# Approaches to quality assurance in the GET and FET bands: Umalusi discussion document

## 1. INTRODUCTION

The General and Further Education and Training bands pose particular problems for a national agency with responsibility for ensuring quality. Provision in these bands is diverse and fragmented in ways that are exaggerated in the case of South Africa by the legacy of the apartheid past. The sector includes schools in which virtually all pupils achieve university entrance level by the time they take their senior certificate as well as schools where most pupils leave before they even attempt the senior certificate. It also includes the fifty FET colleges which bring together colleges with radically different histories, some linked to export-led companies in the manufacturing sector and others struggling to provide the most elementary skill-based programmes for rural and township communities, and the fragile and slowly emerging provision for ABET. Any approach to quality has to take account of this diversity and therefore cannot be of the monolithic 'one-size fits all' type. It must encourage the maintenance and extension of the highest standards where those already exist in schools and colleges without relying too narrowly on one model of quality which all others must aspire to, and in terms of which the majority must necessarily be found wanting. Furthermore Umalusi's stakeholders must understand that ensuring quality is not a technical trick or organizational device that can be wrenched away from the curriculum, pedagogy and assessment within which it is inescapably embedded. This means that any approach to quality has to start from existing provision and the institutions in which it is located as well as taking account of current proposals for reform. In the schools sector this will include the Senior Certificate and the curriculum and examinations that are shaped by it, the schools which have the responsibility for providing the curriculum and the provincial departments with responsibility for examinations. With regard to new policies, account will need to be taken of the proposals for the GETC and the National Curriculum Statements for the FETC (General). In relation to the FET colleges, Umalusi's approach to quality has to begin with the NATED certificates and diplomas administered by the national Department which form the basis of the current college curriculum, as well as emerging proposals for a future college curriculum. It will also need to consider the impact on the college curriculum of SETA funded unit standard-based programmes.

Before discussing either the present provision in schools and colleges or the specific strategy that Umalusi might adopt, this paper takes a step back and considers the origins and purposes of the idea of Quality Assurance and why, for all the problems it has generated, it has been so widely adopted internationally. It argues that quality assurance is closely associated with other ideas that have gained credence in post apartheid South Africa: the notion of the key role of qualifications as drivers of education policy; the idea that qualifications can be expressed in terms of explicit statements of standards (unit standards), and the idea that the curriculum is best represented as a set of outcome statements rather than in the form of syllabuses or

learning programme guidelines. Despite their superficial differences, these ideas, together with the prevailing approach to quality assurance, reflect a common underlying set of assumptions that all have similar origins. In other words, the idea that quality can no longer be taken for granted but needs to be enhanced and maintained through a separate *system of quality assurance* can only be understood in relation to a particular overall approach to reforming the curriculum, qualifications and assessment. It is not the purpose of this discussion document to criticise this kind of development; in some sense it is found in all countries trying to modernise their education system. The aims of this paper are (a) to understand these developments; (b) to identify their inter-dependence and common roots; and (c) to explore their implications for South Africa and for Umalusi. On the basis of the analysis that follows, the discussion document argues for a balance between seeing quality as a judgment that relies on specialist expertise and is achieved by institutions that have earned the trust of their public and seeing it as something that is assured through the application of specific sets of procedures.

# 2. THE EMERGENCE OF QUALITY ASSURANCE

2.1 Both quality and standards in education are enduring and universal goals that can be traced back to before the beginnings of public education. Until recent decades, both have been largely taken for granted. Depending on the sector, quality was associated with the universities and the schools that they were related to, the professions or the craft guilds[1]. In each case standards and quality applied to a very small number of institutions and occupations and often said very little about actual practice; standards were based on tradition and were largely self-justifying. The link between quality and standards on the one hand and particular institutions and associations on the other relied on the ability of the latter to restrict entry and the acceptance of their exclusive rights to define quality and what counted as knowledge.

This association of educational quality and particular institutions has remained important. However, a wide range of forces associated with democratization and global economic change that have led to the expansion of further and higher education, to what some have referred to as 'the professionalisation of everyone', and to the blurring of craft, technical, and administrative occupations, have called into question these self justifying (and sometimes self seeking) modes of ensuring quality and maintaining standards. More controversially, new developments in setting standards for mass production in industry[2] have been seen as providing the basis for developing the quite new approach that underpins systems of quality assurance in education and, more specifically the idea of unit standards as the basic building blocks of qualifications[3]. Central to these new approaches to quality and standards have been moves to 'democratize', or make more public, the criteria on which judgments of quality and standards are made by a process of standardization[4]. This change has led

[1] This description refers to systems that had their origins in medieval Europe; no doubt somewhat similar arrangements can be found in other countries.

[2] Most countries have developed National Standards Bodies for manufactured products and more recently these have been complemented by international standards.

[3] In most countries where these ideas have been introduced, they have been restricted to *vocational* qualifications.

[4] Specifying standards might be appropriate for some areas of production, where it is important to ensure that each part is always exactly the same, and exactly to a specific specification. Standardization

to the move from an implicit to an explicit basis for recognizing quality and standards, and as a result to giving precedence to publicly stated criteria over what can be seen as the sectoral and exclusive notions of quality and standards associated with specialists. A further largely taken for granted development has been the acceptance that, as in the field of industrial production, quality in education can be straightforwardly quantified and measured. The next section will briefly discuss these developments and how they have influenced approaches to both quality and standards in education.

2.2 The old models of quality and standards relied almost entirely on trusting highly valued institutions such as universities. In most countries, the numbers of institutions involved (in the case of education) and the occupations involved (in the case of crafts, trades, and professions) were small and changed little from decade to decade. Universities, professional associations, and craft guilds saw their primary responsibility as preserving standards and quality and handing on the right to and responsibility for the trust involved. Judgement of quality rested in the individual and his (and usually it was his!) institutional position and location[5]. This approach continues to this day, although not without debate, in the peer review and external examiner systems.

In the last fifty years, traditionally elite systems of further[6] and more recently higher education have undergone massive expansion and differentiation. Upper secondary schools changed from being almost entirely geared to selection for university to much more diversified systems in which progression to and selection for university is only one of a number of their purposes. Likewise technical colleges that in many countries were established to support apprenticeships have also become institutions with highly diverse purposes. In such systems the old model of ensuring quality and standards that relied on trusting a small number of respected individuals and institutions appeared to be increasingly untenable. Not surprisingly education policy makers began to look for approaches that relied less on individuals in specific institutions and more on publicly identifiable criteria as a basis on which quality and standards could be judged. This pressure to find ways of ***measuring*** the quality of institutions was also supported by the increasing importance given to the economic role of further education, both indirectly in absorbing large sections of youth who in previous eras would have joined the labour market and more directly in terms of broad preparation of young people for employment and the perceived skill needs of changing labour markets. In searching for some alternative for ensuring quality, education policy makers, initially in the USA but later in most Anglophone countries, turned to industrial practice for their models. Criterion referenced approaches to assessment (the precise specification of criteria), quality assurance systems, and unit standards-based definitions of competence all have their origins in methods developed in mass production and the need to guarantee that products which would later be assembled together to make, for example, a car could be relied on to be identical. The approach might be described as 'ensuring quality by the specification of standards'. It is a method that relies on the

in education is a far more complicated affair. Firstly, the aim of education is *not* to produce identical products. Secondly, by its nature, educational outcomes are hard to specify. While some degree of standardization is generally felt to be necessary in large scale public education systems, it has historically been achieved through other mechanisms, such as external examinations.

[5] As is indicated by the link between the term judgement and the role of judges.

[6] Usually referred to as upper secondary or academic education.

disaggregation of the final outcome by precise specification of the parts that make it up and their final aggregation (or assembly) into the whole (whether this is in the case of education and training, quality, competence, or a broad educational outcome. This is achievable, often with high levels of reliability for industrial products; the step that led to introducing unit standards and outcome statements as the basis of quality assurance in education was to assume that the same process is applicable to social processes such as health, care or education. It follows that quality and high standards are equated with the specification of standards (through the application of quality assurance procedures against those unit standards or outcome statements captured in qualifications). In the case of mass production industries process is often more generic and can take priority over any specific content; this approach is replicated in the case of quality assurance procedures in education and in the application of unit standards and outcomes based qualifications to the curriculum. It is clear therefore that the old and new approaches to quality represent two very different sets of assumptions about the balance between content and processes (or outcomes). The question is whether, or the extent to which the new model is applicable to education and if not, when conditions for the old model no longer apply, what is the alternative. The argument of this paper is that some alternative to the old model is needed but that the direct replacement of judgement of quality only by quality assurance procedures, conceived of as processes whereby learning programmes are judged in relation to prespecified standards and learning outcomes is mistaken and can only lead to less quality, poor standards and a diminished curriculum. While public criteria of quality do have a role, and some focus on outcomes is important in educational processes, they cannot be the only basis for designing education interventions. The next section reviews developments in other countries as the basis for an approach that might be adopted by Umalusi.

## 3. DEVELOPMENTS IN OTHER COUNTRIES

Since the 1980s, in the UK and other Anglophone countries, the old largely self governing and implicit systems of ensuring quality such as the use of university external examiners have begun to be complemented (and sometimes replaced) by more formalized procedures of quality assurance and an attempt, in vocational education, to develop explicit national 'occupational' standards[7] as the basis for vocational qualifications. The old systems relied on the unquestioned respect for their largely self-governing traditions and the legitimacy of their right to restrict access. Furthermore they relied on the expansion of access to selective education at any level being slow and incremental (and in some cases non-existent) and the continuation of a largely unchanging balance between supply and demand for further and higher education. In many ways these implicit approaches to quality mirrored what is known as a normative referenced approach to assessment. Some, but not all of these normative approaches involved decisions in advance about the proportion of candidates who would be awarded a certificate or particular grade; these decisions might be largely but never entirely independent of the performance of individual candidates. It was difficult for such systems to continue to be the basis for ensuring quality in a period of substantial expansion when new institutions were being established and national policies were committed to promoting greater access and equality of opportunity. The new quality systems (unlike the old in which quality was taken for granted but firmly rooted in institutions with strong knowledge-based

[7] Very similar to the unit standards being developed in South Africa (and previously in New Zealand)

curricula and high status) explicitly endorsed the need for public criteria in terms of which all institutions could be judged. Unlike the old systems that relied primarily on trust, the new systems at least claimed to depend on performance according to public criteria. In other words the meaning of quality was no longer taken for granted; even the most prestigious institutions were expected to provide evidence of both the quality of their outcomes and the appropriateness of their procedures for ensuring quality. Previous systems with procedures that were 'invisible' to the wider public were increasingly replaced by 'visible' (or, in theory at least, transparent) systems that involved published criteria that are (at least in principle) challengeable. The shift was from implicitness associated with trust to explicitness based on compliance with criteria and procedures and the provision of evidence. This was not, as is sometimes assumed, the end of a system based on power; it was a shift from one type of power relation based on tradition and hierarchy to another in which power resides in the articulation and interpretation of criteria and procedures. It is also a shift from a system in which power resided largely in elite institutions to one where power to define criteria and procedures and interpret them is in the hands of a new set of agencies and their associated consultants and full time officials. Some sociologists have identified the new 'interpretors' of quality and standards as a fraction of a new middle class. The critical methodological point is that judgement has not disappeared, it has been masked in the form of procedures, which still have to be interpreted.

The claims made for the new approach to quality and standards are that (a) unlike normative models, it does not rely on the selection of suitable students for evidence of quality; it can therefore, at least potentially, be used as a basis assessing quality when a system is expanding and access is being increased; (b) by making quality criteria explicit it can claim to be more universalistic and fairer as a basis for assessment and selection and therefore more congruent with democratic values; (c) by not relying on specific institutions such as schools and universities it can, at least in theory, be applied to workplaces and other sites; (d) it can be used to present critics as conservatives and elitists only interested in protecting their special interests and privileges. However, these advantages turn out to be theoretical than real; international evidence shows little empirical basis fort supporting these claims; it also shows the almost universal tendency of this approach to lead to bureaucracy and excessive paperwork. At best, it serves as a reminder to professionals and other specialists about the importance of being explicit and stating, as far as possible, the grounds for their judgements. No judgments should be beyond challenge; publicly stated criteria, used carefully, can have an important role in such challenges.

In addition, as mentioned earlier, the new systems do not remove the links between power and definitions of quality; they merely shift the basis of power and by invoking rules rather than persons can make it even less accountable. Secondly, while replacing an intrinsic concept of quality which relies on judgment with one that is extrinsic and relies on evidence that certain procedures have been complied with, the new approaches can neglect the extent to which the relation between procedural compliance and quality is always problematic. Thirdly, in replacing intrinsic ideas of quality and standards associated with institutions by quality assurance and unit standards, the new approach introduces a new language and inescapably a new bureaucracy (made up of those who know the language and the rules) and a new kind of what might be called 'technical authoritarianism' (when procedures or criteria are invoked as the basis of decisions on the assumption that they have been

'democratically' decided). Criteria such as 'valuable to students and employers', and 'valued over time and in different sites' are used to develop benchmarks and check-lists and are difficult to disagree with; at the same time there is no way of interpreting them precisely and without ambiguity. Just as the processes of dis-aggregating and aggregating quality become the preserve of specially trained quality assurors, so similar processes also become the preserve of standard generators. Both processes are legitimated by an approach which privileges public outcomes over specialist content. Thus we can see a coming together of the processes of quality assurance with those of standard generation and the emergence of a new elite whose expertise is based on processes and procedures who replace the old elites whose expertise was based primarily on syllabus content. The 'emptying of content' from curricula in mass education systems paralleled the deskilling of much craftwork was something noticed long ago by the American Marxist, Harry Braverman in the last chapter of his classic book *Labour and Monopoly Capital*. Thus, critical caution, rather than uncritical enthusiasm, is the appropriate response of Umalusi to the new Quality Assurance procedurism and its close conceptual and ideological links with standard generation. What is needed is a new 'mixed model' of ensuring quality and defining the curriculum that emphasises institutions and content as much as criteria and procedures.

## 4. LESSONS FOR SOUTH AFRICA

A country like South Africa which is seeking to establish a more democratic educational system that places a high value on 'quality for all' has a number of options for extending and improving quality. The first is to dismiss the new fashion for quality assurance and standard generation as leading to unnecessary bureaucracy, form filling, and obfuscation, and to rely on the old system in which prestigious institutions and the qualifications associated with them were the benchmarks of quality. The democratic version of such an approach would be to expand access to the old institutions at the same time as using them as benchmarks for assessing quality in the new ones and more generally for the whole system. This is essentially the approach to quality adopted for post compulsory education in the Nordic countries and France. However such an approach does not take account of the extreme lack of trust in the elite institutions in South Africa as a result of apartheid. If, as this discussion document has argued, there is no escape from accepting that quality and standards rely on trust, a strategy is needed that builds, establishes, and extends that trust beyond its traditional institutional base. Furthermore, unlike the Nordic countries, not only was the old elitist tradition in South Africa inflexible and lacking any capacity to innovate, it was far too small to be the basis, on its own, for developing a genuinely democratic approach to access and quality. In South Africa, it is not just the distribution of access that has to be changed but also the criteria of educational success themselves. This is dangerous territory and needs to be treated with care; problematizing criteria of educational success can easily lead to relativism and the loss of any objective sense of standards. However, incremental expansion on the basis of what has been successful is an inadequate FET strategy for South Africa in the absence in the FET colleges of a genuine general vocational alternative to the academic progression pathway that combines general education with vocational specialization. The implications of this argument need further development and are only touched on in this discussion document. What is inescapable is that any approach to improving quality in the FET colleges will need institutional and curriculum reform as integral to a new approach to quality management.

A second option—one that is broadly followed in the United States—is to treat education as a consumption good and allow users (e.g. parents, students and employers) to use their own judgments to decide on educational quality on the grounds that (a) they are the best judges of their own educational needs and (b) if institutions and qualifications do not satisfy those needs, 'consumers' will go elsewhere and unsuccessful schools and colleges will 'go out of business'. In a rich society such as the USA with its enormous range of diverse and multiple opportunities, this model works reasonably well (although not for the urban poor on welfare). When resources are scarce and disadvantaged learners are in a majority as in South Africa, such a market model can only amplify inequality. The goal of improving quality must start with extending a quality curriculum and the resources needed to support it.

The argument here is in favour of combining aspects of different approaches to quality and recognizing four key principles as follows:

1. Criteria and procedures for assessing quality have limitations; they must be treated as guidelines and as a resource for developing trust and professionalism and be embedded in a curriculum that gives real access to knowledge. Only secondarily is quality about regulations or procedures to be followed.

2. Access to accumulated specialist knowledge is central to all wider educational and social goals. Hence Quality Assurance procedures for monitoring institutions must support curriculum and staff development and not be treated as separate instruments.

3. Any system for managing and improving quality is inescapably dependent on trust and therefore on the professionalism of teachers and examiners. Criteria always have to be interpreted and cannot be treated as independent of professional judgment. Criteria can support trust; they cannot build or be a replacement for trust. Over-specification of procedures leads inevitably to ritual compliance not to improvements in quality.

4. A distinction needs to be made between a traditionalist notion of trust where the judgement of individuals located in specific institutions is not questioned and a reflexive notion of trust which applies in principle to everyone, involves prior agreement on criteria and procedures, and encourages debate about content, purposes, evidence and interpretation.

# 5. ALTERNATIVE MODELS

5.1 The previous section has stressed the interdependence (and in some cases almost the overlap) between three trends in educational policy: the introduction of systems of quality assurance, the development of a standards generation approach to qualifications, and the privileging of outcomes over content in approaches to the curriculum. The next section draws on a number of approaches to quality that have been developed internationally and indicates how they are related to specific

approaches to qualifications and curriculum. Broadly speaking it is possible to distinguish between four main approaches to ensuring the quality of education:

- the **Examination model** which is closely related to a knowledge-based model of the curriculum. Its focus is on the assessment of individual students. It treats qualifications as primarily concerned with certification. It necessarily involves syllabuses or some other way of specifying to content on which examinations are based. It does not preclude the more general specification of educational outcomes as the basis for guiding the selection and interpretion of content.
- the **Accreditation model** which focuses on institutions, not individual students. It can be combined with an Examinations Model in ensuring that institutions have the resources (human and material) to offer programmes leading to particular qualifications. It is also used in combination with forms of delegated assessment leading to standards-based qualifications.
- **the Inspection model** which pre-dates any current attempts at qualification or curriculum reform and is not tied to a specific approach (it originated in the evaluation of schools but has been extended to the evaluation of any institution or organisation providing education);
- **the Systemic evaluation** model which is concerned with assessing the effectiveness of the system (or parts of it) as a whole.

Given the particular focus on quality in South Africa, the following section will concentrate on the first two models, with the proviso that both can incorporate the Inspection model. It is followed by brief reference to the latter two models.

## 5.1 The Examination model

This model has traditionally been associated with what are known as 'high stakes' examinations for university entrance where the emphasis is on maintaining a national (but increasingly, international) standard for all who gain a particular qualification. The primary assumption of the model is that ensuring quality is linked to providing evidence that students acquire appropriate subject or disciplinary knowledge. The aim of the model is that certificates awarded have a value that is independent of the candidate's institution. However in practice the model only fulfils this aim on its own when the institutions involved are highly selective and have roughly similar resources for preparing students for examinations. The Examination Model has worked relatively well in cases such as the French Baccalaureates, A levels and Scottish Highers (and to some extent, the old South African senior certificate or 'matric'). In France the status of the baccalaureate is ensured by the fact that successful candidates are guaranteed a university place by law; the quality of the baccalaureates is managed by the state. In the UK, the status of A levels reflects the resources and public confidence in the institutions primarily associated with the programmes (in practice the private (known in England as public!) schools and grammar schools[8]. As the model spread to a greater diversity of institutions, examination results became more related to the intake of the school or college rather than to the quality of teaching.

[8] In recent decades the A level ***system*** of examinations has been progressively extended to non-elite institutions such as Further Education Colleges and comprehensive secondary schools.

***Examining Models involve:***

- approval of institutions as accredited centres—checking on staff qualifications, libraries, laboratories and workshop facilities etc;
- appointing chief and assistant examiners (markers);
- monitoring standards across subjects and over time (this refers to maintaining standards in the broad and traditional sense of levels of difficulty; it does not refer to 'unit standards' as ways of expressing outcomes);
- appointment of subject panels responsible for syllabuses, specifications, and marking guidelines; and
- awarding and distributing of certificates.

These activities are undertaken either by a department of government (France) or by specialist examining Boards (England), originally set up by universities but now independent but regulated by a state authority (QCA) or by a national agency (the SQA in Scotland) or in the case of vocational awards in Germany, by Chambers of Commerce and Industry. Examinations models have been used in vocational education and even in 'low stakes' contexts as an instrument for 'raising standards'. The model is potentially an important strategy for maintaining quality in high achieving institutions and for building trust in institutions where it has traditionally been lacking. It can be used in combination with the accreditation of institutions as part of a broader approach to quality assurance. However it is difficult to see how it could operate if the curriculum was based on unit standards or relied on outcomes but no national syllabus or other mechanism for the specification of content should be covered learning programmes (and hence examined).

***Issues in relation to the examinations model for assuring quality***

Examining models in the past have had a limited remit in terms of the range of students that they apply to. Furthermore they are relatively inflexible and not very responsive to change. Because they rely largely on some form of written test they tend to have an academic bias or at least are more reliable in assessing what someone knows than in assessing what they can do. In most countries this model has high status and a high degree of public trust that depends to a considerable extent on the importance given to external marking (in other words, marking not done by the student's teacher). Examining models focus on assessing individual students and not on the activities and procedures of institutions or on promoting institutional improvement. They rely on an efficient and well-staffed core administration and usually on the participation of university academics as chairs of subject panels and exam boards. Historically they have been associated with selection for university (and for the civil service in China from the 16$^{th}$ century and England in the 19th century). They have tended to over value the merits of unseen written examination papers and a student's ability to write clearly in a 2-3 hour period. However, these are contingent and not a necessary links; examinations have an important role whenever the educational priority is access to specialist knowledge.

The typical mode of assessment within this model involves a centrally prescribed syllabus for each subject with recommended texts and model exam papers; students usually but not necessarily write examinations at the end of a course. However some

flexibility has emerged in recent years within this model in terms of mode, structure, and forms of assessment.[9]

## 5.2 Accreditation Models

Accreditation Models are midway between centralized examination models and the kind of delegated assessment model being developed by many of the SETA ETQAs in South Africa. They have been typically more associated with vocational qualifications as they allow an institution to relate to quality and standards to local needs as well as to national criteria. It is the model adopted by Vocational Awarding Bodies in the UK[10]. These bodies accredit institutions as centres (colleges and sometimes schools) and monitor their assessment procedures; they do not necessarily examine individual students except on a sample basis. Unlike the Examination Model, individual institutions carry out the assessment of students and this process is overseen by external verifiers and examiners. The syllabuses tend to be somewhat different from those based on Examination models—again they represent a middle point between tightly prescribed syllabuses and outcomes models which have no formal syllabus. They emphasize outcomes and processes more than explicit content and encourage written and non-written assignments and continuous assessment rather than just unseen examinations.

### *Advantages*

The main advantages of accreditation models are greater flexibility for institutions to build links with employers and other local organisations, and the opportunity to take more account of the specific circumstances of students and the local community. They

---

[9] ***Alternative Modes within the Examinations Model***

Mode 1—a centrally prescribed syllabus, centrally marked and graded

Mode 2—a centrally prescribed syllabus, internally (within institutions or consortia) marked and graded and centrally moderated

Mode 3—a centrally approved *institution-based* syllabus, externally moderated, internally marked and graded.

In the UK questions about uneven quality were raised in relation to the growing number of Mode 3 programmes in the 1980s. There was an assumption that Mode 3 led to lowering of standards. Since the 1980s opportunities for Mode 3 were progressively reduced in favour of more limited flexibility over part of a particular subject.

***Alternative Structures***

The main approach to increasing the flexibility of the examination model has been modularisation of syllabuses and assessment. Under modularisation, subject syllabuses are divided up into separately assessed modules with some scope for choice of module and module sequence on the part of the school or college and student. Modularisation creates considerable administrative problems for the body responsible for examining as it increases the number of 'assessment points' during the year. Furthermore questions have been raised about comparability between modular and linear examination systems. On the other hand modularity gives students more control over their curriculum and gives institutions the opportunity to shape their programmes in relation to the capabilities of their student body and to take into account the specific needs of their locality while retaining national credibility. .

***Alternative Forms of assessment***

The standard approach to assessment for the Examinations Model is the terminal written examination set and examined by an external body. With its association with the university and an external marking system this approach has retained a high degree of public trust in most countries. Modifications have been based on:

- centrally monitored continuous assessment by teachers (this is often for a 1/4 or 1/3rd of the final grade),
- profiles/assignments/essays, reports of practical work/fieldwork/submission of artefacts as alternatives to written examinations
- multiple choice tests (popular in the USA but not elsewhere).

(a) and (b) raise considerable problems for the examining body in assuring some degree of common quality and national standards.

[10] BTEC, C&G and RSA and formerly by the CNAA (for polytechnic degrees).

can also encourage the development of ways of assessing the application of knowledge as well as its acquisition.

***Problems***

The main problems with accreditation models are:

**(i) Variation of standards**

Inevitably, in a de-centralized model that delegates quality and assessment issues to institutions and does not assess individual students, standards can vary widely, despite the accreditation process. The currency value of student grades can become linked to the institution rather than to the capabilities of the student. This unevenness of standards can be reduced by increasing the proportion of externally set and assessed work.

Trust in an accreditation model and therefore in the quality of the education provided does not reside primarily in the methods of assessment as in the examinations model; nor is not just a question of procedures but of context. Context refers to the links with employers, the location of different sectors within the broader division of labour, the status of the college, the past achievements of the students and the recognition given to the particular qualification. This form of trust can only be built up over time. The license allowed to individual teachers in relation to content can disadvantage students when it comes to progression to higher education. Thus, the accreditation model on its own leads to some of the problems involved in replacing syllabuses with outcomes as the basis of the curriculum. Because of its delegated approach to assessment of individual students it is difficult for the accreditation model to be the basis for a high stakes qualification.

**(ii) The expansion of an assessment bureaucracy**

The accreditation model has parallels with systems of quality assurance; it generates a bureaucracy of its own that includes chief and external verifiers (as employees of the accrediting bodies) and internal verifiers and assessors (as employees of providing institutions). This over-emphasis on bureaucracy can be minimized by greater delegation, but this is likely only to be feasible with higher capacity institutions. This points to the need for accrediting and regulatory bodies such as UMALUSI to broaden their role to include capacity building, institutional support and staff development.

**(iii) The separation of content and process**

In the accreditation model, the processes of quality assessment are the responsibility of the accrediting body and tend be separated from content which are the responsibility of the individual school or college (or even the individual teacher). This can lead to teachers paying less attention to content (as it may not be included in the accreditation criteria) and to even successful students lacking the conceptual knowledge to progress satisfactorily to higher education or to succeed if they are accepted.

***Comments***

As suggested, accreditation models with their focus on defining criteria for institutions rather than assessing students have much in common with the move towards quality assurance and outcome-based curricula. However, although there are tensions between such models and syllabus-based curriculum models tied to terminal examinations, they can be combined if their functions—assessing institutional

provision and assessing the attainments of individual students—are clearly distinguished. An approach which relies over much on accreditation criteria has the same dangers as the proceduralism associated with quality assurance systems and the over-specification of outcomes associated with unit standards based approaches to the curriculum.

It is important to stress the overlap between accreditation models and emerging systems of quality assurance, as they could well lead to duplication. Both rely on criteria and procedures, one for accrediting institutions as 'fit to offer courses' and one for monitoring institutional assessment of students. They are prone to all the weaknesses associated with bureaucratization. For example, (a) compliance with procedures can come to take precedence over what the procedures are designed to achieve and (b) institutions can devote enormous resources to paper work and reporting methods rather than to the improved teaching that the reporting refers to.

## 5.3 INSPECTION MODELS

Inspection Models are more holistic in their approach to institutions than the previous two models, and have often been developed quite separately; they focus on the activities of the institution 'as a whole', its achievements and the observation of individual students. Furthermore they focus less on individual syllabuses and examinations (as in the Examination Model) and less on the provision of programmes and their assessment (as in the accreditation model). Inspection Models are unlike Examination Models which focus entirely on student outcomes at one (or in modular courses, more than one) time in the year, and unlike Accreditation Models which imply an on-going relationship between the accrediting body and the institution. They involve one-off visits and the presentation of Inspection Reports both to national government for evaluation purposes and to the individual institution for support and improvement (and in some cases for sanctions). In the UK Inspection has been developed independently of accreditation and examination models and by a separate organisation (formerly HMI and now OfSTED) and is treated as complementary. The outcomes that are the product of examination and accreditation become part of the data for Inspection. As they become accepted, schools and colleges increasingly come to accept them as supportive of their goals and not punitive.

## 5.4 SYSTEMIC EVALUATION MODELS

Systemic evaluation models are not well developed in most countries. They are different from the other three models and are complementary to each. They may involve institutional visits, testing of individual students and the reporting of both institutional practices and outcomes; however they explicitly are not designed to assess individual students or to evaluate or assess individual institutions. The goal of systemic models is to obtain some measure of system, band or sector performance by means of sampling. There are considerable statistical problems involved which are beyond the scope of this paper. What is important is these models focus on the ***system*** rather than on the individual or institutional level of measurement.

England (but not Scotland or Wales) has adopted a variant of systemic evaluation which is wholly based on outcomes (examination or test results) in the form of national LEAGUE TABLES of test and examination results of schools and colleges for different age groups. These tables are highly controversial because a school or

college's position on the league tables inevitably reflects in part the social composition of its intake and its location. The League Tables have also been linked with a market-based system of parent choice and led to some schools concentrating on improving their League Table score to the detriment of their wider educational goals. More recently there have been attempts to counter these weaknesses by developing measures of added value or the 'learning gain' of students rather than relying solely on their final achievements.

## 5.5 CONCLUSIONS

The section has distinguished between four approaches to quality. The examinations approach focuses on the attainments of individual students, while the accreditation approach focuses on the capabilities of schools and colleges to offer courses and undertake assessment and can be located in the move to develop formal explicit criteria for assessment and evaluation. Inspection can be seen as another form of accreditation (schools are graded and in certain cases classed as unsatisfactory). Systemic evaluation is a measure of **system** performance
Some parallels can be noticed between accreditation models and, unit standards-type approaches qualifications and curriculum models that give priority to outcomes rather than syllabuses, accreditation approaches do not pre-suppose any particular model of the curriculum. The examinations model however assumes a knowledge or syllabus-based curriculum that treats qualifications as certificates of assessed achievement rather than as criteria from which curricula can be derived. It is difficult to reconcile a unit standards-based curriculum with an examinations model, unless standardised syllabuses or learning programmes are developed to work with the unit standards; instead, unit standards-based approaches usually place much weight on the registration and monitoring of assessors. International research suggests that there are prohibitive barriers to achieving or measuring quality through the delegation of assessment to registered assessors; assessors find it almost impossible to develop reliable ways of judging student activities or performances in terms of grades or criteria. The key difference between delegated assessment and centralized examinations is where the trust is located. In the former it is in the thousands of teachers who have been registered as assessors making their own judgments. In the latter case trust is located in the examining **system**. No examination systems are perfect; there are limits in what examinations can assess and their reliability also has its limits. If they are made too complex or are expanded too quickly they are subject to crisis. On the other hand they are tried and tested over time; furthermore they have the advantages of anonymity, students have to respond to the same tests and systems of appeal can and are developed.

On the basis of the arguments above, it seems sensible for Umalusi to emphasize examinations and the accreditation or inspection of institutions as its main approaches to ensuring quality in the FET band, and with a greater focus on inspection and a lesser focus on examinations in the GET band. It is also important that Umalusi takes account of the differences between the school and college sectors and between the demands of general and vocational qualifications. The next section begins by reviewing the current systems of approaching quality in FET schools and colleges in South Africa. It then goes on to examine the various proposals for reform before spelling out what it takes to be the implications for UMALUSI of following a middle way or dual approach that combines examining and institutional accreditation.

## 6. CURRENT AND EMERGING APPROACHES TO THE QUALITY ASSURANCE OF QUALIFICATIONS

### 6.1 Approaches in Further Education and Training

The current model of quality assurance within most of the FET system is an examination model. The approach to quality assurance within this model is to ensure that the examinations meet the requirements of the syllabus, as well as to ensure that the examinations and marking are carried out fairly and appropriately, and that the marks are a true reflection of learners' achievements. Within this model, the quality assurance of curriculum and qualifications happens at the level of the systems and processes involved in developing syllabuses and assessment guidelines. There is no separate process of assessing 'standards setting'; the 'standards' to which learners are expected to conform are contained in the syllabus and the examinations. Taken together over a period of time, the syllabuses and examinations provide a relatively specific indication of how each syllabus should be interpreted. Therefore, the processes involved in monitoring and assessing the syllabuses as well as in the setting and marking of examinations are all-important. To reiterate: what is prescribed in the syllabus (including content and skill statements), the type of question set in examinations and the level of difficulty of examinations over a period of time, as well as the approach to marking, are the major determinants of what is formally taught and learnt.

As discussed above, examinations based models can vary; they can be more or less prescriptive. For example, there can be a minimum prescription of texts, and there are obviously various variables possible here. There can also be more than one exam which leads to the same certificate, as is currently the case in South Africa. There is also, within very specific and restricted circumstances, an entirely distinct curriculum through which learners can obtain the Senior Certificate—the Aseca programme, which will be discussed in more detail below.

In South Africa the current (about to be phased out) system of curriculum and syllabus development is highly centralized, and prescribed by national or provincial departments of education. This approach has been based on subjects, which are derived mainly from academic disciplines or broad occupational areas. Syllabi are set nationally and subjects are examined nationally/provincially or through examination bodies (in the past a core syllabus was set nationally, and provinces developed elaborated versions). They are/were accompanied by various other stipulations, such as lists of prescribed set works, as well as lists of recommended books.

South Africa has also had various types of inspectorate models. Inspectors are generally associated with the worst aspects of the apartheid education system. Since 1994, various alternatives have been attempted, which have aimed to be more developmental for teachers and less bureaucratic and authoritarian: developmental appraisal, whole school evaluation, and the new integrated quality assurance system, et cetera. Inspecting schools is clearly outside of the remit of Umalusi, and falls under the national and provincial Departments of Education. However, as will be discussed in more detail later, Umalusi could develop systems to 'inspect' provinces, to see whether or not they are able to provide inputs to schools in an appropriate manner, as well as the appropriate support, as well as whether they manage schools appropriately,

and provide adequate inspection services. This might also be described as an 'audit' function, in the quality assurance language emerging in South Africa.

## Approaches in General Education and Training

Historically, the main model of quality assurance in the GET band has been an inspectorate model, run by the provincial departments, as there has not been a national exam or national system of Inspection. This has taken place within the context of centrally prescribed syllabuses.

In recent years there has been a move towards extending the examinations model to aspects of the GET system. The exams written by adult learners are now moderated by Umalusi, with similar procedures to those described above for the FET band. In theory, common assessment tasks set for grade 9 learners are being phased in, and will also be moderated by Umalusi, although it is not clear to what extent and when this will happen on a meaningful basis through out the system.

What is not clear is the extent to which extending the examination approach is appropriate at this level. While official policy has been designed in such a way that learners can exit the system at the end of GET, in practice this seems unlikely, and this area is therefore likely to remain as a fairly low stakes assessment. Given that there is no systemic need for external examinations at GET level; (and for many countries they do not exist) what needs to be considered carefully is the negative side effects (discussed later) of introducing them at this level. This will be discussed in more detail below, in the suggested approaches for Umalusi.

## New policy directions

Some interpretations of the National Qualifications Framework suggest that the education and training system should move towards a highly decentralized model of assessment, combined with a strong version of an accreditation model of quality assurance. Assessment is thought about as a site-based activity, designed, conducted, and recorded at an institutional level, and moderated by a quality assurance agency. The quality assurance agency also accredits institutions, as well as approving the programmes which they want to run. This approach allows for a totally delegated approach to assessment, based on the assumption that quality is ensured if 'assessors' are trained against the assessment unit standards and 'registered'. This model also implies a decentralized model for curriculum and syllabus design, where educators at a site level design syllabuses learning programmes against unit standards or outcome standards[11]. When the primary role of the quality assuror is the validation of the assessment of outcomes achieved by students, with no notion of a prescribed syllabus or national examination, the notions of provider accreditation and programme approval become of central importance. In other words, because there is no prescribed syllabus as a mechanism for ensuring what is to be taught and learnt, and because there is no central examination to ascertain whether or not learners are in

[11] In the case of schooling, while the curriculum frameworks proposed for GET and FET are composed of outcome statements, they also include some statements of content, thereby creating a kind of hybrid model, where the syllabus is partially developed nationally and partly at site level (or even in some cases at provincial level). The implications of such a model for Umalusi's role in monitoring national examinations remains to be explored, as the policies and approaches are still being developed; it is therefore only be hinted at in this paper.

fact learning, the only measure of quality is through the accreditation of institutions based on specified criteria, and the approval of their capacity to offer programmes.

While Umalusi is still operating primarily in the examinations model, the SETA ETQAs seem to see themselves as operating primarily with accreditation models. However, as has been the experience in other countries, the accreditation model is proving difficult to implement on a large scale nationally. The requirement for assessors to be registered is rapidly proving to be an insufficient basis for a sustainable system of decentralized assessment, and there seems to be a general recognition that externally organized assessment is going to be important for a long time to come. There are also low rates of provider accreditation in the various ETQAs, and increasingly centralized curricula and stipulations about assessment are being introduced into various programmes. Umalusi needs to assess to what extent, and how, it is appropriate for it to move from the first system to the second system. It needs to decide which aspects of an examination based system it wants to maintain, and what its role would be within an accreditation based delegated assessment system.

## Conflicts in the current system

These Examinations and Accreditation models are not necessarily mutually exclusive[12]. It is possible to conceive of a quality assurance system which draws on different aspects of the two models where accreditation might also involve a form of Inspection. But there are real conflicts which must be resolved if frustrations between stakeholders are not to be exacerbated. For example, Umalusi, is struggling with requests to quality assure the Fundamental Learning components of various qualifications being quality assured by the SETAs. However Umalusi's only viable approach to the quality assurance of Fundamental Learning is through national examinations which are at odds with both the SETAs approach to delegated assessment and the idea of unit standards based fundamentals[13]. Furthermore Umalusi does not, and at the moment cannot, verify assessment on demand from a range of sites. Rather, it can only moderate a national examination system. To be expected to combine two such approaches, national examinations and delegated assessment of fundamentals is only to lead to confusion. The international evidence suggests that a unit standards based approach as a way of replacing more traditional syllabus-based approaches to general education in languages and mathematics needs re-examining.

## POSSIBLE APPROACHES FOR UMALUSI

The following section explores how the models described above could be drawn on in practice in the GET and FET bands in South Africa. It is not meant to be a rigid description of an approach, but simply an exploration of what might work, drawing from all of the models described above.

[12] This also applies to the Inspectorate and systemic evaluation models.

[13] In the UK there has been a muddled attempt to combine examinations with a version of fundamentals (key skills) which has only led to fresh doubts about the viability of such an approach to general education. Currently students are encouraged to take General Certificate subjects in mathematics and English instead of key skills in communications and application of number (mathematical literacy).

## Examinations in the FET band

There are various problems with examinations as a primary means of assessment. One of the main criticisms of examinations has been that they are 'inauthentic'; in other words, they only test the ability to write exam answers which is not necessarily transferable to other contexts. Another criticism has been that they assess a narrow form of intelligence. In South Africa, examinations have been linked to rote memorization and the meaningless regurgitation of facts. It is important, therefore, to consider the merits of continuous assessment, as well as approaches to developing assessment with higher levels of validity than examinations in specific areas. All assessments will lead, to some extent, to 'teaching to the test', whatever the nature of the test; however, this can be very narrow 'drilling' of students, or it can be broader, if the tests are able to test broader skills and abilities. Furtheremore, there is little worthwhile learning that does not involve some drilling.

The discussion above, however, has suggested that external examinations are likely to continue be a significant feature of qualifications in the FET band, and a feature, although less significant, in the GET band. Despite all the weaknesses of examinations, there does not seem to be a practical and workable alternative for large scale, high stakes assessment, and it seems that there will be no escape from them in the FET band, where 500 000 learners are exiting a system[14].

It is important to note that written examinations can vary dramatically in quality, and therefore in the direction in which they push the system—they can predominantly test recall, or they can be constructed to test application and analysis. Of course, with the latter, a higher degree of professional judgment and therefore training is required of markers. The challenge, therefore, is how to improve examinations so that they provide students with opportunities to display application and analysis, as well as their critical thinking and creativity. It may well be that some combination of externally assessed examination papers and course work assignment that are assessed by teachers and moderated externally will be most viable for the FETC.

Umalusi will also need to consider the extent to which it will allow different approaches—for example, there is currently one syllabus, but different examinations. Umalusi could also oversee processes such as those whereby subject experts and occupational field experts design and evaluate syllabuses and exams. There is obviously need for more flexibility in the system than has historically been the case, particularly for older learners. Umalusi should therefore consider allowing a few different curricula and syllabuses to be used in the country, for which it would moderate examinations. Based on an analysis of the curriculum statements and learning programme guidelines, Umalusi will need to consider what it will require from the Department of Education in terms of prescribed policy—subject guidelines, or assessment guidelines, or some other kind of specification, that will give teachers, as well as examiners and moderators, sufficient information about what it is that they are supposed to teach.

[14] To reword Winston Churchill's famous statement about democracy, in large scale systems, examinations may well be the worst form of assessment available except for all the other forms which have been tried from time to time.

## Greater decentralization in the FET colleges

There is clearly some need for the examination model described above in the college sector. This is particularly the case if standardization is seen to be necessary, and if attempts are to be made to achieve some equivalence between the general and vocational FETCs. In the past, for vocational and occupationally specific qualifications, exams were set by the national Department of Education, and trade testing was done by the Centre for Trade Testing of the Minister of Labour. If diverse providers, both public and private, are going to offer the same qualification, there needs to be some kind of standardized national assessment requirement. If FET colleges are going to offer the 'new qualifications'—unit standards based qualifications, registered on the NQF, it seems that there needs to be some kind of external assessment body, which assesses learners. This does not mean that there should be no internal assessment, but that the final mark needs to be based on a combination of an internal and external mark.

One possibility is for the Department of Education to take on an increased role in appointing national examiners for new qualifications. Such examiners could set exams where appropriate, or prescribe standardized assessment tasks (with prescribed procedures), for specific qualifications. Another possibility is for the establishment of new national boards or panels for assessment of specific subject areas (like the old trade testing system). What does not appear to be viable is the external moderation, or verification, of a myriad of totally separate assessment processes, against the same standards and qualifications.

It is also appropriate, however, in the FET colleges, for Umalusi to play some sort of accreditation role, so that these institutions can oversee a greater component of their assessment internally. Direct inspections of FET colleges by Umalusi may also be required, given the higher autonomy of these institutions, and the smaller size of this sector. While external examinations will continue to play a role in these institutions, it seems appropriate for these examinations to carry less weight, and be conducted with a 'lighter touch' for the FETC obtained in colleges than for the FETC that is achieved in schools.

## Alternative curricula for the Senior Certificate

Currently there are three types of language course recognized at level four by the Department of Education. There are the schooling languages curricula, which are examined by the Department, the IEB, and the other examination bodies in all eleven official languages; there are the Business English and Sake Afrikaans courses, which are examined by the Department, and there is the Aseca course. This kind of approach, whereby a number of curricula are approved, could enable Umalusi to continue with an examinations based approach, but still allow some degree of flexibility to the different sectors and types of institutions in the band. The Aseca programme, as an alternative model to the current provision in the FET band, is discussed in more detail below.

The Aseca (A Secondary Education Curriculum for Adults)[15] curriculum offers an example of an alternative curriculum which could be approved, and then made part of

[15] The ASECA programme was originally developed by the Sached Trust, based on the outcomes of a national consultative conference on education convened by Sached, a national needs survey

the system. It also offers an example of a different approach to curriculum. Aseca is a curriculum made up of four subjects, and provides the only alternative curriculum which has been recognized by the Department of Education as equivalent to the schooling system[16]. Learners (or providers offering the Aseca curriculum) combine them with other subjects from the schooling or college systems. Schools are not allowed to offer the Aseca curriculum, and Public Adult Learning Centres don't offer it—they offer learners the same matric subjects as those which learners in schools write. It is offered by the Youth College and some private adult education centers, industry (Standard Bank).

Aseca produces the curriculum framework, the learning material and the assessment tools, and provides training to educators offering the programme. Learners get the self-study course materials and various kinds of guidelines. The IEB moderates a portion of portfolios and plays a role in the setting of the exams. Learners obtain a Senior Certificate, although currently in the official documentation the programme is described under the title of the 'Gauteng Youth College Combined Certificate'. There is a 50% pass requirement, learners have to have maths, they have to have a language, they have to pass one other ASECA course. There is no 'sittings' restriction.

The significance of the existence of this programme is that it is an entirely different curriculum, which allows learners to get the same qualification. One of the extreme differences is the degree of prescription involved in the programme: the Aseca programme is entirely directed by the learning materials. The role of teachers is then to tutor learners, and provide support. While this type of model is clearly not desirable in all (or most) circumstances, it is arguably a good option in certain circumstances; particularly for out-of-school youth, for which the programme was designed.

This opens a question about whether it might not be appropriate in South Africa to have different curricula and syllabuses, with differing degrees of prescription. Obviously what we don't want in a national system is too many variations. But it may well turn out that an examination model with a few permutations might give us the flexibility as well as standardization that we want. For example, we could have, as is currently the case, national curriculum statements/syllabuses, against which more than one examination is set. In addition, Umalusi working with the Department of Education could approve one or two alternative curricula, with alternative assessment systems, as with the Aseca programme.

## Schooling in the GET band

Given the problems with external examinations outlined above, proposals to extend them into the GET band for children at school should be regarded with circumspection. Given that in schooling there is likely to be a very limited extent to which learners want to exit the system after grade 9, on the focus for quality assurance should be by way of teacher assessment and an inspectorate model, conducted by

---

commissioned by Sached, and engagement with stakeholders. The needs survey was commissioned after Sached had investigated the existing curricula at high school levels and found that they were not appropriate to the needs of adults. They argued that adults needed a curriculum related to their working and home lives, which was South African, which stressed applied knowledge, and which was modular and offered more flexible possibilities for adult learners (Williams 1997).

[16] Williams (1997) describes the difficult processes of getting the ASECA courses accredited.

provincial departments, which Umalusi could monitor. However, standardized testing, if thought of as part of systemic evaluation **of the system**, and not in relation to the achievements of individual students, it could be used as a tool with which to ascertain levels of learning at specific grades.

## Specific needs of the ABET sector

The discussion on the examination model above drew attention to some of the problems with examinations, and suggested that caution should be adopted before extending this model to lower levels of the education and training system. While there is a trend towards an increasing role for examinations at level one of the NQF, for ABET learners, as well as some moves towards standardized assessment at grade 9, it is far from clear that these moves are in the right direction. The extent to which external assessment is necessary at this level is debatable, and the formalization of ABET seems to be increasingly coming at the cost of small scale and context rich learning; on the other hand, greater standardization has been necessary in achieving accountability from the wide range of different kinds of providers in the area. Umalusi could consider investigating possible ways of conducting systemic evaluation. Given that many adult learners do not study with the aim of obtaining a qualification, it is crucial to find other ways of measuring the health of the system, and not to be relying on examinations only at this level. On the other hand, it is important to provide opportunities for adults to be formally assessed if they want to be, or they will not be able to progress to higher levels of the system.

Accreditation and programme approval approaches in ABET makes some sense when thought of in relation to the current unit standards based approach in ABET. However, there is some indication that many of the emerging learning programmes are quite strongly influenced by schooling, in ways that are not always appropriate for adults. It seems to be is conceivable, and arguably desirable, to have ABET provision which is based on a syllabus directly designed for the needs of adults. This is particularly the case if adult learners are going to write an exam, as a *de facto* syllabus will emerge, and, without clear guidance, it will probably use primary schooling as a basis. In the event of this type of approach to ABET curriculum, programme approval would not really be necessary.

In addition, space and mechanisms need to be created in the overall quality assurance of ABET provision to allow for, and to foster, non-formal programmes, as well as contextually located programmes which do not lead to qualifications or unit standards; it is also important to build an ABET system in which non-formal learning and learning designed with the immediate needs of learners in mind is also important, and ways need to be found of supporting this. This suggests a very flexible and sensitive approach to provider accreditation in this sector. Examinations may have some role to play, particularly for adults who want to proceed to higher levels of study. However, the system should make allowances for adults who are studying for other purposes, and for whom examinations are likely to be counter productive.

UMALUSI also needs to pursue problems with qualification and credit requirements, which do not seem to be entirely appropriate for adults. Thus, it seems appropriate to explore the need for the design of an alternative curriculum for adult learners at this level, including qualifications with fewer requirements (perhaps, say, a language,

numeracy, a social science course, and a natural science course), as well as syllabuses more carefully designed to be appropriate for adult learners.

## Accreditation of assessment and moderation bodies

Umalusi could consider an accreditation approach with regard to assessment bodies. Umalusi needs to be ensuring that the large-scale assessment bodies (such as the national and provincial education departments, as well as the IEB) have adequate systems in place to be conducting assessments. With regard to private bodies like the IEB, it would make sense for Umalusi to accredit such bodies, on the basis of sufficient numbers and the appropriate syllabus/learning programme. However, with regard to the national and provincial departments, it might be more appropriate to conceptualise Umalusi's role in this regard as an inspectorate model—in other words, Umalusi plays the role of inspecting or auditing the assessment bodies to ensure that they have appropriate systems and processes.

In addition, there clearly is a need for an accreditation role with regard to continuous assessment marks. Currently this is mainly done through standardization of marks. It is clear that what is needed is processes which start to build shared sense of practice among educators. Marking processes are crucial in socializing educators in the desired standards; indeed, this is the most powerful way to ensure standardization (Wolf 1995). Models like the IEB's 'User Groups', as well as models building on the existing work in Districts could be considered. Umalusi would need to play a role in ensuring that appropriate systems are created by the examination bodies.

It should also be possible for Umalusi to accredit bodies to conduct moderation. This would relate specifically to the requests that assessment bodies such as the IEB receive to moderate small scale assessments, against specified approved syllabi/curricula. So, for example, the IEB could be accredited to moderate assessments conducted by small providers in a specific context. However, even then Umalusi would have to consider the extent to which this should be based on prescribed syllabuses and issues of scale would need to be considered. As discussed above, a highly decentralized model with lots of little moderation bodies moderating lots of little assessment bodies, all conducting assessment against totally different syllabuses and learning programmes, is very resource heavy; in addition, standardization would be very difficult to achieve. Perhaps assessment bodies could conduct moderation of individually designed assessments against an ASECA type syllabus.

## Inspecting the inspectors

In addition, an inspectorate model of monitoring quality in institutions looks set to continue in some form under the Department of Education's new Integrated Quality Management System. This is largely outside of the remit of Umalusi. However, given that Umalusi is expected to play some role in monitoring providers, it could engage with the Department in this regard. One of the crucial aspects of good inspectorates is subject experts who maintain an ongoing relationship with the schools being inspected. While national and provincial departments will continue to be responsible for the inspectorate role, Umalusi needs to ensure that it knows what is going on in both of these important aspects, and that they are taking place in an appropriate manner, through appropriate systems and approaches. Outside of schooling as well, specified content or syllabuses could form the basis on which inspectors can play a

role in evaluating and strengthening teaching and learning processes. As mentioned above, this model usually works as complementary to an examinations model.

# CONCLUSION: A MIX OF MODELS

This discussion document has argued that the main approach to the quality assurance of qualifications and learning programmes in the FET band should be through an examination model. This means that qualifications should not be looked at as separate components, to be evaluated in terms of specific criteria, and then learning programmes looked at against qualifications. Instead, the quality assurance of qualifications should primarily take place through the systems in place to monitor the standard of question papers and marking, as well as the systems to monitor the curriculum and syllabus. These, however, need to be supplemented by processes to evaluate the quality of teaching and learning taking place in institutions, and therefore the role of inspectorates as an important part of monitoring and improving quality was argued for, and it was suggested that Umalusi should play a role in 'inspecting the inspectors'.

The paper also suggested that Umalusi should consider accrediting assessment bodies, to conduct assessment against prescribed syllabuses, as well as moderation bodies, which could moderate assessment at a site level. It has also argued that caution should be adopted in extending this model lower down the system. What will be important in the system as a whole is ensuring that the different components of quality assurance described above work together, and that information flows between them; there needs to be a relationship between the moderation of question papers, inputs into syllabus design, and inspection of schools.