What's wrong with the NQF?

Presentation at joint Wits/Umalusi seminar

29th August 2007

Stephanie Matseleng Allais

Introduction

Despite strong support for the National Qualifications Framework (NQF), and high hopes pinned on it, implementation of the NQF has proved difficult, and it has been subjected to unresolved policy reviews for many years. The amount of educational provision that has been delivered against the new outcomes-based qualifications and unit standards—the qualifications and unit standards designed through the Standards Generating Bodies of the South African Qualifications Authority (SAQA)—is low (Allais 2007). The quality assurance of provision which state agencies are supposed conduct against outcomes-based qualifications has been contested (Allais, King, Bowie et al. 2007). SAQA's research has found that the NQF has had "minimal positive impact or a mix of positive and negative impact" with regard to portability of qualifications (SAQA 2005c, p. 45), and that the NQF has not facilitated credit accumulation and transfer (SAQA 2006).

Why this should be the case is obviously a matter of considerable debate. Some point to the bureaucracy created around the NQF (Jansen 2004), while others blame differences between the Departments of Education and Labour (for example, Heyns and Needham 2004; Isaacs 2004; Isaacs 2006; Keevy, J. 2006; 2006). It has also been pointed out that the objectives of the framework were not necessarily realistic for a single policy intervention (Departments of Education and Labour 2002).

My research (Allais 2007) focuses on the actual qualification model that was developed for the South African NQF. This includes the role that was given to qualifications in the system, and the particular ways in which qualifications were to be designed. My analysis of the NQF demonstrates that the difficulties encountered during implementation are at least in part due to underlying problems with the model, and the role assigned to outcomes-based qualifications in the reform of education and training.

Models of qualifications frameworks

Frameworks differ significantly in purpose, design, approach to implementation, scope, and in how rigidly their prescriptions about qualifications are applied (Raffe 2003; Tuck, Hart and Keevy 2004; Raffe 2005; Young 2005; Allais 2007).

My research (Allais 2007) suggests two main ideal types of qualifications frameworks, which I have named *frameworks of communication* and *outcomes-led frameworks*. The latter type, of which the South African NQF is an example, is generally introduced to transform or entirely overhaul an education system, and is often introduced with the intention of creating a 'break with the past'. This type is based on an implicit assumption that knowledge is undifferentiated—outcomes are seen to be able to drive education, because educational knowledge does not need to be the starting point. Outcomes can therefore be prescribed outside of educational institutions and separately from syllabuses or educational programmes. A different way of conceiving of a qualifications framework can be seen in what I call a *framework of communications*. This type of approach, which has far less ambitions aims, starts with educational institutions, and relies on them leading the way in finding relationships amongst different qualifications. The Scottish qualifications framework (Raffe 2003), for example, can be understood in relation to this type of model. While institutions could use the language of learning outcomes in this process, learning outcomes are not seen as things that can be prescribed externally to education institutions. Qualifications frameworks thought about in this way must inevitably be built and developed incrementally, and are likely to be less prescriptive, because they are developed through dialogue by the institutions that will use them and be regulated by them.

The outcomes-led model in South Africa

It is well known that the apartheid education system was characterized by extreme inequality, inefficiency, a lack of legitimacy in the eyes of both communities and industry, and authoritarian, ideologically loaded syllabuses (Allais 2007). It produced "high levels of adult and matriculation illiteracy, dysfunctional schools and universities, discredited curricula and illegitimate structures of governance" (Chisholm 2003, p. 269). It is also generally acknowledged that the ANC government inherited an economy that was isolated, inefficient, and probably bankrupt, and a state apparatus that was widely seen as corrupt, authoritarian, and untransparent (Bond 2000; Marais 2001).

What was needed was an education policy which could ensure dramatically increased provision of high quality, relevant education, in a participatory and democratic manner, without increasing the size of the state, and without spending too much money: the miracle transition needed a miracle education policy. A qualifications framework comprised of outcomes-based qualifications seemed, to many of us, to be that policy.

The idea of using learning outcomes to drive curriculum reform seemed to be a useful way of transforming the authoritarian apartheid curriculum, because different stakeholders would have an opportunity to provide input into the creation of the outcome statements which made up the qualifications. Knowledge would therefore no longer be the preserve of experts, who in the past had maintained control over what was worth knowing and who knew it adequately (SAQA 2000c). The idea of wresting the power of defining knowledge and skills away from formal institutions also seemed to provide a way for industry to play a much larger role in defining 'standards' for vocational courses, therefore, according to advocates, ensuring that education was more 'relevant' to the needs of industry but also to people's lives. At the same time, outcomes were also argued to be a mechanism which would enable academic freedom, because they would allow academics and teachers to "interpret the meaning of specified learning outcomes in their classrooms in contextually sensitive ways" (Higher Education Quality Council 2003, p. 18). Thus, it was thought that the relevance of

education to individuals' lives as well as to the needs of society and the economy would be ensured by involving all stakeholders in the design of the outcomes-based qualifications.

Outcomes also seemed to enable 'integration', a notion which had a powerful appeal in the context of apartheid divisions, although it referred to a wide range of different ideas—racial integration, integration between theory and practice, overcoming the divide between general and vocational education and between academic and everyday knowledge, and so on (Motala 2001). Outcomes were also seen as a way of equating learning through formal education with what was learnt in non-formal and informal education, or what was learnt simply through the course of life and work. Because outcomes would be developed separately from specific institutions or specific learning programmes, it was thought that they could be the benchmarks against which all learning could be measured. Outcomes seemed to provide a way of validating the knowledge acquired by people who had been deprived of formal education but had gained important skills and knowledge in the course of life, work, and the struggle against apartheid. The idea here was that people's prior learning could be recognized against the outcome statements.

Because any 'provider' would be able to offer learning programmes against the outcome statements, provision of education would be increased (SAQA 2000a). Outcomes also seemed to be a mechanism for improving quality—they would specify standards for all educational provision, and all educational institutions would have to meet those standards. Regulatory bodies would be able to check up on what institutions were offering because the prescribed outcomes would provide them with a clear standard for judgement (SAQA 2000b). Because the competences that someone had achieved would be transparently specified and available for general scrutiny, it would be straightforward to decide which competences were applicable in other courses or programmes that a learner wanted to undertake, and there would be minimal duplication, and maximum economic efficiency within the education system (SAQA 2000d).

Breaking qualifications up into smaller parts (unit standards) appeared to be a way of ensuring that individuals would not have to waste their time learning irrelevant things—they could acquire the requisite knowledge or the skill that they needed in the short term, and gradually obtain other knowledge or skills if so desired. Conversely, industry would be able to ensure that workers would attain just the specified competencies. Locating all qualifications on a single framework would also, it was thought, ensure that vocational and academic qualifications were of comparable status.

The design of the NQF

The South African NQF was therefore developed as an *outcomes-led* qualifications framework, based on the idea that educational standards could be nationally 'set' by defining learning outcomes and assessment criteria. SAQA explains that "Outcomes are the qualities … that are expected at the end of a process of learning. The meaning of outcomes is similar to the concept of competence" (SAQA 2004, p. 6). A standard has been seen as a clear and fixed statement of competence that a learner achieves, and has served as the building block of qualifications, as well as the basis upon which programmes have been designed and content ('inputs') selected (SAQA 2000a; SAQA 2000d).

A complex array of processes and stakeholder-based structures were created in order to generate, evaluate, and 'register' outcomes-based qualifications and unit standards (parts of qualifications) separately from educational institutions or educational programmes. 'Registering' a qualification or unit standard meant it being formally ratified by SAQA board and being officially placed on one of the eight levels of the NQF. To this end, a complicated format and set of specifications were developed for the qualifications and unit standards to be registered. Another group of institutions, created to evaluate provision of education against the learning outcomes in the qualifications and unit standards, were required to conduct 'quality assurance' of educational programmes against the nationally specified learning outcomes.

Key to the model is the principle that qualifications and unit standards must be composed of learning outcomes defined by stakeholder-based structures independently of any particular institution or learning programme. The underlying assumption is that people who are not specialists based in educational institutions can have knowledge which is at least as relevant and important as those who are, and can therefore be involved in specifying outcomes. The learning outcomes do not involve reference to knowledge areas (seen as 'inputs') and are defined independently of the route that learners take to become qualified. All levels of education, from primary to doctoral studies, and all types of education, from general academic programmes to highly specific focused workplace training programmes were to be accounted for in terms of these outcomes-based qualifications and unit standards.

By May 2007, 11 062 unit standards and approximately 818 outcomes-based qualifications had been developed and registered on the eight levels of the NQF[1]. Examples of new outcomes-based qualifications registered on the NQF are shown in Box 1 below[2].

Box 1: Examples of new outcomes-based qualifications on the South African NQF

General Education and Training Certificate: Housing Consumer Education (level 1)[3]
National Certificate: Retail Shop Floor Practices (level 2)
National Certificate in Quality Checking of Tyres and Tyre Components (level 3)
Further Education and Training Certificate: Community Facilitation in Society and Environment Interactions (level 4)
National Certificate: Maintenance of High-speed Production Processes (Fast-moving Consumer Goods) (level 5)

As discussed above, all the new qualifications which have been developed through the structures of SAQA are comprised of lists of learning outcomes and other specifications. In

[1] This information was obtained from the SAQA website www.saqa.org.za, accessed 12 May 2007, and from Yvonne Shapiro, a SAQA official, in a personal communication (6th November 2006). These are the total numbers of qualifications and unit standards that have been designed; by the 12 May 2007 some of them would have already expired.

[2] The source for all qualifications and unit standards listed below is www.saqa.org.za, accessed 10 November 2005.

[3] Level 1 on the NQF is the equivalent of the end of junior secondary school, level 4 of the end of senior primary school, and level 5 is roughly equivalent to the first year of higher education.

most of them, the learning outcomes are arranged into unit standards. Examples of unit standard learning outcomes (titles) are provided below in Box 2. Note that a 'credit' is supposed to be roughly equivalent to ten hours of learning.

Box 2: Examples of unit standards on the South African NQF

Level 1 unit standards
Apply basic fire fighting techniques (3 credits)
Sweep floors (4 credits)
Show, explain, discuss and analyse the relationship between society and natural environment [sic] (4 credits)

Level 2 unit standards
Demonstrate an understanding of climate and weather in the context of renewable energy (6 credits)
Drive a tractor (10 credits)
Switch a high voltage inline switch on and off (2 credits)
Pack customer purchases at point of sales (3 credits)

Level 3 unit standards
Demonstrate a basic understanding of the causes of falls of ground (2 credits)
Describe ideologies in community contexts (10 credits)
Respond to hazardous conditions or emergencies (10 credits)

Level 4 unit standards
Install an ATM (Automated Teller Machine) (5 credits)
Demonstrate a fundamental understanding of history, geography, politics and economics as relevant to the South African intelligence context (4 credits)
Use knowledge of self to make a life decision in the creative world (5 credits)

Level 5 unit standards
Capture quality sound with a boom microphone (5 credits)
Prepare, cook and serve food in the restaurant (6 credits)
Establish order in the arts and culture learning environment (5 credits)

Level 6 unit standards
Explain and apply the principles of conceptual thinking (10 credits)
Arrange dance productions (15 credits)
Design a computer application for a single-user personal computer for programming with a 4GL (12 credits)

Level 7 unit standards
Analyse global economic structures (10 credits)
Draft amendments to banking legislation (37 credits)
Assess marketability of scripts (10 credits)

The unit standards in Box 2 consist of learning outcomes and other specifications. They were all created separately from educational institutions or programmes, through a series of stakeholder-based structures set up by SAQA.

Outcomes-based qualifications and unit standards such as those listed above were intended to provide the 'standard' against which educational institutions, recast as 'providers' would 'provide' education. SAQA calls designing learning programmes from learning outcomes 'designing down' (SAQA 2000a; SAQA 2005b). 'Designing down' means that the content and methodology of an education programme can (and must) be derived from outcomes. 'Content', or a knowledge domain, or discipline, should not be the starting point for the design of a programme; instead, knowledge areas should be selected on the basis that they can lead to the competence in question, or on the basis that they 'underpin' it. The task of 'providers' is to select content and methodology based on what is required to achieve the outcome. Content and methodology are valued in so far as they enable learners to achieve outcomes.

It is also supposed to be possible for any given stipulated outcome to be obtained through formal, informal, or non-formal learning. If individuals meet the requirements, they can be said to have mastered the same competences. In this sense, outcomes-based qualification frameworks are really assessment frameworks, because the emphasis is on the statements against which learners can be assessed.

Positioning qualifications and unit standards at different levels on the eight level NQF indicates different levels of cognitive complexity, and is meant to send a message to society about the relative value of different qualifications. In other words, according to the NQF, individuals can be functioning at the same 'level' of cognitive complexity regardless of the types of knowledge with which they are working. To put it differently, levels of cognitive complexity can be defined in the absence of a specified field of knowledge. 'Level descriptors' which describe each level of the qualifications framework were created to capture this cognitive functioning outside of specific knowledge areas and practices. The idea is that as long as any particular programme is 'designed down' from outcome statements, and the outcome statements meet the requirements of the level descriptors, the programme will in an important sense be at the same cognitive level as another programme 'designed down' in the same way. Both will be testing the same 'level' of 'competence' in different areas, and both will be testing the same 'generic competencies', such as problem solving.

The driving idea behind the outcomes-led framework model is that, somehow, the *essence* of a learning programme can be mapped through a configuration of clear and transparent learning outcomes in a qualification. This rests on the idea of transparency. As SAQA (2001b, p. 33) says, level descriptors "must provide a *clear understanding* of the *meaning of learning attainment* corresponding to each level on the NQF" (the emphasis is mine). Learning outcomes are meant to be *transparent* to everyone, regardless of their knowledge or training in the relevant area, thus enabling the essence of a programme to be understood *similarly enough* by different stakeholders (Shalem, Allais and Steinberg 2004).

All the claims about the roles of outcomes in overhauling and reforming education and training rest on the idea that outcomes, specified outside of educational institutions and programmes, could and would be sufficiently *transparent*; that they would be interpreted in the *same* way by *different* people, and hence hold the 'standard'. 'Standards' describing competences are intended to enable learners to know what it is that they are trying to learn; to enable providers to know what it is that learners need to be able to do; to enable quality assurers to judge whether or not providers are succeeding; and to enable employers and society to know what the learners are learning (SAQA 2000d). It is intended that standards

enable everyone (whether a teacher, parent, learner, prospective employer, or admissions officer) to see or understand the specific competencies required for successful performance; because they indicate the competencies required in a practice, they generate 'access' to the practice (Shalem and Slonimsky 1999).

But this transparency cannot be achieved in practice.

Spirals of specification

Documents which specify learning outcomes are never so transparent that they can specify a clear competence that will mean the same thing to different people. As I will demonstrate below, learning outcomes always require additional specifications. These specifications themselves are also not clear, and in turn require additional specifications. This spiral of specification makes the unit standards longer and therefore less usable and, paradoxically, less transparent, because they are so long and cumbersome. Consider some of the features of unit standards on the South African NQF[4].

Firstly, unit standards have a *title*, which is intended to be "a coherent and meaningful outcome (milestone/end point) of learning or training that is formally recognized" (SAQA 2001a, p. 22). The title represents the outcome or learning achievement that is registered on the NQF and against which learners obtain credit; the title *is* the learning outcome. Box 2 above contains examples of unit standard titles, and a cursory consideration of the titles shows that on their own they do not in fact contain clear and transparent learning outcomes that everyone would understand or interpret in comparable ways. The intended meaning of the outcomes below is by no means clear, and is open to interpretation:

> Describe ideologies in community contexts
> Respond to hazardous conditions or emergencies
> Demonstrate an understanding of agriculture as a challenging and applied system.

Even apparently straight-forward outcomes such as 'Sweep floors' or 'Pack customer purchases at point of sales' could be interpreted differently by different people in different contexts.

A *purpose statement* is introduced to provide further clarity. The purpose statement "succinctly captures what the learner will *know* and *be able to do* on the achievement of the unit standard" (SAQA 2000e, p. 8, emphasis as in original). Consider, for example, for one of the unit standards mentioned above, 'Describe ideologies in community contexts.'

A purpose statement further clarifies that:

> Learners credited against this Unit Standard are able to instil a sense of objectivity as well as sensitivity in engaging communities. The Unit Standard requires learners to obtain knowledge of different ideologies in the community that will enhance their understanding of the community. Credited learners are also able to determine the

[4] The examples discussed are drawn from research (Allais 2007) which examines a large number and a wide range of unit standards, including ten standards supplied by SAQA as particularly good examples of unit standards (personal communication with SAQA official Eddie Brown, 7th November 2006). My argument is thus not based on a collection of poor examples of unit standards.

> hub and pulse of a community which can assist in determining a programme of action. Credited learners have the tools to determine the rationale for behaviour in communities.

However, the meaning of 'sense of objectivity as well as sensitivity' is not clear. What is understood by ideology, and how should ideologies be studied?

Consider another of the standards above, 'Demonstrate an understanding of agriculture as a challenging and applied system.'

The unit standard has the following purpose statement:

> A learner credited with this competence will be capable of: discovering the nature of agriculture; differentiating between the various agricultural disciplines; and observing and analysing the geographical distribution and economic impact of agriculture.

But what is the 'nature' of agriculture, and how does one discover it? How many different types of agriculture must be observed and analyzed, and over what geographical area should the geographic distribution be? How detailed should it be? The purpose statement is open to interpretation.

Thus, another layer of specification is added to increase transparency, namely, specific outcomes with assessment criteria. These "together reflect and capture the purpose of the unit standard in ways that are *measurable* and verifiable" (SAQA 2000e, p. 9, my emphasis). Specific outcomes are "smaller, more manageable outcomes" (SAQA 2001a, p. 22). The specific outcomes must represent the essence of the title outcome: "[t]he specific outcomes of each unit logically make up the title without going beyond the title or falling short of the title".

Let's return to one of the standards discussed above, 'Describe ideologies in community contexts.' The four specific outcomes which elaborate on this competence are provided in Box 3 below.

Box 3: Specific outcomes for unit standard "Demonstrate an understanding of sociological issues"

> Explore the concept of ideologies using examples from specific communities.
> Gather information regarding ideologies relevant to specific community contexts.
> Describe different ideologies that exist in specific communities.
> Describe the influence of ideologies in community contexts.

It is still not clear from these specific outcomes what 'the concept of ideologies' is, to say nothing of what ideologies relevant to specific community contexts might be. The designers of this standard possibly had something specific in mind—perhaps they were concerned with understanding different political groupings in communities. Perhaps they were interested in understanding what kinds of belief systems are adopted in different kinds of communities. These may all be admirable things to teach in an educational programme, but

outside such an educational context, the specific outcomes above remain open to interpretation. *Assessment criteria* are a further layer of specification. SAQA argues that "if different standards are applied across the system, the credibility and integrity of the whole system is placed in jeopardy", and that the introduction of assessment criteria is a mechanism to ensure that this does not happen (SAQA 2001a, p. 21). Thus, for each specific outcome, there are assessment criteria, which are statements that "describe the standard to which learners must perform the actions, roles, knowledge, understanding, skills, values and attitudes stated in the outcomes. They are a *clear and transparent* expression of requirements against which successful (or unsuccessful) performance is assessed" (SAQA 2001a, p. 21, emphasis is mine). Assessment criteria, SAQA (2000e, p. 10) further explains, "must be *sufficiently transparent* to ensure ease of understanding across a range of learning providers, learning services [sic] and learners" (emphasis is mine). Box 4 below shows assessment criteria for one of the specific outcomes of the unit standard discussed above.

Box 4: Assessment criteria for specific outcome "Explore the concept of ideologies using examples from specific communities."

> Ideology is described in terms of specified conceptualization.
> Examples of ideologies are identified with reference to specific communities.
> Own ideology is explained in terms of the conceptualization and impact of ideologies in development practice.

From the assessment criteria in Box 4, we still do not know exactly what is meant by 'ideologies' in this context, and what the specified conceptualization is. We do not know what is meant by 'communities', nor are we clear what exactly it means to explain one's 'own ideology'. All of these concepts remain open to interpretation.

Assessment criteria *cannot* fulfill their necessary role of making the specified competencies in the specific outcomes clear. An additional layer of specification, *range statements,* is introduced to define the "contexts in which the individual is expected to perform" (SAQA 2001a, p. 22). It is intended that range statements "define the limits, parameters and areas for inclusion and areas for exclusion of the Unit Standard" (SAQA 2005a, p. 17). SAQA goes on to explain that they should describe the "situations and circumstances in which competence must be demonstrated". In other words, it is intended that they increase the transparency of the standard by making clear the context in which the 'competence' exists. Range statements can be added to unit standard titles, specific outcomes, and assessment criteria.

For example, the second specific outcome of the unit standard discussed above, 'Gather information regarding ideologies relevant to specific community contexts,' has as its first assessment criterion, 'Gathering of information regarding what is happening in specific communities and areas is described in reference to ways in which it is done'. This assessment criterion has a range statement, which clarifies that

> Information gathering can include interviews, meeting community leaders, informal group discussions, etc.

One of the specific outcomes for the agriculture unit standard discussed above is:

> Identify various agricultural disciplines and describe how they are linked.

A range statement explains that

> Examples of agricultural disciplines include crop science; soil science; agricultural economics; agricultural engineering; animal science; horticultural science; agricultural forestry and agricultural extension.

But this does not clarify what is being demanded of the learner—what exactly, and how much must they know about each of these disciplines and how they are linked?

The list of layers of specifications is not yet complete. Unit standards must also contain specifications of learning assumed to be in place, assessment and moderation options, critical cross-field outcomes, and notes. These are added because, despite all the layers of specification already described, it is clear that people can still interpret unit standards in various ways. In the process of specification outcomes tend towards becoming increasingly narrower as developers try to achieve transparency and specificity. This often results in lengthy documentation with various kinds of specification for restricted and low level tasks, such as packing groceries or washing hands. As Wolf (1995) argues in relation to the National Vocational Qualifications in the United Kingdom, the domain of standards becomes narrower and narrower, without becoming fully transparent—a never ending spiral of specification. Young (1996, p. 28) similarly points out that "[a]ll the experience of NVQs in England and other outcomes-based systems indicates that attempts to increase the precision of outcomes can only lead to them becoming trivialized". And despite these lengthy specifications and narrowly specified outcomes, empirical research recently conducted at Umalusi suggests that educational providers nevertheless interpret the unit standards very differently from each other (Allais, King et al. 2007).

In addition to the downward layers of specification, layers of regulations are added above the unit standards, to govern who can make judgements against them, and to govern who can judge whether judgements were made correctly against them. Assessors are checked upon by moderators, who are checked up on by verifiers. Yet in order to be an assessor, moderator, or verifier, an individual must be found competent against an assessment unit standard, moderated by a moderator who has been found competent against an assessment and a moderation unit standard, and verified by an individual who has been found competent against assessment, moderation, and verification unit standards. Thus, the system is not only cumbersome and complicated, but is ultimately circular. The spiral of specification and regulation reaches both upwards and downwards.

The complicated structures and processes established under the NQF as well as the layers of specifications and regulations about the outcomes-based qualifications and unit standards are a *direct consequence* both of requirement for outcomes statements to be transparent and understandable outside of educational or professional contexts, and the fact that they cannot be transparent. These educational and professional contexts and traditions are where decisions can be made and understood about what should be learnt and taught. The discussed complexity is the logical outcome of a system in which learning outcomes are disembedded from the context of a discipline, a knowledge area, a practice, or a learning

programme, and these learning outcomes are required to *transparently* disclose to all roleplayers and stakeholders what the required competencies and standards are. One of the particular ironies of this situation is that the specifications make the documents increasingly longer, often making them more and more opaque in the quest for greater transparency. It is implausible to imagine learners reading these specifications to understand what they will be learning, or parents doing so to find out what their children have learnt, or employers doing so to find out where the competences of job applicants lie.

None of the claims made to justify outcomes-based qualifications can be sustained, once outcomes are shown to be opaque. Learning outcomes as 'standards' are unable to express the consensus which is implied in the notion of 'standard'. If the outcome statements, specific outcomes, and assessment criteria are not transparent, and if curricula cannot be designed from them, then the claim that outcome statements provide the basis for fair and transparent assessment collapses. The idea that educational quality can be judged against outcome statement developed outside of educational programmes or institutions similarly does not work.

Despite the severity of the problem of over specification, the issue is not necessarily specific to education. The explication of any kinds of performance might lead to similar spirals of specification. What makes the outcomes-led approach particularly problematic in education is that education is about the acquisition of knowledge, and it is in relation to the specification of knowledge that the idea of outcomes collapses.

Educational knowledge and outcomes

Perhaps it is significant that the *notes* category, a non-compulsory section of unit standards, very low down on the list of design features, is the only place in a unit standard where knowledge can be specified. Unit standards, SAQA maintains, are not about knowledge:

> [w]here there is an *embedded knowledge* section it comprises a statement of the knowledge base required for competent performance and achievement of the unit standard, representing what the learner has to understand and be able to explain in the area (sub-field) at the particular level.
> (SAQA 2000e, p. 10, emphasis in original)

> If the identified knowledge is that which we need to develop in order to *achieve* identified results or outcomes … then it *belongs in learning programs,* which are about inputs. We should not say anything about this in unit standards, which are about outcomes. Let us trust teachers, trainers and instructional designers to *do their job*, and identify what must be learnt in order for people to be able to achieve the outcomes!
> (SAQA 2000e, p. 27, emphasis in original)

Knowledge in this context seems to mean discrete sections of information. This is because forcing knowledge to be 'designed down' from outcome statements, or to be accountable to outcome statements, trivializes it, and reduces it to pieces of unrelated information.

It is important to understand that outcomes-based qualifications are worse than just an unnecessary addition to the education system. *Specifying outcomes outside of a knowledge context undermines and marginalizes educational knowledge*. Even if the people who are creating the unit

standards are specialists, the unit standards are doomed to this spiral of specification because they are disembedded from knowledge areas or practices. In other words, carpentry experts may be called in to design the carpentry unit standards, but this will not avoid the spiral of specification, because the task that they are called to do—specify learning outcomes outside of a knowledge area, educational context, or practice—is impossible. Outcome statements are a dangerous mechanism as they force specialists out of their roles as specialists, and into the role of bureaucrats, where they find themselves setting outcome statements and judging courses on the basis of requirements which are in no way internal to the tradition of their discipline, knowledge area, or practice. In addition, people outside of a knowledge area or practice may gain the impression that the outcome statements provide them with all the information that they need—when in fact they are unable to 'see' what might be implied by a particular outcome precisely because of their lack of expertise.

Educational knowledge is structured (Bernstein 2000). It can be hierarchically organized as in the sciences, or organized as a series of specialized languages with "specialized modes of interrogation and specialized criteria for the production and circulation of texts as in the social sciences" (Moore 2004:144). What is important is that there is a significant difference between codified knowledge, or knowledge that is organized into disciplines on the one hand, and the knowledge available to people through everyday life experiences on the other. The conditions for acquisition of codified knowledge are very different to the conditions in which everyday knowledge is acquired. Necessarily, disciplinary or codified knowledge is often not directly practically useful or easy to learn (Young 2003).

The purpose of education programmes is to provide learners with access to codified knowledge, precisely because they do not acquire this knowledge in everyday life. While it is theoretically possible for someone to assimilate specialized knowledge through informal processes, it is extremely unlikely that this will happen in the course of everyday life; the nature of specialized knowledge is such that learners need to be introduced to it over a sustained period of time, gradually acquiring greater levels of conceptual depth and breadth. Mastery of codified facts, concepts, principles, and skills is needed to acquire specialized knowledge. Extended, well-planned and structured education programmes extended in time need to be in place in order to enable such learning. Disciplinary knowledge cannot be disaggregated easily, as learning needs to be sustained, sequenced, and systematic[5].

Educational knowledge can include systematized practices and skills which are tacit. Craft knowledge is often tacit (not written or spoken) but it similarly requires sustained and systematic study, and is also not easily disagreggated (Gamble 2004b; Gamble 2004a). Such knowledge is in some ways *less* suited to outcome statements than disciplinary knowledge, precisely because it is tacit and so learning outcome statements cannot be verbalized. Practical knowledge or workplace knowledge of any kind can in fact not easily be reduced to transparent verbal specification. Making judgements against performance statements is notoriously tricky in workplaces, even when these apply to observable material items such as manufactured products. The higher the level of professional competence of the workplace,

---

[5] Given the emphasis on redress in the rhetoric surrounding the NQF, it is important to note that offering education in little bits is likely to be least viable for disadvantaged learners.

the more difficult it is for someone outside of the particular area to be able to make a judgement about the competence. As Morrow (2001, p. 105) explains:

> Practices are sustained or corrupted to a considerable degree by the ways in which participants and significant others interpret, think about, and discuss, them. But those interpretations, thoughts and discussions do not float freely above the 'reality' of the practice, they are part of that reality.

Qualifications frameworks are often associated with vocational education, where it is claimed that outcome statements are a basis for ensuring that vocational programmes are relevant, and that they prepare competent learners for the workplace—because the outcomes specify exactly the competencies required. In fact the tight specification of narrowly defined tasks is likely to contribute to restricting learners' competences to those required in low-level jobs. Because knowledge becomes lists of information or task specifications, learners are unlikely to be able to master the deep underlying principles and skills needed to progress to higher levels of learning. As Beck and Young argue, (2005, p. 189) relying on "task specifications" and "standards of performance" smacks of knowledge authoritarianism, as it denies trainees "access to the forms of knowledge which permit alternative possibilities to be thought" and thus will inevitably "negate the possibilities of understanding and criticism".

Educational institutions are necessary precisely because specialized knowledge requires sustained, carefully sequenced study. Learners are socialized into a discipline, a field, a content area, a practice, or a way of operating. Often, the criteria for assessment cannot easily be articulated, except superficially. In Gamble's (2002, p. 79) words, "evaluative criteria reside not only with the master they reside *in* the master as the carrier of a collective knowledge tradition"; they cannot simply be written up into a standard or qualification. Transmission and development knowledge cannot be easily disaggregated, as learning needs to be sustained and systematic, in institutions which take time and resources to build up.

When the two circumstances are taken together—the narrowness of the highly specified, fragmented learning outcomes on the one hand, and the fact that educational knowledge has its own structure and value on the other—it is clear that the outcomes-based qualification model will not work. Using outcomes-based qualifications to lead educational transformation results in policy that in fact undermines the work of educational institutions and the building of specialized education systems that enable access into specialized knowledge areas and practices. Outcomes-based qualifications and qualifications frameworks might appear to emphasize delivery, but the very act of reducing knowledge and skills to practices that can be delivered against discrete performance statements, undermine the essence of education.

Neoliberalism and social constructionism

My research analyzes the South African NQF through a conceptual framework derived from both the literature on political economy (as the NQF is about reform of the state) as well as the sociology of knowledge. While there is no space here to go into the details of this discussion, very briefly, I argue that both the popularity of, and the problems associated with an outcomes-led qualifications framework, can be understood if the NQF is understood as a neo-liberal public-sector reform based on an implicit, and crudified, social constructionist view of knowledge.

Some have argued that qualifications frameworks cannot be entirely neoliberal because they are centralized, state reforms, (eg, Phillips 1998). This view is held because any state intervention (other than the direct privatization of state assets) is seen as being opposed to neoliberalism, because neo-liberalism argues for unbridled markets and a negligible role for the state. But some advocates of neoliberalism have shifted from the notion that the world would function as a perfect market if only governments would stop interfering, to the idea that the world will always be an imperfect market, and the role of governments is to make it a better market—to support existing markets and build markets in areas that have previously been seen as non-market areas (Fine 2001b). As Fine explains, (1999; 2000; 2001) the *post-Washington consensus* variant of neoliberalism *is* concerned with state intervention, but with particular types of intervention. The role of the state is seen to be facilitating the functioning of the market by improving information flows in order to improve markets, thereby opening up areas of human society which were previously seen as non-market areas, and extending the reach of the market.

Within this line of thought, neoliberal reforms of the public sector have emphasized the disaggregation of government agencies into smaller units that are constituted as cost centres and expected to compete with one another or with private institutions contracted by the state. Performance statements are posited as a mechanism that will stimulate the growth of new service providers, as well as enabling the state to evaluate the quality of provision. This type of reform is located in rhetoric which emphasizes 'relevance' 'efficiency and effectiveness', 'customer satisfaction' and 'results orientation', although there is seldom any evidence for how these desirables will be achieved, or clear explanation about why they are likely to be achieved (Phillips 1998; Pollit 1998:174). My research (Allais 2007) demonstrates that the growing popularity of outcomes-led qualifications frameworks in education reform can be understood as part of this type of neoliberal public sector reform. The key mechanism through which outcomes-led qualifications frameworks operate is the provision of explicit, formal, and measurable performance statements (learning outcomes or statements of competence) against which all education must be measured. These learning outcomes are captured within qualifications and part qualifications, which then become the tool for driving the education system.

Outcomes-based qualifications can be seen as a significant tool to open up markets in education. Separate educational 'competences' are seen as 'goods' or 'services' that can be delivered through the market. It is intended that stipulation of educational outcomes disaggregates the provision of education, so that 'providers' can deliver just the required outcomes, and consumers can purchase only the bits that they want, without having to sit through long educational programmes which are perceived as irrelevant. Instead of education being 'dominated' by the concerns of educators and the academy, education can be opened up to a wider range of 'service providers', who can all provide programmes that lead to the outcomes or competences in question. The primary role of the state is to regulate this market, through contracted or government owned agents. This regulation is different from earlier notions of regulating markets. Here, instead of the state protecting society from the failures of the market, the state is trying to increase the ways in which the market can 'deliver services' to society, using regulation to *create* the market, to turn something into a market deliverable 'good' or 'service'.

Neoliberalism emphasizes the role of education in the economy—but a specific type of education. Internationally, and particularly in countries where neo-liberal ideas have been

influential, governments have increasingly looked for educational reforms which increase the supply of 'relevantly' trained 'competent' potential workers or self-employed individuals (renamed as 'human resources'). Neoliberalism also wants the state to do more with less—a smaller state, but one which is more accountable, and which supports the market in order to improve the distribution of goods and services. Thus, governments have looked for ways of increasing the measurability of education, and the accountability of those employed or contracted by the state to deliver education. Using learning outcomes to drive educational provision not only fits in with these trends in public sector reform, but it also has a broad apparent common sense appeal, as it appears to offer a clear sense to learners of what is expected of them; to society of what learners have learnt; and to educators of what to design programmes against. Further, outcomes appear to eradicate the difference between high and low status qualifications or education programmes, and create relevant and high quality programmes. It is not a hard reform approach to sell to the general public, as the apparent common sense logic of it is highly seductive.

My analysis (Allais 2007) also demonstrates that the outcomes-led idea has been facilitated by trends in education studies. During roughly the same period as neoliberalism's global hegemony, post-modern ideas about knowledge have become influential. Within the broad although eclectic body of thought that is postmodernism, a particular school of ideas has been influential in education policy reform and educational studies: *social constructionism*. Social constructionism in its crudest form sees all knowledge as relative (no knowledge claims take precedence over others) and undifferentiated (rejecting the notion of different types of knowledge). The term social constructionism is tricky to use as it has been used not only with very different emphases, but within different disciplines, with substantively varied meanings. Nonetheless, it has played an important role in educational policy.

The relativism inherent in social constructionism, while apparently concerned with democratization of knowledge and educational institutions, and the concerns of marginalized groups, also provides an educational rationale for treating educational institutions as generic 'service providers' rather than specialist and specific institutions. Social constructionist ideas reinforce the rejection of a disciplinary base to education and a privileged role for educational institutions, as well as encouraging skepticism about the role of the state. These ideas provide an educational justification for the neoliberal approach which relies on performance specifications to create and regulate a market of educational provision.

Thus, outcomes-led qualifications framework are primarily concerned not with state delivery of education, but with state regulation of provision. Educational institutions are recast as 'service providers'. Where the state is a 'provider' of education, it is treated in the same way as private providers. As Ensor (2003, p. 331) explains, "[i]nstitutions such as universities and technikons line up with other potential providers (including employers) with no privileged claim to either set standards or develop curricula", or, as Muller (2000, p. 98) puts it, "the specialized status of schools, colleges and universities … will be dissolved …. Learning sites and settings are despecialized and decentralized, whereas standard setting, monitoring and accreditation are recentralized". These trends are typical of neoliberal public sector reform, where state entities are treated in the same way as non-state entities. Education is seen not as a public good, but as goods supplied by the market. The state's role is to improve the functioning of the market: it must enable the sellers to supply appropriate commodities to appropriate consumers, who will be able to make relevant purchases if they have sufficient

information. Specifying outcomes separately from institutions is a mechanism to achieve these things.

Thus, the notion of 'standards' shifts from being something associated with a discipline or craft and from being defined collectively (if implicitly) by scholars in disciplines or artisans within crafts, to being specified targets and performance criteria (Hartley 2003). This shift is facilitated by the social constructionist rejection of the privileged status of educational knowledge and institutions, and skepticism about the role of the state. Outcomes can be the mechanism against which different kinds of 'knowledges' learnt in different contexts can be measured, because none of these 'knowledges' have a privileged status.

My research (Allais 2007) demonstrates that the shift to specified but discrete performance targets and the focusing of the state on regulation, do not provide an adequate basis for educational reform. This is particularly the case in a context like South Africa, where educational institutions are uneven.

My research suggests that introducing an outcomes-led framework as the driver of educational reform can in fact weaken the education system. While it appears as if an outcomes-led framework will drive an increase in educational delivery, it cannot actually do so, because it does not provide a basis for the building and strengthening of educational institutions. Provision does not emerge against prescribed learning outcomes; provision requires specialized specialized institutions. This fact is profoundly demonstrated by the lack of provision of programmes against the over 11 000 unit standards that have been developed on the South African qualifications framework. Instead of focusing attention on the creation of learning outcomes, the scarce resources of country like ours, in which the provision of education urgently needs to be improved, should be directly channeled into improving institutions and teachers.

The failure of the outcomes-led qualifications model does not mean that there is no role for qualifications frameworks within educational reform. A differently designed framework could play an important role in educational delivery, particularly if it focuses on relating qualifications from different institutions, and supporting links between learning at different educational sites, work-places and communities.

REFERENCES

Allais, S. (2007). The Rise and Fall of the NQF: A critical analysis of the South African National Qualifications Framework. Doctoral thesis. University of the Witwatersrand

Allais, S., King, M., et al. (2007). The 'f' word: the quality of the 'fundamental' component of qualifications in general and further education and training. Pretoria: Umalusi.

Beck, J. and Young, M. (2005). "The assault on the professions and the restructuring of academic and professional identities: a Bernsteinian analysis." British Journal of Sociology of Education 26(2): 183-197.

Bernstein, B. (2000). *Pedagogy, Symbolic Control and Identity: Theory, Research, Critique*. London: Taylor Francis.

Bond, P. (2000). *Elite Transition*. London: Pluto Press.

Chisholm, L. (2003). The state of curriculum reform in South Africa: The issue of Curriculum 2005. *State of the Nation: South Africa 2003-2004*. J. Daniel, A. Habib and R. Southall. Pretoria: HSRC Press.

Departments of Education and Labour (2002). Report of the Study Team on the Implementation of the National Qualifications Framework. Pretoria: Departments of Education and Labour.

Ensor, P. (2003). "The National Qualifications Framework and Higher Education in South Africa: some epistemological issues." Journal of Education and Work 16(3): 325-346.

Fine, B. (1999). "The Development State Is Dead--Long Live Social Capital?" Development and Change 30(1): 1-19.

Fine, B. (2000). "Endogenous growth theory: A critical assessment." Cambridge Journal of Economics 24(2): 245-265.

Fine, B. (2001). *Social Capital versus Social Theory: Political economy and social science at the turn of the millennium*. London and New York: Routledge.

Gamble, J. (2002). "Teaching without words: tacit knowledge in apprenticeship." Journal of Education(28): 63-82.

Gamble, J. (2004a). A knowledge perspective on the vocational curriculum. Human Sciences Research Council Colloquium on the FET Curriculum knowledge. Pretoria.

Gamble, J. (2004b). Tacit knowledge in craft pedagogy: a sociological analysis. Doctoral thesis. University of Cape Town

Hartley, D. (2003). "Education as a Global Positioning Device: some theoretical considerations." Comparative Education 39(4): 439-450.

Heyns, R. and Needham, S. (2004). An Integrated National Framework for Education and Training in South Africa: Exploring the Issues. Qualifications-Africa Conference hosted by the South African Qualifications Authority. Gallagher Estate, Midrand.

Higher Education Quality Council (2003). *Improving teaching and learning resources: Draft policy document*. Pretoria: HEQC.

Isaacs, S. (2004). "Understanding systemic change in building a South African education and training system that is world class." SAQA Bulletin 5(1): 6-20.

Isaacs, S. (2006). Response to Dr Jim Gallacher's paper, "National qualifications frameworks: instruments of change or agents of change?" Second Annual National Qualifications Framework Colloquium hosted by the South African Qualifications Authority. Velmore Conference Estate, Pretoria: SAQA.

Jansen, J. (2004). "Do Good Ideas Matter?" SAQA Bulletin 6(2): 87-93.

Keevy, J. (2006). A Foucauldian Critique of the Development and Implementation of the South African National Qualifications Framework. Doctoral thesis. University of Pretoria

Keevy, J. (2006). The South African National Qualifications Framework as key driver for the development of qualifications frameworks in the Southern African Development Community. 4th Sub-Regional Conference on Assessment in Education, University of Johannesburg: Umalusi.

Marais, H. (2001). *Limits to change: the political economy of transition*. Cape Town and London: UCT Press/Zed Books.

Moore, R. (2004). *Education and society: issues and explorations in the sociology of education*. Cambridge: Polity.

Morrow, W. (2001). "Scriptures and Practices." Perspectives in Education 19(1): 87-106.

Motala, E. (2001). Policy analysis capacity in South Africa. *Implementing Education Policies: The South African Experience*. Y. Sayed and J. Jansen. Cape Town: University of Cape Town Press.

Muller, J. (2000). *Reclaiming Knowledge*. London and New York: RoutledgeFalmer.

Phillips, D.J. (1998). The switchment of history: the development of a unitary qualifications framework. Thesis type. University of Wellington

Pollit, C. (1998). Managerialism Revisited. *Taking Stock: Assessing Public Sector Reforms*. B. Guy Peters and D. Savoie. Montreal: Canadian Centre for Management Development.

Raffe, D. (2003). "'Simplicity Itself': the creation of the Scottish Credit and Qualifications Framework." Journal of Education and Work 16(3): 239-258.

Raffe, D. (2005). "National Qualifications Frameworks as integrated qualifications frameworks." SAQA Bulletin 8(1): 21-31.

SAQA (2000a). The National Qualifications Framework and Curriculum Development. Pretoria: SAQA.

SAQA (2000b). The National Qualifications Framework and Quality Assurance. Pretoria: SAQA

SAQA (2000c). *The National Qualifications Framework and Standards Setting.* Pretoria: SAQA.

SAQA (2000d). *SGB Manual Part One.* Pretorai: SAQA.

SAQA (2000e). *SGB Manual Part Two.* Pretoria: SAQA.

SAQA (2001a). *Criteria and Guidelines for Assessment of NQF registered Unit standards and Qualifications.* Pretoria: SAQA.

SAQA (2001b). Development of level descriptors for the National Qualifications Framework. Pretoria: SAQA.

SAQA (2004). *NQF Support Link: Reader for Learning Programme 1.* Pretoria: SAQA.

SAQA (2005a). *Criteria and Guidelines for the Generation and Evaluation of Qualifications and Standards within the National Qualifications Framework (NQF).* Pretoria: SAQA.

SAQA (2005b). Developing learning programmes for NQF-registered qualifications and unit standards. Pretoria: SAQA.

SAQA (2005c). National Qualifications Framework Impact Study. Report 2. Establishing a baseline against which to measure the progress of the NQF. Pretoria: SAQA.

SAQA (2006). "Credit Accumulation and Transfer in the context of the South African National Qualifications Framework. An exploratory investigation." SAQA Bulletin 9(2): 1-34.

Shalem, Y., Allais, S., et al. (2004). "Outcomes-based Quality Assurance: What Do We Have to Lose?" Journal of Education (34): 51-77.

Shalem, Y. and Slonimsky, L. (1999). "Can we close the gap? Criteria and obligation in teacher education." Journal of Education(24): 5-30.

Tuck, R., Hart, J., et al. (2004). "The Relevance of the National Qualifications Framework Impact Study to qualification framework development in the Southern African Development Community." SAQA Bulletin 6(2).

Wolf, A. (1995). *Competence-based Assessment*. Buckingham: Open University Press.

Young, M. (1996). The Outcomes Approach to Education and Training: Theoretical Grounding and an International Perspective. IMWG Conference on the National Qualifications Framework. Proceedings, Johannesburg: Technikon SA Conference Centre: HSRC on behalf of the Inter-Ministerial Working Group on Education and Training.

Young, M. (2003). Curriculum studies and the problem of knowledge: updating the Enlightenment? Rethinking Curriculum Studies Seminar Series, Institute of Education, University of London.

Young, M. (2005). National qualifications frameworks: Their feasibility for effective implementation in developing countries. Geneva: International Labour Organization.