

UMALUSI



Quality Council for General and Further
Education and Training

Report on Accreditation and Monitoring of Private Education Institutions and Private Assessment Bodies

**For the Period
1 April 2021 - 31 March 2022**



UMALUSI



Quality Council for General and Further
Education and Training

EVALUATION AND ACCREDITATION UNIT

REPORT ON

ACCREDITATION AND MONITORING OF

PRIVATE EDUCATION INSTITUTIONS

AND PRIVATE ASSESSMENT BODIES

FOR THE PERIOD

1 APRIL 2021 - 31 MARCH 2022



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ABBREVIATIONS AND ACRONYMS

A&C	Accreditation and Coordination
AAC	Accreditation Appeals Committee
AB	Assessment Body
ABET	Adult Basic Education and Training
ACC	Accreditation Committee of Council
AET	Adult Education and Training
CAPS	Curriculum and Assessment Policy Statements
CEO	Chief Executive Officer
CET	Continuing Education and Training
CFO	Chief Financial Officer
DBE	Department of Basic Education
DHET	Department of Higher Education and Training
E&A	Evaluation and Accreditation
EMIS	Education Management Information System
EXCO	Executive Committee of Council
FET	Further Education and Training
GENFETQA	General and Further Education and Training Quality Assurance
GETC	General Education and Training Certificate
GFETQSF	General and Further Education and Training Qualifications Sub-framework
IAC	Internal Accreditation Committee
IMC	Internal Moderation Committee
IS	Independent School
LOI	Letter of Intent
NATED	National Education Programme (Report 190/191)
NCS	National Curriculum Statement
NC(V)	National Certificate (Vocational)
NQF	National Qualifications Framework
NSC	National Senior Certificate
PED	Provincial Education Department
PSQ	Post School Qualifications
QAA	Quality Assurance of Assessment
QAM	Quality Assurance and Monitoring
Q&R	Qualifications and Research
QCC	Qualifications Curriculum and Certification
QP	Quality Promotion
SACE	South African Council for Educators
SE	Self-evaluation
SIR	Statistical Information and Research



EXECUTIVE SUMMARY

Umalusi is a Schedule 3A entity with a staff establishment of over 130. The organisation has three branches: the Corporate Services branch headed by the Chief Financial Officer (CFO), and the two branches dealing with operational matters, namely Qualifications and Research (Q&R) and Quality Assurance and Monitoring (QAM). Executive Managers head the two operational branches. The three branches report to the Chief Executive Officer (CEO) through the relevant branch heads.

The Evaluation and Accreditation (E&A) unit lies within Programme three, the QAM branch. The purpose of Programme three is to ensure that the providers of education and training have the capacity to deliver and assess qualifications registered on the General and Further Education and Training Qualifications Sub-framework (GFETQSF) and are doing so to the expected standards and quality. The E&A unit fulfils this purpose through the evaluation, accreditation and monitoring of independent schools, private Further Education and Training (FET) colleges, and private Adult Education and Training colleges that offer the curriculum or programmes leading to a qualification registered on the GFETQSF and private assessment bodies assessing the registered qualifications.

It is a legal requirement that private education institutions be accredited to offer a qualification registered on the GFETQSF or programmes leading to the qualification registered on the GFETQSF. The accreditation process comprises several steps that the private education institution must undergo. Reports on institutions that have completed the steps in the process are presented to the Accreditation Committee of Council (ACC). The ACC considers the report on the institution and recommends an outcome of the accreditation application. This recommendation is then submitted to the Umalusi Chief Executive Officer for approval on behalf of Umalusi Council.

Similarly, private assessment bodies must be accredited by Umalusi to assess a qualification registered on the GFETQSF. Private assessment bodies must demonstrate the capacity to conduct, administer and manage national examinations and assessment of learner achievement and deliver valid, reliable, fair, and credible assessments and examinations. Umalusi Council makes the final decision on the accreditation of private assessment bodies.



Chapter 1

BACKGROUND

Outcome

As part of Programme 3: Quality Assurance and Monitoring, the Evaluation and Accreditation unit of Umalusi implements processes to ensure the achievement of the second organisational outcome, Enhanced educational standards.

Purpose

The purpose of Programme 3 is to ensure that the providers of education and training have the capacity to deliver and assess qualifications registered on the GFETQSF and are doing so to the expected standards and quality. Specifically, the purpose of the Evaluation and Accreditation sub-programme is to quality assure the delivery of qualifications registered on the GFETQSF at private education institutions and the capacity of private assessment bodies to assess those qualifications.

Legislation underpinning the work of the E&A unit

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

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

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

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

- (a) Develop and implement policy for quality assurance;
- (b) Ensure the integrity and credibility of quality assurance; and
- (c) Ensure that quality assurance as is necessary for the Sub-framework is undertaken.

The *General and Further Education and Training Quality Assurance Act, 2001* (Act No. 58 of 2001, as amended) stipulates in terms of sections 17A (2),



“The Council must develop policy for the accreditation of assessment bodies other than departments of education and must submit it to the Minister for approval.

- (d) The Minister must make regulations in which the policy for accreditation is set out.
- (e) The Council must accredit an assessment body in accordance with the regulations contemplated in paragraph (b) above; and 23(1),

The same Act stipulates in terms of section 23(1),

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

- (2) Any institution that is required to register as –
 - (a) an independent school in terms of the South African Schools Act, 1996 (Act No. 84 of 1996).
 - (b) a private college for further education and training In terms of the Further Education and Training Colleges Act, 1998 (Act No. 16 of 2006); or
 - (c) a private centre in terms of the Adult Basic Education and Training Act, 2000 (Act No. 52 of 2000),

Must comply with the policy and criteria contemplated in subsection (1).

and section 25,

- (1) The Council must monitor private education institutions to ensure compliance with the policy contemplated in section 23(1).
- (2) If a private education Institution fails to comply with the policy, the Council must—
 - (a) Notify such private education institution in writing and set out the nature and extent of the failure; and
 - (b) Determine a reasonable period within which the private education institution must comply with the policy.
- (3) At the expiry of the period contemplated in subsection (2)(b), the Council—
 - (a) Must evaluate the steps taken by the private education Institution to comply with the policy and take into account any submissions made by the education Institution; and
 - (b) May affirm the accreditation of the private education institution or withdraw the accreditation as from a date specified by the Council.
- (4) Before the Council withdraws an accreditation, it must notify the head of the department or registrar concerned, as the case may be, contemplated in section 24(1) of its intention to withdraw the accreditation and of the date of the intended withdrawal.

Scope

The E&A unit provides for the quality assurance of provision and assessment through evaluation and accreditation of private education institutions and assessment of private assessment bodies. This entails ensuring that:



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

In line with legislation, applications for accreditation are considered in respect of the following:

- Independent schools to offer the National Curriculum Statement leading to the National Senior Certificate;
- Private Further Education and Training (FET) Colleges offering the NATED Report 190/191 N1 to N3 Engineering Studies and the National Certificate (Vocational),
- Private Adult Education and Training Colleges offering the General Education and Training Certificate: Adult Basic Education and Training (GETC: ABET); and
- Private assessment bodies intending to assess the above-mentioned qualifications.

The Evaluation and Accreditation (E&A) unit conducts its operations through three (3) sub-units. The structure of the unit changed effective 1 April 2021. Previously the sub-units were structured around sectors and qualifications, whereas with the restructuring, the sub-units concentrate on specific accreditation processes. The sub-units are now the Evaluation and Monitoring sub-unit, the Evaluation and Verification sub-unit, and the Accreditation and Coordination sub-unit.

- (a) The Evaluation and Monitoring sub-unit** deals with the initial stages of an accreditation application from Letter of Intent (LOI) to the evaluation of submitted self-evaluation reports; monitoring of accredited institutions; the extension of scope process; accreditation and monitoring of private assessment bodies; and providing assessment bodies with details regarding the accreditation status of private education institutions. The sub-unit is responsible for organising the annual accreditation forum, and liaison with the Department of Higher Education and Training in matters related to accreditation of private colleges.
- (b) The Evaluation and Verification sub-unit** is responsible for the conduct of site verification visits of independent schools and private colleges that have met the requirements at the desktop evaluation stage of the accreditation processes and those that are in the "improvement" stage after an initial outcome of provisional accreditation or a window period to improve. The purpose of the site verification visit is to verify implementation of the evidence submitted in the self-evaluation report. The sub-unit is responsible for liaison with provincial education departments in matters related to accreditation of independent schools.
- (c) The Accreditation and Coordination sub-unit** serves as the secretariat of the Internal Accreditation Committee (IAC), Accreditation Committee of Council (ACC) and Accreditation Appeals Committee (AAC). The A&C sub-unit coordinates the presentation of accreditation reports to the IAC, ACC, AAC, and the CEO. This sub-unit is also responsible for communicating the outcome of accreditation applications to private education institutions, and coordinates the issuing of accreditation certificates.



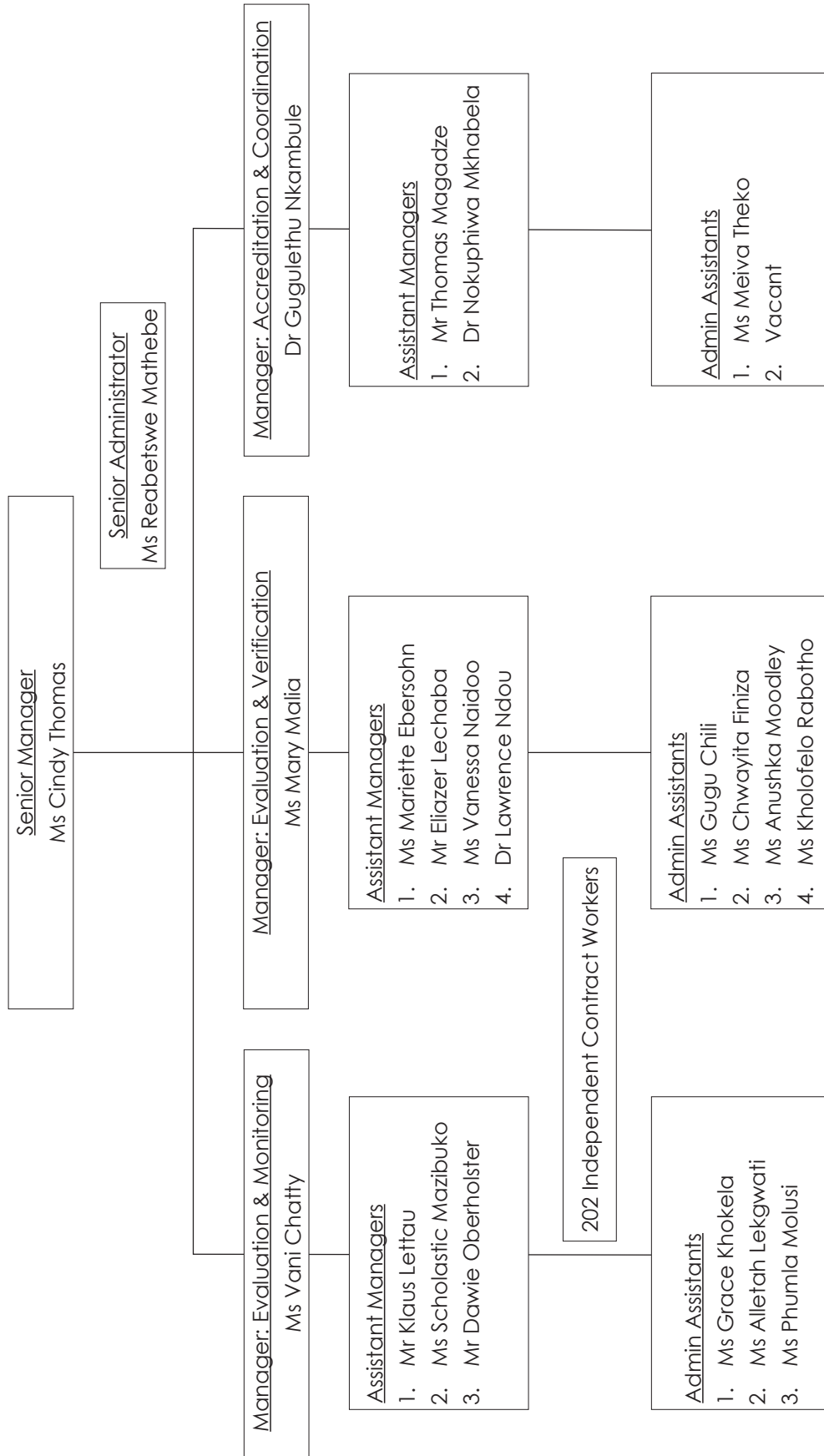
Each sub-unit is led by a manager who oversees the work of the sub-unit and reports directly to the Senior Manager: Evaluation and Accreditation, who in turn reports to the Executive Manager: Quality Assurance and Monitoring. Assistant Managers report directly to a manager and are responsible for implementing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



Organogram

➤ The organogram outlining the reporting structure within the E&A unit follows.

E&A Organogram as at 31 March 2022





Chapter 2

ACCREDITATION OF PRIVATE EDUCATION INSTITUTIONS

INDEPENDENT SCHOOLS

Overview

The National Senior Certificate (NSC) is currently the only qualification for schools that is registered on the GFETQSF. Independent schools that intend to offer the National Curriculum Statement (NCS) leading to the NSC must be accredited by Umalusi.

Legislation pertaining specifically to the accreditation of Independent Schools

includes:

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

The approved criteria for accreditation of an independent school to offer the National Curriculum Statement leading to the National Senior Certificate are:

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

Accreditation decisions are based on the extent to which an independent school meets the minimum standards of the accreditation criteria. The outcome of an application for accreditation by an independent school can be accreditation, two (2) years provisional accreditation, or no accreditation.



If an institution is found not to meet the minimum standards for accreditation at the first presentation of the report to the Accreditation Committee of Council (ACC), it is granted a reasonable period ("window period") to improve on its submission to meet the requirements prior to the accreditation decision being made. During this "window period" schools are expected to address the areas in which they did not meet the minimum requirements for accreditation and maintain the standards that were in place at the original site visit. Following the period given to improve, schools are once more evaluated against the minimum standards for accreditation and improvement reports are presented to the Accreditation Committee of Council (ACC) for consideration of an outcome.

The Accreditation Process for Independent Schools

The accreditation process comprises the following steps:

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

PRIVATE COLLEGES

Overview

Private Colleges that intend to offer the curriculum leading to a qualification registered on the GFETQSF must be accredited by Umalusi. The qualifications / programmes registered on the GFETQSF that are offered by private colleges are as follows:

Private Further Education and Training Colleges:

- National Certificate (Vocational), and
- NATED Report 190/191 N1 to N3 Engineering Studies programme

Private Adult Education and Training Colleges:

- The General Education and Training Certificate: Adult Basic Education and Training (GETC: ABET) at NQF Level 1.



Legislation pertaining specifically to the accreditation of private colleges includes:

- (a) *Continuing Education and Training Act, 2006 (Act No. 16 of 2006 as amended)*, hereafter referred to as the CET Act;
- (b) Policy for the quality assurance of Private Colleges for Continuing Education and Training, offering Qualifications registered on the General and Further Education and Training Qualifications Sub-framework and the Accreditation of Private Assessment Bodies, published in Government Gazette No. 41887 of 7 September 2018.

The approved criteria for a private college to offer a qualification registered on the GFETQSF are as follows:

- Mission directed leadership and management
- Teaching, learning and training
- Assessment and results
- Learner support

Accreditation decisions are based on the extent to which the private college meets minimum standards as outlined in the accreditation criteria.

The outcome of an application for accreditation by a private college can be seven (7) years accreditation, two (2) years provisional accreditation, or no accreditation. If an institution is found not to meet the minimum standards for accreditation at the first presentation of the report to the Accreditation Committee of Council (ACC), it is granted a reasonable period ("window period") to improve on its submission to meet the requirements prior to the accreditation decision being made. During this "window period" private colleges are expected to address the areas in which they did not meet the minimum requirements for accreditation and maintain the standards that were in place at the original site visit. Following the period given to improve, private colleges are once more evaluated against the minimum requirements for accreditation and improvement reports are presented to the Accreditation Committee of Council (ACC) for a recommendation on the outcome.

The Accreditation Process for Private Colleges

The accreditation process comprises the following steps:

- Letter of intent (LOI) to apply for accreditation;
- Attendance of a Quality Promotion (QP) meeting;
- Self-evaluation by the private college;
- Desktop evaluation of the self-evaluation report by Umalusi;
- Referral of the private college to the Department of Higher Education and Training for registration (or provisional registration) as a private college and as an examination centre;
- Site verification visit by Umalusi;
- Consolidation of the reports on each of the processes into an accreditation report;



- Consideration of the application by the Accreditation Committee of Council and their recommendation of an accreditation decision; and
- Approval of the accreditation decision by the Umalusi Chief Executive Officer on behalf of Umalusi Council.



Chapter 3

THE ACCREDITATION PROCESS

The steps in the accreditation process for independent schools and private colleges are outlined in this chapter.

Letter of Intent (LOI) to apply for accreditation

According to the General and Further Education and Training Quality Assurance (GENFETQA) Act, 2001 (as amended), Umalusi is required to quality assure registered private education institutions that offer qualifications registered on its sub-framework. This applies to independent schools that are registered in accordance with the South African Schools Act (SASA), 1996, as amended, and private colleges that are registered in accordance with the Continuing Education and Training Act, 2006 (Act No. 16 of 2006). Furthermore, according to section 3(1) and (2) of the National Qualifications Framework (NQF) Act, 2008 as amended, every qualification or part-qualification offered within the Republic by education institutions must be registered on the NQF in accordance with the NQF Act. Therefore, Umalusi accredits registered independent schools and private colleges to offer qualifications or programmes leading to qualifications registered on the General and Further Education and Training Qualifications Sub-framework (GFETQSF) of the NQF. Currently, Umalusi accredits private education institutions to offer the following qualifications that are registered on the GFETQSF: the National Senior Certificate (NSC), the National Education Programme (Report 190/191) N1-N3 Engineering Studies, the National Certificate (Vocational) (NC(V)), and the General Education and Training Certificate: Adult Basic Education and Training (GETC: ABET).

The “Letter of intent” (LOI) to apply for accreditation is the institution's indication of its intent to apply for accreditation. It is an online process, which indicates to Umalusi whether the institution falls within Umalusi's mandate for accreditation. The LOI is a mere indication of an intention to apply for accreditation and may not in any way be viewed as an application for accreditation. Institutions which do not fall within Umalusi's scope for accreditation are not able to continue with the accreditation process beyond this step.

In total during the period 01 April 2021 to 31 March 2022, 150 independent schools, 84 private Further Education and Training (FET) colleges and eight (8) private Adult Education and Training (AET) colleges submitted the letter of intent (LOI) to apply for accreditation. Table 1 and the graph below illustrate the substantial increase in the number of LOIs submitted per year in the three (3) financial years from 1 April 2019 to 31 March 2022 in the independent school and private FET college sectors.



Table 1: LOI submitted between 01 April 2019 and 31 March 2022

	INDEPENDENT SCHOOLS					PRIVATE FET COLLEGES					PRIVATE AET COLLEGES				
	Q1	Q2	Q3	Q4	Total	Q1	Q2	Q3	Q4	Total	Q1	Q2	Q3	Q4	Total
2021/22	41	39	28	42	150	25	23	17	19	84	3	2	1	2	8
2020/21	8	42	21	51	122	5	6	25	14	50	1	3	0	3	7
2019/20	20	32	29	19	100	37	30	27	7	101	4	8	18	0	30

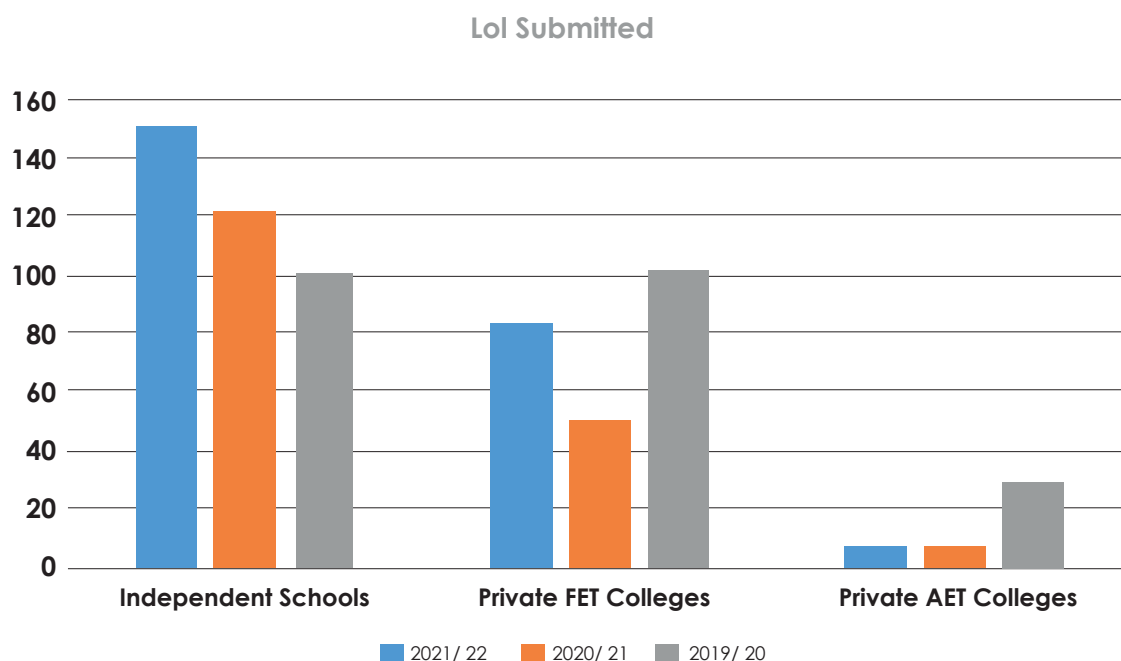


Figure 1: LOI submitted between 01 April 2019 and 31 March 2022

Areas of Strength

- Institutions can complete the Letter of Intent at any time of the year and can prepare for uploading the self-evaluation instrument by the due dates to be compliant with requirements for registration as an examination centre for the next academic cycle.
- The process is online; therefore, it can be accessed from anywhere at any time, and can continue, even during period such as the COVID-19 lockdown.
- Since it is an online process; documentation is stored electronically, which reduces the amount of paper-based evidence which must be kept.

Areas of Concern

- There are still a number of schools that complete the LOI without being registered by the Provincial Department of Education, which means that they are operating outside of legislation.
- Some applicants have no understanding of the purpose and requirements of the qualification that they intend to offer.



- (c) The limited knowledge and understanding of the qualifications for which private colleges apply results in them struggling to choose the correct combination of subjects. Since institutions are invited to a Quality Promotion workshop after completing the Letter of Intent (LOI) to apply for accreditation, those that do not understand the requirements of the qualification then have difficulty with selecting subjects at the LOI stage.
- (d) Incorrect contact details provided by the institutions results in Umalusi being unable to communicate with them until such time that they lodge a query as to why their process is not continuing.
- (e) Some private colleges repeatedly change their registered company name, which causes administrative challenges and delays in the process.
- (f) The letter of intent is not an application, it is only an indication of the intent of the provider. Many providers are under the impression that this is an application.

Quality Promotion Meetings

Quality Promotion (QP) meetings are meetings that are conducted with schools and private colleges to explain the accreditation criteria and provide guidelines for the self-evaluation and site verification processes prior to submission of the application for accreditation (that is, the self-evaluation report).

Attendance of a Quality Promotion meeting is a compulsory step in the accreditation process, prior to an institution gaining access to the self-evaluation report. This is in an endeavour to ensure that institutions applying for accreditation understand the process and requirements for accreditation. At the Quality Promotion meeting private education institutions are taken through the relevant legislation, the accreditation process, the documents needed as evidence and all that is required for the self-evaluation report, as well as what will take place during the verification site visit. This is to equip applicants for the accreditation process and gives them an opportunity to ask questions about the process and requirements for the provision of the qualification.

It has been noted that after attending a QP meeting, some private colleges make amendments to the subjects chosen, whilst others cancel their applications. This is particularly prevalent amongst Adult Education and Training (AET) providers who do not wish to register as companies or feel that the requirements for accreditation are too demanding for the AET sector.

The online approach allows QP meetings to be conducted as and when the need arises for institutions across all provinces in the country without incurring travel and accommodation costs for Umalusi and the providers. The table below indicates the number of Quality Promotion meetings conducted over the 2021/22 financial year.



Table 2: Quality Promotion Meetings held between 01 April 2021 and 31 March 2022

Quality Promotion Meetings held	Q1	Q2	Q3	Q4	Total
Independent Schools	10	8	6	3	27
Private FET and AET Colleges	2	2	3	4	11

Areas of Strength

- The meetings are conducted online throughout the year as and when the need arises in line with applications received from institutions.
- Applicants gain a better understanding of the accreditation process and have a clear understanding of Umalusi's expectations following the meetings.
- The information provided to institutions during the Quality Promotion Meetings clearly explains the processes and minimum requirements for accreditation.
- Attendance numbers have improved significantly since conducting the QP meetings online.
- Meetings for FET and AET providers have been separated to focus on specific issues related to each qualification.

Areas of Concern

- At times load shedding interferes with attendance of Quality Promotion meetings.
- Some consultants attend the Quality Promotion Meetings under the guise of being employees of an institution, rather than the principals and staff of the institution attending on behalf of that institution. This results in the principal and staff of the institution having no understanding of the requirements for accreditation, which then becomes a challenge at the site visit stage of the application when they cannot demonstrate implementation of what was submitted in the self-evaluation stage.

Recommendation for improvement

- The director / owner / campus manager / principal or key people involved in submitting the evidence for the self-evaluation report for an institution must attend the Quality Promotion Meetings prior to starting the accreditation process, so that they are aware of the process and requirements for accreditation.

Self-evaluation Report and Desktop Evaluation

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

Trained evaluators and subject specialists are allocated specific criteria to evaluate online once the



self-evaluation is received. If the self-evaluation (SE) of the institution is found not to meet the minimum standards, the SE is returned to the institution to give them an opportunity to submit further relevant evidence, at the fee approved by Umalusi Council. The SE may be returned to the institution a maximum of two times. If the evidence still does not meet the minimum requirements for accreditation after the two additional submissions, the application will be rejected. Should the institution still seek accreditation with Umalusi, they will be required to make a new application and pay all the relevant fees.

Regulation 26A(1-4) Chapter 5 "Requirements for the registration of independent schools as examination Centres" of the *Regulations pertaining to the conduct, administration and management of the National Senior Certificate (NSC) Examinations* (Gazette No. 31337 of 29 August 2008 as amended) states "In order for an independent school to be registered as an examination centre by either an accredited private assessment body or the state, such a school, besides being registered as a school, must also be accredited by Umalusi." Umalusi will therefore issue certificates to only the learners who sat and fulfilled the requirements of the NSC at accredited independent schools or independent schools that have made considerable progress in their application for accreditation with Umalusi.

Schools that submitted a self-evaluation report meeting the required standard and made considerable progress in their application for accreditation by Umalusi by 31 August 2021 are indicated as compliant with Umalusi's processes for the 2022 National Senior Certificate examinations. Similarly, private colleges that submit a self-evaluation report meeting the required standard are referred to the Department of Higher Education and Training for provisional registration as private colleges and examination centres.

Table 3 below indicates a comparison between the number of self-evaluation reports evaluated during the three (3) financial years: 2019/20, 2020/21 and 2021/22. The number of self-evaluation reports submitted by schools increased compared to previous years, mainly due to an increase in reapplications received after an outcome of no accreditation (32 reapplications out of the total of 107). The decrease in the number of self-evaluation reports submitted by private FET and AET colleges can possibly be attributed to the impact of COVID-19 and the concomitant financial constraints. The uncertainty of the future of the NATED N1-N3 Engineering Studies programmes is also causing some hesitancy amongst private FET colleges to apply for accreditation to offer those programmes.



Table 3: SE submitted between 01 April 2019 and 31 March 2022

Self-evaluation reports submitted	INDEPENDENT SCHOOLS Section A					PRIVATE FET COLLEGES					PRIVATE AET COLLEGES				
	Q1	Q2	Q3	Q4	Total	Q1	Q2	Q3	Q4	Total	Q1	Q2	Q3	Q4	Total
2021/22	14	61	19	13	107	12	6	24	5	47	1	0	0	0	1
2020/21	2	31	34	8	75	10	25	8	19	62	1	2	0	2	5
2019/20	4	13	57	10	84	13	14	19	17	63	0	1	0	0	1

SE reports submitted between 01 April 2019 and 31 March 2022

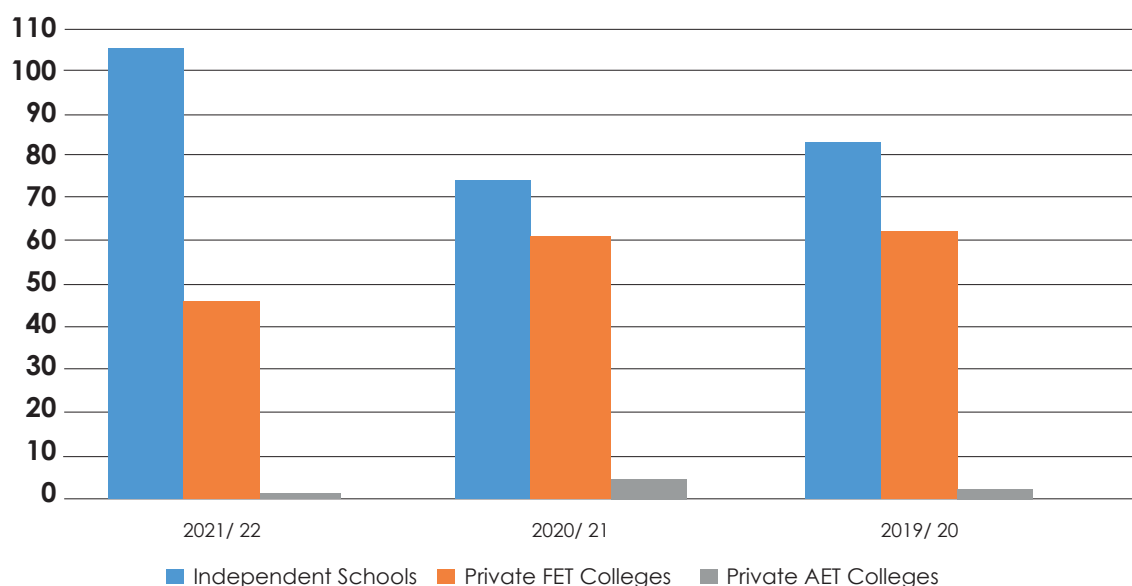


Figure 2: SE reports submitted between 01 April 2019 and 31 March 2022

Areas of Strength

- The online system is secure; unauthorised persons cannot access confidential information.
- The self-evaluation process enables institutions to reflect on the processes, procedures, and policies in place, as well as amend and develop further policies in order to meet the evidence requirements. This can lead to improvement within the institutions.
- Being given an opportunity to correct and submit outstanding information at the self-evaluation stage enables institutions to develop.
- The use of contracted, trained officials to evaluate self-evaluation reports provides the required capacity to deal with the number of applications.
- Evidence submitted is easily accessible in case of appeals and queries.
- No wastage of volumes of paper and printing by providers that need to submit evidence.



- (g) Most of the independent schools submit self-evaluation reports and supporting evidence that meet the minimum standards at first attempt.
- (h) Independent schools find the system user friendly and experience very few challenges in submit the self-evaluation report and supporting evidence.

Areas of Concern

- (a) Detailed evidence is required in the self-evaluation process, which some institutions take a long time to upload and submit.
- (b) The quality of the self-evaluation submissions for colleges is generally unsatisfactory. This results in the self-evaluation being returned to the college to correct their submission. This is probably due to many of the colleges making use of private consultants or due to the campus manager or owner not attending the quality promotion meetings and not understanding the requirements for the submission of the self-evaluation report.
- (c) Some private consultants (not endorsed by Umalusi) charge institutions exorbitant fees and submit unsatisfactory self-evaluation reports.
- (d) Many private colleges submit documents which are obviously from other colleges, and not pertaining to the college for which the application is being made.
- (e) Most of the private college applications are for accreditation to offer the NATED N1 – N3 Engineering Studies programme, which has a very old curriculum.
- (f) Very few applications for accreditation to offer the NC(V) are submitted. Of those submitted, many providers struggle to meet the requirements of the resources that are specific to the programme they intend to offer.

Recommendation for improvement

- (a) The head of the institution and representatives of the institution must attend the Quality Promotion Meeting and personally manage and oversee the self-evaluation process in their institutions to ensure that relevant information is provided.

Site visits

The main purpose of the site verification visit is to verify the evidence submitted during the desktop evaluation process. Therefore, the reports written during the desktop evaluation process are used as the basis for the site verification process. The site verification visit is conducted on one day.

This verification includes verification of, amongst others, the ethos, vision and mission, policies and procedures, staff establishment, financial viability, premises and facilities, curriculum content and delivery, assessment practices, learner support and performance, and results. For private colleges there, with an added emphasis on stakeholder satisfaction, and analysis of the results leading to improvement in the college processes.

Whilst independent schools are required to first be fully registered with the provincial education



department and enrol learners, then apply for accreditation, there is a different approach for private colleges. The Continuing Education and Training Act (No. 16 of 2006) paragraph 30(1)(b)(ii) requires the registrar to register an applicant as a private college if the registrar has the reason to believe that the applicant, among other considerations, will comply with the requirements of Umalusi. Private colleges are therefore required to satisfactorily complete the self-evaluation stage of the accreditation process before being referred to the Department of Higher Education and Training (DHET) for registration as a private college and examination centre. Private colleges must then meet the requirements of the DHET and be registered (or provisionally registered) as a private college and as an examination centre to offer the specific subjects, before enrolling students and conducting examinations.

In line with policy for the quality assurance of Private Colleges for Continuing Education and Training offering Qualifications registered on the General and Further Education and Training Qualifications Sub-framework and the Accreditation of Private Assessment Bodies (Gazette 41887 of 7 September 2018), registration (or provisional registration) of a private college is a pre-requisite for accreditation. Implementation of this policy means that private colleges, which are not registered or provisionally registered by the DHET, will not be able to continue with the accreditation process post the self-evaluation stage of their application

The site verification visit is co-ordinated by an assistant manager together with an admin assistant who deals with the logistical arrangements. The assistant manager deploys Independent Contract Workers (ICWs) to conduct the evaluation. The evaluation team consists of trained general evaluators and subject specialists. Profiles of the evaluation team members are sent to the institution prior to the site verification visit so that institutions can indicate if they feel any of the evaluators or subject specialists have a conflict of interest that could affect their application.

Different sources of data collection are used to triangulate information. These include interviews with management, learners, teachers/lecturers, verification of implementation of policies and general functionality of structures at the institution, lesson observations and inspection of the premises and facilities. The evaluation team develop site verification reports, guided by an evaluation guideline in making their professional judgements and recommendations.

The impact of the COVID-19 pandemic meant that no physical site visits were conducted from April 2020. This was because of the lockdown in South Africa that imposed travel and movement restrictions. Umalusi explored the use of technology to take the applications for accreditation forward. The unit thus embarked on online site verification visits. In order to prepare institutions for this fairly new approach, institutions are invited to attend a pre-site visit meeting. The purpose of the pre-site visit meeting is to prepare institutions for the online site visit by ensuring that they have the necessary resources to participate in this online process. Furthermore, to advise institutions on how verification of information should be packaged and shared during the site visit. Whilst there is a shift from the face-to-face approach of conducting site verification visits, the criteria and quality of verification remains rigorous and intense.

As the online site visits had to first be conceptualised and then piloted, and evaluators and subject specialists trained in the new approach, very few initial site visits were conducted during this financial year under consideration.

Table 4: Site visits conducted between 01 April 2017 and 31 March 2022

Initial verification Site visits conducted	Independent Schools	Private FET Colleges	Private AET Colleges	Total
2021/22	48	8	0	48
2020/21	0	0	0	0
2019/20	163	29	0	192
2018/19	288	25	1	314
2017/18	231	52	7	290

Initial Verification Site Visits conducted

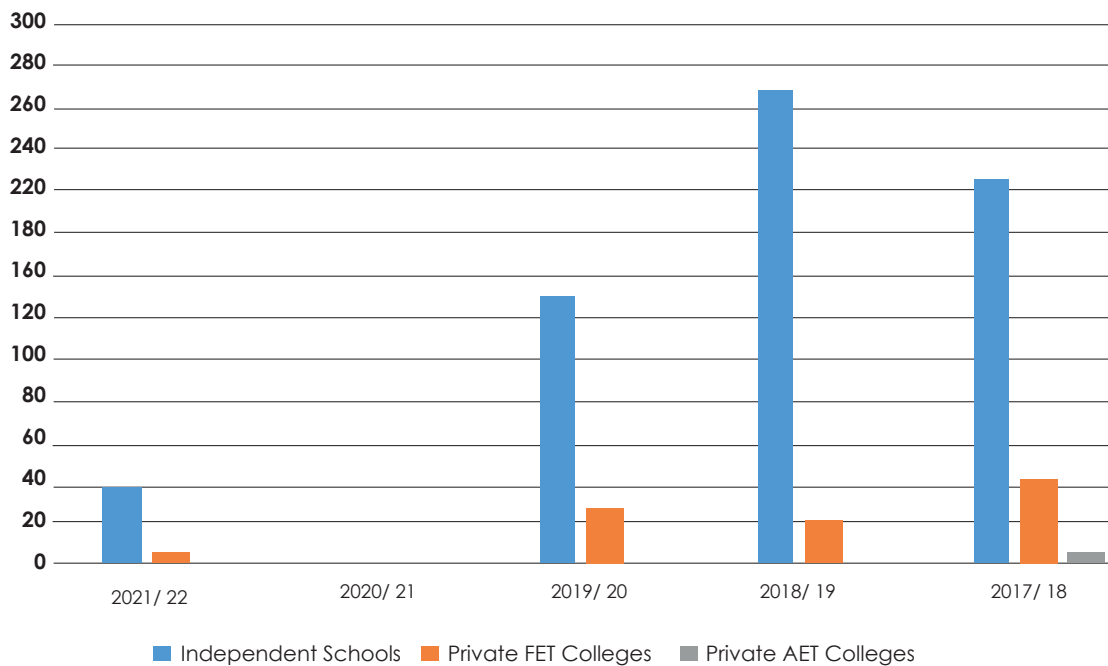


Figure 3: Initial verification site visits conducted

The graph above is a clear indication of the impact of COVID-19 on the site visit process. Although there is evidence of a decline in the number of site visits conducted for independent schools as from the 2019/20 financial year, the steep decrease in the 2020/21 financial year is a result of COVID-19 and the lockdown restrictions that prevented the conduct of physical site visits. This created a backlog which is now being addressed using an online approach to site visits.

Similarly, the statistics clearly illustrate the impact of the COVID-19 lockdown restrictions on the conduct of physical site visits for private FET colleges in the 2020/21 and 2021/22 financial years. Furthermore, in terms of private colleges, there are limited dates available for site visits to be conducted due to the



trimester nature of the NATED programme. Implementation of the online site visits starts to show in the statistics for the 2021/22 financial year. However, the picture depicted by the private AET colleges is not related to COVID-19 but is due to the lack of applications received in this sector, which has seen a decline since AET providers have been required to register as private colleges in terms of the Continuing Education and Training Act.

A new development in the process is the conduct of "confirmation" site visits after an online site visit. These are unannounced physical site visits by two Umalusi officials following an online site visit where it is felt necessary to physically verify evidence presented in an online site visit. Nine (9) confirmation site visits were conducted in the 2021/22 financial year.

Areas of Strength

- (a) Online site verification visits are successfully conducted.
- (b) The introduction of pre-site visits meetings has been welcomed by many institutions.
- (c) The online site visit process enhanced communication with institutions.
- (d) Online site visits are safe and cost-effective as there is no need for travel and accommodation.
- (e) More site visits can be planned and conducted as evaluators can be deployed from any part of the country without having to allow for travel time.
- (f) Institutions submit documents in preparation for the online site visits. This saves much time in verification of evidence on the day of the site visit.
- (g) Thorough evaluation of evidence is done through probing and questioning during the online process.
- (h) The online site visit process is recorded. The recordings serve as reference in cases of dispute.
- (i) Minimal contact with others, which has been important during the COVID-19 pandemic.

Areas of Concern

- (a) Some of the institutions do not have the required technology to conduct a successful online site verification visit.
- (b) Nationwide loadshedding without warning disrupts the online process.
- (c) Internet connectivity and reception remains a challenge, especially for institutions in remote areas.
- (d) For private colleges, site visits can only be conducted once they are registered or provisionally registered by the DHET, have conducted a national examination, and paid the required fee. It must be noted that the registration process has also been affected by the COVID-19 pandemic, leading to a delay in the registration of private colleges. These factors make advance planning very difficult, as it is dependent on the actions and compliance of the applicant.



- (e) Sometimes colleges enrol learners for the first two trimesters and have no enrolments for the final trimester of the year, so teaching and learning cannot be verified during a trimester when no learners are enrolled. This is a key requirement during a site visit as it provides information on the implementation of the qualification.
- (f) Some providers do not inform Umalusi that they do not have registered learners and accept site visits. On the day of the site visit, therefore, teaching and learning cannot be verified.
- (g) The site visit captures the situation at an institution at one given point in time. There is great potential for “window dressing”; however, this is addressed in the “follow-up” site visits or “confirmation” site visits, which, under normal circumstances, are conducted unannounced.
- (h) In terms of private colleges, there are limited dates available for site visits to be conducted, especially for the NATED programme because of the nature of the trimester calendar.

Recommendations for improvement

- (a) Institutions must notify Umalusi when confirming the date of the site visit if they do not have registered learners.
- (b) Institutions must ensure that they have the necessary devices and technology for a successful online site verification visit.
- (c) Backup plans must be put in place in case of loadshedding during a site visit.



Reports to the Accreditation Committee of Council

Desktop and site visit reports are consolidated into one consolidated accreditation report with a recommendation on the outcome of the accreditation application, based on the minimum indicators for accreditation decisions. The level of compliance by an institution is measured against specific indicators to determine whether the institution meets the minimum criteria for accreditation.

The consolidated accreditation reports are moderated, quality assured and approved within the sub-unit prior to being submitted to the Accreditation and Coordination sub-unit, where they undergo another moderation process prior to being assigned to Accreditation Committee of Council (ACC) members for consideration. The number of accreditation reports presented to the ACC per quarter is largely dependent on the number of site verification visits conducted.

Table 5 below indicates a comparison between the number of accreditation reports presented to the ACC during the three (3) financial years; 2019/20, 2020/21, and 2021/22. The number of independent school consolidated accreditation reports presented to the ACC has dropped significantly from 243 in the 2019/20 financial year to 53 in 2020/21 and 18 in 2021/22. Similarly, the number of private FET college consolidated accreditation reports presented to the ACC has declined from 33 in the 2019/20 financial year, to 10 in 2020/21 and seven (7) in 2021/22. This decline is attributed to the COVID-19 lockdown restrictions which prevented the conduct of site verification visits.

A contrasting trend is observed in the number of independent school improvement reports presented to the ACC. An increase is observed from 107 in the 2020/2021 financial year to 168 in the 2021/2022 financial year, which is two more than the pre-COVID-19 statistics of 166 improvement reports presented to the ACC in the 2019/20 financial year. Whilst the initial site verification visits were put on hold due to COVID-19 lockdown restrictions, the improvement report process for independent schools was used to pilot the online site verification approach. More detail on the improvement report process is provided in the section dealing with improvement reports.



Table 5: Reports submitted to the ACC between 01 April 2019 and 31 March 2022

		INDEPENDENT SCHOOLS			PRIVATE FET COLLEGES			PRIVATE AET COLLEGES		
		2021/22	2020/21	2019/20	2021/22	2020/21	2019/20	2021/22	2020/21	2019/20
Initial Consolidated Accreditation reports submitted to the ACC	Q1	0	52	79	0	7	7	2	0	0
	Q2	0	0	92	0	0	12	0	0	0
	Q3	2	1	42	1	3	6	0	0	0
	Q4	15	0	30	6	0	8	0	0	0
	TOTAL	18	53	243	7	10	33	2	0	0
		2021/22	2020/21	2019/20	2021/22	2020/21	2019/20	2021/22	2020/21	2019/20
Improvement reports submitted to the ACC	Q1	18	36	22	0	8	12	0	1	1
	Q2	31	0	36	0	0	22	0	0	1
	Q3	72	47	34	2	35	14	0	2	1
	Q4	47	24	74	7	23	4	0	9	3
	TOTAL	168	107	166	9	66	52	0	12	6

Consolidated and Improvement Reports submitted to the ACC

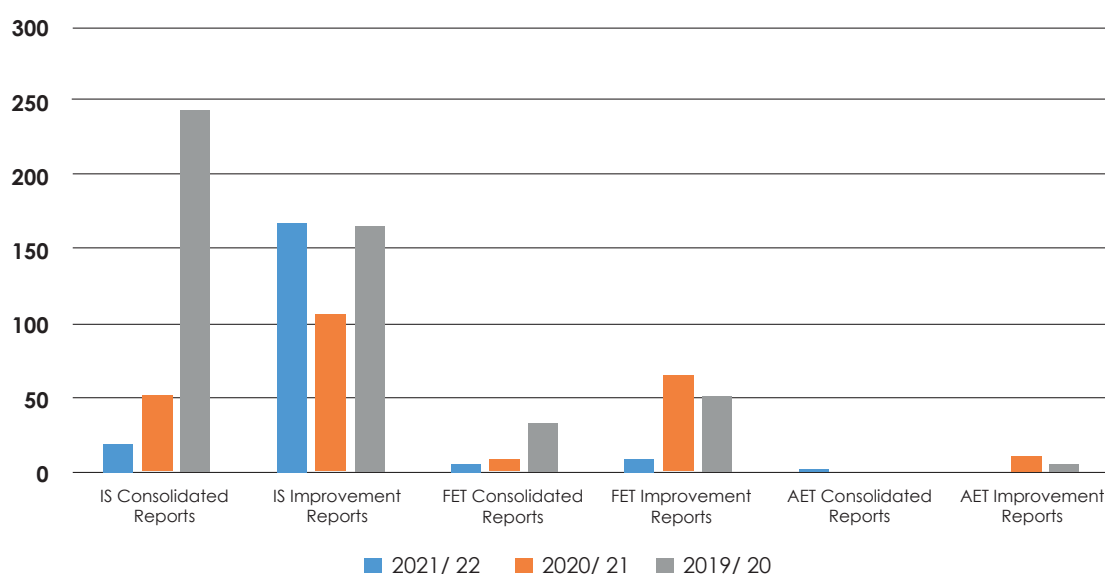


Figure 4: accreditation reports submitted to the ACC

Areas of Strength

- The format of the consolidated reports directs reporting, ensuring that key information is provided for making a recommendation on the accreditation decision.
- The online site visits have proved to be rigorous and an effective means of conducting verification.



Areas of Concern

- (a) Many applications could not be finalised when no physical site visits could be conducted during the COVID-19 pandemic.
- (b) The consolidated accreditation report involves an intensive process of collating information from the desktop evaluation reports and the site visit reports on a particular institution. This demands specialised report writing skills and is a time intensive process.

“Window Period”

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

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

- (a) Notify the private education institution in writing and set out the nature and extent of the failure; and
- (b) Determine a reasonable period within which the private education institution must comply with the policy.

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

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

In terms of this legislation, a “window period to improve” is offered to private education institutions that fail to meet the minimum standards for accreditation at the first presentation of the accreditation report to the ACC. Such private education institutions are granted an opportunity to improve on their submission to meet the requirements before the final accreditation decision is made.

Institutions must maintain the minimum requirements for accreditation at all times. The period granted to improve is informed by any risks which may become evident during the evaluation process. The greater the risk, the less time is given to an institution to improve, in order that the students and staff at the institution are not unduly placed at risk. Under normal circumstances, the period is 6 months, but can range from 1 month to 12 months, depending on the areas to be improved. For instance, where learners are at risk, a short period is granted; and if the only area a school needs to improve on is the grade 12 results, then the window period must accommodate the next examination cycle.

A fee is payable for the evaluation after a period to improve. If the fee is not paid, further evidence is not evaluated, and the report will be submitted to the ACC indicating that the institution has not paid and therefore no further evidence was evaluated. The outcome will then be “no accreditation”.

Letters and feedback reports clearly indicating the areas where the institution did not meet the minimum requirements for accreditation and the time period in which the minimum requirements must

be met are sent to the affected institutions. Institutions must submit evidence of their compliance with the minimum requirements for accreditation and pay the required evaluation fee prior to the expiry of the "window period". The submitted evidence is evaluated, and where necessary, a follow up site visit (announced or unannounced) is conducted to verify implementation of evidence submitted in respect of compliance with the requirements for accreditation. During the evaluation, all core aspects of the accreditation criteria are considered when the Accreditation Committee of Council makes a decision on the outcome of the application, not only the areas indicated in the feedback report. Therefore, if standards have dropped in areas which the institution originally met the requirements, that will be taken account in deciding on the outcome of the application. All the accreditation criteria must be met at the point of review.

The table and graph below indicate the number of "window period" letters issued to private education institutions after consideration by the ACC following an initial site visit in the financial years 2018/19 to 2021/22. The decrease in the number of "window period" letters issued is directly related to the inability to conduct the site verification visits due to COVID-19 lockdown restrictions. The effects of COVID are clearly illustrated in the graph.

Table 6: "Window period" letters issued

No. of "window period" letters issued	Independent Schools	Private FET Colleges	Private AET Colleges
2021/2022	4	6	0
2020/2021	34	5	0
2019/2020	199	22	0
2018/2019	102	33	6

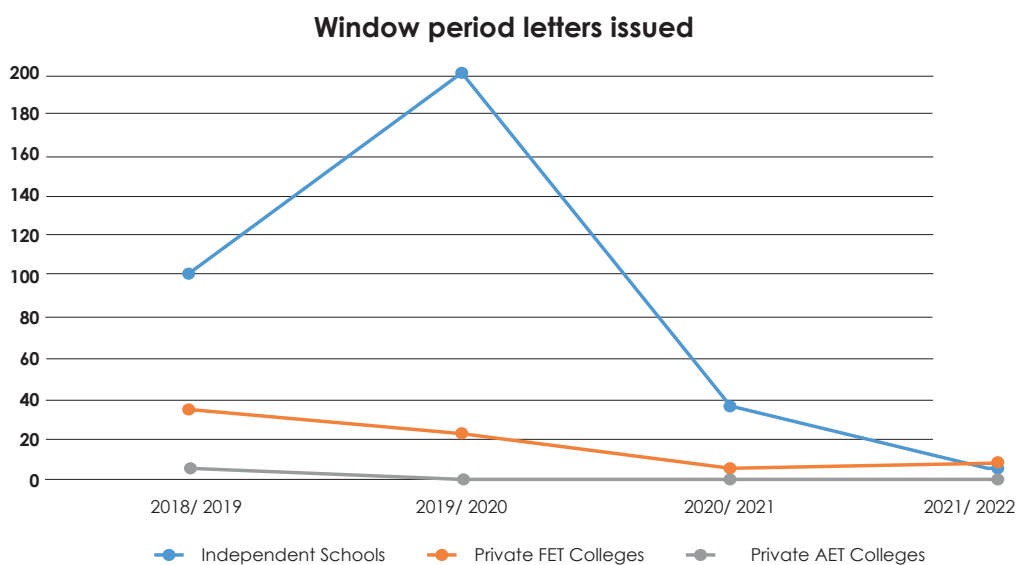


Figure 5: Window period letters issued



Areas of Strength

- (a) The “window period” fulfils the legislative requirement of informing the institutions of the areas where they have not met the minimum requirements and giving them a reasonable period to improve in those areas.

Areas of Concern

- (a) Including this extra step which involves evaluation and verification of evidence, increases the human resources needed to conduct the evaluation, verification, and reporting processes.
- (b) Some institutions change their contact details during the accreditation process without informing Umalusi. The letters notifying the institution of the areas to be improved and the due date for submission of evidence supporting the improvement are then in some cases not delivered timeously to the institutions.

Recommendations for improvement

- (a) Institutions must update their contact details on the Umalusi website as soon as there is a change. This will ensure that the institutions receive feedback on their application for accreditation timeously.

“Improvement” Reports

When an institution has been through the accreditation process and found not to meet the minimum requirements for accreditation, it is given a period within which to address the areas in which it was found lacking. This is either a “window period” to improve, or a period of provisional accreditation. Upon payment of the required fee to evaluate evidence after a period to improve, evaluators appointed by Umalusi conduct the “follow-up” evaluation and produce an “improvement” report. “Follow up” site visits are conducted to verify the information provided by the institution and implementation of policies and procedures, curriculum content and delivery, assessment practices, structures, facilities, resources, and equipment in place at the institution. These follow up site visits were previously unannounced, but with the restrictions brought about by COVID-19, online site visits are now being conducted. Due to the nature of online site visits, they cannot be unannounced. However, where it is felt necessary, since the COVID-19 restrictions have been relaxed, Umalusi officials conduct confirmation site visits following an online site visit.

A follow-up site visit is also conducted in cases where accredited private education institutions move premises and submit an application for a “change of site”. The premises are visited to verify whether the new facilities and resources still meet the minimum requirements for quality provision of the qualification.

The table below indicates the number of follow-up site visits conducted following evaluation of an improvement report, per sector, over the period 01 April 2019 to 31 March 2022.



Table 7: “follow up” site visits conducted

				Private FET Colleges			Private AET Colleges		
	2021/22	2020/21	2019/20	2021/22	2020/21	2019/20	2021/22	2020/21	2019/20
Q1	37	0	19	0	0	13	0	0	1
Q2	83	0	40	0	0	15	0	0	1
Q3	29	3	43	7	1	4	0	0	0
Q4	1	0	60	4	0	5	0	0	0
TOTAL	150	3	162	11	1	37	0	0	2

“Follow up” Site Visits Conducted

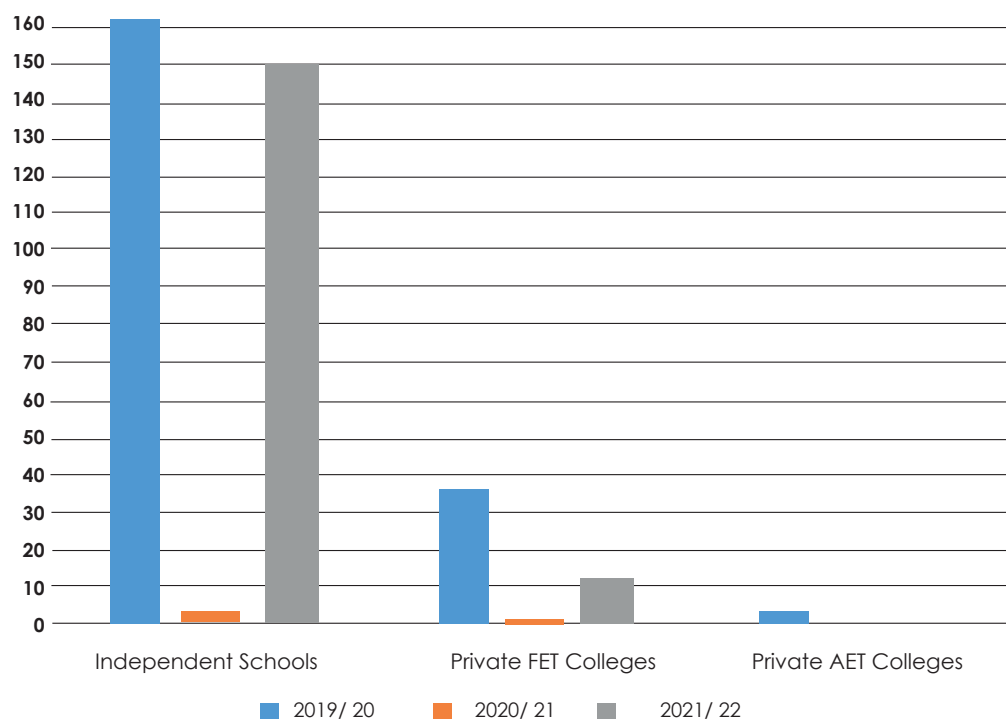


Figure 6: follow up site visits conducted

The online “follow up” site visits are conducted in a rigorous and professional manner. The majority of institutions have expressed their preference for an online site visit and provided positive feedback after an online site visit. Since the online site visits are recorded, all information is available for review.

Some of the feedback received after online site visits:

- Clear communication was received explaining the purpose of site visits and what was needed to conduct the online visits.
- The team communicated and acted in a very professional manner.
- Evidence was sent prior to the online visit and implementation was verified through online virtual platforms.
- Opportunity was given for the college to highlight recent developments and challenges.



- *The college appreciated the online visit so that the process could continue.*
- *A valuable exercise, the nature of the questions in the interviews assisted both management and staff to familiarise themselves on the quality assurance process and gave learners the opportunity to provide feedback on changes that may be required.*

Accreditation decision taken after the “window period” or provisional accreditation

A report on the extent to which the private education institution meets the accreditation criteria during a window period or provisional accreditation (the “improvement report”) is considered by the Accreditation Committee of Council. The ACC considers the extent to which the institution then meets the accreditation criteria and recommends the outcome of the institution’s application for accreditation to the Chief Executive Officer of Umalusi for a final accreditation decision on behalf of Umalusi Council.

The private education institution may be granted an outcome of accreditation, provisional accreditation, or no accreditation, depending on the extent to which the institution meets the relevant criteria. A second “window period” or a “window period” after provisional accreditation may not be granted, therefore institutions which do not meet the minimum requirements for accreditation after a “window period” or provisional accreditation receive an outcome of “no accreditation”.

Improvements following a “window period” or provisional accreditation

The table and graph below indicate that institutions are not effectively using the “window period” to improve their accreditation status. The percentage of schools receiving accreditation after a period given to improve declined from 73% in the 2018/19 financial year to 20% in the 2020/21. The 2021/22 financial year saw an increase to 43%, but it is still concerning that schools do not make better use of the opportunity given to them to improve and meet the requirements for accreditation.

The converse of the above shows the increase in the number of schools that are not meeting the requirements for accreditation. Despite there being a reduction in the staggering 68% of institutions given an opportunity to improve in the 2020/21 financial year still not meeting the requirements for accreditation, to 46% in the 2021/22 financial year, this still represents 76 independent schools in one year that did not make use of the opportunity given to them to meet the requirements for accreditation. More concerning is that the majority of the schools continue to operate as accreditation of an independent school is not linked to registration of an independent school. The public should therefore be vigilant and insist on evidence of an independent school being accredited by Umalusi before enrolling their children in an independent school.



Table 8: Independent School accreditation outcomes between 01 April 2018 and 31 March 2022 following a “window period to improve”

INDEPENDENT SCHOOL OUTCOMES FOLLOWING A PERIOD GIVEN TO IMPROVE				
	TOTAL	Accreditation	Provisional accreditation	No accreditation
2021/22	166	71	19	76
		43%	11%	46%
2020/21	109	22	13	74
		20%	12%	68%
2019/20	56	27	8	21
		48.2%	14.2%	37.5%
2018/19	128	93	12	23
		73%	9%	18%

Independent School accreditation outcomes following a period to improve

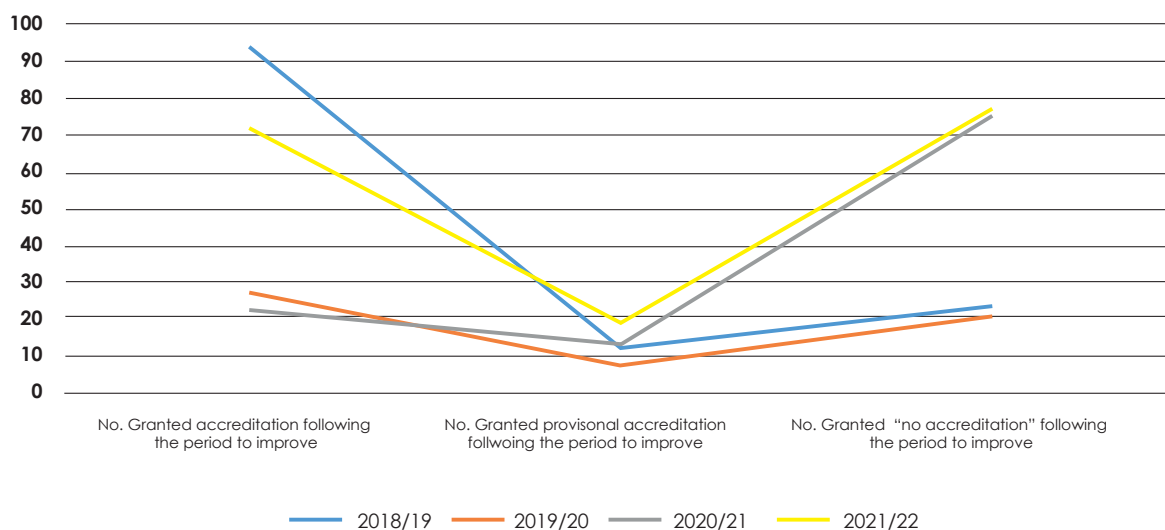


Figure 7: Independent School accreditation outcomes following a period to improve

The statistics for private colleges for the past two financial years reflect a similar trend to that of independent schools.

Two private FET college improvement reports were presented to the ACC in the 2021/22 financial year – one received an outcome of two years provisional accreditation, and one no accreditation. No private AET college improvement reports were received in the past financial year.



Table 9: private college outcomes following a period given to improve

PRIVATE COLLEGE OUTCOMES FOLLOWING A PERIOD GIVEN TO IMPROVE				
	TOTAL	Accreditation	Provisional accreditation	No accreditation
2021/22 Private FET Colleges	2	0	1	1
		0%	50%	50%
2020/21 Private FET Colleges	69	4	42	23
		6%	61%	33%
2021/22 Private AET Colleges	0	0	0	0
		-	-	-
2020/21 Private AET Colleges	12	0	2	10
		0%	17%	83%

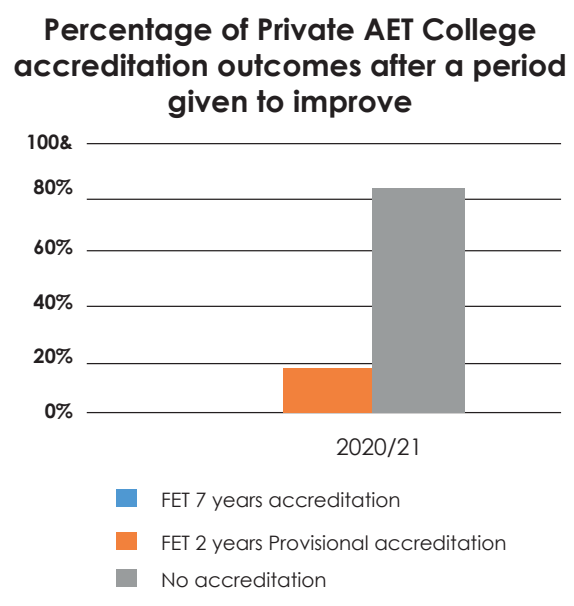
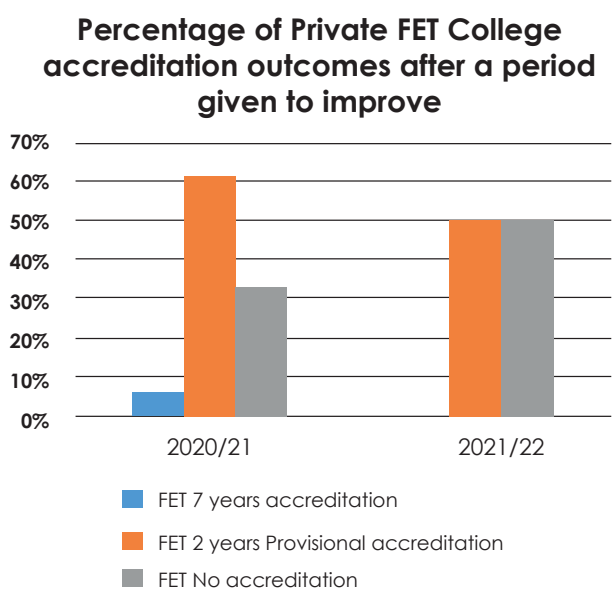


Figure 8: Private college accreditation outcomes following a period to improve

Areas of Strength

- Institutions that take the feedback on the areas to be addressed seriously and implement the changes often move from a window period to accreditation.
- All stakeholders enjoy the benefits of the improvements in the institutions that take the process seriously and make the required changes in order to meet the requirements for accreditation.



Areas of Concern

- (a) Many institutions wait until the expiry date of the period given to improve to submit their evidence to support the improvement. This results in the institutions not having an accreditation status while they are waiting for the outcome to be finalised.
- (b) Some institutions claim to have not received the outcome of their application. On investigation it is often found to be because the contact details have changed, and they have not informed Umalusi accordingly.
- (c) Principals / Heads of institutions leave an institution without proper handover, resulting in the new incumbent not knowing what is required in terms of the institution's application for accreditation.
- (d) Institutions that expect to be reminded to submit and pay.
- (e) The high staff turnover at some institutions.
- (f) Schools that rely on the subsidy from the Provincial Education Department to sustain the school financially.
- (g) The increasing number of fraudulent SACE certificates found during the evaluation process.
- (h) Schools that extend their facilities without consulting registered construction companies, which places the health and safety of learners at risk.
- (i) Institutions that operate without valid health and safety certificates and or Certificate of Acceptability as food premises.

Recommendations for improvement

- (a) Institutions must take responsibility for ensuring that they adhere to the timelines that are indicated in the accreditation feedback letters.
- (b) Principals / Heads of institutions must put stringent measures in place to verify the professional qualifications and SACE registration of teachers / lecturers.
- (c) Institutions must ensure that they make payment for the improvement process within the specified time period, as evidence is only evaluated once payment is made. Non-payment within the specified time will lead to accreditation outcome being decided on the original evaluation, and the institution will receive an outcome of no accreditation.



Monitoring

Accredited institutions are subject to regular monitoring to ensure that the minimum requirements for accreditation are maintained, which include:

- (a) The institution continues to offer the curriculum leading to the qualification they are accredited to offer. (For schools that is the National Curriculum Statement leading to the National Senior Certificate);
- (b) The institution operates on the premises where it is registered to operate;
- (c) Any change of ownership is communicated;
- (d) The principal holds a professional teaching qualification and is registered with the South African Council for Educators (SACE).
- (e) At least 80% of the teachers hold professional teaching qualifications and all educators have current registration with SACE;
- (f) The premises are safe, and a current health and safety certificate and evidence of annual servicing of fire equipment are in place;
- (g) The institutions are financially viable;
- (h) For schools the grade 12 results continue to be on par with or above the national average.

Institutions that fail to maintain the required standards are given notice of intent to withdraw the accreditation, and a reasonable period within which to comply with the requirements. Failure to comply within the specified time may lead to withdrawal of the institution's accreditation.

Withdrawal of accreditation may lead to:

- (a) Review of the registration status of an institution by the provincial education department or the DHET, and
- (b) Withdrawal of the examination centre registration by the assessment body.

Before the Council withdraws an accreditation, it must notify the registrar concerned of its intention to withdraw the accreditation and of the date of the intended withdrawal.

The continuation of the COVID-19 pandemic in the 2021/22 financial year led to an increase in the number of educators who were not compliant with requirements for registration with the SACE or professional teaching qualifications as they had challenges in receiving their police clearance, work permits, or evidence of professional teaching qualifications on time. Some institutions experienced delays in obtaining health and safety certificates.

Institutions that were due for monitoring but had applied for extension of scope were monitored through the extension of scope process and were not included in the monitoring statistics. In addition, it was found during the monitoring process that, of the institutions that were due for monitoring, five (5) schools had closed due to the effects of the COVID-19 lockdown and two (2) private colleges requested that



their accreditation be cancelled as they no longer offer the qualification that they were accredited to offer.

Non-compliance post-accreditation is generally due to:

- (a) Schools struggling to maintain at least 80% professionally qualified and SACE registered teachers.
- (b) Expired health and safety certificate.
- (c) Annual servicing of firefighting equipment not adhered to.
- (d) Misalignment between grades registered to offer, grades offered at the school and the grades applied for accreditation.
- (e) The non-compliance of college lecturers with regard to SACE registration and suitable teaching qualifications.

Table 10 below indicates the number of independent schools and private colleges monitored between 01 April 2019 and 31 March 2022.

Table 10: Accredited Institutions Monitored Between 01 April 2019 And 31 March 2022

No. of institutions monitored	INDEPENDENT SCHOOLS					PRIVATE FET COLLEGES					PRIVATE AET COLLEGES				
	Q1	Q2	Q3	Q4	Total	Q1	Q2	Q3	Q4	Total	Q1	Q2	Q3	Q4	Total
2021/22	122	61	49	98	330	10	14	6	10	40	1	5	0	1	7
2020/21	23	60	36	78	197	1	1	11	8	21	0	0	2	0	2
2019/20	54	49	36	110	249	1	2	4	9	16	0	0	3	3	6

Accredited Institutions Monitored

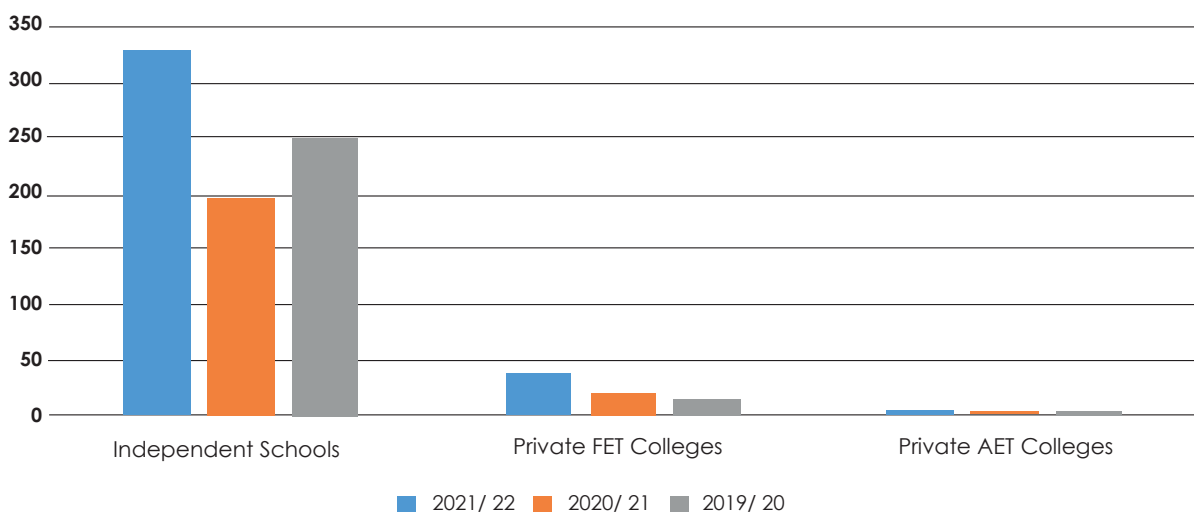


FIGURE 9: Accredited institutions monitored between 01 April 2019 and 31 March 2022

Areas of Strength

- (a) Most of the schools continue to adhere to the Umalusi accreditation criteria post accreditation..
- (b) The majority of schools submit the monitoring reports on time.



Areas of Concern

- (a) There is an increasing number of schools and colleges that only attend to the areas where they no longer meet the requirements for accreditation once they receive the notice of intent to withdraw accreditation.
- (b) Some colleges do not take the submission of the monitoring report seriously and will just submit something for the sake of submitting, without paying attention to whether the submission meets the minimum requirements for accreditation.

Recommendations for improvement

- (a) Accredited institutions should continue to maintain the standards that were in place at the time that they were granted accreditation.
- (b) Wider awareness regarding the requirements of the qualifications required to teach at a college in a specific field of study.
- (c) Institutions must adhere to timelines for submission of monitoring reports.
- (d) Institutions must establish a culture of ongoing monitoring of teaching and learning and keep records of:
 - Internal monitoring of teaching and learning;
 - Tracking of learner performance; and
 - Analysis of results per subject per level.

Monitoring Under performing Accredited Schools

One of the accreditation criteria that accredited independent schools must continue to meet is that their grade 12 results continue to be on par with or above the national average. Ten accredited schools achieved results below the national average in the 2020 National Senior Certificate (NSC) examination and are considered as “underperforming” accredited schools. The ten schools were required to submit an improvement plan for 2021. The aim of the improvement plan is for schools to put measures in place to assist learners who are struggling, and to ensure that the school results improve.

Online site verification meetings were held with the underperforming schools to verify the implementation of their improvement plans and to emphasise the importance of continuing to meet the accreditation criteria by performing on par with or above the national average NSC pass percentage. Of the ten underperforming accredited independent schools, eight (8) managed to improve their results in the 2021 NSC examinations. The schools that continue to under perform will face withdrawal of their accreditation if they continue to underperformed.

There are no clearcut comparisons of results for private college national examinations, and no clear pass percentages are calculated as the learners enrol for subjects at a time rather than the full qualification at a particular level. This makes it very difficult to identify poor performance. Colleges, therefore, are encouraged to ensure that they continue to offer suitable learner support.



Extension of scope

Private education institutions that have acquired accreditation may apply for “extension of scope” to offer additional grades / subjects / programmes linked to their current accreditation. The independent institution must be registered with the Provincial Education Department (PED) and or the Department of Higher Education and Training (DHET) for the phase/subject/programme for which it is applying for extension of scope. Eight (8) independent schools applied for extension of scope in the 2021/22 financial year.

The following process applies to application for extension of scope by an accredited institution:

- (a) Submission of a LOI indicating the phase for which the extension of scope is sought.
- (b) Payment of the requisite fees.
- (c) Attendance of a Quality Promotion meeting.
- (d) Submission and evaluation of a Self-evaluation report.
- (e) Site verification visit conducted.
- (f) A consolidated report is presented to the ACC for a decision.
- (g) Independent institutions which are successful in their application for extension of scope must return their original accreditation certificate to Umalusi and will be issued a new certificate indicating all the grades/subjects/ programme accredited to offer.

Area of Strength

- (a) The Self-evaluation instrument is user friendly and much less onerous than the initial application.

Areas of Concern

- (a) Since institutions can only apply for Extension of Scope once accredited, some schools that have since progressed to offering grade 12 have challenges in registration as examination centres while they are still engaged in the Extension of Scope process.
- (b) A number of private colleges that submitted the LOI for extension of scope failed to make the necessary payment. The process could therefore not continue.

Extension of Scope Site visits

A site verification visit is conducted by trained evaluators and subject specialists to verify the information provided by the institution during the extension of scope self-evaluation process. For schools, this verification focuses on the phase that the school is extending its provision to offer as it has already been accredited, as well as ensuring that the school continues to meet the core requirements for accreditation for the school as a whole. If the evaluation finds that standards have dropped in the grades already accredited to offer, it is possible that the school may be notified of intent to withdraw accreditation.



Training of Independent Contract Workers in the conduct of online Extension of Scope verification site visits took place prior to piloting the Extension of Scope online visits.

The table below indicates the number of online Extension of Scope site visits conducted in the 2021/22 financial year.

Table 11: Extension of scope Site visits conducted per quarter between 01 April 2021 and 31 March 2022

No. of extension of scope site visits conducted	Q1	Q2	Q3	Q4	Total
2021/22 (Independent Schools)	0	0	5	10	15

Areas of Strength

- (a) Online Extension of Scope site visits require no travel and accommodation arrangements. This enabled the completion of all the Extension of Scope site visits that had been on hold in the previous financial year due to the COVID-19 restrictions.
- (b) The rigorous accreditation process ensured that institutions were well-prepared. Most met the Extension of Scope requirements.

Areas of Concern

- (a) Loadshedding results in some online site visits having to be re-scheduled.

Recommendation for improvement

- (a) Institutions should have a plan in place to accommodate loadshedding.



Reapplication

There are two reasons for reapplication.

- Private colleges must submit a reapplication for accreditation in year six of their seven- year accreditation.
- Schools and colleges can re-apply for accreditation after receiving an outcome of no accreditation.

There is a slightly different approach for schools that are reapplying for accreditation. Details about the reapplication process are explained during the Quality Promotion Meetings. It is important that institutions contact Umalusi prior to submitting a reapplication so that they can be advised of how to submit a new application as the system will not accept an application under exactly the same institution name.

The table below indicates the number of applications received for reapplication per sector

Table 12: Reapplications by schools and colleges for the period 1 April 2021 – 31 March 2022

	REAPPLICATIONS 2021/22				
	Q1	Q2	Q3	Q4	Total
Independent Schools	6	15	7	4	32
Private FET Colleges	0	0	0	0	0
Private AET Colleges	0	0	0	0	0



Chapter 4

ACCREDITATION OF PRIVATE ASSESSMENT BODIES

Overview

Entities intending to assess a qualification that is registered on the General and Further Education and Training Qualifications Sub-framework (GFETQSF) may apply for accreditation as a private assessment body. Accreditation is granted if the private assessment body demonstrates the capacity to conduct, administer, and manage a national examination and assessment of learner achievement.

The accreditation of a private assessment body involves a process of evaluation to determine whether it has the capacity, systems, processes, and products of the appropriate quality to deliver valid, reliable, fair and credible assessments and examinations.

The Evaluation and Accreditation unit of Umalusi is responsible for the accreditation process of private assessment bodies. The manager responsible for the accreditation and monitoring of private assessment bodies coordinates the evaluation process, which comprises a number of steps that culminate in the presentation of an accreditation report for consideration by Umalusi Council. Umalusi Council makes the final decision on the accreditation of private assessment bodies.

Legislation pertaining to the accreditation of private assessment bodies includes:

- (a) *South African Schools Act, 1996 (Act No. 84 of 1996);*
- (b) *Continuing Education and Training Act, 2006 (Act No. 16 of 2006, as amended);*
- (c) *Policy and criteria for the quality assurance, accreditation and monitoring of independent schools and private assessment bodies, Government Gazette No. 35830 of 29 October 2012, as amended in 2017;*
- (d) *Regulations regarding the criteria for the quality assurance, accreditation and monitoring of independent schools and private assessment bodies, Government Gazette No. 41206 of 27 October 2017;*
- (e) *Policy for the quality assurance of private colleges for continuing education and training, offering qualifications registered on the General and Further Education and Training Qualifications Sub-framework, and the accreditation of private assessment bodies (Government Gazette No. 41887 of 7 September 2018);*



- (f) *The National Curriculum Statement Grades R – 12, which includes:*
 - a. The Curriculum and Assessment Policy Statements Grades R-12;
 - b. The National policy pertaining to the programme and promotion requirements of the National Curriculum Statement Grades R-12; and
 - c. The National Protocol for Assessment Grades R-12.
- (g) *Regulations pertaining to the Conduct, Administration and Management of the National Senior Certificate Examination (Government Gazette No. 31337 of 29 August 2008 as amended);*
- (h) *Regulations pertaining to the National Curriculum Statement Grades R-12 (Government Gazette No. 36041 of 28 December 2012 as amended);*
- (i) *Standard Setting and Quality Assurance of the General and Further Education and Training Qualifications Sub-framework, Umalusi, 2014;*
- (j) *A Policy for the Management of Qualifications on the General and Further Education and Training Qualifications Framework, a Sub-framework of the National Qualifications Framework;*
- (k) *National Policy on the Conduct, Administration and Management of the Assessment of the National Certificate (Vocational), (Government Gazette No. 30287 of 12 September 2007);*
- (l) *Internal Continuous Assessment (ICASS) Guidelines for Report 191 Programmes in TVET Colleges implementation January 2017;*
- (m) *Internal Continuous Assessment (ICASS) Guidelines for the NC(V) Qualifications in TVET Colleges implementation January 2017; and*
- (n) *National Policy on the Examination of Formal Technical College Instructional Programmes.*



Structures involved in the accreditation of private assessment bodies

The structures that play a role in the accreditation process of assessment bodies are:

- **Internal Moderation Committee (IMC)**, a panel that evaluates the initial application, conducts the verification site visits, and makes recommendations to the Accreditation Committee of Council (ACC). The Chief Executive Officer of Umalusi chairs the IMC. In addition to the CEO, the IMC is constituted by the Executive Manager: Quality Assurance and Monitoring; the Executive Manager: Qualifications and Research; the Chief Financial Officer; Senior Managers of the following units of Umalusi: Evaluation and Accreditation; Quality Assurance of Assessment-School Qualifications; Quality Assurance of Assessment-Post School Qualifications; Qualifications, Curriculum and Certification; Statistical Information and Research; Finance and Supply Chain Management; and Information Communication and Technology; the Managers of the Evaluation and Accreditation unit, and the Managers of the Quality Assurance of Assessment units dealing with the qualification.
- **Assessment experts** who may be contracted to work individually or in teams to evaluate the self-evaluation undertaken by the applying assessment body, conduct the site visits, moderate the standard of the examination products, monitor the examinations and report on the findings.
- The **Accreditation Committee of Council** is responsible to review and moderate the recommendations submitted by the secretariat of the Accreditation Committee of Council, in respect of the outcome of an application for accreditation and, if satisfied, confirms the recommendations and refers the decision for approval by Umalusi Council.
- **Umalusi Council** considers the recommendations of the ACC and makes a decision on the outcome of the application for accreditation by the private assessment body.
- The **Accreditation Appeals Committee** considers appeals against an accreditation decision or outcome that a private assessment body feels to be unjust. The Accreditation Appeals Committee presents their recommendation to the Executive Committee of Council for a decision.



The Accreditation Process for Private Assessment Bodies

The General and Further Education and Training Quality Assurance Act (GENFETQA), 2001, as amended, requires private assessment bodies to apply for accreditation to assess and examine qualifications that are registered on the GFETQSF.

The performance of applying private assessment bodies is evaluated against the accreditation criteria that were approved by:

- The Minister of Basic Education in Government Gazette No. 35830 of October 2012 as amended, and the *Regulations regarding the criteria for the quality assurance, accreditation and monitoring of independent schools and private assessment bodies*, Government Gazette No. 41206 of 27 October 2017; as well as
- The Minister of Higher Education and Training in the *Policy for the quality assurance of private colleges for continuing education and training, offering qualifications registered on the General and Further Education and Training Qualifications Sub-framework, and the accreditation of private assessment bodies*, (Government Gazette No. 41887 of 7 September 2018).

The rigorous evaluation process stretches over a minimum of three years for new applicants. Assessment bodies applying for accreditation are evaluated against the following criteria:

Criterion 1: Leadership, planning and management

Criterion 2: Assessment standards

Criterion 3: Research and development

Criterion 4: The conduct and administration of examinations

Criterion 5: Resulting systems and processes



Private assessment bodies accredited by Umalusi

Table 13 indicates the status of private assessment bodies accredited to assess qualifications registered on the GFETQSF.

Table 13: Current status of private assessment bodies accredited to assess qualifications registered on the GFETQSF.

Assessment Body	Qualification	Accreditation Status
Independent Examinations Board (IEB)	National Senior Certificate (NSC)	Full accreditation
	General Education and Training Certificate: Adult Basic Education and Training (GETC: ABET) at NQF Level 1	Full accreditation
South African Comprehensive Assessment Institute (SACAI)	National Senior Certificate (NSC)	Provisional accreditation
	General Education and Training Certificate: Adult Basic Education and Training (GETC: ABET) at NQF Level 1	Provisional accreditation

Monitoring of the conduct, administration, and management of examinations

Monitoring of the conduct, administration and management of examinations is coordinated by Umalusi's QAA units. The following quality assurance of assessment processes are evaluated and reported on by the QAA, SIR and QCC units:

- Moderation of question papers
- Moderation of school-based assessment portfolios
- Monitoring the state of readiness to conduct the examinations
- Monitoring of writing
- Standardization of the marking guidelines
- Monitoring of marking
- Verification of marking
- Standardization and resulting
- Certification
- Management of irregularities

The E&A unit monitors the registration of private education institutions as examination centres. Assessment Bodies may not register candidates for examinations at unaccredited institutions, or institutions that have not made significant progress in their application for accreditation. During the November 2021 NSC examinations, monitoring of designated examination centres (examination centres which are established to accommodate candidates receiving tuition through distance education providers) was conducted.



Chapter 5

ACCREDITATION OUTCOMES

Overview

The Accreditation and Coordination (A&C) sub-unit coordinates the workings of the three committees involved in the accreditation of private education institutions, namely the Accreditation Committee of Council (ACC), Internal Accreditation Committee (IAC) and Accreditation Appeals Committee (AAC). The A&C sub-unit serves as the secretariat of the committees and coordinates the presentation of accreditation reports to the ACC, IAC, AAC, and the CEO. This sub-unit is also responsible for the communication of the outcome of accreditation applications to private education institutions and coordinates the issuing of accreditation certificates.

In the financial year under consideration, all meetings of the ACC, IAC and AAC have been conducted through an Online platform due to the restrictions imposed as a result of the COVID-19 pandemic.

Committees

There are three committees responsible for accreditation of private education applying for accreditation with Umalusi:

ACCREDITATION COMMITTEE OF COUNCIL

The ACC was established by Council to support the work of the Evaluation and Accreditation (E&A) unit's evaluation processes, and to give institutions the assurance that accreditation decisions have been interrogated and are credible and valid.

The Committee consists of thirteen (13) Council appointed members made up of one (1) member selected from the Council membership to act as Chairperson; a team of twelve (12) nominated members from the private and public provider sectors that Umalusi serves including assessment bodies; a deputy chairperson selected from the twelve (12) nominated members. Umalusi full time staff members act as *ex-officio members*. The Committee meet a minimum of four (4) times annually. The role of the committee is to deliberate on and recommend decisions on the outcome of applications for accreditation.



INTERNAL ACCREDITATION COMMITTEE

The IAC consists of the Senior Manager and Managers of the E&A unit of Umalusi. The Manager, Accreditation and Co-ordination sub-unit chairs the Internal Accreditation Committee. Managers may co-opt Assistant Managers from their sub-unit onto the IAC as necessary.

The purpose of the Internal Accreditation Committee is to consider recommendations of the evaluation teams with regard to monitoring reports, and to consider requests for reviews of accreditation decisions and present findings and recommendations to the Accreditation Committee of Council. The Internal Accreditation Committee meets a minimum of four times annually, prior to each meeting of the ACC.

ACCREDITATION APPEALS COMMITTEE

The AAC is a committee established by Council. It is chaired by a member of Council appointed by the Chairperson of Council. The purpose of the Appeals Committee is to ensure that private providers of education and training and private assessment bodies have an opportunity to appeal an accreditation decision or outcome felt to be unjust.

Members of the Accreditation Appeals Committee are appointed by Umalusi Council. The committee consists of one (1) legal expert and two (2) professional persons, qualified and experienced in the work of Umalusi. Four meetings of the Accreditation Appeals Committee are scheduled per calendar year. However, the committee only meet on the scheduled dates if there are appeals to be considered. The chairperson of the Accreditation Appeals Committee has the power to call meetings as s/he deems necessary.

The Accreditation Appeals Committee considers appeals against accreditation decisions of the Accreditation Committee of Council and makes recommendations to the Umalusi EXCO in respect of the appeal. The EXCO makes the final decision on the outcome of an appeal.



Reports to the Accreditation Committee of Council (ACC)

The reports that are written during the desktop evaluation and site verification visit are consolidated into one accreditation report. The accreditation report is moderated and quality assured, and a recommendation is made on the outcome of the institution's application for accreditation. The accreditation recommendation is informed by the institution's level of compliance to the indicators and criteria for accreditation. The consolidated accreditation reports are further moderated and approved by the manager within the sub-unit prior to being submitted to the Accreditation and Coordination sub-unit, where they undergo another moderation process. Once accepted, reports are allocated to Accreditation Committee of Council (ACC) members to consider in order to ensure that the accreditation process is fair and that the decisions are consistent with the evidence found.

ACC members have access to the evidence provided by the institutions, as well as the source reports together with the consolidated accreditation report. Each ACC member is required to write a report on the institutions allocated to him/her, with recommendations as to whether to accept or amend the accreditation recommendation by the secretariat (the Evaluation and Accreditation unit), along with supporting reasons for their recommendation. Each member presents his/her findings on the allocated reports, and the committee makes a decision as to the final recommendation of the outcome of the institution's application for accreditation.

The turnaround time from the submission of the self-evaluation report to communication of the outcome to the institution after presentation of the accreditation report to the Accreditation Committee of Council can be up to 18 months. However, for private colleges this can be longer as it is dependent on the private college obtaining registration from the DHET as a private college and examination centre. The college must then conduct a full academic cycle of offering the qualification before the site visit can take place.

The following factors may delay the process:

- An institution's accreditation application not aligned to its offering;
- Incomplete submissions;
- Non-payment for the site visit;
- The institution has not attended a pre-site visit meeting in preparation for the site visit;
- Examinations taking place;
- School / college holidays;
- Institutions deferring site visits.



Accreditation outcomes

The Accreditation Committee of Council makes a recommendation as to the outcome of the application of accreditation to the Chief Executive Officer of Umalusi on behalf of Council. Once an outcome has been approved, accreditation letters, signed by the Umalusi Chief Executive Officer on behalf of Umalusi Council, are issued to the private education institution.

Independent Schools

Independent schools applying for accreditation can be awarded one of the following statuses:

- Accreditation
- Two (2) years provisional accreditation
- No accreditation (following a "window period" to improve or provisional accreditation)

The table below indicates the number of independent schools granted each status in the 2021/22 and previous financial years.

Table 14: Accreditation letters issued to independent schools

	2021/22	2020/21	2019/20	2018/19	2017/18	2016/17	2015/16	2014/15	Total
Total Number of accreditation letters issued	203	155	205	236	218	152	92	69	1330
Accreditation	80	36	113	129	142	96	55	47	698
Provisional accreditation	27	34	69	60	65	53	36	19	363
	2021/22	2020/21	2019/20	2018/19	2017/18	2016/17	2015/16	2014/15	Total
No accreditation	96	85	23	47	11	3	1	3	269

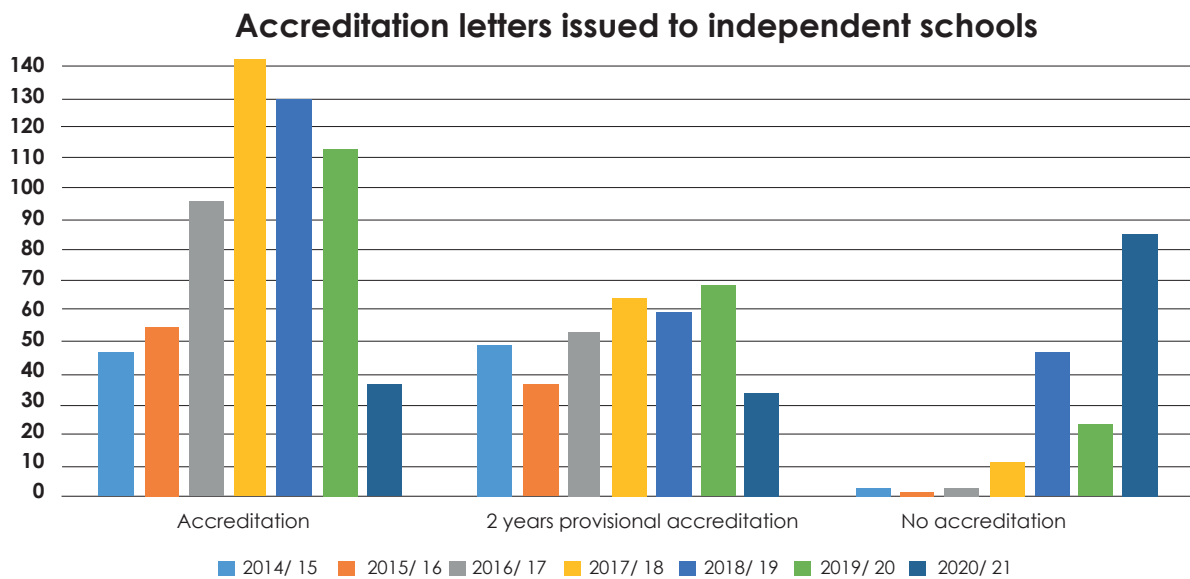


FIGURE 10: ACCREDITATION LETTERS ISSUED TO INDEPENDENT SCHOOLS

Issues preventing schools from achieving accreditation include:

- Some schools move premises without acquiring permission and the necessary documentation from the Provincial Education Department.
- Health and safety certificates that have either expired or are not obtained - especially for new premises.
- Schools hiring unqualified teachers, or teachers who are not registered with SACE.
- Fraudulent SACE certificates.
- Provisional EMIS registration certificates issued by some of the Provincial Education Departments (PED).
- Some PEDs requiring two EMIS certificates for a combined school even when the school operates on the same premises (Umalusi will not accredit an institution if it does not meet the PED's registration requirements).
- Schools do not make use of the "window period" to make the required improvements or do not follow up on their accreditation application after being granted a period to improve.

Private Colleges

Accreditation letters, signed by the Chief Executive Officer of Umalusi, are issued to institutions once a decision regarding their status has been made. Private colleges are awarded one of the following statuses:

- Seven (7) years accreditation
- Two (2) years provisional accreditation
- No accreditation (following a "window period" to improve or provisional accreditation)



The table below indicates the number of private colleges granted each status in the 2021/22 and previous financial years.

Table 15: Accreditation outcome letters issued to Private Colleges

	Private FET Colleges					Private AET Colleges				
	2021/22	2020/21	2019/20	2018/19	2017/18	2021/22	2020/21	2019/20	2018/19	2017/18
Total Number of accreditation letters issued	25	54	57	93	70	11	4	9	19	16
7 years accreditation	1	4	14	37	24	0	0	1	3	5
2 years provisional accreditation	8	36	27	52	33	2	0	7	11	6
No accreditation	16	14	16	4	13	9	4	1	5	5

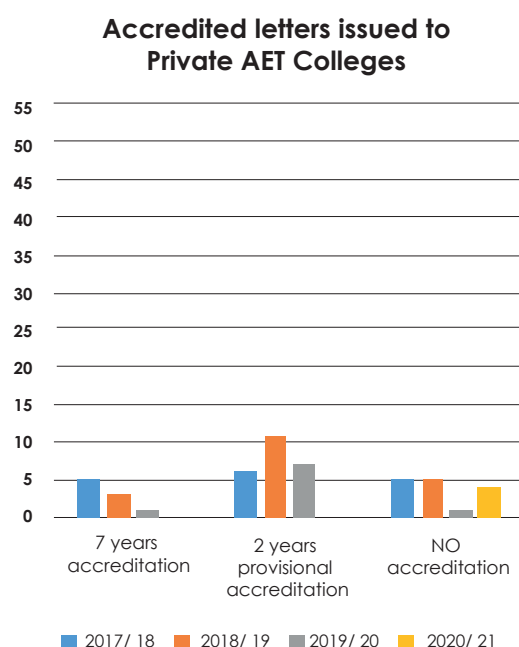
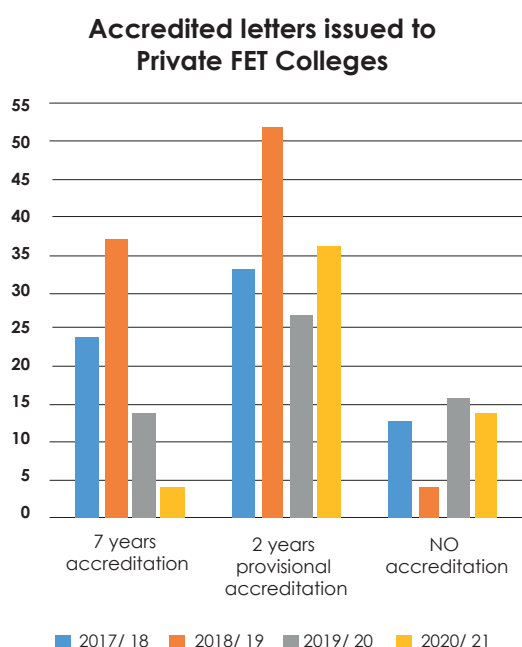


Figure 11: Accreditation letters issued to private colleges

The number of private colleges granted a “window period” to improve or two years provisional accreditation outweighs those receiving seven years accreditation. For many private colleges, it is found that the evidence submitted in the self-evaluation report is not implemented in the college. This could be as a result of outsourcing the compilation of the self-evaluation report rather than the management and staff of the college working together to develop the self-evaluation report.



Review and appeal of accreditation decisions

In line with the provisions of the Promotion of Administrative Justice Act (No. 3 of 2000, as amended), institutions have the right to appeal an outcome of “no accreditation”. Details on how to submit an appeal are included in the letter that institutions receive advising them of the “no accreditation” outcome.

The review and appeal processes are internal processes of validating an accreditation decision, which are addressed as follows:

- (a) A query or appeal is received from the private education institution.
- (b) The query or appeal is recorded in the appeals register.
- (c) The letter containing the query or appeal is brought to the attention of the manager dealing with accreditation of the institution to investigate the matter.
- (d) The query or appeal and findings are presented to the Internal Accreditation Committee (IAC).
- (e) The query or appeal and findings together with the recommendation of the IAC are presented to the Accreditation Committee of Council (ACC).
- (f) The ACC considers the findings and the recommendations of the IAC and then either:
 - (i) Reviews the original recommendation, or
 - (ii) Stands by their original decision and advises that the matter be referred to the Accreditation Appeals Committee (AAC) should the institution still wish to pursue the appeal.
- (g) The institution is advised of the decision of the ACC and invited to lodge a formal appeal to be handled by the AAC. An invoice is raised for the private college to pay an appeal fee, which is determined on an annual basis by Umalusi Council.
- (h) If payment is made within the stipulated time period, the appeal is presented to the Accreditation Appeals Committee.
- (i) The Chair of the AAC presents the recommendations of the Accreditation Appeals Committee to the Umalusi EXCO for a decision.
- (j) The outcome is communicated to the private education institution.

It must be noted that the basis for an appeal must be that the institution believes, and has evidence to support the claim, that an incorrect decision was made taking into account evidence that was presented at the time of the decision. Measures put in place after the evaluation do not constitute grounds for an appeal.



Appeals presented to the AAC in 2019/20, 2020/21 and 2021/22

Between 1 April 2019 and 31 March 2022, 28 appeals have been considered by the Accreditation Appeals Committee (AAC). Of the 28, four (4) appeals have succeeded. In these cases, the appellants were given an opportunity to present evidence for the Accreditation Committee of Council (ACC) to consider in reviewing the accreditation decision. Overall, this represents 1.4% of no accreditation decisions of the Accreditation Committee of Council made between 1 April 2019 and 31 March 2022 which have been reviewed by the AAC. The appeals were successful based on procedural matters rather than an incorrect decision being made at the time of the evaluation. This is evidence of the rigorous and reliable processes in place in considering the outcome of applications for accreditation.

The table below indicates the number of appeals presented to the AAC per financial year between 1 April 2019 and 31 March 2022.

Table 5: Appeals presented to the AAC

	Quarter	INDEPENDENT SCHOOLS			PRIVATE FET COLLEGES		
		2021/22	2020/21	2019/20	2021/22	2020/21	2019/20
Appeals presented to the Accreditation Appeals Committee	Q1	0	0	5	0	0	0
	Q2	2	0	2	0	1	1
	Q3	0	0	0	0	5	6
	Q4	0	1	4	0	2	0
	TOTAL	2	1	11	0	8	6

Appeals considered by the AAC

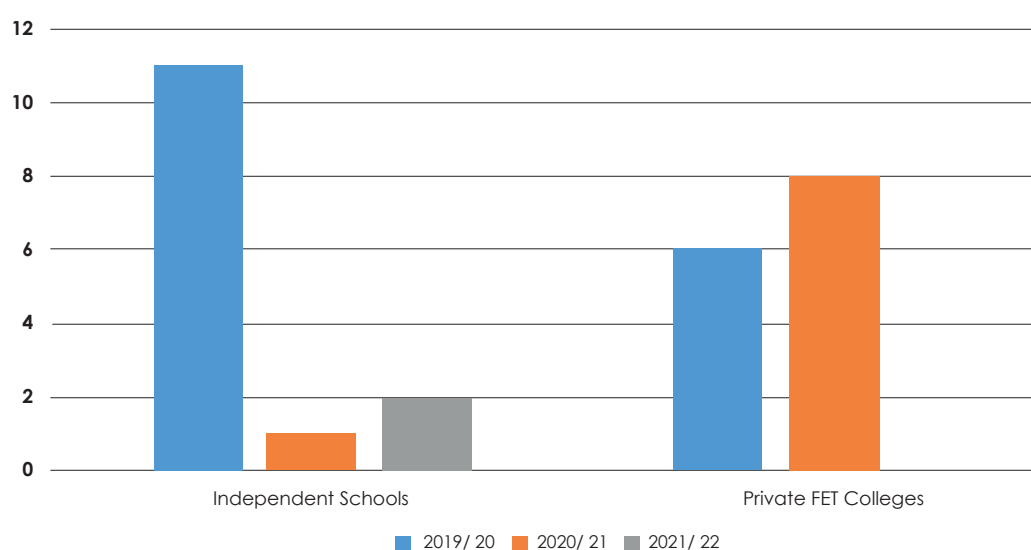


Figure 12: Appeals presented to the AAC



Area of Strength

- (a) The Accreditation Appeals Committee provides another layer for review of accreditation decisions, ensuring that the accreditation process is fair, efficient and reliable.

Areas of Concern

- (a) Most of the appeals indicate that evidence was put in place subsequent to the accreditation decision or will still be put in place at a later date, which does not constitute the basis for an appeal.
- (b) Some of the appeals are a request to be granted additional time to meet the requirements for accreditation, which is also not the basis for an appeal.

Recommendations for improvement

- (a) Private education institutions must take note that the basis for an appeal must be that the institution believes, and has evidence to support the claim, that an incorrect decision was made taking into account evidence that was presented at the time of the decision.
- (b) Institutions must take note of the timelines indicated for meeting the accreditation requirements and payment for evaluation following a period given to improve. Failure to meet the requirements or failure to pay the evaluation fee within the stipulated time periods will lead to an outcome of no accreditation, which will be upheld by the AAC in case of an appeal.



Chapter 6

STAKEHOLDER ENGAGEMENT

The Evaluation and Accreditation unit engages in various activities to establish and maintain stakeholder relations, such as:

- Meetings with officials from the Department of Higher Education and Training, Department of Basic Education and Provincial Education Departments.
- Quality Promotion Meetings.
- Meetings with schools and private colleges by prior arrangement.
- Accreditation Forum and Accreditation Certificate Presentation Ceremonies.
- Responding to queries and providing lists of accredited colleges for the DHET campaigns on awareness of "bogus colleges" that are held in various provinces.
- Any other meeting or seminar that may be initiated by the sub-unit and approved by the Senior Manager.

The restrictions imposed by the COVID-19 lockdown brought about the introduction of online meetings. All meetings are now conducted on an online platform.

An online meeting between Umalusi officials and officials from the Department of Basic Education, Provincial Education Departments, and private assessment bodies was held on 17 August 2022. The purpose of the meeting was to discuss matters relating to the alignment of the registration of independent schools (as private education institutions and as private examination centres) and their accreditation by Umalusi. The alignment is outlined in the Policy and criteria for the quality assurance, accreditation and monitoring of independent schools and private assessment bodies. The policy was gazetted by the Minister of Basic Education on 29 October 2012 and amended in 2017.

The 2022 Accreditation Forum and Certificate Presentation Ceremony was conducted as a webinar on 14 March 2022. The webinar allowed Umalusi to be able to accommodate many delegates. 864 delegates registered to attend and on the day of the event, in excess of 600 delegates connected to the webinar.

The theme for the Forum was "Two Decades of Assuring Quality Education in South Africa." This was in line with Umalusi celebrating twenty years of assuring quality education in South Africa. Topics of the presentation were:

- Understanding Umalusi's role in education,
- Twenty years of assuring quality education in South Africa,
- Capacitating and developing teaching staff post Covid conditions.
- Accreditation and the qualifications registered on the General and Further Education and Training Qualifications Sub-framework,



- Dealing with breaches of the SACE professional Code of Ethics,
- SACE registration requirements.

A breakaway session was included in the programme which allowed delegates from independent schools and private colleges to attend different sessions specific to each sector.

Very positive feedback was received from participants, indicating that many delegates prefer an online forum, although presentation of certificates will always be more effective in a physical setting.

OTHER ACTIVITIES

Reporting accreditation status

Independent Schools

The stage in the accreditation process of independent schools is reported to Provincial Education Departments annually and more frequently on request. The stages are reported in terms of “green” “amber” and “red” colour coding. This assists assessment bodies in identifying whether schools have met the requirements or made considerable progress towards meeting the requirements for accreditation.

A “green” colour coding indicates that an independent school is compliant with Umalusi’s processes for that particular year. A “red” colour coding indicates that either the independent school has not submitted an application for accreditation, or the independent school has been through the accreditation process and received an outcome of no accreditation.

The “amber” colour coding indicates that the independent school has not met the minimum requirements for accreditation and has been granted a window period to improve on their submission or received an outcome of no accreditation after June of that same year (which means that there was not sufficient time for the school to reapply for accreditation prior to 31 August of that same year).

It must be noted that registration of examination centres is the responsibility of the assessment body and not Umalusi. However, assessment bodies must ensure that independent schools meet the requirements for registration as an examination centre in accordance with Regulations 26A and 27 of the *Regulations pertaining to the conduct, administration and management of the National Senior Certificate examination*.

The table below indicates the number of registered independent schools in South Africa in each of the categories as at December 2021. This includes primary schools and schools offering a qualification other than the National Senior Certificate. The number of schools with a red status remains high due to schools that are either offering a qualification other than the NSC, or are primary schools that are reluctant to apply for accreditation.



Table 17: 2022 red, green, amber CODING across nine provinces

Province	Green	Amber	Red	Total
Eastern Cape	93	21	111	225
Free State	34	6	34	74
Gauteng	502	54	694	1250
KwaZulu Natal	153	19	107	279
Limpopo	96	12	58	166
Mpumalanga	60	10	70	140
North West	54	5	35	94
Northern Cape	22	2	17	41
Western Cape	135	13	136	284
TOTAL	1149	142	1262	2553

Independent Schools: December 2021

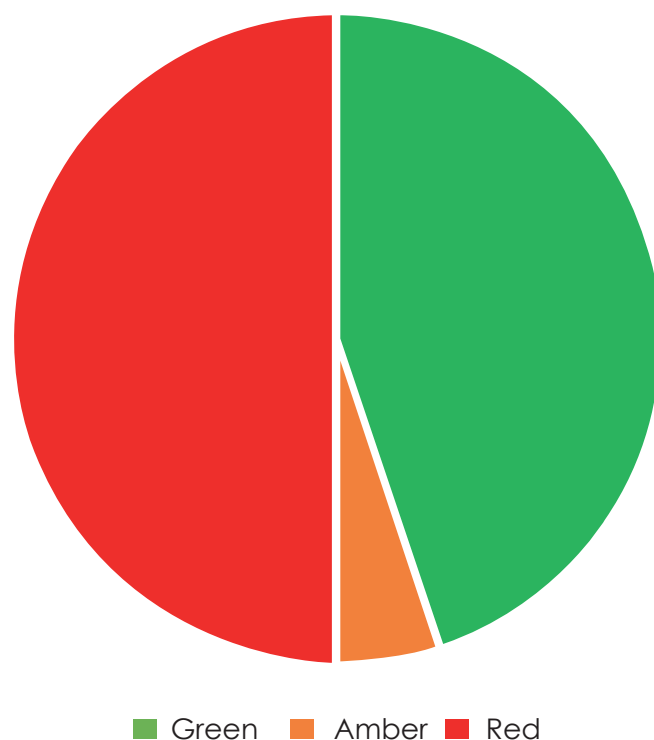


Figure 13: IS Red, Green, Amber Colour Coding 2022 (as at 31 Dec 2021)

In addition, the outcome of accreditation applications is communicated to the provincial Heads of Department and the Directors responsible for registration of independent schools in each province once the schools have been notified of the outcome of their application.



Private Colleges

In line with the GENFETQA Act No. 58 of 2001, as amended, Umalusi reports accreditation decisions to the Registrar in the Department of Higher Education. All accredited private colleges and those that have made significant progress (those that have submitted a self-evaluation report meeting the minimum requirements) are indicated on the list provided to the DHET prior to each examination cycle. Only private colleges included on that list and that have been granted registration as a private college and as an examination centre by the DHET for the qualifications certified by Umalusi may enrol learners at the beginning of a tuition cycle.

In addition, individual letters indicating colleges that meet the desktop requirements of the accreditation process are sent to the DHET Registrar of private colleges.

The cut-off dates to be compliant with Umalusi's processes to be included on the "green list" are as follows:

NATED N2-N3 Engineering Studies

- 31 March for the August examination of the same year.
- 15 August for the November examinations of the same year.
- 15 November for the April examinations of the following year.

NC(V)

- 15 November for the November examination of the following year.

Areas of Concern

- (a) The lack of understanding of the difference between accreditation and registration and which entities are responsible for each process.
- (b) The lack of understanding that the assessment bodies, and NOT Umalusi, are responsible for registration of examination centers.
- (c) The low number of independent primary schools that apply for accreditation.



Review of approach to quality assurance of Adult Education and Training centres

There are very few applications for accreditation from private Adult Education and Training colleges. This may be attributed to the stringent requirements for registration of AET centres as private colleges in terms of the CET Act. In line with a revised approach to registration of private AET colleges by the DHET, the following requirements for accreditation of private AET Colleges have been revised:

- Private AET colleges may be registered as Close Corporations, or under any South African law that includes the Non-Governmental Organisations, Co-operatives and Trusts;
- Private AET colleges are required to submit annual financial statements which may be accompanied by review reports by independent registered accounting officers, accountants and auditors; audited financial statements are not compulsory.
- Exemption on submission of an Occupational Health and Safety report for clients' premises used to conduct training.

GENERAL CHALLENGES

- (a) It is concerning to see an increase in the number of applications, particularly for accreditation as a private college, where it is evident that the applicants have no understanding of the qualification and the requirements for the qualification.
- (b) Despite attendance of quality promotion meetings being compulsory for all applicants, there are still many submissions that do not meet the minimum requirements. In most cases, this can be ascribed to people who attend the meetings not being involved in compiling the self-evaluation report for submission to Umalusi, but rather delegating it to staff who have no understanding of the requirements.
- (c) It is evident that a growing number of institutions are making use of consultants to compile their submissions and oversee their accreditation process. Not only is this an unnecessary expense for institutions, but it also defeats the objective of the accreditation process, which is to facilitate an entrenchment of an internal culture of ongoing improvement of provision and assessment. It must be noted that there are no consultants endorsed by Umalusi.
- (d) Some institutions use the brand of Umalusi as a marketing tool to attract learners to register for qualifications and programmes that are not accredited by Umalusi. This is against the law. Institutions may only offer programmes and qualifications which they are registered and accredited to offer. Members of the public are urged to check the accreditation letters and certificates issued to private education institutions to ensure that the institution is accredited to offer a specific qualification and subjects (private colleges) or grades (independent schools) within that qualification. Although the registration and accreditation processes are related, Umalusi can only communicate to applicants about Umalusi's processes. However, many applicants expect Umalusi to provide feedback on the registration process, which is outside of Umalusi's control.



- (e) The work of the unit is constantly expanding as new processes develop. The staff complement has not increased in line with the expanding workload. Nevertheless, it is the hard work, commitment, and dedication of the staff of the Evaluation and Accreditation unit that ensures the fulfilment of the mandate of Umalusi in regard to accreditation of private education institutions.

CONCLUSION

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

The Evaluation and Accreditation continues to adapt processes to the changing environment to ensure quality provision of the qualifications registered on the GFETQSF. The shift to online processes has strengthened the quality assurance processes, with the added benefit of recordings of online meetings and site verification visits. This has proved to be most useful where institutions have disputed the outcome of their applications.

The unit continues to review and update its procedures to ensure more efficient quality assurance processes. Great effort is made to ensure that the quality assurance of private education institutions and private assessment bodies is fair, efficient, and reliable so that quality education and assessment is provided to learners.

UMALUSI



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