

FREQUENTLY ASKED QUESTIONS: QUALITY ASSURANCE OF INDEPENDENT SCHOOLS

This document is intended to contribute to a better understanding of Umalusi's quality assurance mandate, scope, and initiatives, as they apply to independent schools and their assessment bodies.

1. Quality assurance mandate and scope

1.1	<p>Why does an independent school have to be accredited?</p> <p>Accreditation is a legal requirement for independent schools in terms of the following legislation:</p> <ul style="list-style-type: none"> - General and Further Education and Training Quality Assurance (GENFETQA) Act, 2001 (as amended) - National Qualifications Framework (NQF) Act, 2008 as amended, - Policy and Criteria for the Quality Assurance, Accreditation and Monitoring of Independent Schools and Private Assessment Bodies as promulgated by the Minister of Basic Education on 29 October 2012 (Government Gazette 35830), as amended; - Regulations regarding the criteria for the Quality Assurance, Accreditation and Monitoring of Independent Schools and Private Assessment Bodies (Government Gazette 41206 of 27 October 2017).
1.2	<p>What is accreditation?</p> <p>Accreditation is the outcome of a quality assurance process of evaluating an independent school to determine whether it has the capacity to offer a qualification or programmes leading to a qualification on the General and Further Education and Training Qualifications Sub-framework.</p> <p>Accreditation attests to the capacity and the quality of the offering in an independent school in respect of the independent school's implementation of the curriculum in support of the qualification at the required standard.</p>
1.3	<p>What is registration of an independent school?</p> <p>Registration of an independent school refers to a process that independent schools must undertake with Provincial Education Departments to operate in South Africa in accordance with the requirements of the Constitution of South Africa and the South African Schools Act, No. 84 of 1996. An Independent School must be registered with the Provincial Education Department before seeking accreditation with Umalusi.</p>
1.4	<p>Are all schools expected to apply for accreditation with Umalusi?</p> <p>According to the General and Further Education and Training Quality Assurance (GENFETQA) Act, 2001 (as amended), Umalusi is required to quality assure independent schools that are registered in accordance with the South African Schools Act (SASA), 1996, as amended.</p> <p>Furthermore, according to sections 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.</p>

Therefore, Umalusi accredits registered independent schools that offer qualifications or programmes leading to qualifications registered on the General and Further Education and Training Qualifications Sub-framework (GFETQSF). Currently, the only qualification offered by independent schools that is on the GFETQSF is the National Senior Certificate (NSC). The National Curriculum Statement (NCS) is the curriculum leading to that qualification.

Public schools are not required to apply for accreditation.

1.5 How do I apply for accreditation?

Application for accreditation is an online process accessed on Umalusi's website: www.umalusi.org.za. Click on the link "Apply for Accreditation". You will then be guided through the online application process. <https://www.umalusi-online.org.za/OA/>

1.6 Our school offers a foreign/international curriculum. Are we expected to apply for accreditation with Umalusi?

In terms of section 3 of the National Qualifications Framework Act (NQF), foreign qualifications offered in South Africa are required to be registered on the NQF. Once a qualification is registered on the General and Further Education and Training Qualifications Sub-Framework (GFETQSF), a school must apply for accreditation to offer that qualification.

1.7 What is Umalusi's quality assurance approach for independent schools?

In line with its quality assurance mandate, Umalusi uses a set of criteria to accredit independent schools to offer a qualification on the General and Further Education and Training Qualifications Sub-Framework (GFETQSF). For independent schools, this refers to the National Senior Certificate (NSC) and the curriculum leading to it (which is the National Curriculum Statement, including the Curriculum and Assessment Policy Statements – CAPS). Umalusi's main focus in regard to independent schools is their internal quality management of education provision.

The criteria for the accreditation of an independent school to offer a qualification on the General and Further Education and Training Qualifications Sub-framework are as follows:

- Criterion 1: School Ethos
- Criterion 2: Leadership, Management and Communication
- Criterion 3: Teaching and Learning
- Criterion 4: School Results

1.8 Is the accreditation of independent schools optional or compulsory?

Accreditation is compulsory for independent schools that offer the curriculum leading to a qualification on the General and Further Education and Training Qualifications Sub-Framework (GFETQSF), currently the National Senior Certificate.

1.9 We are in the process of establishing a school. Do we start with accreditation or registration?

Your school must first be registered with the relevant provincial education department as an independent school (to obtain a "licence" to operate) before Umalusi can accredit it.

<p>The registration letter/certificate issued by the Provincial Head of Department indicating the registered name of the school, the grades that may be offered, the physical address that the school may offer, and the EMIS registration number, must be submitted as proof of registration as an independent school.</p>
<p>1.10 Is it a problem if our teachers are not registered with the South African Council for Educators (SACE)?</p> <p>Yes. According to Chapter 3 of the SACE Act of 2000, "no person may be employed as an educator by any employer unless the person is registered with the council". It is illegal for principals or owners of schools to appoint teachers who are not registered with SACE.</p>
<p>1.11 Does Umalusi consider all teachers who are registered with SACE to be compliant with Umalusi's requirements?</p> <p>As indicated in 1.10 above, all teachers employed at a school must be registered with SACE (i.e., have current registration with SACE). In addition, Umalusi requires that at least 80% of the teachers employed at a school hold professional teaching qualifications. Note that a person with provisional SACE registration stating that the registration is not for employment purposes may not be employed as a teacher in an independent school.</p>
<p>1.12 Does Umalusi accredit private providers of curriculum material, including teaching and learning aids?</p> <p>No – Umalusi accredits independent schools registered in terms of the South African Schools Act that offer a qualification on the General and Further Education and Training Qualifications Sub-framework (GFETQSF), currently the National Senior Certificate.</p>
<p>1.13 Does Umalusi accredit online schools?</p> <p>Since online schools are not currently registered under the South African Schools Act, they do not fall within Umalusi's mandate for accreditation.</p>
<p>1.14 Can our school offer some subjects and grades through traditional face-to-face teaching and other subjects or grades using the services of an online school?</p> <p>Since accreditation attests to the capacity of a school to offer the curriculum leading to a qualification on the General and Further Education and Training Qualifications Sub-framework at the required standard, a school must demonstrate that they can deliver the qualification at the required standard. Using another provider to provide some subjects or grades does not attest to the capacity of a school to provide the qualification themselves.</p>
<p>1.15 We have a combined school (i.e., primary and high schools). Do we have to apply for accreditation as one school or as separate schools?</p> <p>If your combined school has one EMIS number and operates at the address indicated on the registration certificate, then you need to submit only one application for accreditation as a combined school.</p> <p>However, if the primary and high schools have separate EMIS numbers, you must submit and pay for two separate accreditation applications. Note that there must be a separate principal for each registered independent school (i.e. each EMIS number).</p>

1.16	<p>Are pre-schools required to apply for accreditation?</p>
<p>No. Only schools offering grades between 1 and 12 must apply for accreditation with Umalusi. Once Grade R attendance is compulsory, Umalusi will inform schools of the requirements for accreditation of Grade R.</p>	
1.17	<p>We have a small school with very few learners and staff members. Do we have to apply for accreditation like all other schools?</p>
<p>Yes. Independent schools that offer the curriculum leading to the National Senior Certificate are obliged to be accredited with Umalusi and to further comply with the monitoring and evaluation requirements of Umalusi.</p>	
1.18	<p>Our school has moved to new premises since we applied for registration. How will that affect our accreditation application?</p>
<p>Accreditation is linked to the EMIS registration and registered physical address of the school. Therefore, if your school has an EMIS number but is operating at a different physical address, you need to contact your provincial department of education to ensure that the EMIS registration and registered physical address of the school are aligned. If the school moves premises once accredited, Umalusi must be informed within 14 days, and an application for a change of premises must be submitted to Umalusi within 30 days.</p>	
1.19	<p>Will our school be registered as an examination centre even if it is not accredited by Umalusi?</p>
<p>No. To ensure full compliance with relevant legislation, public and accredited private assessment bodies must ensure that only accredited independent schools are registered as examination centres.</p>	
1.20	<p>We are engaged in the accreditation process, but the assessment body will not register our school as an examination centre. Can Umalusi advise the assessment body to register our school as an examination centre?</p>
<p>Registration of an examination centre is the responsibility of the assessment body and not Umalusi. All queries related to the registration of an examination centre must be directed to the assessment body.</p>	
1.21	<p>Can we register our Grade 12 learners to write the NSC examination under an accredited school's examination centre number?</p>
<p>The Regulations pertaining to the conduct, administration, and management of the National Senior Certificate examination (Government Gazette 31337 as amended) require that independent schools register as examination centres in their own names.</p> <p>Accredited schools that are found to be registering learners from unaccredited schools under their examination centre may have their accreditation withdrawn.</p>	
1.22	<p>Where can one view a list of accredited schools?</p>
<p>Accredited schools are listed on Umalusi's website. This information can be accessed at www.umalusi.org.za under "Accredited Institutions".</p> <p>https://www.umalusi-online.org.za/enquiries</p>	

1.23	<p>What is Umalusi doing about independent schools that are not accredited?</p> <p>Umalusi identifies unaccredited schools through the list of independent schools provided by the Provincial Education Departments (PED) and the Department of Basic Education and alerts the PED of unaccredited schools that they become aware of. Should you know any school that may not be registered or accredited, please send its name and contact details to info@umalusi.org.za or accreditation@umalusi.org.za. Umalusi will alert the relevant Provincial Education Department accordingly.</p> <p>Note that the registration and deregistration of independent schools fall under Provincial Education Departments and not Umalusi.</p>
1.24	<p>How much do we have to pay for the accreditation application?</p> <p>A full schedule of fees is indicated on page 9 of the "Open Letter to Applicants – Independent Schools", which is available on the Umalusi website: https://www.umalusi.org.za/services/accreditation/.</p>
1.25	<p>Are schools offered any discounts on the accreditation fees?</p> <p>There is a rebate in place for the self-evaluation and site visit fees; however, there are some factors that will be taken into consideration before a rebate is approved for a school; factors such as whether the school qualifies for a provincial subsidy or not, if the school is registered as a non-profit organisation, the annual fee income, etc. Schools must apply for a rebate when submitting the online Letter of Intent to apply for accreditation.</p>
1.26	<p>Our school has reservations about evaluators seeing our confidential documents such as audited financial statements.</p> <p>Appointed evaluators must sign a code of ethics and oath of secrecy.</p>
1.27	<p>Who evaluates our self-evaluation and monitoring reports?</p> <p>Self-evaluation and monitoring reports are evaluated by qualified, experienced evaluators and subject specialists appointed and trained by Umalusi.</p>
1.28	<p>Can our school ask an education consultant to compile our self-evaluation report or to develop school policies for us?</p> <p>Although it is the prerogative of schools to use consultants in portfolio and policy development, it is Umalusi's view that policies compiled by consultants do not always allow staff members and learners at the school to participate actively in their development. Subsequently, it is unlikely that staff members will take full ownership of the policy development, implementation, monitoring, and review processes. In the main, Umalusi believes that an increased role of consultants limits the entrenchment of an internal culture of quality management.</p>
1.29	<p>Can we use generic policies of our association to support our compliance with the accreditation criteria?</p> <p>Yes, but they should be customised to suit the specific context of your school.</p>
1.30	<p>How would Umalusi know if the required policies and procedures were not merely developed for submission and that they don't necessarily inform/guide practice at the school?</p>

	<p>To ensure that submitted policies and procedures guide the actual day-to-day operations at the school, Umalusi conducts verification site visits. The main focus of the site visit is to ascertain whether schools have evidence of policy implementation, monitoring and review of the policies they submitted as part of their portfolio of evidence.</p>
1.31	<p>Our school's internal policies are not documented but are known to all staff members, learners, and parents. Is it really necessary that they should be documented?</p> <p>Yes. Policy documentation will ensure consistent and effective implementation, monitoring, review, and general improvement of the policy's effectiveness.</p>
1.32	<p>How do we know that our evidence will sufficiently support our compliance with the criteria?</p> <p>Quality Promotion meetings are held to assist schools with the evidence required for the self-evaluation report.</p> <p>Pre-site visit meetings are held before the initial site verification visit to discuss the requirements for the site visit.</p>
1.33	<p>Surely our narrative should be sufficient to support our compliance with the accreditation criteria.</p> <p>No. Narratives explain what the school perceives to be its strengths and weaknesses in relation to the compliance criteria. Compliance is mainly determined by the relevance and adequacy of supporting evidence provided by the school, which can be confirmed through observation of the actual implementation of the policies.</p>
1.34	<p>Can the primary school and high schools (of a combined school) get different accreditation decisions from Umalusi?</p> <p>If the primary and high schools make an application as a combined school and are registered with one EMIS number, there will be one outcome for the whole school. If the primary and high schools apply for accreditation separately, then each application can have different accreditation decisions.</p>
1.35	<p>How does the POPI Act affect the evaluation of our accreditation application?</p> <p>Section 11(1)(e) of the Protection of Personal Information (POPI) Act No. 4 of 2013 states that personal information may be processed if the processing is necessary for the proper performance of a public law duty by a public body.</p> <p>Section 38(1) further states that personal information processed for the purpose of discharging a relevant function is exempt from sections 11(3) and (4), 12, 15 and 8 in any case to the extent to which the application of those provisions to the personal information would be likely to prejudice the proper discharge of that function.</p> <p>38(2) states that "Relevant function", for the purposes of subsection (1), means any function (a) of a public body".</p> <p>Umalusi is exempted from sections 11(3) and (4), 12, 15 and 18 in carrying out its mandate of accrediting private education institutions. These sections are:</p> <p style="padding-left: 40px;"><i>11(3) A data subject may object, at any time to the processing of personal information</i></p>

11(4) *If a data subject has objected to the processing of personal information in terms of subsection (3), the responsible party may no longer process the personal information.*

12(1) *Personal information must be collected directly from the data subject, except as otherwise provided for in subsection (2)*

15 *"Further processing of personal information" must be in accordance or compatible with the purpose for which it was collected in terms of sections 13 and 18, "Notification to data subject when collecting personal information."*

Your school will need to ensure that the necessary provisions are in place in terms of the personal records that will be provided for the school's application for accreditation.

2. Site visits

2.1	<p>Our school has just participated/is participating in a site visit conducted by our association. Is it necessary to also participate in an Umalusi site visit?</p> <p>Yes. Accreditation by Umalusi is a legislative requirement for schools offering the curriculum leading to the National Senior Certificate. It is granted by Umalusi to independent schools that participate actively in its quality assurance initiatives and meet the minimum standards in each of the criteria for accreditation.</p>
2.2	<p>The independent school sector is competitive. Why should our school be site visited by principals or senior teachers from other independent schools?</p> <p>Schools are always informed before the site visit about their site evaluators; thus, they are given an opportunity to express their unhappiness with any of the evaluation personnel Umalusi assigns to the school. Also, site evaluators and team leaders sign relevant documents to ensure they conduct themselves ethically. Furthermore, Umalusi, not the site evaluator, makes the final accreditation decision.</p>
2.3	<p>How experienced and qualified are Umalusi's evaluators and subject specialists?</p> <p>The evaluators and subject specialists who Umalusi appoints are highly experienced and suitably qualified in the education field, including educationists, school heads and senior teachers. Appointed evaluators and subject specialists further undergo specialised training by Umalusi in the accreditation processes.</p>
2.4	<p>Umalusi visited our school. Will there be another visit?</p> <p>There may be another visit to verify further evidence or evidence subsequently submitted if your school is granted a "window period" to meet specific conditions within a given period or receives an outcome of provisional accreditation. There may also be a confirmation physical site visit following an online site visit.</p> <p>Additionally, there may be a visit as part of the monitoring process. Umalusi may also visit a school again if a complaint is lodged by learners, parents, a member of the public or any government department.</p> <p>Site visits may be announced or unannounced.</p>

2.5 Will the site visit be conducted physically or online?

Umalusi, through its Evaluation and Accreditation (E&A) Unit, may conduct online site verification visits and/or physical site visits to ensure that the application process continues.

2.6 What are the implications on the accreditation fees when Umalusi conducts online site visits?

Umalusi still needs to pay the evaluators and subject specialists for an online site visit, plus the cost of data and also the travel and accommodation costs of the Umalusi officials who conduct an unannounced physical visit to the school. For that reason, the fees remain the same since the site visit cost does not cover the full travel and accommodation costs of the site visit team.

3. Monitoring

3.1 How will Umalusi monitor the compliance of schools that are accredited?

With the gazetted policy and regulations on the criteria for the quality assurance, accreditation and monitoring of independent schools and private assessment bodies, schools that meet the minimum standards for accreditation are granted accreditation, followed by monitoring. The approach for monitoring will be differentiated. Accredited schools will be required to submit a monitoring report when notified thereof. Umalusi officials may also conduct unannounced monitoring site visits. In such cases, Umalusi officials will have a letter from Umalusi authorising them to conduct the unannounced site visit.

3.2 Is it compulsory to submit monitoring reports?

Yes. Accredited independent schools that must submit monitoring reports to maintain their accreditation status will be notified through email correspondence. Umalusi may withdraw the accreditation of schools which fail to submit their monitoring reports.

Umalusi may conduct an unannounced site visit to accredited schools which fail to submit the monitoring report within the prescribed period. There will be an additional charge over and above the biennial accreditation fees for site visits conducted to accredited schools which fail to submit a monitoring report within the required period.

3.3 Are schools expected to pay a fee every time they submit a monitoring report?

Accredited schools must pay a biennial accreditation fee (every two years) post-accreditation. However, an extra fee may be charged if Umalusi is required to follow up on a school that fails to meet the monitoring requirements.

3.4 What happens to schools which do not submit their monitoring reports to Umalusi?

Their accreditation status will be reviewed; consequently, the school's accreditation may be withdrawn. Such schools will be warned about the implication of their failure to maintain their accreditation status.

Furthermore, schools' accreditation status is regularly communicated to accredited assessment bodies and provincial education departments. Schools that fail to maintain their accreditation status may have their registration status reviewed by provincial education departments and their examination centre registration status withdrawn by

	<p>the assessment body on the recommendation of Umalusi. The SASA, 1996, provides for the registration and withdrawal of registration of independent schools.</p>
<p>3.5 How must schools submit their monitoring report and evidence?</p>	<p>Schools are required to submit their monitoring reports and evidence via email. Should the evidence be larger than 10 MB, schools must request a "Large File Request" from the Assistant Manager responsible for monitoring, enabling them to submit up to 2GB of data on one link. In consideration of cyber security issues, please use the official Umalusi links rather than external drives such as Google Drive, DropBox, etc.</p>
<p>3.6 Does a school receive an accreditation certificate after each monitoring?</p>	<p>No. Accredited independent schools receive an accreditation certificate only at the point of accreditation and at the expiry of the certificate if they have maintained the minimum requirements for accreditation. Accreditation certificates are not issued after each monitoring cycle.</p>

4. General

<p>4.1 As far as we are concerned, we comply with all the accreditation criteria, but our accreditation letter says we are not fully compliant.</p> <p>To address this, compare the evidence provided by your school with Umalusi's evidence requirements. You may address queries to accreditation@umalusi.org.za.</p> <p>Schools which do not meet the minimum requirements for accreditation at the first presentation of the report to the Accreditation Committee of Council are granted a "window period" within which to meet the minimum requirements for accreditation.</p> <p>With the letter advising you of the outcome of your application, you will receive feedback on the areas in which the school failed to meet the minimum requirements for accreditation. In addition, you will be advised of the date by which the school is required to meet all the minimum requirements for accreditation and the date by which a re-evaluation fee must be paid. Failure to pay the required fee by the date indicated will automatically result in "no accreditation".</p> <p>Please note that all the accreditation criteria must be met at the time of review. Therefore, if standards drop from the time of the initial site visit, that will be considered in determining the outcome of the school's application for accreditation, even if the item was not specified in the feedback on the accreditation application.</p> <p>The fee payable for evaluation of evidence following a "window period" to improve or provisional accreditation is indicated in the schedule of fees in the "Open Letter to Applicants – Independent Schools" on the Umalusi website: www.umalusi.org.za</p> <p>The fees are revised on an annual basis.</p>
<p>4.2 Is there an appeal process if we disagree with the outcome of our application?</p> <p>In terms of the Umalusi appeal process, a request for an appeal must be submitted within ten working days of receipt of the outcome of the accreditation application to the email address accreditation.appeals@umalusi.org.za.</p>

The basis for an appeal must be that the institution believes and has evidence to support its claim that an incorrect decision was made, considering the evidence presented at the time of the decision. Any measures implemented after the evaluation or planned to be implemented will not be considered as the basis for an appeal.

Detailed reasons for the appeal must be indicated on the appeal form. The appeal (on the requisite form) must be emailed to **accreditation.appeals@umalusi.org.za**.

The required fee must be paid for an appeal to be considered. Should the appeal finding be in favour of the appellant, the fee paid will be refunded to the applicant.

Note that a school may submit **an informal query** on the reason for their accreditation outcome to accreditation@umalusi.org.za or one of the Umalusi staff copied in the email notifying them of the outcome of their application. There is no payment required for a query. Schools are advised to follow the query route before submission of a formal appeal.

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