners may have enrolled prior to 2005 or 2006 and only received awards in 2006; and some learners may have enrolled in 2006 but will only receive awards after this on programmes that are longer than one year.

Figure 8: Learner figures: enrolments and awards

Learner enrolment and awards	2006	2005
Enrolment NQF qualifications	9 860	4 729
Awards NQF qualifications	4 806	4 729
Enrolment non-NQF qualifications	14 221	12 391
Awards non-NQF qualifications	8 727	7 891
Total enrolment	24 081	28 533
Total awards	18 454	21 033
% of awards in relation to enrolment	54%	74%
Enrolment short courses/ skills programmes	8 475	6 194
Awards short courses/ skills programmes	Information not supplied	Information not supplied

Figures on dropout rates showed some anomalies and nil returns, but an estimation of approximately an 8% dropout rate has been made on the basis of average enrolment and dropout per site. Of interest are the reasons given for dropout. By far the most common reason cited was financial issues in relation to shortage of funds to pay fees. The second set of reasons related to problems dealing with learning, such as lack of time, lack of self discipline, inability to cope with materials and so on. Family problems, health issues and drug and alcohol abuse were noted by several providers. Only two providers mentioned job placement as a reason for dropping out.

4.5.2 LEARNER PROFILES

Based on figures for 2006 across the sample for NQF-registered qualifications, a substantial majority of learners (close to 90%) are Black. Coloureds and Indians equally represent about 9% of the student figures, with Whites representing the remainder of about 1%. In 2006, males represented about 57% of the student population in the sample. The majority of learners were in the 17-25 age bracket, with about 20% over 25 years old, with only 4% over 36 years old. This does not meet the trend noted in Part 1, where the majority of learners are in the older age bracket. It may reflect the "second chance" out-of-school youth learners in this sample.

For non-NQF qualifications, the figures change slightly, in that White figures increase to about 7%, while Indian and African figures decrease. Black learners are still, however, in the majority at about 85% of the total enrolment for 2006. Gender figures change in that female learners represent 50.4% of enrolment with males at 49.5%. Age also shifts very slightly: the younger age bracket still represents a substantial majority at 75%, with a slight increase of the older age bracket over 36 at 5.7%.

A major shift occurs in the short courses and skills programmes data. While Blacks are still in the majority at 60%, the number of Coloured and White learners represented increases to 17% and 14% respectively. Indian learners represent 9% of the total enrolment. Female enrolment increases to 52%. Whilst the youngest age bracket is still in the majority at 55%, there have also been marked increases in the age profile, with 29% of the learners between 26 and 35 years old, and 16% of the learners over 35 years.

The totals for enrolments across all sites are higher for full-time learners than for part-time learners for both NQF and non-NQF programmes, as well as for short courses and skills programmes. This

does not necessarily apply across individual sites, as it is dependent on the nature of programmes offered.

4.5.3 Tracking and employment

Tracking information on learner employment after graduation is scarce. Six sites only reported on this in relation to NQF-registered qualifications, with numbers ranging from just over 200 subsequently employed learners for two sites, over 100 for one site, and below 100 for the remainder; the lowest number cited as five learners. The main reasons given for lack of information related to the relative newness of the NQF-registered qualifications. Another reason was the fact that many learners go on to do other courses elsewhere. There was acknowledgement from three sites that they do not have tracking systems in place.

For non-NQF-registered qualifications, reasons given for lack of information noted the relatively recent establishment of many of the courses, and an acknowledged lack of tracking mechanisms.

4.5.4 Learner support

Learner support information applied across all categories of programmes. An overview is given in Figure 9.

Figure 9: Number of sites and forms of learner support

Before enrolment	
Career guidance	26 sites
Financial support	19 sites
Information sessions	22 sites
Consultation	1 sites
During programmes or courses	
Library and study centre resources	20 sites
Excursions	15 sites
Extra classes	23 sites
Tutoring	23 sites
Study skills	16 sites
Induction	2 sites
Guest speakers	2 sites
Language programmes	1 sites
On completion of programmes or courses	
Job placement	11 sites
Alumni club	3 sites
Follow up training	8 sites
Internship programmes	1 sites
Experiential learning	2 sites
CV writing and interview skills	2 sites
Access to job-seekers website	1 sites

The range here appears to support the positive comments made by evaluators on learner support.

4.6 STAFF PROFILES

In terms of these returns, over 60% of the staff is employed on a full time basis. However, these figures include administrative and maintenance staff, and do not give an accurate reflection of the number of academic staff employed on contract. Male staff are in the majority.
Black professional staff are in the majority (62%), followed by Whites (22%), Indians (10%) and Coloureds (6%).

Of the 27 sites that responded, the profile of professional staff according to qualifications and experience is given in Figure 10.

Figure 10: Staff qualifications

Category	Total numbers across sites
Unqualified	107
Education diploma	844
First degree	97
Degree + education diploma	55
Postgraduate education diploma	29
Honours degree	38
Masters degree	16
Doctorate	8
Trade qualification	214
Trade qualification + education diploma	21
Assessor standards	161
Moderator standards	57
Verifier standards	6
Other	261

From these figures it appears that the majority of educators have an education diploma, and there is a good representation of those with a trade qualification. Unknown elements are the categories of "unqualified" and "other". It may be that either or both of these categories cover professional staff members who have certification in short courses in a specific field, rather than diplomas or degrees.

In general, the majority of professional staff reported on have between one and five years of teaching experience, and between one and five years of industry or workplace experience.

4.7 PARTNERSHIPS

Twelve sites reported on the existence of partnerships, with expertise and advice as the most common type of support. There was some provision of facilities, equipment and financial support from partners. Seven of the partners named, presumably in the context of specific projects and programmes, were other providers (such as FET private providers, public FET colleges and higher education institutions). Other partners named represent businesses such as those in the computer or hospitality industry. One provider partners with the state for its specific target learners.

4.8 RATINGS AND COMPLIANCE

The data for ratings and compliance was gathered from the verification reports against the categories listed under 3.1. Collated scores against the thirteen categories yielded an overall compliance score, with anything below 3 representing non-compliance and a score of 6

representing 100%. Six sites were found to be non-compliant, while six sites had scores of 5 or more.

From the average score for each question across all sites, the lowest scores were in the categories of client satisfaction (in other words, the provider's tracking of client satisfaction) and staff support. The highest scoring categories were financial resources and MIS systems. These findings are borne out by the observations made in the verification reports. The trend in the commentary for motivation for compliance noted evidence of preparation for the site visits, progress in implementation of requirements, and a willingness to work with Umalusi. Motivation for non-compliance generally pointed to problems with implementation, especially in relation to newer qualifications, few systems for monitoring, evaluation and tracking, and lack of evidence of record keeping.

5 Themes and trends

Part 5 provides qualitative comment derived from the implications of some of the data, in conjunction with the themes and trends noted by monitors and evaluators in the Verification Reports and plenary workshops.

5.1 REGULATORY CONFUSIONS

Not surprisingly, both the profiles and the verification reports showed some confusion around the roles of Umalusi and the SETAs in relation to accreditation. These manifested themselves in various ways: for example, in incorrect assumptions around the existence of MoUs between Umalusi and the SETAs; inconsistencies in relation to reporting and certification issues; confusion expressed by staff and learners about accreditation and what it means; and inaccurate use of accreditation terminology and qualification nomenclature, in particular in prospectuses and marketing materials. (For example, there are confusions around the distinctions between diplomas and certificates and what private providers are and are not "allowed" to offer.) Providers themselves are asking for clarification on the roles played by the different bodies, and for advocacy around accreditation in relation to what it means, and who is accredited and who is not. It should also be noted that officials in different ETQAs themselves have conflicting interpretations of various aspects of accreditation responsibilities and processes. These issues are of course part of the broader policy terrain discussed in Part 1 of the report, and will need to be addressed in terms of current, transitional and future decisions.

5.2 THE MULTI-PURPOSE CHARACTER OF PRIVATE FET

What seems clear is that the majority of the providers who already fall under Umalusi's scope, in that they offer either DoE vocational qualifications or the Senior Certificate, also offer a large proportion of occupational and provider-based qualifications and programmes, and, in particular, short courses. The implication of this is that the institutional character of these providers and their sites is not one-dimensional, as, say, in the case of schools, who are essentially single purpose providers. This may mean that Umalusi should reconceptualise an approach to these providers in terms of institutional criteria, accepting that there will be multi-management and delivery mechanisms across a provider, or at different sites. In the case of DoE qualifications, quality assurance through curricula and assessment mechanisms are already in place in any case. The question remains as to the degree to which Umalusi will be involved in the remaining categories of qualifications, and to what extent it will consider occupational qualifications and short courses at this point.

5.3 RELATIONSHIPS WITH INDUSTRY/ WORKPLACES

In cases where this was applicable, the information on links with employers and workplaces was very sketchy. This is of concern in relation to two aspects of delivery of vocational training: (i) linking with workplaces for the purposes of on-site practical training; and (ii) monitoring and follow-up in terms of job placement.

As regards practical training, most providers to whom this relates use simulated experiences instead of actual workplace training. There were a few instances where the training is very specific and there are agreements with local workplaces in the immediate environment.

Enabling and monitoring of job placements is a key issue. Where any claims in this regard are made, data is very informal: tracking of this seems to rely on phone calls from friendly companies, or volunteered feedback from individual students. A confirmed history of successful job placements would in itself be a major indicator of satisfactory provision: if such information is to be used as

an indicator, there may need to be common requirements for the gathering and reporting of comparable data on job placements.

5.4 PROGRESSION TO HIGHER EDUCATION AND THE PUBLIC SECTOR

Again, hard data on progression to higher education (where relevant) was hard to glean from the reports. Either it was difficult to elicit this information through the instruments used, or the providers do not actually have it. As discussed in Part 1 of this report, there are difficulties relating to portability and transferability between the private and public sectors, and between unit-standard based and non-unit-standard based programmes and qualifications: these synergies, or lack of them, are a problematic feature of the current FET environment. It is of particular concern in relation to claims made by providers about the status of their offerings, and in relation to learner expectations. The viability of private FET will be seriously undermined if there is lack of confidence in the ability of their qualifications to give access to further options.

5.5 COMMUNITIES OF PRACTICE

The concept of communities of practice, sometimes referred to as communities of trust, is an ongoing theme in debates on the development of the South African NQF. Essentially this is invoked as a conceptual tool through which to explore how a shared sense of professional standards can be developed, so that portability of learning and articulation of credits can be enabled.

The relationship of the notion of "communities of practice" to Umalusi's accreditation undertakings rests mainly on the fact that Umalusi's approach to quality assurance is informed in some ways by the idea of peer review – a model in which those who themselves work in a particular sector are seen as the best people to make judgements about institutional practices within that sector. To this end, those appointed as monitors and evaluators are required to have some experience or knowledge of the sector, and are often involved in the sector.

This approach has long been used in the public higher education sector and is not without its problems there. However, in the FET private provider context it appeared to raise special concerns. At the end of the day private providers are commercial competitors; there is a sense in which they are not willing to openly share too much information about their products or trading practices. This is exacerbated by the fact that (unlike the situation in schools) there is no common curriculum, or external national assessment (with the exception of the DoE programmes). Providers invest in their own programme and materials development, and do not distribute these freely. In addition, the point was made by several providers that staff poaching occurs. These factors tend to work against the building up of communities of practice in the sense of sharing of professional expertise.
If Umalusi's accreditation approach aims at fostering the idea of building up communities of practice in this sector, it will need to revisit what the term can or should mean in this context. Only then can it plan for realistic ways for working towards this goal.

5.6 ASSESSMENT ISSUES

Where DoE vocational programmes were the focus, the assessment practices were fairly clear as they follow common guidelines, and are linked to national external examinations. This also appeared to be the case with qualifications or certification for international and vendor-specific courses (for example, Pitman's, Microsoft and so on), and with those linked to professional bodies (for example, Financial Management Institute of Southern Africa, South African Institute of Management). With other programmes and qualifications, however, there was quite a range in terms of the level of detail supplied by providers, with many providers relying only on internal assessment and moderation, raising issues of comparability of standard between similar programmes. This reflects the general trend of SETA ETQA practices that rely on a decentralised model of quality assurance: it is difficult, therefore, to make any generalised statements about the quality of the assessment of these programmes, given the variability of practices amongst the

various SETAs. Sector-specific and programme-specific investigations would have to be undertaken in this regard. The scope of such investigations would need to be determined in relation to Umalusi's decisions on its areas of interest within the private FET provision.

The use of registered assessors and moderators is a feature of the SETA ETQA model of decentralised assessment. However, the information gathered by the verification reports and the FET profiles (and thus reflected in data from the database) was not sufficiently clear to make the distinction between those who have completed (or perhaps not, as non-submission of portfolios of evidence is endemic in the field of assessor training) the generic training only, and those who have gone to the next step and are registered with the appropriate SETA as constituent assessors. In addition, as noted in Part 1 of the report, there are extremely varying practices in relation to whom, how and against what criteria different SETAs register their constituent assessors and moderators. For example, while some SETAs will only register constituent assessors against specific sets of unit standards for which they have subject matter expertise, other SETAs register constituent assessors against entire qualifications (including the fundamentals). Umalusi would, therefore, need to determine whether or not the information about registered assessors would be useful to its model or not.

5.7 PRACTICES, CHALLENGES, IMPROVEMENTS

Key challenges most commonly identified by both the providers and the verification reports cover the following areas:

- Transition from traditional educational practices to NQF alignment is a challenge to professional staff and management. The varied requirements from different ETQA bodies are time-consuming, and processes are seen as confusing and slow. Delays in getting accreditation and approval affect planning and delivery. Varied assessment and reporting requirements are also areas of concern.

- Providers feel under threat from "fly-by-nights" who offer similar qualifications at lower fees. Lack of quality also undermines the reputation of solid providers. Providers feel that the public should be better informed about accreditation and what it means.

- Staff shortages feature, especially for skills programmes, as do retention and turnover owing to head-hunting by other providers. Also, professional staff sometimes suffer from administrative overload because of assessment and reporting requirements from SETAs.

- The difficulties of offering practical components, in terms of space and costs, are included, and finding worksites that will enter into partnership on these.

- Completion and dropout rates are an area of concern.

- Financial instability because of bad debts is an area of concern.

Suggested solutions to challenges from providers strongly emphasised two areas. The first was the promotion of partnerships with industry, looking at both financial issues such as bursaries for learners, and subsidies or incentives to encourage industry to assist providers, in terms of both experiential learning for learners and skills upgrading for academic staff. The second was a plea for clarification and simplification of the processes that providers need to undertake in order to be NQF-compliant. From evaluators, recommendations for improvement focused on identified areas of weakness. The most commonly cited recommendations for improvement were as follows:

- Improve record keeping systems, most especially for purposes of monitoring and evaluating information on progression, articulation and job placements.

- Employ more administration personnel so that professional staff are not over-burdened with these details.

- Address issues around practical and experiential learning, in conjunction with setting up stronger links with workplaces and employers.

- Formalise procedures for involving staff and learners in the institutions.

- Set up strong and interested academic boards in order to ensure quality.

General good practice areas were noted by evaluators and monitors as follows:

- Financial management by providers in the sample appeared to be in good order.

- Nearly all providers appeared to have fairly sophisticated MIS in place, and to be working towards improving these. (On the other hand, the variability of data supplied suggests that these may neglect important quality assurance concerns.)

- Communication with learners seemed to be a key focus for these providers, and there was a surprising range of learner support processes in place.

- Most of the verification reports commented on the commitment and enthusiasm of the staff.

- Resources and physical environments in the sample were generally satisfactory.

The site visit verification process has certainly deepened Umalusi's understanding of the characteristics of private provision in FET, the nature of these providers, and some of the challenges they face. The personal interaction and observation processes through which evaluators and monitors employ their professional judgement also yields vital perspectives on the sector. It must be noted, however, that the process is extremely time consuming and expensive, and the various steps and layers in reporting allow for some slippage in capturing accurate data. The main recommendation in this report in relation to gathering information is to provide simpler but standardised formats for the information that Umalusi identifies as essential.

6 Concluding comments

Even on the basis of a relatively small sample, the site visit verification process has provided rich information, in particular about the systemic issues facing the sector. Several major features of this sector stand out.

- Most of the private FET providers who are required to engage with Umalusi are multi-purpose providers, working across general, vocational and occupational areas of delivery. This means that the principle of "one ETQA, one provider" does not work in practice.

- Provision reflects an extremely varied range of qualification and programme types, with a great deal of variation in the purpose, scope and duration of programmes, and therefore of learner profiles and delivery mechanisms. This in turn means that the institutional character of many sites is not one-dimensional.

- The quality assurance terrain in which private FET providers currently operate is over-complex, with duplication of activity in some areas and neglect in others.

It is not the intention of this report to propose recommendations linked to a particular model of accreditation and quality assurance. The legislative framework is currently in flux, and the role of the QCTO, while possibly leading to a reduction of administrative demands on providers, has not been finalised. Where the findings of this report could be helpful to Umalusi is in identifying "entry points" to the development of a viable and streamlined model for the carrying out of Umalusi's responsibilities on a much larger scale in this complex sector.

Quality assurance by Umalusi for private FET provision has two broad aims: one is to protect the consumer from being misled about the status, nature and quality of what he or she is paying for; and the other is to create a supportive environment for growth in the sector. One side of the coin is a policing and public information role, the other is a development role. The question Umalusi faces is how best can it define and focus its energies in order to marry these roles, taking into account the key features noted above. In addition, the issue of scale must be borne in mind: the sector is large, and growing; a resource-intensive model of quality assurance will not be sustainable. Key therefore is the notion of a simplified and streamlined process with clearly defined goals and parameters. That is, the principle of a selective approach to quality assurance is endorsed: rather than trying to look at everything, choose a few key areas on which to concentrate.

This section of the report briefly outlines suggested tasks as next steps, and identifies possible focus areas for exploration in relation to the quality assurance questions raised by the verification process. What is listed below may be viewed as a menu of issues and options for consideration: some may potentially be in conflict with one another, and various combinations and permutations of approaches are possible.

6.1 FIRST STEPS: MAPPING QUALIFICATIONS AND PROGRAMMES

As we have seen, there is a wide range of programmes and qualifications offered by the target providers. The breakdown of groups should be viewed in terms of building on existing practice where possible, and looking at what kind (if any) of intervention is fit for purpose where Umalusi has not been previously engaged.

6.1.1 The DoE qualifications (NATED, NCVs, GETC Adult and National Senior Certificate), or part qualifications, registered on the NQF

These are currently quality assured through a centralised curriculum model, supported by external assessment. These practices will presumably continue, on the basis of Umalusi's existing relationships with the DoE.

6.1.2 Provider-based qualifications or legacy qualifications, or part qualifications, some of which are registered on the NQF while some are not

This represents a wide range of qualifications, most of which are not quality assured at present. Umalusi should continue its current investigations into these offerings: a listing of types needs to be determined, an estimation of learner uptake arrived at, and a progress report drawn up on if/how these qualification are being made NQF-compliant. Once this information has been gathered, Umalusi will be in a better position to determine what kind of quality assurance model will suit this category of provision (for example, could some of these qualifications be addressed through the curriculum and assessment model currently used for DoE qualifications?), and what its role would be. Issues of partnerships with other quality assurance bodies will also come into play in relation to these qualifications.

6.1.3 Occupational qualifications, or part qualifications (skills programmes), registered on the NQF

These clearly fall under SETA ETQAs or the proposed QCTO. What needs to be understood here is what (if anything) the nature of Umalusi's responsibilities is. Partnerships will be central for addressing this group of qualifications.

6.1.4 Short courses

It is tempting to leave these to their own devices. However, as a public protector in this domain, Umalusi needs to find some means of identifying and addressing problem areas in this area of provision. Given the proliferation in this group, it may need to look at mechanisms other than engagement with curricula or assessment, as suggested in point 6.6 below.

6.2 UNDERSTANDING AND DEVELOPING PARTNERSHIPS

As noted above, each group of qualifications has implications for Umalusi's partnerships with other quality assurance agencies. Given the focus of FET private providers, a major partner is likely to be the SETA ETQA community or the QCTO once it is operational. The issue here is to understand the nature and scope of Umalusi's interest in occupational qualifications, and how this ties in with its statutory responsibilities for the FET sector. What are the questions at play in this area - what is of interest? Will Umalusi only be interested in those that can be defined as cross-sectoral? What does this term mean? Are the issues mainly to do with portability and articulation with the public sector, and with progress beyond FET? What is Umalusi's interest in general education components such as the fundamentals?

A developing understanding of the nature and limitations of Umalusi's role in this area is the basis on which relationships can be established. Once these are more clearly understood, processes for agreement, monitoring and evaluation can be developed.

6.3 IDENTIFYING MINIMUM INSTITUTIONAL CRITERIA

The current accreditation process looks exhaustively at a whole range of institutional criteria. In the interests of simplification, research should be done on the identification of minimum institutional criteria. In addition, there needs to be a clearer picture of what institutional information has already been gathered through other means. Umalusi should not expend energy on aspects of institutional compliance that have already been ascertained. To this end, information needs to be gathered on the following:

- Registration information submitted to the DoE
- Information submitted to the South African Revenue Service (if this is possible)
- Information submitted to any other quality assurance body

Umalusi could then look at ways of checking an institution's compliance in key areas, without re-gathering or re-verifying such information.

6.4 IDENTIFYING FOCUS AREAS FOR SCRUTINY

Umalusi has in the past explored the idea of using "quality standards" (Umalusi, 2004, p.2) for different areas of institutional activity, against which degrees of effectiveness can be measured. Such a framework takes a quality management approach, in that it looks at how an institution manages its resources and delivery, and monitors itself against its own baselines. This approach was reflected in the structuring of the verification reports, in terms of categories against which evaluators reported.

In line with a more contained approach suggested for private FET, it would be an option to select one or two focus areas and develop criteria and indicators for this area. For example, if the area "learner achievements" was chosen, sub-groups linked to indicators would include enrolment, retention, throughput, dropout rates, statistical analysis of results, and so on. All providers would be expected to report in the same way on this focus area.

6.5 CONSOLIDATING REPORTING SYSTEMS

This verification process has illustrated the fact that the data gatherer should not assume that everyone understands what information is being asked for in the same way. Even within this small sample, interpretations of terminology and ways of categorising information have been very different.

In order to avoid such inconsistencies, it would be very useful if Umalusi could provide a common database for the specific information it has identified as essential for carrying out its quality assurance function. For example, if information on staff qualifications is required, all providers should plan for recording and sending through this information in a common format; if information on the linkage between course duration and enrolment figures is required, then this must be clearly defined; if job placement information post-graduation is required, ways in which this should be gathered and reported on should be clearly set out. Every effort must be made to lessen ambiguities. Apart from specifying and limiting meanings as far as possible, the use of examples should be considered.

6.6 IDENTIFYING RED FLAGS

The red-flag approach initiates intervention on the basis of evidence of the consequences and effects of poor provision, rather than taking a front-end approach to quality. The red flags or warning systems that a provider is not performing adequately would need to be identified and defined – for example, anomalies in enrolments and pass rates, misleading advertising, or public

complaints. The quality assurance body takes on a watchdog role. This approach may suit particular groups or categories of programmes, such as short courses, where other approaches may not be viable.

6.7 IN CONCLUSION

The present phase of the verification and accreditation process marks an important stage in Umalusi's engagement with private FET providers. The process of building understandings and relationships between providers and the quality assurance body is well underway. Umalusi's increasing knowledgeability about the sector will enable it to develop an approach that will help it carry out its responsibilities to the best effects with limited means.

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