

**A FOUCAULDIAN CRITIQUE OF THE
DEVELOPMENT AND IMPLEMENTATION
OF THE SOUTH AFRICAN
NATIONAL QUALIFICATIONS FRAMEWORK**

by

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I declare that A FOUCAULDIAN CRITIQUE OF THE DEVELOPMENT AND IMPLEMENTATION OF THE SOUTH AFRICAN NATIONAL QUALIFICATIONS FRAMEWORK is my own work and that all the sources that I have used or quoted have been indicated and acknowledged by means of complete references.

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...we are going to be the shapers of this “mythical beast”.
Whether it is going to be a benevolent force for good in our hands
or whether it ends up a vicious malevolent monster,
we will only have ourselves to blame.

(Isaacs, 1996:62)

SUMMARY AND KEYWORDS

Title of thesis

A Foucauldian critique of the development and implementation of the South African National Qualifications Framework

Summary

This study investigates the development and implementation of the South African National Qualifications Framework (NQF) since its conceptualisation in the early 1980s, up to 2005. Premised on the concern that power struggles are having a negative effect on the development and implementation of the NQF, the purpose of the study is to support improved future development and implementation of the NQF by describing the amalgamation of the different and contradictory views that support the development of an NQF that replaces all existing and divisive education and training structures in South Africa – the NQF discourse. A further purpose of the study is to reveal this NQF discourse as a system in which power is exercised, and then to make recommendations on minimising the negative effects of the power struggles.

Based within a Foucauldian theoretical framework, the study includes an extensive review of local and international literature on NQF development and implementation that is used to develop an NQF typology to describe and analyse the various aspects of the NQF. The literature review is followed by a qualitative analysis, using Foucauldian archaeology and genealogy, of an empirical dataset containing 300 interviews (including focus groups) with NQF stakeholders, 90 responses to discussion documents and 72 news articles published between 1995 and 2005.

The findings of the study confirm the initial concern that power struggles are having a negative effect on the development and implementation of the South African NQF. The findings also show that the very same power struggles can have positive effects, but that in the South African NQF discourse, the balance of power is skewed towards the negative. Importantly, it was found that NQF development and implementation cannot be divorced from power, and that rather than attempting to undermine power within the NQF discourse, efforts can be better spent on three focused activities:

1. Inculcating an understanding of the NQF as a social construct.
2. Improving the compatibility between the NQF and the South African context.
3. Bridging the entrenched differences between educationalism and vocationalism.

Key terms

- National Qualifications Framework (NQF)
- Power
- Discourse
- South Africa
- Development
- Implementation
- Education
- Training
- Foucault

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ABBREVIATIONS AND ACRONYMS

ABET	Adult Basic Education and Training
ACCAC	Qualifications Curriculum and Assessment Authority for Wales
AHPCSA	Allied Health Professions Council of South Africa
ANC	African National Congress [www.anc.org.za]
ANTA	Australian National Training Authority
APL	Accreditation of Prior Learning
APPETD	Association of Private Providers of Education and Training
AQF	Australian Qualifications Framework [www.aqf.edu.au]
AQFAB	Australian Qualifications Framework Advisory Board
ASDFSFA	Association for Skills Development Facilitators of South Africa [www.asdfsfa.org.za]
AVCC	Australian Vice-Chancellors' Committee
BANKSETA	Banking Sector Education and Training Authority [www.bankseta.org.za]
BOTA	Botswana Training Authority [www.bota.org.bw]
BOTQA	Botswana Qualifications Authority (proposed)
BSA	Business South Africa
CARICOM	Caribbean Community – Member States are <i>Antigua and Barbuda, Bahamas, Barbados, Belize, Dominica, Grenada, Guyana, Jamaica, Saint Lucia, St. Kitts and Nevis, St. Vincent and the Grenadines, Suriname, and Trinidad and Tobago</i> [www.caricom.org]
CAT	Credit Accumulation and Transfer
CCEA	Council for Examinations and Assessment for Northern Ireland
CEAC	Colleges of Education Accreditation Committee (New Zealand)
CEDEFOP	European Centre for the Development of Vocational Training [cedefop.eu.int]
CEPD	Centre for Education Policy Development
CHE	Council on Higher Education [www.che.org.za]
CIDA	Canadian International Development Agency [www.acdi-cida.gc.ca]
CNC	National Commission of Certifications (France)
CODESA	Convention for a Democratic South Africa
COMESA	Common Market for Eastern and Southern Africa – Member States include <i>Burundi, Comoros, Democratic Republic of Congo, Djibouti, Egypt, Eritrea, Ethiopia, Kenya, Madagascar, Malawi, Mauritius, Rwanda, Seychelles, Sudan, Swaziland, Uganda, Zambia and Zimbabwe</i> [www.comesa.int]
CONOCER	Occupational Competency Standardisation and Certification Council (Mexico) [www.conocer.org.mx]

COSATU	Congress of South African Trade Unions [www.cosatu.org.za]
COTT	Central Organisation for Trade Testing
CQAF	Common Quality Assurance Framework (European Union)
CTP	Committee of Technikon Principals
CUMSA	Curriculum Model for Education in South Africa
CUP	Committee of University Principals
DANIDA	Danish International Development Agency [www.um.dk/danida]
DENOSA	Democratic Nursing Organisation of South Africa
DNE	Department of National Education
DoE	Department of Education [www.education.pwv.gov.za]
DoL	Department of Labour [www.labour.gov.za]
ECSA	Engineering Council of South Africa
ECTS	European Credit Transfer System
EMASA	Education Management Association of South Africa
ERS	Education Renewal Strategy
ESGB	Engineering Standards Generating Body
ETQA	Education and Training Quality Assurance Body
EQF	European Qualifications Framework (proposed)
EU	European Union – Member States are <i>Austria, Belgium, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxemburg, Malta, Poland, Portugal, Slovakia, Slovenia, Spain, Sweden, The Netherlands and the United Kingdom</i> [www.europa.eu.int]
FASSET	Sector Education and Training Authority for Finance, Accounting, Management, Consulting, and other Financial Services [www.fasset.org.za]
FEQF	Further Education Qualifications Framework (proposed)
FET	Further Education and Training
FETC	Further Education and Training Certificate
FETAC	Further Education and Training Awards Council (Ireland)
GATS	General Agreement on Trade in Services
GDE	Gauteng Department of Education
GENFET	General and Further Education and Training
GENFETQA	General and Further Education and Training Quality Assurance Body
GET	General Education and Training
GETC	General Education and Training Certificate
GTZ	Deutsche Gesellschaft Technische Zusammenarbeit [www.gtz.de]
HEQC	Higher Education Quality Committee
HEQF	Higher Education Qualifications Framework (proposed)

HESA	Higher Education South Africa
HET	Higher Education and Training
HETAC	Higher Education and Training Awards Council (Ireland)
HETS	Higher Education Training Sectors
HPCSA	Health Professions Council of South Africa
HRD	Human Resource Development
HSRC	Human Sciences Research Council [www.hsrc.ac.za]
IACSA	Institute of Administration and Commerce of South Africa
IAU	International Association of Universities [www.unesco.org/iau]
ICSA	South Africa Institute of Chartered Secretaries and Administrators
INDLELA	Institute for the National Development of Learnerships Employment Skills and Labour Assessments
ITB	Industry Training Board
IVETA	International Vocational Education and Training Association [www.iveta.org]
ILO	International Labour Office [www.logos-net.net/ilo]
INSETA	Insurance Sector Education and Training Authority [www.inseta.org.za]
IMWG	Inter-Ministerial Working Group
ITAB	Industry Training Advisory Board (Australia)
ITO	Industry Training Organisation (New Zealand and Trinidad and Tobago)
JIP	Joint Implementation Plan
LQA	Lesotho Qualifications Authority (proposed)
LQF	Lesotho Qualifications Framework (proposed)
LSC	Learning and Skills Council (England, Wales and Northern Ireland)
MBA	Master in Business Administration
MoU	Memorandum of Understanding
MQA	Mauritius Qualifications Authority [www.mqa.mu]
MSTF	Multi-Sectoral Task Force (Lesotho)
NAP	New Academic Policy
NAPTOSA	National Professional Teachers' Organisation of South Africa [www.naptosa.org.za]
NBFET	National Board for Further Education and Training
NCHE	National Commission on Higher Education
NECC	National Education Coordinating Committee
NEPAD	New Partnership for Africa's Development [allafrica.com/nepad]
NEPI	National Education Policy Initiative
NGO	Non-Governmental Organisation
NICATS	Northern Ireland Credit Accumulation and Transfer System [www.nicats.ac.uk]

NLRD	National Learners' Records Database
NQA	Namibian Qualifications Authority
NQAI	National Qualifications Authority of Ireland [www.nqai.ie]
NQF	National Qualifications Framework
NRF	National Research Foundation [www.nrf.ac.za]
NSA	National Skills Authority
NSB	National Standards Body
NSDS	National Skills Development Strategy
NTA	Namibian Training Authority
NTA	National Training Agency (Caribbean) [www.ntatt.org]
NTB	National Training Board
NUFFIC	Netherlands Organization for International Cooperation in Higher Education [www.nuffic.nl]
NUMSA	National Union of Metal Workers of South Africa
NVQ	National Vocational Qualification (England)
NZQA	New Zealand Qualifications Authority [www.nzqa.govt.nz]
NZVCC	New Zealand Vice-Chancellors' Committee
OAU	Organisation for African Unity [www.africa-union.org]
OBE	Outcomes-Based Education
OBET	Outcomes-Based Education and Training
OECD	Organisation for Economic Co-operation and Development [www.oecd.org]
PPCAP	Polytechnics Programme Committee (New Zealand)
QAA	Quality Assurance Agency for Higher Education (England) [www.qaa.ac.uk]
QC	Qualifications and Quality Assurance Council
QCA	Qualifications and Curriculum Authority (England) [www.qca.org.uk]
QFL	Qualifications Framework for Lesotho (proposed)
RAU	Rand Afrikaans University (now University of Johannesburg) [www.uj.ac.za]
RDP	Reconstruction and Development Programme
RPL	Recognition of Prior Learning
RQF	Regional Qualifications Framework
RVQ	Relative Value Coefficients
REQV	Relative Education Qualification Value
SABPP	South African Board for Personnel Practitioners [www.sabpp.co.za]
SACE	South African Council for Educators [www.sace.org.za]
SACP	South African Communist Party [www.sacp.org.za]
SACNASP	South African Council for Natural Scientific Professions
SACSSP	South African Council for Social Service Professions

SADC	Southern African Development Community – Member States are <i>Angola, Botswana, Democratic Republic of Congo, Lesotho, Malawi, Mauritius, Morocco, Mozambique, Namibia, South Africa, Swaziland, Tanzania, Zambia and Zimbabwe</i> [www.sadc.int]
SADCQA	Southern African Development Community Qualifications Agency (proposed)
SADCQF	Southern African Development Community Qualifications Framework (proposed)
SADTU	South African Democratic Teachers Union [www.sadtu.org.za]
SAICA	South African Institute for Chartered Accountants [www.saica.co.za]
SAQA	South African Qualifications Authority [www.saga.org.za]
SAUVCA	South African Universities Vice-Chancellors Association [www.sauvca.org.za]
SCOTCATS	Scottish Credit Accumulation and Transfer System
SCQF	Scottish Credit and Qualifications Framework
SETA	Sector Education and Training Authority
SGB	Standards Generating Body
SIC	Standard Industrial Classification
SMME	Small-, Medium- and Micro Enterprise
SOAC	Specific Occupational Advisory Committees (Trinidad and Tobago)
SQA	Scottish Qualifications Authority [www.sqa.org.uk]
SSC	Sector Skills Council (England, Wales and Northern Ireland)
SSDA	Sector Skills Development Agency (England, Wales and Northern Ireland)
SVQ	Scottish Vocational Qualification
TCCA	Technical Committee on Certification and Accreditation (SADC)
TOP	Trade, Occupational and Professional
TTNVQ	Trinidad and Tobago National Vocational Qualification
TVE	Technical and Vocational Education
TVET	Technical and Vocational Education and Training
TEVETA	Technical Education, Vocational and Entrepreneurship Training Authority (Zambia) [www.teveta.org.zm]
UCT	University of Cape Town [www.uct.ac.za]
UKZN	University of KwaZulu-Natal [www.ukzn.ac.za]
UNESCO	United Nations Education, Scientific and Cultural Organisation [www.dakar.unesco.org]
UOFS	University of the Orange Free State (now University of the Free State) [www.uovs.ac.za]
UP	University of Pretoria [www.up.ac.za]
USAID	United States Agency for International Development [www.usaid.gov]

VET	Vocational Education and Training
VETA	Vocational Education and Training Authority (Tanzania)
VQA	Victorian Qualifications Authority (Australia) [www.vqa.vic.gov.au]
WTO	World Trade Organisation [www.wto.org]
ZIMQA	Zimbabwe Qualifications Authority (proposed)
ZMT	Zone of Mutual Trust

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COMPACT DISC

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CHAPTER 1: THEMATOLOGICAL AND METHODOLOGICAL ORIENTATION

1.1 INTRODUCTION

1.1.1 Purpose of the study

The purpose of this study is to support the improved future development and implementation of the South African National Qualifications Framework (NQF). The purpose is achieved through a critique of the development and implementation of the NQF over three periods: an initial *conceptualisation period* (early 1980s to 1994) that covers the first discussions of an NQF that focused on the liberation of unskilled black workers during the time of the apartheid regime; a second *establishment period* (1995 to 1998) – South Africa being one of only a few countries with fully functioning NQFs in the late 1990s, this period covers the promulgation of NQF legislation and the setting up of various NQF systems and structures; and a third *review period* (1999 to 2005) – a period of intense review, varying support, extensive debate and criticism that has continued to the present day.

The study is conducted within the parameters of a theoretical framework that is based on the work of Michel Foucault (1926-1984). Well known for various seminal works that range from the strategic use of history to an understanding of repressive power, Foucauldian theory is selected as the most suitable theoretical framework in providing the necessary research tools for this study that inevitably focuses on contestations, power struggles and history within the NQF discourse. Importantly, the purpose of this study is not to critique Foucault's work, nor is it to get too involved in the debates between Foucault and his interlocutors. Although such debates are considered, this is only done to develop the theoretical framework and the two Foucauldian research methods, archaeology and genealogy. The study focuses on NQF development and implementation and uses Foucauldian theory as a means to an end, namely to support the improved future development and implementation of the South African NQF.

1.1.2 Context of the study

In 1994, when South Africa's first democratic elections took place, the time was most opportune to initiate the national implementation of the NQF. Since 1994, development and implementation has continued unabatedly, through periods of significant support, opposition and continual review. Now, in 2005, the time is just as opportune to reflect on the development and implementation process of the South African NQF through formal research projects such as this Foucauldian critique.

Throughout the ten years of NQF development and implementation, and increasingly in more recent days, an escalating measure of instability and struggle for dominance between the key agents tasked to oversee the development and implementation of the NQF has been noticed – to the extent that, in the opinion of this author, the implementation of the NQF has been, and still is being detrimentally affected. From his experience as well as numerous formal interviews and informal discussions with stakeholders, the author came to realise that a phenomenon that is often referred to only in passing, that is misunderstood and even ignored, features significantly in the NQF discourse. The phenomenon is power. It appears as if the way in which power has manifested in the NQF discourse is negating much of the hard work done by so many South Africans that have committed to taking the education and training system beyond the legacy of Apartheid.

Given the focus on power, the theoretical framework and research tools for this investigation were carefully selected. After an extended period of searching and testing of various methods, ranging from a relatively unstructured phenomenological approach that required a process of retreat and non-engagement with power, a more organised and focused approach was identified from the work of Foucault (cf. Keevy, 2004, 2004b and 2004c). Two Foucauldian research methods, archaeology and genealogy, were applied, refined and eventually re-applied to the NQF discourse – this thesis contains the results of this investigation. As is expected from a formal study of this nature, the results of the application of the Foucauldian methods are preceded by a detailed description of the research design that also includes the development of research methods.

In recent years NQFs have been developed in many other countries, even beyond the first generation of NQFs that preceded the South African NQF such as those developed in England, Wales and Northern Ireland, Scotland, Australia, New Zealand and Ireland (Tuck, Hart and Keevy, 2004). Examples of second generation NQFs include those of Brazil, Turkey, Singapore and Malaysia, while more recent developments in the Southern African Development Community (SADC) (Technical Committee on Certification and Accreditation [TCCA], 2005), the English speaking Caribbean Community (CARICOM) (McArdle, 2004) and the European Union (EU)

(European Commission, 2005) constitute a third generation of NQFs (Samuels and Keevy, 2005b). Although the purpose of this study is not to compare the variety of NQFs, it is noted that a thorough investigation into the South African case will, without any doubt, contribute to the international NQF discourse. For this reason this research project includes international NQF development and implementation, but is limited to those aspects that shed more light on the South African NQF.

Two points pertaining to the context of this study need to be noted from the discussion above:

Firstly, the author of this thesis does not stand outside the NQF discourse. This internal vantage point enables the author to engage with some of the intricacies of NQF development and implementation that would not have been afforded a more objective “outsider”. This is of course also a constraint, in that the author is, to a lesser or greater extent, directly or indirectly, involved on a daily basis in the very practices that may be considered as forms of power. It is therefore argued that the author’s personal bias cannot be removed from this critique of the NQF and that it is necessary to consistently and transparently note this bias, whilst simultaneously critically engaging with that which is happening in the present.

The second point that informs the context of this study is the turbulent and uncertain state of NQF development and implementation at the time that this study on power in the NQF discourse was completed. It is quite probable that government may, through legislation, bring an end to the period of uncertainty during the final stages of this study. The very nature of such a *powerful* action emphasises the need for engagement on the detrimental effect of power struggles on NQF development and implementation.

1.1.3 Location of the study

This critique of the exercise of power in the development and implementation of the NQF is located within the discipline of Philosophy of Education. As explained above, the work of Michel Foucault is used as theoretical framework to guide the research process and also to provide the necessary and appropriate research tools.

The location of the study is not limited to post-modern or post-structural theory, although aspects of both are evident. As is the case with the work of Foucault, a more impartial and straddling approach is assumed – an approach that is at the same time *limited* to the work of Foucault and also *not limited* to a particular school of thought. The decision for this approach originates primarily from the very nature of the object of this study, namely the NQF as social construct. According to Isaacs (2001:124) a social construct of this nature requires social actors in society to not only

theorise, construct and implement the NQF, but also to ‘enable, actively change or work against [the NQF]’. Isaacs continues by asking the question:

Is the NQF modernist, constructivist or postmodernist in nature, and therefore subject to the criticisms and advantages of the specific label? (*Ibid.*)

The response to this question broadly summarises the reason for placing this study outside a particular school of thought:

The evolving NQF will tend toward particular theoretical directions as a consequence of intellectual scrutiny, rather than being determined in advance by tight definition (Isaacs, 2001:125).

It is argued in this study that the choice of a Foucauldian theoretical framework accommodates the evolving, and therefore also current nature of the NQF, providing a common frame of reference for the research. As was mentioned earlier, the choice of placing the study within a Foucauldian framework was not made without intense deliberation. Although this choice is debated in much more detail later in this, and in subsequent chapters, it is useful to note, even at this introductory stage, the main reasons for making this choice:

- Empirical evidence can be included in the Foucauldian framework
- Power can be analysed in the Foucauldian framework
- Research methods for the analysis of power are available in the Foucauldian framework
- The analysis of power moves beyond the institutional level in the Foucauldian framework.

These reasons are briefly discussed below.

1.1.3.1 Empirical evidence can be included in the Foucauldian framework

Foucault’s approach to analysing power includes an emphasis on empirical evidence. The author’s involvement in a longitudinal comparative investigation into the impact of the NQF on the South African education and training system, the NQF Impact Study (SAQA, 2004 and 2005b) and various other NQF-related research projects has facilitated access to a wealth of empirical data that could not have been gathered by a single researcher in a formal study as this. It must also be noted that only data that were accessible to the public were used (see SAQA, 2004c-g, 2005c-g). At no stage is raw, unreleased empirical data accessed, as this would compromise the author’s integrity and violate the right to anonymity of the research subjects.

In summary, one of the factors that influenced the choice to use Foucauldian theory was the acceptance of empirical research, and more importantly, the value that a more empirical approach adds to the analysis of power relations in the NQF discourse as noted by Foucault:

I would like to suggest another way to go further towards a new economy of power relations, a way which is much more *empirical*, more directly related to our present situation, and which implies more relations between theory and practice (in Dreyfus and Rabinow, 1983:210, emphasis added).

1.1.3.2 Power can be analysed in the Foucauldian framework

The second reason for selecting the Foucauldian framework is probably the most obvious, as Foucault is best known for his work on power. He is most definitely not the only person who has been preoccupied with an analysis of power, but together with the research methods that he develops in the course of his work, the Foucauldian framework is most suitable to a critique of power in the NQF discourse.

This reason also highlights an important self-imposed limitation on this study: power is interpreted in the Foucauldian sense and other interpretations such as those of Adler (1994), Hobbes (see Lloyd, 1992 and Giroux, 1997), are pushed outside the limits of this study. The work of Freire (see Darder, 1991 and Freire, 1985) is a notable exception, as it will be shown that Freireanism has not only had an important influence on NQF development in South Africa, but also that there are similarities between Freire and Foucault's interpretations of power.

The Foucauldian framework, including the Foucauldian research methods, are employed to make sense of the data collected and create a vantage point from which the problem of the detrimental effect of power in the NQF discourse can be critiqued. The following statement by Foucault illustrates his emphasis on the analysis of power:

Who exercises power? How? On whom? ...Who makes decisions for me? Who is preventing me from doing this and telling me to do that? Who is programming my movements and activities? (in Anderson, 1995:41)

Importantly, Foucault himself was adamant that his work was concerned with far more than power alone. This point is taken up again at a later stage, as it has important implications for this study - if Foucault argues that he was not primarily concerned with an analysis of power, then it is important to investigate what he was concerned with, as such insight contributes to an improved

understanding of how to analyse power, possibly in a much more indirect and even antagonistic manner.

1.1.3.3 Research methods for the analysis of power are available in the Foucauldian framework

The third reason for selecting Foucauldian theory has to some extent already been discussed: contained within Foucault's work is a range of methods or tools that can be used to "break up systems of power":

"[all] my books...are, if you like, little tool boxes. If people want to open them, use them, use a particular sentence, idea or analysis like a screwdriver or wrench in order to short-circuit, disqualify or break up systems of power, including eventually the ones from which my books are issued...well all the better!" (Foucault, 1975 in Milchman and Rosenberg, 2003:12).

An important, and not as welcoming characteristic of Foucault's work becomes evident in the quotation above. The complex and even sometimes incoherent nature of his writings, as well as his own attempts to break up the systems of power from which even his own books are issued, complicates the task of understanding and applying his methods. In his writings, his methods are continually evolving, replaced by subsequent improved methods and criticised for their inability to analyse power. For this reason a significant part of this thesis is dedicated to the initial development of two Foucauldian research methods in the context of this study of power in the NQF discourse. It is argued that the fluid nature of these methods requires such a developmental approach, rather than a more conventional overt description and application. It is further argued that the Foucauldian qualitative methods employed in this study, although familiar and common in name to other applications of Foucauldian theory, are unique, and have been developed in the particular context of this study and will therefore have limited general applicability in other studies, however similar in nature.

1.1.3.4 The analysis of power moves beyond the institutional level in the Foucauldian framework

The fourth and final reason for placing this study in a Foucauldian theoretical framework is also the most significant. Foucault (1983, in Popkewitz and Brennan, 1998:234) argues that the fundamental point of power relationships 'is to be found outside the institution'. The limitations that would have been posed on this study on power in the NQF discourse if the critique had remained

at the superficial level of the interaction between NQF stakeholders, such as the South African Qualifications Authority (SAQA), the Department of Education (DoE) and the Department of Labour (DoL), higher education institutions, private education and training providers, and even large corporates, would have diminished the value of the study. As will be seen throughout this thesis, the institutions associated with NQF development and implementation are not disregarded – in fact, the identification of power relations between such NQF stakeholders forms an important part of the initial stage of the description of power in the NQF discourse - what is more important however, is that the analysis of power in the NQF discourse moves *beyond* the point of power relations between institutions in an attempt to identify the very starting points that are linked to the noticeable way in which power appears at the point of its direct relationship with the NQF.

1.1.4 The researcher's social location and research assumptions

Over the past ten or more years it has been the privilege of the author to be involved with the development and implementation of the South African NQF. This included personal involvement in policy research and guideline development within SAQA, but also at the coalface of implementation, as Science teacher and Physics lecturer. The author's current position as researcher within the employ of SAQA has created the opportunity to reflect on NQF development and implementation both from the side of policy generation, and importantly, policy compliance.

The author is not unbiased in this critique - commitment to the vision and mission of SAQA, although subservient to that of the NQF, is stated upfront. Even so, the results of the systematic description of the development and implementation of the South African NQF are presented as they are, often directly aimed at SAQA, and more so, often requiring the author to speak out against SAQA. It is, however, not the intention of this study to target specific institutions, whether they be SAQA or any other – the intention is rather to move beyond individual institutions to the level of power relations between the stakeholders involved with NQF development and implementation. In short, the researcher's social location has a significant influence on the process and outcome of the research project. This social location does not imply that the researcher cannot be critical of NQF development and implementation, even to the extent that, where needed, specific institutions can be criticised.

The researcher's social location necessitates a number of research assumptions, some of which have already been mentioned, to ensure that the research design is robust enough to avoid constriction in unrelated issues and more importantly, is able to accommodate environmental factors related to the researcher's social location, without skewing the outcomes of the research. Three research assumptions are made:

- The researcher has the legitimacy to speak about power in the NQF discourse
- Suitability of Foucauldian theory and research methods
- Suitability of the qualitative research design.

1.1.4.1 Legitimacy to speak about power in the NQF discourse

The first research assumption follows from a specific question: What gives the researcher the right to claim legitimacy to speak about power in the NQF discourse? The answer to a question of this nature may require an extended debate that would probably reverberate between a more phenomenological need to investigate the way that things (objects, images, ideas and emotions) appear or are present in the researcher's consciousness, suspending the object itself and looking only at the researcher's experience (see Dreyfus, 2002a), to a hermeneutic unearthing of a deeper and hidden meaning (see Rabinow, 1984), and even to the structuralist interpretation of human behaviour as rule-governed and meaningless. In this study, it will rather be argued that the researcher's legitimacy to speak about power in the NQF discourse is not explained through phenomenology, hermeneutics or structuralism, but rather from within the Foucauldian theoretical framework. Prior (1997:65) sheds some light on what such legitimacy from a Foucauldian perspective would entail:

...examine the discursive rules through which knowledge come to be produced, encoded and displayed...it is only by means of such rules that any "author" can claim legitimacy to speak, write and authoritatively pronounce on a given topic in the first instance.

Even though the need to examine the rules through which knowledge is created in the NQF discourse in order to speak about power in the NQF discourse is heeded and discussed at various stages throughout this thesis, the implied assumption throughout the thesis is that the researcher does have the legitimacy to speak, write and pronounce on power in the NQF discourse.

1.1.4.2 Suitability of the Foucauldian theory and methods

A second research assumption is that the selection of Foucauldian theory and research methods are best suited to a critique of power in the NQF discourse. Supporting arguments for this selection have already been put forward, with many more that will be made in the section that describes the research design, yet, despite these supporting arguments, however convincing they may be, the research project remains bound by the choice of the Foucauldian theoretical framework and research methods.

1.1.4.3 Suitability of the qualitative research design

A third research assumption is that the research design (as will be described in more detail later in this chapter) fits into a research discipline that is broadly described as “qualitative”. Although this term is often misused to describe a generic non-quantitative field of research (see Piantanida and Garman, 1999) it is recognised that the Foucauldian approach does, at least in part, fit into this field. The assumption therefore is that a qualitative approach to this research project will ultimately lead to improved research results.

The author’s own background in physics, mathematics and statistical analysis makes the decision to follow a more qualitative approach all the more relevant – the qualitative route required considerably more time and effort, but ultimately added value as the most appropriate research design.

1.1.5 Structure of this chapter

The remainder of this chapter presents a detailed discussion on the theme of the study, i.e. the Foucauldian critique of the development and implementation of the South African NQF, but also on the methodology (research design) that was applied in the study.

The chapter is structured as follows:

- *Background* – a detailed account is given of the development and implementation of the South African NQF across three distinct periods.
- *Problem statement* – the problem addressed with this study is succinctly formulated.
- *Concept clarification* – the two main concepts (including some derivatives) of this study are clarified: NQF and Power.
- *Research design and methods* – this includes a discussion of the Foucauldian theoretical framework.
- *Outline of chapters* – an outline of the remaining four chapters is given.

1.2 BACKGROUND

1.2.1 Introduction

The post-apartheid implementation of the South African NQF represents a courageous, but also often criticised move championed by an emerging community of education and training decision-makers, many of which were outspoken critics of the previous regime. The NQF was, and probably still is, seen as the major vehicle to achieve large-scale transformation of the South African education and training system (Granville, 2003).

The South African NQF is unique in that it has as fundamental point of departure the *integrated approach* to education and training to ensure the parity of esteem between “academic education” and “vocational training”:

In the early 1990s a number of concepts and theories were developed that resonated with the experience, the critique and the aspirations of activists in South Africa. These ideas, particularly those for an integrated system of education and training and a single national qualifications framework, helped to shape the reform proposals that became incorporated in the first Election Manifesto of the African National Congress (ANC) and later in various education and training acts (Young, 2001:18).

The approach to quality assurance associated with the NQF was linked directly to the integrated approach to education and training and led to the creation of numerous Education and Training Quality Assurance bodies (ETQAs) responsible for the ‘monitoring and auditing [of] achievements in terms of national standards or qualifications’ (SA, 1998a:2). Although the SAQA Act (Act 58 of 1995) and its associated regulations (SA, 1998a and 1998b) attempted to delineate the role of the ETQAs, SAQA and other roleplayers, the complexity and historical context in which the NQF was being implemented, presented numerous hurdles that had to be overcome.

The influence of British colonialism that engulfed South Africa for more than 150 years, the subsequent Afrikaner emancipation at the turn of the twentieth century and the recent democratisation championed by the African National Congress (ANC) all contribute to the variety of forms of power that can be identified in modern-day South African education and training quality assurance practices associated with the NQF discourse:

In 1994, South Africa’s first democratically elected government took power. This was the result of a long process of negotiations between representatives of the old order and those

of the liberation movements who had fought against it for many decades. The new government, led by the ANC, was overtly committed to building a society based on equity, people's participation in decisions that affected their lives, and abolishing the racist order and overcoming its legacy (Pampallis, 2002:4).

The initial commitment from the ANC government to a participatory approach was faced with severe obstacles:

The state's weakness is in a large part a function of a historically conditioned lack of capacity, further complicated by the confounding nature of a complex policy environment. Its attempts at developing policy to transform the [education and training] sector should thus be seen in the light of a diffusive policy force field in which the state's power to act has decisively been circumscribed (Fataar, 2003:34).

Keeping these undercurrents in mind, the description of the background to this study on power in the NQF discourse is structured according to three generally recognisable and distinct periods of NQF development and implementation:

- Conceptualisation period (early 1980s to 1994)
- Establishment period (1995 to 1998)
- Review period (1999 to 2005).

1.2.2 NQF Conceptualisation period (early 1980s to 1994)

The initial period of NQF development is reasonably well documented, both in early publications and numerous summaries provided by current authors. The origin of the NQF can be traced back to the late 1970s and early 1980s. At the time South Africa was ruled by the apartheid regime and had a racially fragmented education system. Black people faced severe difficulties when attempting to move to more senior levels within organisations. The only way that they were able to get better salaries was to improve their educational status, hence the characteristic and significant involvement of labour unions, most notably the Congress of South African Trade Unions (COSATU), in these early days of NQF development.

Even at this early stage the influence of the Old Commonwealth in South Africa was noted by McGrath (1997:169):

The work itself [on the South African NQF] drew on similar thinking in the other countries of the Old Commonwealth, notably Australia and England.

McGrath concluded his paper, aptly titled *Education and training in transition: analysing the NQF*, by referring to the challenges of power in South Africa:

The NQF policy came to the centre of the agenda because it promised much when progressive forces could think of no coherent and feasible alternative response to the *new challenges of power* in the era of globalisation and the aftermath of apartheid (McGrath, 1997:181, emphasis added).

Another significant influence in this first stage was the fact that much of the initial thinking took place in reaction to policy developments of the then Nationalist Government such as the *De Lange Report* (Human Sciences Research Council [HSRC], 1981), the *Curriculum Model for Education in South Africa* (CUMSA) (Department of National Education [DNE], 1991), *The NTB/HSRC Investigation into a National Training Strategy* (HSRC, 1991) and the *Educational Renewal Strategy* (DNE, 1992).

In the period leading up to South Africa's first democratic elections in 1994, the then Department of Manpower and representatives from the trade union movement were able to find consensus in one of their working groups:

A national qualifications framework was first discussed in Working Group 2 and a consensus reached on the broad objectives of a new integrated framework (SAQA, 2004:23).

At that stage there was common agreement on a number of key features of the proposed national qualifications framework, including that the NQF would be the vehicle for an *integrated approach*:

[An] NQF is seen as providing the vehicle for the development of coherence across the predominantly theoretical/predominantly applied learning divide (National Training Board [NTB], 1994:91, 93)

According to the NTB (1994) such an "integrating" NQF could be based on a range of principles. These included the introduction of a fair assessment system which measures achievement against clearly stated standards; the establishment of a dynamic and flexible system able to adapt quickly to new developments in the labour market, workplace, education and training; encouragement for more people to participate in further education and training; development of learning which is

relevant and responsive to the needs of the individual, economy and society; promotion of access to learning; provision of a variety of routes to qualifications; simplification of the structure of qualifications; and the provision of national quality assurance.

In their NQF “roadmap” document, the NTB (1994) also raised concerns about the lack of involvement of ‘organisations normally situated outside the system’ (1994:100). It was concluded that the result of such incoherence would lead to a less than successful education and training system:

Unfortunately in many cases, South Africa included, the education and training system has no links with or influence upon those organisations controlling the parameters and the environment. The result is less-than-successful education and training (*Ibid.*).

The NTB suggested that ‘coherent linkages with and between a number of traditionally discrete organisations and areas’ (1994:100) had to be made. As will be seen in the next section, and throughout this thesis, such linkages never really developed, or where they did, they were severely affected by vested interests and power struggles.

1.2.3 NQF Establishment period (1995 to 1998)

The South African NQF was brought into being through the promulgation of the SAQA Act in 1995 (SA, 1995c:1) with very specific objectives, namely to:

1. create an integrated national framework for learning achievements;
2. facilitate access to and mobility and progression within education, training and career paths;
3. enhance the quality of education and training;
4. accelerate the redress of past unfair discrimination in education, training and employment opportunities; and
5. contribute to the full personal development of each learner and the social and economic development of the nation at large.

Significantly, this was the first piece of education and training legislation approved by the post-apartheid government and formed a key reference point for the development of many other government policies, regulations and acts. Notable examples include: the *Higher Education Act* (1997), the *Further Education and Training Act* (1998), the *Adult Basic Education and Training Act* (2000) and the *General and Further Education and Training Act* (2001). The SAQA Act was

followed by numerous publications that announced the intentions of SAQA in its capacity as primary overseer of the NQF's development and implementation. By the end of 1998 the *National Standards Bodies (NSB) Regulations* (SA, 1998b) and the *ETQA Regulations* (SA, 1998a) had been promulgated, twelve NSBs and four Standards Generating Bodies (SGBs) had been established and a number of initial qualifications and unit standards had been registered (SAQA, 2004).

Underpinning the legislation was a very specific and "new" approach to education and training, sometimes described as neo-liberal (Allias, 2003) and restrictive (Fataar, 2003), but also as bold, innovative and visionary:

[D]emocratic government was highlighting its intent to try to achieve something deemed well nigh impossible in many education and training systems in the world. Why such a bold, innovative and visionary approach to an area – education and training – that is generally regarded as extremely difficult to shift, let alone change? (Mehl, 2004:15)

The pronouncements of authors such as Allias, Fataar and Mehl indicate that the approach to education and training associated with the NQF, was not unanimously accepted throughout the education and training system. It can be argued that such acceptance was never an option in any case and that, as was the case in many other countries that followed a similar route (e.g. Scotland, Ireland, Australia and New Zealand - see Young, 1996 and 2003, Ensor, 2003 and Granville, 2003), the refinement and implementation would be left to stakeholders to sort out during implementation, as explained by Isaacs (1996:62):

...we are going to be the shapers of this "mythical beast". Whether it is going to be a benevolent force for good in our hands or whether it ends up a vicious malevolent monster, we will only have ourselves to blame.

Two years after the promulgation of the SAQA Act (SA, 1995c), in March of 1997, the SAQA Executive Officer assumed duties with a small staff contingent. Government funding of SAQA was limited and was supplemented by external donor funds, mainly from the Canadian International Development Agency (CIDA, 1995) and the European Union (EU, 2002). The lack of government funding was of grave concern to many stakeholders, including the funding agencies themselves:

The issue of sustainability of SAQA has been widely aired, and its dependency on donor funding increasingly poses a risk to the organisation in terms of its sustainability. 80% of SAQA funding is received from donors; the DoE provides 17% of funding...3% is self-generated by SAQA (EU, 2002:42-43).

The funding agencies also raised other concerns. CIDA noted that the complexity of the NQF project posed a particular challenge:

It is within this highly complex, consultative, certification process that the Ministry of Education has invited CIDA to participate in the development of a project targeted to support the Government of South Africa in the process of integrating education and training into one national system with a credit-based framework (CIDA, 1995:3).

Importantly, CIDA (*Ibid.*) also noted specific areas of risk associated with the SAQA project. These included the magnitude and the complexity of the task, the fact that certain groups may be disadvantaged if their educational achievements are incompatible with the new standards, possible resistance to the new system from some of the institutions which will play key roles and the commitment to SAQA could be modified in significant ways or possibly even abandoned under extreme circumstances. CIDA was also particularly aware of the yet to be determined “balance of powers” that would be necessary for the implementation of the NQF to succeed:

The *balance of powers* between the three levels of government has not been finalised...Almost every service and institution of public life is being dramatically overhauled. The pace of change is extremely rapid and in some instances hard to manage given the sheer scope and urgency of it. Many interests are threatened. Some interests are being advanced, but the advances may not be perceived to be sufficient to satisfy their proponents. There is a risk that change of this magnitude will not be successfully managed in all its aspects and that gridlock or worse could affect each aspect of the reform activity (CIDA, 1995:19, emphasis added).

In addition to the concerns about funding and the balance of power, questions about support were also asked. Cosser (2001:163) agreed that SAQA, with the overall responsibility for NQF development and implementation, started out confidently:

SAQA has managed to secure the support of powerful social partners for the NQF – particularly the Department of Education, the Department of Labour, organised business, and organised labour.

Notably, even at this early stage of NQF implementation, Cosser also warned that SAQA would need to retain this support during the next phase of implementation by ‘courting the continued buy-in of these partners’ (2001:163). He mentioned some specific examples of how SAQA would be able to retain support: the generation of standards that meet the needs of schooling for the Department of Education, and the needs of the National Skills Development Strategy (NSDS) for

the Department of Labour; promotion of the translation of standards into learning programmes that will contribute to the upgrading of skills of the workforce; and the fostering of the role of trade unions in skills development.

Although there was general acceptance of the NQF processes during the establishment period, it was not a blanket acceptance and even during this period there were signs of underlying contestations, as described by Samson and Vally (1996:7):

Discussions around the NQF have been restricted to a few, and the implications of the new system have not been fully explored. This is partly due to the specialised and technocratic language which surrounds the NQF, as well as the complexity of the proposed bureaucracy which will put it into place.

SAQA's early dominance in the 1997-1998 period gradually rescinded to make room for much greater prominence of ETQAs, particularly the two band ETQAs, the Council on Higher Education's Higher Education Quality Committee (HEQC) and UMALUSI (the General and Further Education and Training Quality Assurance Council). HEQC was tasked to quality assure all higher education provisioning, while UMALUSI took on the quality assurance of all multi-purpose general and further education and training provisioning. The difference in capacity between the two band ETQAs and their relationships with one another, SAQA and other partners led to constant disparities and lack of coherence across the education and training system.

The developments leading up to the SAQA Act in 1995, and the period shortly thereafter are summarised in the table below (mainly from Isaacs, 1996, SAQA, 2004 and Maja, 2004):

Labour-related	Education-related	Non-governmental Organisation (NGO)-related
NTB/HSRC investigation into a National Training Strategy (HSRC, 1991); National Training Strategy Initiative (NTB, 1994)	De Lange Report (HSRC, 1981); CUMSA (DNE, 1991); ERS (DNE, 1992); NEPI of the National Education Coordinating Committee (NECC) (1992 in NTB, 1994); Policy framework for education and training (ANC, 1994); Proposed SAQA Act (in ANC, 1994b)	Implementation Plan for Education and Training (IPET) (CEPD, 1994 and Nzimande and Mathieson, 2004)
Inter-Ministerial Working Group (IMWG) (1994); White Paper on Education and Training (DoE, 1995); Draft NQF Bill (SA, 1995); SAQA Act (SA, 1995c)		
Ways of seeing the NQF (HSRC, 1995)	Lifelong learning through a NQF (DoE, 1996); NCDC NQF Working Document (DoE, 1996b)	Limited direct involvement

Table 1: Overview of developments leading up to the SAQA Act and shortly thereafter

1.2.4 NQF Review period (1999 to 2005)

By 1999, two years after SAQA's establishment and four years after the SAQA Act (SA, 1995c) had been passed, South Africa started to engage in a somewhat premature review process that would persist, without significant closure, well into the next decade.

Three NQF review processes are discussed in this section:

- *Curriculum Restructuring in Higher Education* – conducted by the HSRC and NRF in 1999, this review never reached the South African public.
- Departmental reviews of the NQF – the *Report of the Study Team on the implementation of the NQF* was completed in 2002, while the *Interdependent NQF System: Consultative Document* was released in 2003.
- Other developments – the European Union Mid-Term Review (2002), the draft Higher Education Qualification Framework (2004) and the NQF Impact Study (2003 to 2005).

At the time of the writing of this thesis the outcomes of the review processes were still undetermined, although areas of agreement were starting to emerge – these are discussed in *Chapter 3*.

1.2.4.1 Curriculum Restructuring in Higher Education (1999)

The first significant review of the NQF took place in 1999 under the guidance of Kraak of the HSRC and was commissioned by the National Research Foundation (NRF, 1999). The research focused mainly on curriculum restructuring in higher education in South Africa. Four key areas were covered:

Overview of the South African context

Including a 'review of the conditions and pressures which gave rise to particular policy goals and led to particular policy strategies' (NRF, 1999:3 and Lockett, 1999).

Review of national organisations

Organisations implicated in the development of national higher education curriculum policy development, including the DoE, SAQA, the Committee of Technikon Principals (CTP) and the South African Universities Vice-Chancellors Association (SAUVCA) (Gevers, 1998).

Case studies

A case study analysis of three NSBs: Physical, Mathematical, Computer and Life Science (NSB 10), Human and Social Studies (NSB 07), and a professionally orientated NSB (HSRC and SAQA, 1999). Case studies were also conducted at a selection of higher education institutions (Brown, 1998).

This review was seen by many as the first organised attempt from the higher education sector to question the objectives of the NQF. As was noted by Cosser *et al* (1999), the South African NQF was unique in that the higher education sector was included:

While HETS [Higher Education Training Sectors] abroad are reconsidering their positions *vis-à-vis* their national qualifications frameworks, the South African HETS is unique in being the only HETS to have been committed from the outset to realising the objectives of the NQF (1999:1).

In papers commissioned as part of the review, authors such as Lockett (1999), Gevers (1998) and Kraak (1999) highlighted a number of key concerns at that time (most of which are presently still being debated):

The current demand [for higher education institutions] to be accountable to the DoE for their educational practice and to be subjected to quality assurance is often perceived to be uncomfortable if not threatening (Lockett, 1999:1).

Gevers (1998:9) raised three broad areas of concern from the Australian and New Zealand processes:

- the NQF concept originated from the labour movement and aims primarily to improve human resource development – higher education institutions perceive this as a drift towards vocationalism and undesirable standardisation;
- rigid frameworks could have a negative impact on the diversity of higher education programmes; and
- the emphasis on outcomes are overly reductionist and behaviorist.

In response Ensor (1999) was particular critical of Gevers' comments:

It was not clear whether Professor Gevers was at the time giving voice to SAQA's or UCT's [University of Cape Town] particular view... (1999:55).

It was also during this period that Badat (presently the Chief Executive Officer of the Council on Higher Education [CHE]) raised the concern that too many problematic issues were being taken for granted:

Dr. Saleem Badat of the University of the Western Cape said he had been struck by the fact that so many problematic issues were "rendered unproblematic"...What the various provisions meant for the business of teaching and learning was a "black box". There was no conception of the human beings who were meant to be engaging in the SAQA processes...The problematic debate around standards had been completely effaced and the curriculum and pedagogical aspects of what was being proposed had been ignored (NRF, 1999:40).

Another point raised in the report was the amount of controversy and power struggles that were associated with early NQF implementation:

Mr. Isaacs also roused considerable controversy with a comment that the NQF was not mandatory. It rested on voluntary participation, he said, and one did not have to join the NQF. "You are never going to get a summons from SAQA". Although no one took up this

comment at the time, it was referred to several times during the next day. Prof. Naude said he had never heard of law being described in this way. Institutions had no option but to comply with the requirements of the NQF...“It could happen that in the power play someone tries to block something in an NSB,” Mr. Isaacs said. “If an NSB doesn’t do its work, SAQA can take over that function” (NRF, 1999:42-43).

The sentiments expressed by Lockett (1999) and Gevers (1998) were not new at the time, nor did they cease to feature throughout the NQF review period as noted by Allias (2003) and Fataar (2003). Even though there were brief interludes during which the voice of higher education was less prominent, the subsequent 2002 and 2003 reviews continued with a similar message, albeit in a more disguised form.

A joint HSRC/SAQA research project (HSRC and SAQA, 1999) that formed part of the NRF research included a section on *Curriculum Restructuring – Shifting the power relations in knowledge production*. This consideration is significant to the current research on power in the NQF discourse in that it represents one of the first signs of awareness that power relations had to be considered during NQF development and implementation.

SAQA’s initial acceptance of the NRF research initiative (see Cosser [1999] above) soon made place for a much more reserved approach. In 2000 Jansen was requested by SAQA to ‘review and assess SAQA’s concerns against the HSRC report’ (Jansen, 2000:3) – i.e. the NRF research. Ironically, Jansen, who also participated in the workshops during the NRF process, was also recognised as one of the more vocal NQF critics:

One of the most powerful critiques of the NQF and OBE [outcomes-based education] at either of the two workshops came from Prof. Jonathan Jansen, Dean of Education at UDW [University of Durban-Westville]...He said that he had been stunned by South Africa’s faith in policy and also by the belief that policy was made by simply declaring it. Predicting that neither the NQF nor OBE would work, Prof. Jansen said policies had to “resonate with the ideas of practitioners’ thinking” in order to work. “People have to make sense of [them] in the daily grind of their work” (NRF, 1999:46).

Jansen’s meta-evaluation concluded that the NRF research did *not* meet the minimum required standards:

The main report fails to meet acceptable standards of evaluation and research practice...The main report has methodological, organisational and editorial flaws that call into question the validity of several of the key findings (Jansen, 2000:11).

Jansen's conclusion was based on a range of concerns:

- serious differences between SAQA and the HSRC about the nature, purpose and focus of the study;
- discrepancy between what is claimed to be the focus of the study;
- different understandings between the HSRC and SAQA with respect to the evaluation process;
- conceptual weaknesses and inadequacies in the report;
- methodological inadequacy of the research design and process followed during the study;
- bias against SAQA in the way that the report was written; and
- poor organisation of the report, including editing and factual inaccuracies.

As a result, the NRF report was never released into the broader public domain. This event also marked a point at which the HSRC withdrew from many of the public debates on NQF development and implementation.

1.2.4.2 Departmental reviews of the NQF (2002-2003)

The 2002-2003 period was characterised by attempts from the Departments of Education and Labour to refocus NQF implementation – also perceived by many roleplayers as an attempt to regain control of implementation agencies that, in the view of the Departments, had superseded their mandates. Two publications exemplify these attempts, even though they were themselves constricted by the lack of agreement between the two Ministries:

- *The Report of the Study Team on the implementation of the National Qualifications Framework* (DoE and DoL, 2002); and
- *An Interdependent National Qualifications Framework System: Consultative Document* (DoE and DoL, 2003).

The Ministerial brief to the Study Team was to 'recommend ways in which the implementation of the South African NQF...could be streamlined and accelerated' (DoE and DoL, 2002:i). A year later, a DoE/DoL Task Team was appointed to prepare the *Consultative Document* with the task to 'prepare a draft joint statement on behalf of the Departments of Education and Labour' (DoE and DoL, 2003:2) that would reflect 'a joint position in the light of the Study Team's report and the public response' (DoE and DoL, 2003:2). It was apparent from the Departments' struggle to agree on the Study Team's recommendations that any form of closure to the review period was not to happen soon. The two reviews are summarised below.

Summary of the recommendations from the Report of the Study Team on the implementation of the NQF

The Study Team was appointed by the Ministers of Education and Labour and chaired by Jairam Reddy, member of the Council on Higher Education's (CHE) Higher Education Quality Committee (HEQC), and also former chairperson of the National Commission on Higher Education (NCHE). Other members included Mokubung Nkomo (then SAQA Chairperson), Ben Parker (University of Natal), Ron Tuck (former Chief Executive Officer of the Scottish Qualifications Authority) and Michael Young (University of London).

The brief of the Study Team was to 'recommend ways in which the implementation of South Africa's NQF...could be streamlined and accelerated' (DoE and DoL, 2002:i). Widely regarded as having kept true to this brief, the Study Team based their recommendations on various submissions from NQF stakeholders and international developments:

Qualifications design and implementation

Finding that much of the complexities in the system were as a result of SAQA's commitment to an integrated approach, it was recommended that the division between unit standards-based and non-unit standards-based ("whole") qualifications was unnecessary, that the NQF should be based on ten levels and that there should be a more explicit acceptance of the need for qualifications of less than 120 credits.

Standards setting and quality assurance

It was found that the standards setting process was too cumbersome and that there had been a proliferation of quality assurance structures. As a result it was recommended that the Sector Education and Training Authorities (SETAs), CHE, DoE and DoL be established as new standards setting bodies, while the CHE, SETAs and GENFETQA would undertake quality assurance – in effect arguing that standards setting and quality assurance for a specific qualification become the responsibility of a single body.

Leadership and governance

The Study Team pointed out that the responsibility for leadership of the NQF 'rests squarely with the Departments of Education and Labour, working closely with the South African Qualifications Authority' (DoE and DoL, 2002:vii). In order to institutionalise these leadership roles, the Study Team recommended that an *NQF Strategic Partnership* be established. It was also recommended that the DoE and DoL be referred to as NQF *partners* and not *stakeholders*, as stakeholders 'rarely if ever exercise delegated powers'

(*Ibid.*). Furthermore, it was recommended that NQF legislation be revised and amended to remove ambiguities and inconsistencies.

Resources

Recognising that the government had not 'come to grips with the resource implications of this flagship project' (DoE and DoL, 2002:vii), the Study Team recommended an urgent review of SAQA's revenue sources, including the problematic dependence on donor funding. A new funding model was suggested based on an annual grant from the DoE as well as additional DoL and NSA support for the SETAs.

Summary of the recommendations from the Consultative Document

After a decision was taken that neither the DoE nor the DoL would make a public statement on the *Study Team Report* (DoE and DoL, 2002), an Inter-Departmental Task Team was appointed to prepare a joint statement on behalf of the Departments. The Task Team consisted of senior officials from both Departments – their names were never made known. Their recommendations included the following:

Interface between learning and work

The Task Team recommended that the further development of the NQF had to recognise 'the different modes of learning' (DoE and DoL, 2003:7) in order to encourage collaboration between various structures, but without compromising the value of each learning perspective. As a result it was recommended that the NQF be revised to ten levels with three distinct pathways: general (mainly schools), general vocational (mainly colleges) and trade, occupational and professional (mainly workplace learning). The Task Team recommended that the nested qualifications model (first discussed in the NAP [CHE, 2001]) be used to aid the development of new qualifications.

Standards setting and quality assurance

The Task Team made it very clear that the 'formal NSB/SGB model no longer [provided] a suitable organisational framework for the further development of the NQF' (DoE and DoL, 2003:25) and recommended that "new communities of trust" be created through the establishment of three Qualifications and Quality Assurance Councils (QCs) responsible for higher education, general and further education, and trade, occupational and professional qualifications. Like the Study Team (DoE and DoL, 2002), the Task Team recommended that a single body oversee quality assurance and standards setting functions. It was also recommended that the minimum threshold for qualifications remain 120 credits to avoid the status of the term qualification becoming "devalued".

Governance, legislation and funding

Agreeing that NQF legislation would have to be reviewed and revised, the Task Team suggested that the strategic leadership of the NQF be taken up by an *Inter-Departmental NQF Strategic Team* that would be similar to the Task Team and that would *not* include SAQA. It was also recommended that an annual *NQF Forum* be convened by SAQA as a 'broad consultative not decision-making body' (DoE and DoL, 2003:39).

As was the case during the initial review period (cf. NRF, 1999), Jansen's assistance was called for by SAQA to evaluate the two departmental reviews. By 2004 Jansen completed his "meta-evaluation" of both the *Study Team Report* (DoE and DoL, 2002) and the *Consultative Document* (DoE and DoL, 2003) – importantly, this time the evaluation took place after the documents had already been in the public domain. The main findings were as follows (Jansen, 2004):

- The proposed restructuring of SAQA is consistent with a broader governmental commitment to "streamlining" post-1994 policy structures.
- The dilemmas facing SAQA have their roots in unresolved political divisions, bureaucratic inertia and financial commitments.
- The review created deep despair and disagreement in the Authority and its structures and raises critical questions about the ways in which the study was pursued.
- It is clear that the character and authority of SAQA will change fundamentally as a result of the review – such authority being delegated elsewhere in the national education and training system.
- It is clear that what is on the table is a political decision in search of justificatory evidence.
- It is desirable to decide on the best possible response that retains the impressive intellectual assets built-up under SAQA and the basic commitments of the Authority to equity and social justice in the national education and training system.

Jansen (2004:50) further emphasised that the NQF reviews were not just normal cycles of administrative reviews but signified political interventions designed to deal with an unsatisfactory situation:

These policy reviews are not simply, as claimed, part of the normal cycle of administrative review associated with government bureaucracies throughout the world. Reviews also represent, as demonstrated elsewhere, a political intervention intended to revisit, revise or even reverse policies around which the political agenda has shifted. Such reviews are often conducted in response to political pressures from above or below (or both) to deal with an unsatisfactory situation... It would be a mistake, therefore, to read the review of the

NQF as *simply* a logical event following time-honoured procedures of reviewing, refining and affirming policy...

Jansen's conclusion that the review of the NQF was initiated due to "an unsatisfactory situation" is important. It is during this review period that the NQF and its implementing agencies, particularly SAQA, were most severely interrogated as evident in the following response by SAQA to the *Consultative Document* (DoE and DoL, 2003):

What we now face is an unravelling of the power to support our original operationalising of the NQF and the re-aligning of power by the Departments of Education and Labour around a new set of recommended innovations intended to resolve perceived problems of the present operationalisation (SAQA, 2003:6).

The manner in which the review was undertaken, the purpose of the review, and most significantly, the depth and range of responses that were made to the review documents form an integral part of the broader NQF discourse and thus also of the focus of this research project.

1.2.4.3 Other developments during the review period

Three additional developments, one an external EU review (EU, 2002), one a development in the Higher Education sector (DoE, 2004) and the other a SAQA study to determine the impact of the NQF (SAQA, 2004 and 2005b), are also important to gain a thorough understanding of the NQF review period that started in 1999 and continues to the present day. Each of these is discussed below.

European Union Mid-Term Review

A fourth review was conducted by consultants on behalf of the European Union (EU, 2002) as required by the Financing Agreement for the European Community (EC) funded SAQA Project (also see Samuels *et al*, 2005). This review was characterised by an independent view of the NQF project and posed considerations for strategic decision-making:

The [EU Mid-Term Review of SAQA] finds that the [NQF] project had a high degree of policy relevance at its inception, focusing on the NQF as a primary lever for thoroughgoing systems reform and as the lynchpin for a broad range of education and training policies designed to increase the volume and quality of trained person power. The project has retained its relevance during the subsequent period of national policy implementation by successfully demonstrating its capacity to change the embedded paradigms of education

and training through managing a broad-based stakeholder participation process in building the new system (EU, 2002:5).

The findings and recommendations of the EU Mid-Term Review, amended after taking the Report of the Study Team (DoE and DoL, 2002) into account, are summarised as follows:

Relevance

As noted above, it was found that the SAQA-EU project retained a high degree of relevance, but that this relevance was not reflected in the financial resourcing of SAQA: 'The fact that 80% of current funding has been achieved through donor agencies reflects a mismatch between project relevance and state support' (EU, 2002:16). As a result it was recommended that the need for government commitment had to be emphasised, but also that the NQF should 'give more direct public expression to, and demonstration of, its relevance to the needs of individual users...' (EU, 2002:17).

Efficiency

The review found that implementation and regulatory functions were satisfactorily established, although not fully operational. It was also found that despite considerations that targets had shifted in the changing environment, the management of NSBs and the performance of ETQAs were unsatisfactory. Advocacy and progress with the NLRD were also noted as unsatisfactory and delayed. Recommendations included a radical restructuring of SAQA, gradual movement to the new standards setting structures – with the warning not to dismantle existing structures before the capacity of new structures had been assured.

Effectiveness

Over and above some internal organisational problems, it was found that the National Learners' Records Database (NLRD) was ready to receive data, but that this data was not forthcoming due to external consequences. It was recommended that the NLRD remain a discrete business system and that the five-year communications strategy be implemented, but also broadened and strengthened to convey the message that 'SAQA and its partners are building a strong and *simple* system of learning' (EU, 2002:22, emphasis in the original).

Special issues

It was found that research activity and output had been appropriately confined to the preparation and publication of policy documents, but that these should be broadened to include longitudinal and baseline studies as well as strategic partnership projects with universities and research institutes. Another finding was that the relations between SAQA and the DoL were satisfactory, but that the 'relations with the DoE are less than satisfactory' (EU, 2002:24). As a result it was recommended that SAQA had to take cognisance of the differences between themselves and the DoE, noting that the DoE was focusing on 'institutional and management reform – rather than on building a new system' (EU, 2002:25).

The Draft Higher Education Qualifications Framework Policy

Subsequent to the release of the *Consultative Document* (DoE and DoL, 2003) the NQF system was shrouded in a veil of anticipation, expectation and concern. To aggravate circumstances even more, a new Minister of Education was appointed in 2004. Faced with the still incomplete reviews initiated by her predecessor, the new minister did not have the option to use a review of the NQF as "political intervention" as the South African education and training community had had enough of the continual delays in finalisation of the outcomes of the NQF review process. So, instead, the first draft legislation released under the new minister had an ominous title: *The Draft Higher Education Qualifications Framework Policy (HEQF)* (DoE, 2004), suggesting that this was something different to the NQF. Key recommendations included the following:

- a higher education qualifications framework that is an integral part of the NQF
- greater institutional focus on qualifications
- compatibility with the Ministry of Education's funding policies
- more administrative role for SAQA with many of the current SAQA functions transferred to the HEQC
- incorporation of the nested approach to qualifications design
- nine qualification types mapped across six higher education qualification levels.

Initially interpreted by many as an effort to separate higher education from the NQF, the discussion document did not improve the instabilities caused by the inconclusive review process, as noted in SAQA's response to the DoE:

SAQA calls for a return to collaborative relationships between the agencies responsible for implementing the NQF. The current power struggles are having a negative impact on NQF implementation and may result in systemic changes that are not necessarily beneficial to

South African learners – the very same learners for whom the system is ultimately designed...In conclusion SAQA wishes to advise the Minister of Education, the honourable Naledi Pandor, that in its view, the draft HEQF policy in its current form does *not* present a meaningful way forward for the South African higher education system... (SAQA, 2004i:26).

Despite the uncertainty caused by the extended review period, significant movement within the NQF system took place from 1999 to 2004 (SAQA, 2004): the 12 NSBs became operational; more than 100 SGBs were registered; 32 ETQAs were accredited; more than 7000 qualifications were registered; and a wide range of guideline and policy documents were published.

More recently the DoE has shown the intention to develop a similar framework for Further Education – a Further Education Qualifications Framework (FEQF). At the time of the completion of this thesis this discussion document had not yet been released.

NQF Impact Study

Acting on the recommendation of the EU Mid-Term Review (EU, 2002) to develop longitudinal and baseline studies, SAQA initiated the NQF Impact Study in 2003. The study was designed as a longitudinal comparative study that would commence with a baseline evaluation in 2005. The purpose of the study was to:

...achieve the effective measurement of the impact of the NQF on the transformation of education and training in South Africa (SAQA, 2004:8).

Seventeen indicators, based on the five NQF objectives and organised into four sets, were developed. Each of the indicators were rated according to the *type of impact* that had been achieved (SAQA, 2005b:105). The key findings and recommendations were as follows (based on an interpretation by Samuels *et al*, 2005):

High Positive Impact

This rating meant that the research evidence showed a marked positive change across most of the education and training system as it pertains to the NQF. The following indicators were rated as *High Positive*: Nature of learning programmes; Organisational, economic and societal benefits; Contribution to other national strategies.

Moderate Impact

This rating meant that the research evidence showed moderate positive change across the education and training system. The following indicators were rated as *Moderate*: Number of

qualifications; Relevance of qualifications; Equity of access; Quality of learning and teaching; Assessment practices; Career and learning pathing. Evidence included: a shift in qualification development to NQF Levels 3, 4 and 5; a significant number of unit standards have been developed since the NQF was established; and historical qualifications still form the majority of qualifications registered on the NQF. Other findings are as follows: public higher education institutions are frustrated by DoE requirements related to the qualification registration process and lack of involvement in learnerships; private education and training providers are frustrated by the DoE registration requirements; increased numbers of non-traditional qualifications are becoming available; and learnerships were seen as too few, too narrow focused, too low and even not always matching the requirements of the workplace.

Minimal/mixed Impact

This rating meant that the research evidence showed minimal positive and/or a mix of positive and negative change across the education and training system. The following indicators were rated as *Minimal/mixed*: Effectiveness of qualification design; Portability of qualifications; Qualifications uptake and achievement; Integrative approach; Redress practices; Number of registered assessors and moderators; Number of accredited providers; Quality assurance practices. Findings included: Quality assurance practices have improved since the implementation of the NQF but are regarded as overly bureaucratic and resource intensive; SMMEs have been supported; 119 MoUs have been signed to date, although they appear to not be working well, especially between SETA ETQAs and the band ETQAs; and tensions exist between ETQAs due to overlapping responsibilities and differing levels of development. It was also found that limited progress had been made on *portability* and *redress*, the development of communities of trust required more attention, and an *integrative approach* was also found to be lacking mainly due to lack of parity of esteem between vocational and academic qualifications.

Negative Impact

This rating meant that the research evidence showed a marked negative change across most of the education and training system as it pertains to the NQF. No indicators were rated as *Negative*.

The first results of the NQF Impact Study were well received by NQF stakeholders and signified the first indications of a more reflective and mature system:

South Africa has gradually matured from the process of *policy formulation* and has begun the process of *policy implementation*. During the next five years we will have to grapple

much more with the notion of *policy impact*, and thus the NQF Impact Study is timely in this regard (Maja, 2004:104).

As before, Jansen was also consulted:

The Impact Study project of SAQA is easily one of the most sophisticated measurement and monitoring systems that I have yet witnessed to emerge in South Africa. Its sophistication lies in its self-critical posture and its consciousness of the limits and potential of impact studies, especially in its more quantitative conception (Jansen, 2004:97).

The results of the NQF Impact Study highlighted a range of aspects that required urgent attention. Although the Impact Study attempted to remain “outside” the contestations and power struggles occurring during the period of uncertainty, some reflection was unavoidable:

As the Study Team noted [referring to the *Study Team Report*, DoE and DoL, 2002], conflict and contestation are a normal part of complex national development programmes. The important thing is to learn from such experiences. All the evidence suggests that South Africa is prepared to learn and go forward. Indeed, because of the open and transparent processes of review and debate in South Africa, the international community is also learning from South Africa’s experience (SAQA, 2004:34).

As mentioned earlier, the author’s involvement in the NQF Impact Study contributed significantly to this critique of the NQF discourse by enabling an improved understanding of the South African context as well as enabling direct access to the extensive empirical data that was gathered during the Study.

1.2.5 Summary

This background section has intended to present a brief, though detailed overview of South African NQF development and implementation. The key points are summarised in the table below.

Period of NQF development and implementation	Years	Key points
Conceptualisation	Early 1980s to 1994	<ul style="list-style-type: none"> • Developed in revolt to the apartheid policies • Three parallel developments (DoL, DoE and NGO) • Response to new challenges of power • Focus on integration
Establishment	1995 to 1998	<ul style="list-style-type: none"> • SAQA Act promulgated in 1995 • Bold, innovative and visionary approach • Donor support • Balance of power unfinished although SAQA does secure the support of powerful partners • Differences between HEQC, UMALUSI and SAQA start to develop
Review	1999 to 2005	<ul style="list-style-type: none"> • HSRC review of SAQA (1999) – awareness of power relations • Report of the Study Team (2002) – need for leadership through a DoE/DoL/SAQA NQF Strategic Partnership • <i>Consultative Document</i> (2003) – need for a joint DoE/DoL position, Inter-Departmental NQF Strategic Team (excluding SAQA) suggested • EU Mid-Term Review (2002) – NQF is very relevant, resistance from higher education and SAQA/DoE relationship is problematic • Draft HEQF (2004) – separate framework for higher education with an institutional and funding focus • NQF Impact Study (2003 to 2005) – too soon to evaluate impact, baseline findings indicate gradual improvement and no negative impact

Table 2: Periodic summary of NQF development and implementation

1.3 PROBLEM STATEMENT

Following from this background section, three overarching observations are discussed below. Importantly, these observations form the foundation for the problem that is identified and addressed through this study:

- NQF development and implementation has been contested since conceptualisation
- Stakeholders have unrealistic expectations of the NQF
- Power struggles exist and influence NQF development and implementation.

1.3.1 NQF development and implementation has been contested since conceptualisation

Firstly, *contestation* seems to have always formed part of NQF implementation. Since the initial conceptualisation in the early 1980s to the more recent period of uncertainty, contestations are noted:

Education and, to a less visible extent, training have been contested terrain throughout most of South Africa's history. The roots of the NQF lie in these contestations and in the necessity for all South Africans to be able to equip themselves with the tools needed to negotiate life positively and productively (SAQA, 2000:4).

Nkomo's (2004b:2) advice is that we should not be labouring to avoid the contestations; we should rather extract the "pearly ideas" from the contestations to give momentum to continued NQF implementation:

This is indeed the start of a new period of NQF development and implementation; a period that shows maturity that goes beyond our initial period of exhilaration and transformation – this is a time to accept that contestations are, and will most probably always be, part of NQF implementation. Instead of labouring to avoid contestations, we should rather...manage and extract the pearly ideas from the contestations so as to give renewed momentum to an improved NQF...

A comment from Badat (2004:4) echoes a similar sentiment:

In reality there is neither an entirely neo-liberal inspired reform process and pervasive and hegemonic neo-liberalism, nor a wholly revolutionary sweeping displacement of old social structures and arrangements and dawn of an entirely new social order. Instead, there is a mixed picture and fluid situation characterised by contesting social forces with competing goals, strategies and policy agendas, by attempts to resolve profound economic and social paradoxes in differing ways, by continuities and breaks and contradictions and ambiguities in policy and practice, and by differing trajectories and trends. The post-apartheid South African social order is not yet indelibly defined and continues to be uncertain.

1.3.2 Stakeholders have unrealistic expectations of the NQF

The second common theme that emerges is concerned with the *unrealistic expectations* imposed on the NQF. Both McGrath's (1997) early observation that the NQF policy "promised much" and the following comment by Jansen (2004b:95) allude to this theme:

The first reason the NQF has had minimal impact in the South African education and training system is quite simply that the NQF promised what it could never deliver in practice. This in part has to do with the nature and complexity of practice, but it has a lot to do with the idealism and euphoria of policymaking in the years immediately preceding and following the formal installation of a democratic government in 1994. Put bluntly, we got carried away.

1.3.3 Power struggles exist and influence NQF development and implementation

A third theme that emerges from the periodical review is that of *continued power struggles, posturing and political manoeuvring*. The evidence is overwhelming. From most recent SAQA reports (e.g. SAQA, 2005), back to early discussion documents such as the *Ways of seeing the NQF* (HSRC, 1995), and even to a wide range of newspaper articles, such as the one below, all have this similar message:

So, what is all the anger and frustration about? Why have the departments of education and labour been forced to negotiate a new framework? Why is there the perception of a turf war between the two departments? Why should we be restructuring only a few years after the establishment of new structures? (Jewison, 2004:14)

Young (2005:9) agrees, and adds that it is not surprising that NQF implementation faces resistance from vested interests expressed as power relations:

NQFs are top down initiatives led by governments or government agencies and based on a set of general principles about how qualifications should be designed and what they should achieve...It follows, not surprisingly, that implementing an NQF is likely to face considerable resistance from vested interests. These interests may be an expression of power relations (such as different roles of employers, trade unions and different sectors of

the teaching profession) or it may be that the NQF challenges the day to day practices of assessors, teachers or managers.

In view of these observations the following problem is identified, although it remains unconfirmed until sufficient supporting evidence is found, which is ultimately the reason for undertaking this study:

Power struggles are having a negative effect on the development and implementation of the South African NQF.

Two additional underlying problems and related research questions follow from the identification of this problem:

1. *Unrealistic expectations of NQF stakeholders*: Do stakeholders have unrealistic expectations of what the NQF is supposed to achieve? Is stakeholders' support for the NQF waning because the NQF is not delivering what they think it should?
2. *NQF rooted in contestations*: Have contestations been part of NQF development and implementation even since its conceptualisation?

This problem (as well as the additional underlying problems and research questions) is revisited throughout this thesis and forms an important focus point of the research design of the study.

1.4 CONCEPT CLARIFICATION

1.4.1 National Qualifications Framework

1.4.1.1 Introduction

As mentioned in the introduction to this thesis, an increasing number and variety of NQFs have emerged across the world in recent years. Some of the characteristics of these NQFs are described in this section.

According to Mavimbela (2001:2) the NQF is a concept 'that only seems to have become common currency in organisational design in the last quarter of the 20th century'. Originating mostly from developments in the United Kingdom in the 1980s and 1990s, NQFs have come to represent current thinking about competency, recognition for learning and national and regional portability. All

in all the concept of an NQF is not as clear-cut as some might argue. Ranging from “loose” arrangements that simply reflect already established national systems, to “tight” arrangements that are highly prescriptive (Tuck, Hart and Keevy, 2004), NQFs have come to represent national attempts by governments to make changes to their education and training systems. Simply put, NQFs are not only about qualifications, or qualification structures; NQFs are complex social constructs with context-specific characteristics, purposes and features.

In many of the first NQFs, if not all, development and implementation was associated with significant contestations that led to extended periods of review and adjustments. Second generation NQFs (implemented in the late 1990s, early 2000s) on the other hand, show fewer signs of contestation, while most recent developments, or third generation NQFs, show even fewer.

Examples of NQFs are:

1st generation NQFs: England, Wales and Northern Ireland, Scotland, New Zealand, Australia, South Africa and Ireland.

2nd generation NQFs: Mexico, Singapore, Trinidad and Tobago, Philippines, Namibia, Mauritius and Malaysia.

3rd generation NQFs: France, SADC (regional), EU (regional), Zimbabwe, Lesotho, Zambia, Angola, Mozambique, Democratic Republic of Congo, Tanzania, Botswana, Malawi, Philippines, Uzbekistan, Turkey, Brazil, Chile, Jamaica, Barbados, Colombia and the Caribbean (regional).

In order to clarify the NQF concept the following key aspects are discussed below:

- NQFs in general
- Suggested NQF typology
- Sub-, national- and meta-qualifications frameworks
- South African NQF
- NQF discourse
- NQF stakeholders.

1.4.1.2 NQFs in general

A framework is defined as a structure or frame supporting or containing something. Mavimbela (2001) suggests two ways of interpreting such a framework: the first views a framework as a durable structure, meeting different needs at different times - she also warns that this structure could be 'too narrow and complex for ordinary human beings to use, and so becomes a prison'; the second view is similar, but differs in that it focuses on growth, 'with the right open spaces so that it does not limit'. Cosser (2001:160) adds a similar interpretation:

A national qualifications framework is, in the first instance, a *framework*. It is, to use the construction metaphor, not the building itself but the frame, the constructional system, that gives shape and strength to the building...

Both Mavimbela and Cosser highlight the fact that in essence an NQF is about the levels and structures, albeit non-physical, that form the grid upon which qualifications are pinned. It is however doubtful that the eight or ten levels of the South African NQF, together with the associated level descriptors, number of credits and notional hours, collectively constitute an NQF. A definition of the New Zealand Qualifications Authority (NZQA, 2002) goes some way towards expanding the definition, although it is still limited mainly to the design:

...a qualifications framework, be it the NQF or any other, provides nationally recognized, consistent standards and qualifications and recognition for all learning of knowledge and skills.

The definition of the Australian Qualifications Framework (AQF) suggests that an element of scope or comprehensiveness may also be included:

...unified system of thirteen national qualifications in schools, vocational education and training...and the higher education sector (mainly universities) (www.aqf.edu, accessed 15 February 2005).

The Scottish Credit and Qualifications Framework (SCQF) also includes the notions of scope and design, but adds the notion of an underlying, covert or overt purpose:

From 2001, mainstream Scottish qualifications have been brought into a single unifying framework known as the Scottish Credit and Qualifications Framework (SCQF). In this Framework, qualifications are described in terms of their levels and their credit

value...These qualifications provide the foundations of a learning and credit transfer framework that is being implemented and embedded throughout Scotland's education and training provision (SCQF, 2003:1).

The Irish NQF also adds a more bureaucratic and even regulatory dimension:

...a [Irish National Qualifications] framework for the development, recognition and award of qualifications in the State...based on standards of knowledge, skills or competence to be acquired by learners (Ireland, 1999: Section 7).

An example of a much more recent development, the proposed SADC Qualifications Framework (SADCQF) adds dimensions of comparability, harmonisation and benchmarking:

...consists of a set of agreed principles, practices, procedures and standardised terminology intended to ensure effective comparability of qualifications and credits across borders in the SADC region, to facilitate mutual recognition of qualifications by [SADC] Member States, to harmonise qualifications wherever possible, and to create regional standards where appropriate (Technical Committee on Certification and Accreditation [TCCA], 2005:7).

Another third generation NQF, the proposed Lesotho Qualifications Framework (LQF) highlights some of the earlier points, namely the structuring of new and existing qualifications, but adds specific design features related to quality assurance and the recognition of all forms of learning:

A NQF is a structure of defined and nationally accredited qualifications, which are awarded at defined levels. It indicates the interrelationships of the qualifications and how one can progress from one level to another. NQF, therefore, is the route through which the country brings education and training together in a single Unified System. A qualifications framework is designed to provide: (a) Quality assured, nationally recognised and consistent training standards; (b) Recognition and credit for all acquisition of knowledge and skills. It is a way of structuring existing and new qualifications (Lesotho, 2004:7).

NQF definitions from other countries such as Mexico (Zuniga, 2003), Namibia (Gertze, 2003) and Zimbabwe (Pesenai, 2003) add even more dimensions to the concept of an NQF. The point to be made is that NQFs cannot be seen as only the "constructional system" Cosser speaks of; they are in fact complex (social) constructs that go beyond this "framework" interpretation – a point also

later made explicitly by Cosser and others (see the following section). In support of this wider interpretation, Kraak and Young (2001:30) refer to the SAQA definition of the NQF as

...a social construct whose meaning has been, and will continue to be, negotiated for the people, by the people.

They argue that an NQF consists of three components: (1) A map of all the qualifications included in the framework; (2) An organisation of bureaucracy; and (3) Practices and agreements between users, providers and assessors. They argue further that an NQF that 'seeks to underpin the particular system of education and training that it advocates' would be a 'benign ideology', and must rather be replaced by an attempt at taking full cognisance of 'its overlay of a further system of classification onto reality' – in this way adding a policy breadth dimension (discussed again later in this chapter).

From this discussion on NQFs it has been shown that there is general agreement that *NQFs are complex social constructs with diverse features such as design, scope, purpose and policy breadth.*

The notion of an NQF as being a socially determined and dynamic object is widely supported. Cosser (2001: 157) explains the importance of consensus:

...by "social construct" SAQA means in the first instance a mental construction (of a framework) that is socially determined – shaped by consensus of those individuals and groups party to its construction.

Isaacs (2001:124) on the other hand suggests that a social construct necessarily implies that some form of resistance and contestation can be expected:

The essential nature of the NQF is that of a social construct, in that we as social actors in society not only theorise about, construct and implement it, but we also enable, actively change or work against it.

Isaacs also lists three necessary criteria for a successful social construct:

- *democratic participation of stakeholders* – he comments that the legitimacy of the social construct is undermined if this does not occur;

- *intellectual scrutiny* – credibility is influenced if this does not happen, and it includes ‘academic scrutiny, international benchmarking, best practice, cutting-edge research and development and appropriate international comparators’; and
- *adequate resourcing* – Isaacs makes the comment that failure to consider affordability and resourcing has led to the demise of most social constructs.

Cosser (in Cosser *et al*, 1999:1) agrees with Isaacs’ understanding, and emphasises that the criteria are key to successful NQF development and implementation:

...the NQF is a social construct, a synthesis of the experience, thinking and practice of South Africans from a variety of socio-economic backgrounds representing a variety of world-views. The cornerstones of this construct are democratic participation, intellectual scrutiny, and the availability of resources – notions central to SAQA’s development and implementation of the NQF.

Tuck *et al* (2004:12), although agreeing with the notion of an NQF as a social construct, warn that the links with the stakeholders (society) can be lost during the sometimes difficult and complex implementation phase (a point also made by Cosser, 2001):

The central point is that each NQF is a *social construct* – a means by which the aims and values of stakeholders – politicians, practitioners, learners, and social partners – are brought together in a single, very public, system. The system features of any country’s NQF should be designed to be appropriate to its agreed aims and purposes. These in turn should reflect the values and aspirations of stakeholders. Not surprisingly, given the complexity of the change processes involved in designing and implementing an NQF, system development can seem to acquire “a life of its own” and the links with stakeholder-derived aims and purposes weakened (Tuck *et al*, 2004:12, emphasis in the original).

Following from the discussion in this section, an NQF is interpreted as follows in the context of this study:

An NQF is a complex social construct with specific overt and/or covert purposes implemented and overseen by government bureaucracies.

1.4.1.3 Suggested NQF typology

As will be shown in *Chapter 3* of this thesis, NQFs can be defined using a typology based on the work of Tuck *et al* (2004) that includes components as suggested by Young (2005), Raffe (2005) and Granville (2004).

The suggested NQF typology consists of eight categories, each of which are briefly described below:

- Guiding philosophy
- Purpose
- Scope
- Prescriptiveness
- Incrementalism
- Policy breadth
- Architecture
- Governance.

Guiding philosophy

As is the case with most education and training developments, current thinking can usually be traced back to a particular school of thought. NQF development is no exception, although it is peculiar in that scholars associate NQFs with a wide variety of guiding philosophies ranging from post-Fordism to reductionism. Even within specific countries the opinions are diverse, suggesting the need for a careful analysis of each to fully understand the specific NQF. In the context of this study, the underlying philosophy of an NQF is interpreted as follows:

Guiding philosophy is the underlying thinking that implicitly, often covertly, underlies the development and implementation of the NQF.

Purpose

Closely related to the previous more covert purposes (or guiding philosophies), NQFs' overt purposes include the achievement of social justice (e.g. South Africa), access and comparability (e.g. the proposed SADCQF), and the regulation of education and training systems (here South Africa is also a good example). The purpose of an NQF is more often than not determined by a national government. In the context of this study, the purpose of an NQF is interpreted as follows:

Purpose is the explicit, usually overt, reasons for the development and implementation of the NQF – purpose is usually reflected in the objectives of the NQF.

Scope

The variety of qualifications that are registered on NQFs vary from country to country. In some cases the NQF encompasses all forms and levels of training, while in others specific sectors, most often Higher Education, are excluded. The scope of an NQF refers to the extent to which the various systems and sectors are unified. In the context of this study, the scope of an NQF is interpreted as follows:

Scope is the measure of integration of levels, sectors and types of qualifications as well as the relationships between each on the NQF.

Prescriptiveness

Tuck *et al* (2004:5) note that prescriptiveness ‘has been the single most contentious aspect of the implementation of first generation NQFs’. In the context of this study, the prescriptiveness of an NQF is interpreted as follows:

Prescriptiveness is the stringency of the criteria which qualifications have to satisfy in order to be included in the NQF.

Incrementalism

The rate (tempo or period of implementation) and manner (starting with specific sectors, or doing all at once) of NQF implementation differs from country to country. South Africa stands out as one of the most radical and quickest implementations, while countries such as Ireland and Scotland have opted for a more gradual approach. In the context of this study, incrementalism is interpreted as follows:

Incrementalism is the rate and manner in which the NQF is implemented.

Policy breadth

The extent to which the establishment of NQFs are linked to other related measures is also important. These include design features (also referred to as intrinsic logic) and institutional arrangements, such as credit transfer and employment criteria (referred to as institutional logic). In the context of this study, the policy breadth of an NQF is interpreted as follows:

Policy breadth is the extent to which an NQF is directly and explicitly linked with other measures that influence how the NQF is used.

Architecture

Design features of NQFs refer to the organisational and structural features that characterise a particular NQF. Examples include the use of outcomes-based qualifications, core skills and level descriptors. In the context of this study, NQF architecture is interpreted as follows:

Architecture is the configuration of structural arrangements that make up the design of the NQF.

Governance

NQF governance includes all the activities that lead to the development and implementation of an NQF, such as legislation, the role of implementing agencies and funding. In the context of this study, NQF governance is interpreted as follows:

Governance is all activities that can be seen as purposeful efforts to guide, steer, control or manage institutions, sectors or processes associated with the NQF.

1.4.1.4 Sub-, national- and meta-qualifications frameworks

Although NQFs are similar in that they can all be described using the suggested typology, they can differ with regards to the particular typological configuration. Various such examples are discussed throughout this thesis, but in particular in *Chapter 3*. It is also important to note that although the concept “*National Qualifications Framework*” suggests that all NQFs are by default *national* systems, there are also qualification frameworks that are developed and implemented across regions, such as in SADC (TCCA, 2005), the EU (Clark, 2005) and the Caribbean (Zuniga, 2004) – these “regional” qualifications frameworks can also be described using the typology and only differ from the conventional notion of an NQF as a result of their regional scopes (i.e. the measure of integration of levels, sectors and types of qualifications as well as the relationships between each in the NQF - see the previous discussion).

Likewise a qualification framework with a more limited scope, such as covering only particular levels, sectors or types of qualifications can exist within another NQF. The proposed Higher Education Qualifications Framework (HEQF) (DoE, 2004) in South Africa is such an example. Literature suggests that the more limited “frameworks within frameworks” be referred to as “sub-frameworks” or sectoral frameworks (Lolwana, 2005) (also see Griesel, 2005). A national

framework can also be composed of strong sectoral frameworks – Lolwana (2005, referring to the Tomlinson Report, 2004) argues that such national frameworks are “climbing frameworks” that are more likely to ‘accommodate explicit differentiation, without fragmenting the system’ (Lolwana (2005:23).

Regional qualifications frameworks that accommodate diverse national frameworks are referred to as “meta-frameworks” (cf. Tuck *et al*, 2005:1):

Some regional frameworks will accommodate national frameworks built on the same basis of levels and credits, but others will have to accommodate frameworks built on diverse patterns of levels of credits and these will have to be a new kind of framework – the meta-framework.

The most recent draft consultation document from the European Commission (2005) also uses the term “meta-framework”, defining it as follows:

A meta-framework can be understood as a means of enabling one framework of qualifications to relate to others and for one qualification to relate to others that are normally located in another framework. The meta-framework aims to create confidence and trust in relating qualifications across countries and sectors by defining principles for the ways quality assurance processes, guidance and information and mechanisms for credit transfer and accumulation can operate so that the transparency necessary at national and sectoral levels can also be available internationally (European Commission, 2005:13).

The following table highlights the differences discussed above:

	Sub-framework	National framework	Meta-framework
Scope	Within an NQF, covering specific levels, sectors or types of qualifications	National, but not necessarily all levels, sectors and types of qualifications	Regional, but not necessarily all levels, sectors and types of qualifications
Prescriptiveness	Usually tighter	Varying from loose to tight	Usually looser
Examples	HEQF	South African NQF	SADCQF, EQF

Table 3: Sub-, national- and meta-qualifications frameworks

The intention with this discussion has been to highlight the point that all NQFs can be described with the suggested typology, even those that are regional or sectoral.

1.4.1.5 The South African NQF

As this study attempts to improve the development and implementation of the *South African NQF*, it is necessary to briefly reflect on the way in which the NQF concept has been interpreted in the South African context.

SAQA (2001:1) *defines* the South African NQF as:

...a set of principles and guidelines by which records of learner achievements are registered to enable recognition of acquired skills and knowledge, and thereby using an integrated system that encourages lifelong learning.

The *purpose* of the South African NQF is summarised by its five objectives, namely to (SA, 1995c):

1. create an integrated national framework for learning achievements;
2. facilitate access to and mobility and progression within education, training and career paths;
3. enhance the quality of education and training;
4. accelerate the redress of past unfair discrimination in education, training and employment opportunities; and
5. contribute to the full personal development of each learner and the social and economic development of the nation at large.

The *principles* of the NQF include: *integration* (to form part of a system of human resource development which provides for the establishment of a unifying approach to education and training); *relevance* (to be and remain responsive to national development needs); *credibility* (to have national and international value and acceptance); *coherence* (to work within a consistent framework of principles and certification); *flexibility* (to allow for multiple pathways to the same learning ends); *standards* (to be expressed in terms of a nationally agreed framework and internationally accepted outcomes); *legitimacy* (to provide for the participation of all national stakeholders in the planning and co-ordination of standards and qualifications); *access* (to provide ease of entry to appropriate levels of education and training for all prospective learners in a manner which facilitates progression); *articulation* (to provide for learners, on successful completion of accredited prerequisites, to move between components of the delivery system); *progression* (to ensure that the framework of qualifications permits individuals to move through the levels of national qualifications via different appropriate combinations of the components of the delivery system); *portability* (to enable learners to transfer their credits or qualifications from one

learning institution and/or employer to another); *recognition of prior learning* (to, through assessment, give credit to learning which has already been acquired in different ways, e.g. through life experience); and *guidance of learners* (to provide for the counselling of learners by specially trained individuals who meet nationally recognised standards for educators and trainers) (SAQA, 2000:5-6).

The *architecture* (or design features) of the South African NQF include an eight-level framework (currently being amended to ten levels), three bands, a range of qualification types and credits (where one credit is based on ten notional hours of work). The structure of the NQF is illustrated in the diagram below.

NQF level	Band
8	Higher Education and Training (HET)
7	
6	
5	
4	Further Education and Training (FET)
3	
2	
1	General Education and Training (GET)

Diagram 1: Current structure of the South African NQF

The South African NQF is premised on legislation. The SAQA Act (Act 58 of 1995) led to the establishment of SAQA as overseeing body – the Act also described the composition, role and functions of SAQA. Also included in the Act was the establishment of quality assurance and standards setting bodies, the ETQAs, NSBs and SGBs. More importantly though, the SAQA Act led to the formal establishment of the South African NQF – ironically the naming of the Act, as the SAQA Act, and not the NQF Act, was one of the first signs (some would even argue mistakes) of the contestations that were to be associated with NQF implementation in the years to come. Even by 2005, NQF stakeholders and partners were still fully supportive of the objectives and principles of the NQF (SAQA, 2004), although support for the implementing agencies was much less consolidated (DoE and DoL, 2002 and 2003). SAQA itself has also recently reflected on its branding strategy, considering a change in focus from advocacy of SAQA as overseeing body, to the advocacy of the NQF.

Two sets of regulations followed from the SAQA Act: the NSB Regulations (SA, 1998b) and the ETQA Regulations (SA, 1998a).

The NSB Regulations (SA, 1998b) prescribed the structure of the standards setting system (mainly stakeholder driven) and defined qualifications. The following *types* of qualifications (that can be registered on the NQF) were prescribed:

- National Certificate at levels 1 to 8 that has 120 (one hundred and twenty) or more credits with 72 (seventy two) credits at or above the level at which the certificate is registered.
- National Diploma that has a minimum of 240 (two hundred and forty) credits, of which at least 72 (seventy two) credits shall be at level 5 or above.
- National First Degree that has a minimum of 360 (three hundred and sixty) credits of which at least 72 (seventy two) credits shall be at level 6 or above.

The NSB Regulations (*Ibid.*) define a qualification as:

...a planned combination of learning outcomes with a defined purpose or purposes, including applied competence and a basis for further learning (SAQA, 2000b:8),

and a unit standard as:

...the registered statements of desired education and training outcomes and their associated assessment criteria, describing the quality of the expected performance (*Ibid.*).

The NSB Regulations (*Ibid.*) further prescribed that qualifications could only be registered on the NQF once they had been approved by SAQA and recorded on the National Learners' Records Database (NLRD). Historically, education and training providers were responsible for developing their own qualifications; however, since the establishment of SAQA, the NSBs and SGBs have taken over this responsibility.

The ETQA Regulations (SA, 1998a) focused on the role of the quality assurance bodies (these were not to be stakeholder driven – existing bodies, mainly the SETAs and existing statutory professional bodies were to be included). The ETQA Regulations also spelled out the requirements that education and training providers had to meet in order to offer NQF-registered qualifications. Two general requirements were: (1) all private providers, i.e. providers that are not government funded, needed to *register* with the DoE (DoE, 2002 and 2002b); (2) all providers, public and private, needed to be *accredited* by sector-specific ETQAs (SA, 1998a). At the time of this study, there were 33 ETQAs responsible for quality assuring education and training in various sectors (this includes the 23 SETAs, professional and other bodies). All ETQAs were to be accountable to

SAQA for their quality assurance functions – this included being subjected to regular monitoring (SAQA, 2004j) and auditing (SAQA, 2005).

From this brief overview it has been shown that the South African NQF is also a complex social construct, highly regulatory in purpose, aiming for more than simply organising or arranging qualifications into levels and credits. Closely linked to the NQF's design features is a specific purpose of social transformation and redress. (The other typological components of the South African NQF, such as scope, prescriptiveness and incrementalism are discussed in *Chapter 3*.)

Based on the preceding discussion, and the earlier more generic interpretation of an NQF, the following interpretation of the South African NQF is used in this study:

The South African NQF is a complex social construct with specific overt and/or covert purposes implemented and overseen by the South African government.

1.4.1.6 The NQF discourse

The NQF discourse is made up of various groups of discourses, some formal, but the majority informal. The formal discourses could include pedagogy, philosophy and politics. The informal discourses could include complaints from learners, the interaction between quality assurance bodies and providers, debates on the architecture of the NQF and general public consent or dissatisfaction. Such an interpretation of the NQF discourse could further include aspects such as:

- mode of knowledge production associated with the NQF (from Foucault, 1972), but also as considered by Kraak, 1999 and Young, 1998);
- systems of meaning, including social and political practice, institutions and organisations (Lemmer, 2003);
- forms of spoken interaction, formal and informal and written texts of all kinds (*Ibid.*); groups of formal and informal “sub-discourses” such as educational theory, public opinion and learner complaints; and also
- the wider international discourse on NQFs.

Although this interpretation is surely not inaccurate, it would be very limited and, more importantly, would disguise the real nature of a systemic discourse such as the NQF discourse. In order to clarify this concept it is necessary to first review Foucault's interpretation of discourse, as this study is placed within a Foucauldian theoretical framework, and then also to consider NQF-specific literature. Three interpretations are discussed below:

- Foucault's discourse as a medium for power relations
- Kraak's discourse that is concerned with the distribution of power
- Deacon and Parker's unifying discourse that is associated with hegemonic struggles.

Foucault's discourse: a medium for power relations

Piantanida and Garman (1999) suggest that Foucault interprets discourse as language exchanges within a topic or field of study, such as the NQF. What is important about the Foucauldian interpretation of discourse, according to Piantanida and Garman, is that it links discourse with power relations:

For example, Foucault (1972, 1980) discusses the discourse system that produces psychiatrists who let people talk, or rather, "confess", and thereby control the practice. From Foucault's point of view, all intellectuals, all teachers and students within disciplines, are to some extent incorporated within these systems of control based upon the mode of knowledge production that defines much of the social world... (1999:228).

Foucault (1980:93) suggests that power relations permeate society, but that these power relations cannot be established without the 'production, accumulation, circulation and functioning of a discourse'. Revisiting the earlier background discussion on the NQF, as well as the stated problem of power struggles in NQF development and implementation, it is evident that the Foucauldian framework is well suited to this study, but also, and more importantly, that the "language exchanges" associated with the NQF provide a fitting "medium" within which power relations associated with the broader NQF discourse can be established. Stated differently, the NQF discourse is a conducive medium for the establishment of power relations.

Kraak's discourse: the distribution of power

Another important feature of discourse surfaced in the early years of NQF implementation when Kraak (1998:4) argued that:

"Systemic" discourse is the name being attached...to a highly persuasive, influential and coherent view which emerged in the education and training policy formulation process which began in earnest after the unbanning of the ANC in February 1990.

Kraak (*Ibid.*) explained that this notion of discourse is associated with four tendencies: (1) it focuses on structural characteristics of a system and is concerned with the 'distribution of power between state, market and education and training institutions'; (2) it is interested in social relations which 'underpin the forms of differentiation, articulation and certification which emerge within the

education and training system and between it and other structures such as the economy and the labour market'; (3) it has a 'political dereliction towards the creation of a unified education and training system'; and (4) it argues that 'each education and training system is held together by a distinctive regulatory framework over all others'. Kraak argued further that these tendencies of a systemic discourse are increasingly associated with the development of a single NQF that replaces differentiated and divisive qualification structures of that period.

Deacon and Parker's discourse: a struggle for hegemony

A third interpretation of discourse is from Deacon and Parker (1999:165). They warned that a new *unifying discourse* was emerging from the reconciliatory process that characterised the 1994 period:

Prior to 1990, it was possible to identify at least three different discourses which ordered the terrain of educational theory and practice in South Africa: traditional, vanguard and critical. In the interregnum between 1990 and 1994, a new unifying discourse emerged from the reconciliatory process of political negotiation, and this policy discourse, a contradictory amalgamation of traditional, vanguard and critical elements, reigns supreme at the present moment. Though these four discourses are undoubtedly distinct, and continue to struggle for hegemony, they all draw upon the core assumption and practices peculiar to modernity and derived from the Enlightenment faith in the capacity of reason to illuminate, transform and improve nature and society.

Deacon and Parker do well to capture this commonly agreed, but seldom-formulated view that the post-1994 education and training discourse had become a "contradictory amalgamation" of other discourses. Often verbalised as a contradictory merger of divergent philosophies (also see Oberholzer's [1994b] discussion on the philosophies associated with providing institutions), NQF proponents argue that this was indeed the purpose of the South African NQF. This point is important and is taken up again later in this thesis.

Foucault, Kraak or Deacon and Parker?

It is important to note that none of the three interpretations are contradictory. Both Foucault and Kraak emphasise that power is associated with discourse, whereas both Kraak and Deacon and Parker allude to the emergence of a (unified) discourse directly associated with NQF development. Based on this explication, the NQF discourse, being particularly conducive to the establishment of power relations, is interpreted as follows for the purposes of this study:

The NQF discourse is a dominant, influential and coherent amalgamation of divergent and even contradictory views, which support the development of an NQF that replaces all existing differentiated and divisive education and training structures.

1.4.1.7 NQF stakeholders

In the context of this study all individuals, organisations and institutions that are in one way or another influencing the NQF, or are influenced by the NQF, are referred to as “stakeholders”. The term “stakeholder” originates from South Africa when new minefields were discovered and prospectors used stakes to demarcate their claims. The term “NQF stakeholder” is therefore chosen to symbolise such claims within the broader NQF discourse and includes the implementing and overseeing bodies, such as SAQA; government departments, such as the DoE and DoL; quality assurance bodies, such as the ETQAs (cf. CHE, 2003b); standards setting bodies, such as the NSBs and SGBs; and many others.

Although some authors suggest that the government departments responsible for the NQF, i.e. the DoE and DoL, should not be categorised as NQF stakeholders, but rather as NQF partners, it has been decided that for the purposes of this study, “stakeholder” will be used as the collective term for *all* parties involved. The terms “NQF principals” and “NQF partners” have therefore been retained as particular stakeholder groupings.

The following categories of NQF stakeholders are identified:

NQF stakeholder grouping	Description
Overseeing Agency	The SAQA Board and SAQA staff
Principals	DoE and DoL
Partners	CHE (including the HEQC) and UMALUSI
Quality Assurance Bodies	ETQAs (including some professional bodies and SETAs)
Standards Setting Bodies	Consultative Panels (formerly NSBs, also referred to as Fit-for-purpose Panels) and SGBs
Education and Training Providers	Public and private institutions that offer NQF qualifications
Learners	Learners that have completed NQF qualifications, that are currently completing NQF qualifications or are considering completing an NQF qualification
Employers	Companies ranging from SMMEs to large corporates
Organised Labour (Unions)	Education and non-education
Other government departments and organisations	National and provincial, such as the National Skills Authority (NSA) and the Institute for the National Development of Learnerships Employment Skills and Labour Assessments (INDLELA) (previously the Central Organisation for Trade Testing, COTT)
Non-ETQA professional bodies and associations	All professions, statutory and non-statutory
Education and training consultants and other individuals	Individuals that function outside particular institutions or organisations
Non-Governmental Organisations (NGOs)	Organisations that receive no governmental funding
International agencies	Such as UNESCO and the ILO
Others	This category includes any other institutions or organisations that do not fit into any of the categories above

Table 4: NQF stakeholders

1.4.2 Power

1.4.2.1 Introduction

The second of the two central concepts that form part of this study, after the NQF, is *power*. Power (as interpreted by Foucault) is discussed at length in the second chapter of this thesis – the following is therefore only a brief summary of that discussion, and is structured as follows:

- *Foucault's power* – describing Foucault's power as it occurs in various contexts.
- *Power in the NQF discourse* – the concept of power is further described by applying the Foucauldian interpretation to the NQF discourse.

- *Guises of power* – the way in which power “appears” in the NQF discourse.

1.4.2.2 Foucault’s power

The point has already been made that power and discourse are inextricably linked, more specifically, that power relations cannot be established without discourse (Foucault, 1980). What has not been clarified is precisely what is meant by power, power relations, effects of power or any of the other “appearances” or “variants” of power. Temporarily postponing a more detailed discussion of such variants of power to the next section, it is possible to briefly look at power itself.

As will be shown at length in *Chapter 2* of this thesis, Foucault is notorious for taking a position and then later correcting that very position in favour of another. Using a bi-directional strategy that required a correlation between a thematic and periodic overview of Foucauldian theory, some progress was made to better understand his work, but also, importantly for this study, venture to interpret power in the context of this study on power in the NQF.

Foucault (1980:89) describes power as something that is

...neither given, nor exchanged, nor recovered, but rather exercised, and that [it] only exists in action.

Furthermore power is

...essentially that which represses. Power represses nature, the instincts, a class, individuals (*Ibid.*).

At this point three aspects of the concept of Foucault’s power in general are apparent: power is linked to discourse, power exists only in action and power represses. On all three counts it is clear that ‘power is not a substance or based in something’ (Berkhout, 2005:8). Foucault is interested in how power is exercised and does not try to develop strategies through which power can be undermined (Smart in Hoy, 1986:169).

Other aspects of Foucault’s power include the link between power and knowledge (power and knowledge directly imply one another), and because there can be no “power free” society, power is conceptualised as

...a complex strategical situation or relation which produces reality (Smart, 1994:7).

Davidson (in Hoy, 1986:226) also suggests that the notion of power should not be reduced to a consequence of legislation and social structure only. Berkhout (2005:9) argues for an analysis of power based on everyday practices that are shaped by current discourses:

...power must be broadly understood but at the same time analysed carefully as anchored in what he [Foucault] calls “micropractices” – those practices that constitute everyday life in modern societies and that are shaped by current discourses.

In summary, and based on the points discussed above, Foucault’s power is interpreted as follows within the context of this study:

Power exists in complex strategic relationships with reality, is established within discourse, represses, is linked to knowledge and is studied at the point where it is completely invested in its real and effective practices.

1.4.2.3 *Power in the NQF discourse*

Two key concepts, as they relate to this study that aims to improve NQF development and implementation, have been discussed in this section: the *NQF*, and *power*.

On the one hand NQFs have been described as social constructs that are ‘negotiated for the people by the people’ (in Kraak and Young, 2001:30) – a view supported by Cosser (2001) and Isaacs (2001). It has also been argued that NQFs can be described using an NQF typology, also showing that NQFs do more than organise or arrange qualifications into levels and credits, but that they are complex social constructs with specific overt and/or covert purposes implemented and overseen by government bureaucracies. It was furthermore explained that a broader NQF discourse exists, one that is particularly conducive to the establishment of power relations, and represents an amalgamation of divergent and even contradictory views – mainly in support of the development of an NQF that replaces all other existing education and training structures.

On the other hand, Foucault’s power has been described as requiring a medium to be established, i.e. a discourse; power exists only in action, i.e. power is not given or exchanged, nor recovered; power represses, even though power is not only negative; power and knowledge directly imply each other; power cannot be reduced to a consequence of only legislation and social structure; an analysis of power should be based on everyday practices that are shaped by current discourses (for example, the way in which education and training practices have been influenced by the NQF discourse).

The following interpretation of power in the NQF discourse is arrived at:

Power exists in the NQF discourse in that different NQF stakeholders continually and consistently exercise power - this power represses the voices of some stakeholders in order to make others more dominant.

1.4.2.4 The guises of power

As alluded to earlier, the different “appearances” of power in discourse are, in the context of this study, collectively referred to as “guises” of power. Six such guises are briefly described in this section (a more detailed discussion is found in *Chapters 2 and 5*):

- Forms of power
- Techniques of power
- Power relations
- Origins of power
- Manifestations of power
- Effects of power.

The sequence is chosen to make it possible for a logical progression from the guises that are made up of pre-identified categories (i.e. forms of power, techniques of power and power relations) that only require the identification of such examples in the NQF discourse, to the guises that require a more detailed interrogation of the empirical dataset (i.e. origins of power, manifestations of power and effects of power).

Forms of power

Forms of power include, amongst others: legal power, political power and busno power. In the context of this study, forms of power are interpreted as follows:

Forms of power are the characterisable and unique mode in which power appears within the NQF discourse.

Techniques of power

Numerous techniques of power exist. The following are some examples: bureaucratisation (to make something into a system of government that is based on unnecessary official procedures, divisions and hierarchy of authority); regulation (to subject to restrictions) and colonisation (to take possession of and lay claim over that which is weaker). In the context of this study, the techniques of power are interpreted as follows:

Techniques of power are the methods or systems by which power is exercised in the NQF discourse.

Power relations

Power relations are not about “who has power” but are rather about the matrix of power relations in which roleplayers are embattled. In the context of this study, power relations are interpreted as follows:

Power relations are the web of overt and covert interactions and associations between and amongst NQF stakeholders.

Origins of power

In the context of this study, origins of power are interpreted as follows:

Origins of power are the primary sources, starting points and/or catalysts that are directly linked to the noticeable way in which power appears at the point of its direct relationship with the NQF.

Manifestations of power

In the context of this study, manifestations of power are interpreted as follows:

Manifestations of power are the noticeable and observable appearances of power at the point where they are in direct and immediate relationship with objects within the NQF discourse.

Effects of power

Both positive and negative effects of power exist in the NQF discourse, although the range is preferably understood to lie on a continuum between the two extremes. In the context of this study, the effects of power are interpreted as follows:

Effects of power are the outcomes or results of the manifestations of power in the NQF discourse.

Moving from this improved understanding of the NQF discourse as well as Foucault's power, it is necessary to identify a suitable research design, including research methods, within the limits of the Foucauldian theoretical framework, that will be robust enough to address the problem of power struggles in NQF development and implementation. This is discussed in the next section.

1.5 RESEARCH DESIGN AND METHODS

1.5.1 Choice of a Foucauldian-based research design

An appropriate research design was required in order to effectively and coherently critique the development and implementation of the South African NQF. The specific research design, based on Foucauldian theory, was only chosen after a careful literature review. As was mentioned in the introduction to this thesis, the process was extremely time-consuming and laborious, but in the end contributed to a design that is well suited to the study.

Prior (1997:77) agrees that Foucault's work is difficult to "translate" but still very useful:

It is not, of course, always easy to translate Foucault's work into a set of methodological precepts that can be followed by the empirical researcher.

A range of factors (such as the purpose of the study, the problem being addressed and a number of environmental factors) informed the selection of the particular research design:

Firstly, the purpose of the study is to improve the development and implementation of the NQF – this requires the application of research methods that will lead to specific recommendations.

Secondly, the identified problem, namely the existence of detrimental power struggles in the NQF discourse, requires a research design that is able to effectively analyse power without being constricted in various secondary issues. This is supported by literature:

Since the problem is a function of its [theoretical] framework, the problem can be better articulated and understood if [the theoretical framework's] basic system is well understood and articulated (<http://mutans.astate.edu>, accessed 28 January 2005).

Thirdly, the range of pragmatic “environmental” factors that influenced the selection of the research design included the author’s direct involvement in the longitudinal NQF Impact Study (SAQA, 2004 and 2005b). This contributed to an improved understanding of the issues at stake and also facilitated direct access to a wealth of empirical data that was also placed within the public domain. The same argument can be applied to the author’s involvement in various other SAQA research projects, such as Credit Accumulation and Transfer (CAT) (see Naude *et al*, 2005) and professional qualifications (see Keevy, 2005), as well as the development of SAQA responses to discussion documents such as to the Draft Higher Education Qualifications Framework (DoE, 2004) (see SAQA, 2004i). Another environmental factor is the author’s involvement on the Southern African Development Community’s (SADC) Technical Committee on Certification and Accreditation (TCCA), tasked to work on the development of a SADC Qualifications Framework (SADCQF) (see Pesenai, 2003 and TCCA, 2005). Collectively, these factors contributed to the selection of a complex, arguably difficult to translate, but also most appropriate Foucauldian research design.

In summary, the four reasons for using Foucauldian theory are:

1. A Foucauldian analysis accommodates, even advocates, the use of empirical evidence (e.g. Foucault in Dreyfus and Rabinow, 1983).
2. Foucault’s work includes a particular focus on the analysis of power (e.g. Foucault in Anderson, 1995).
3. Foucault’s work included the development of research tools (archaeology and genealogy) for the analysis of power (e.g. Foucault in Milchman and Rosenberg, 2003).
4. A Foucauldian analysis requires a focus on “micropractices” (practices that constitute everyday life as they are shaped by current discourses [Berkhout, 2005]), therefore also requiring that the fundamental point of power relations are to be found outside institutions (cf. Foucault in Popkewitz and Brennan, 1998).

1.5.2 Research design

The research design for this research project on power in NQF development and implementation consists of two core components:

- Foucauldian theoretical framework
- Foucauldian research methods (archaeology and genealogy).

The Foucauldian theoretical framework provides the logical structure and reference points within which the study takes place. Importantly, the theoretical framework creates a lens through which the problem is viewed, understood and analysed. The Foucauldian theoretical framework also limits the number of perspectives from which the problem can be interpreted, and although it is acknowledged that many other diverse perspectives may be equally valid, they are also impossible to employ simultaneously:

No inquirer can investigate a problem from all perspectives simultaneously. And that is what a logical structure or theoretical framework is all about. It establishes a vantage point, a perspective, a set of lenses through which the researcher views the problem (<http://mutans.astate.edu>, accessed 28 January 2005).

The theoretical framework is discussed in more detail in the next section.

The second component of the research comprises two research methods, archaeology and genealogy. Foucault developed both qualitative methods during different stages of his work. Archaeology is particularly useful to describe the NQF discourse (Keevy, 2004b), while genealogy can be used to reveal the NQF discourse as a system of constraint (cf. Foucault, 1980). The two methods are discussed in *Chapter 2* and summarised later in this section on the research design. List coding, using ATLAS.ti analytical software, precedes the application of the two methods.

The research methods, following from this research design, are summarised in the table below.

Research methods (and corresponding chapters)	Description	Outcomes
<i>Literature review of Foucauldian theory</i> (Chapter 2)	Description of the Foucauldian theoretical framework, including a Foucauldian understanding of power and the development and description of the Foucauldian research methods, archaeology and genealogy	<ul style="list-style-type: none"> • Characteristics of the Foucauldian framework • Characteristics of Foucault's power • Description of archaeology • Description of genealogy
<i>Literature review of NQF development and implementation</i> (Chapter 3)	Identification and explication of objects in the NQF discourse through the development of an NQF typology and positioning of the South African NQF in relation to the developed typology	<ul style="list-style-type: none"> • Typological components • Objects in the NQF discourse • Observations from the literature review • Findings from the typological positioning of the South African NQF
<i>Qualitative analysis of empirical data</i> (Chapter 4)	Systematic description and revelation of the NQF discourse as a system of constraint through coding and the application of archaeology and genealogy to empirical data	<ul style="list-style-type: none"> • Coded dataset • Description of the NQF discourse • Revelation of the NQF discourse as a system of constraint
Findings and recommendations (Chapter 5)	The description of power through the synthesis of the results from the qualitative analysis, and the development of a set of recommendations on how to minimise the negative effects of power struggles	<ul style="list-style-type: none"> • Findings - description of power in the NQF discourse • Recommendations – how to minimise the negative effects of power struggles

Table 5: Research design

1.5.3 Theoretical framework

Jansen (2001) explains that although it is relatively easy to collect data, it is usually much more difficult to explain what the data means. He argues that the value of a theoretical (or conceptual) framework is that it is a 'facility with which to make sense of the data' (*Ibid*, 1). Jansen argues that the terms "conceptual framework" and "theoretical framework" are often used interchangeably, although many would argue that a conceptual framework is on a lower level, one in which 'concepts are stringed together in order to explain a particular event' (*Ibid*). Furthermore, the prior creation of a theoretical framework also facilitates more effective data collection. Jansen defines a theoretical framework as:

...an explanatory device that enables a researcher to make sense of, or assign meaning to, the data collected (*Ibid*).

Jansen's definition of a theoretical framework can be broadened to include methodological aspects such as identification and even development of research methods. Other important points mentioned by Jansen concerning an appropriate theoretical framework include: the elevation of the level of sophistication of a study as it moves beyond description of what happened to explanations for why it happened; providing an organising tool that focuses data collection, i.e. it is possible to test the validity of that theory through empirical evidence; and giving a study a broader comparative and theoretical significance that holds value beyond the specific context within which the researcher works.

As argued earlier, the choice of the Foucauldian theoretical framework is based on a literature review, that led to the formulation of four reasons for the choice (i.e. focus on empirical evidence, power, archaeology and genealogy, and "micropractices"). Jansen (2001:3) suggests that such a literature review should lead to a justification for the particular study 'building towards a platform for justifying your study as adding new knowledge to what existing literature has not addressed':

Some scholars use the literature review as a means for building and expounding the theoretical or conceptual framework (*Ibid.*).

The selection of the Foucauldian theoretical framework was both a clarifying and exclusionary step in the research process (cf. <http://mutans.astate.edu>, accessed 28 January 2005). It sharpened the focus on the purpose of the study (i.e. to improve the development and implementation of the NQF) and therefore also brought increased clarity to the problem (i.e. the existence of detrimental power struggles in the NQF discourse). The theoretical framework also:

...excludes from the view of the inquirer other perspectives that might be brought to bear on the problem, but does so in explicit recognition of those perspectives and the rationale for their rejection (*Ibid.*).

Once a theoretical framework has been selected, it is important to ask 'what advantages and disadvantages may accrue as a result of using it' (*Ibid.*). The choice of a particular theoretical framework should be made to 'maximise those advantages that are most salient for the investigation' but also to 'minimise those disadvantages that are most inimical to it' (*Ibid.*). The advantages and disadvantages of using a Foucauldian theoretical framework are discussed in *Chapter 5*.

1.5.4 Research methods and sampling

1.5.4.1 Introduction

As is the case with the choice of a theoretical framework for a particular study, research methods are only meaningful if applied within the limits of the selected theoretical framework. Furthermore, the research methods selected for this study, ranging from literature reviews to coding and the application of archaeology and genealogy, all fit into a broad category of qualitative research.

Piantanida and Garman (1999) argue that the term *qualitative* is “broad and evasive”, to the extent that it confuses novice researchers. They further argue that it would be overly simplistic to view the process as a quantitative vs qualitative debate only, and that this rather unfortunate contrast originates from early debates that really focused on the ‘merits of non-numeric versus numeric data debates’ (1999:246). Many of these early “postpositivist” researchers began to acknowledge the role of language in shaping human existence and ‘reluctantly acknowledged the possibility that all human reality is socially constructed’ (1999:245). Silverman (1997) supports the “evolution” of qualitative research:

...we no longer need to regard qualitative research as provisional...qualitative studies have already assembled a usable, cumulative body of knowledge (Silverman, 1997:1).

At present, Piantanida and Garman suggest, the early quantitative vs qualitative debates are no longer the major concern in educational research – they suggest that the debates have now shifted within the qualitative discourse community creating four distinct camps:

- Empiricists
- Interpretivists
- Criticalists
- Deconstructivists.

Empiricists (or postpositivists)

Postpositivists adhere to the principles of ‘objectivity, validity and reliability...the world is a given, and they find the meanings that are inherent in reality’ (1999:246). Postpositivists also seek to ‘test correlations between variables’ (Silverman, 1993:21).

Interpretivists

Interpretivism considers that human beings construct their own reality. Interpretivists generally agree with constructivists and phenomenologists as well as the hermeneutic search for deeper understanding. Interpretivists are of the opinion that postpositivists ignore the 'worldview orientation of the researcher' (1999:247) as they focus primarily on legitimisation. Interpretivists argue that 'the theoretical perspective one takes is central to one's inquiry' (*Ibid.*).

Criticalists

Criticalists agree mostly with interpretivists, differing only in focus. Criticalists have a

...proclivity to direct the purposes of [their] research to questions about social, historical, political, gender and/or economic forces. Their uses of these theoretical lenses to examine the situations under study give rise to the name critical theorists (*Ibid.*).

Deconstructivists

The fourth camp are the deconstructivists, who, according to Sipe and Constable (1996, in Piantanida and Garman, 1999:247), take the relativism implied in interpretivism and critical theory to its ultimate limit:

...deconstructivists assert that formulations of truth are always embedded in language, which can be shown to be self-contradictory at points...We can't get outside our own symbol systems, and are therefore constrained by their vulnerability.

Reflecting on the discussion above, the qualitative research methods employed in this study are probably best placed somewhere between the interpretivists' view that the researcher's worldview cannot be ignored, (refer to the section on the researcher's social location earlier in this chapter):

The role of the researcher in the qualitative analysis refers particularly to the awareness of bias and preconceived ideas, since assumptions may blind the evidence of the data (Smit, 2002:67).

and the criticalists' attempt to use theoretical lenses to examine the situations under study (refer to the discussion on the way in which the Foucauldian theoretical framework creates a lens through which the research problem is viewed).

1.5.4.2 Selection of qualitative research methods

As illustrated in the previous table the research design for this research project that investigates power in NQF development and implementation includes three research methods. The intention was not to randomly combine various research methods to avoid selection of a particular method, often referred to as “garbage-can eclecticism” (see Jansen, 2001), but a careful and meticulous selection of methods was required that would best make sense of empirical data. The choice of methods for this research project reflects such a careful and prolonged investigation, even including trial application of the methods (see Keevy, 2004, 2004b and 2004c) to ensure maximal benefit from the application as well as sufficient alignment with the Foucauldian theoretical framework.

The research methods are applied in the following sequence:

- the empirical data is coded using ATLAS.ti analytical software after which Foucauldian archaeology is used to describe the NQF discourse; and
- the same empirical data is coded again, this time to facilitate the application of Foucauldian genealogy to reveal the NQF discourse as a system of constraint.

In the following sections the research methods are discussed in more detail.

1.5.4.3 Coding using ATLAS.ti

The first step in the qualitative analysis of data related to the NQF discourse involves a coding process with analytical software called ATLAS.ti. Such a coding process has become well accepted as a preparatory phase towards a more in-depth analysis that can either be continued within the software environment or taken elsewhere, as in this study, where archaeology and genealogy are applied:

Whenever empirical research involves the analysis of numerical or textual data, it is now possible and increasingly easy to use a software programme to do so...Tools such as Ethnograph, ATLAS.ti, Nud*ist and WinMax are becoming common tools of the empirical researcher (Mouton, 2001:79).

A point that needs some brief attention is that ATLAS.ti is to a large extent based on grounded theory. The question that comes to mind is whether this makes ATLAS.ti inappropriate for this study that has placed itself within the limits of a Foucauldian theoretical framework. Smit (2002,

quoting the founding developer of ATLAS.ti, Thomas Muir) explains that although the development of ATLAS.ti was strongly influenced by grounded theory, it does not imply that the software can only be used in research within a grounded theory approach:

This does not imply that this software may only be used in an analysis that uses a grounded theory approach (2002:69).

Also, since ATLAS.ti is only used as an initial part of the research design, it is suggested that the software is well suited and not in conflict with the Foucauldian framework. A statement by Jansen (2001:2) regarding the nature of grounded theory supports the position:

...a priori decisions about the data is undesirable...explanations are generated from a close and ongoing scrutiny of the data yielded in the course of the study.

The preference for coding with ATLAS.ti stems not so much from the advantages that can be obtained from theory building, but is rather attributed to the 'speed and comprehensiveness' (Smit, 2002:71) of the process. As Smit notes, the software can cope with multiple and even overlapping codes without losing context.

1.5.4.4 Sampling and stratification

Following Piantanida and Garman (1999), an attempt is made to capture a sample of the language exchanges associated, or as Potter and Wetherell (in Lemmer, 2003:7) put it, 'all forms of spoken interaction, formal and informal texts of all kinds', with the NQF – i.e. the broader NQF discourse (see the previous section). This is done with full awareness that this NQF discourse is the medium through which the very power relations that are being investigated, are established (*Ibid.*). For this reason this critique of the development and implementation of the South African NQF draws on a wealth of empirical and other data that has already been gathered. Three sources are used:

- 300 interviews (including focus groups) conducted as part of the NQF Impact Study (SAQA, 2004 and 2005b) between 2003 and 2004
- 90 responses to Departmental discussion documents released between 2002 and 2004
- 72 news articles related to the NQF published between 1995 and 2005.

The three empirical sources as well as the sampling associated with each are discussed below.

Firstly, the author personally conducted more than 60 interviews and 10 focus groups with various NQF stakeholders as part of Cycles 1 and 2 of the NQF Impact Study (SAQA, 2004 and 2005b). The data gathering took place between 2003 and 2004 and included learners, education and training providers, organised labour, employers, ETQA staff, NSB members, SAQA staff and representatives from the DoE and DoL. All the interviews were transcribed and analysed together with additional interviews and focus groups conducted by/with fellow researchers. The results of the analysis were published by SAQA (2004c-h and 2005c-g) to encourage researchers to access empirical data, albeit secondary, for research purposes. This study is an example of such research that follows from the NQF Impact Study.

As might be expected with the use of secondary data, the sampling and stratification could not be influenced. The data were, however, seen as extremely relevant to this study on the development and implementation of the NQF. Although the NQF Impact Study attempted to determine the impact of the NQF on the South African education and training system, numerous structured interviews and focus groups conducted with respondents ranging from young learners in a Further Education and Training (FET) institution in Limpopo, to national Ministerial Advisors, provide a significant amount of evidence that points towards power struggles associated with NQF development and implementation. In fact, the amount of relevant evidence prompted the author to undertake this study.

The sampling was based on pragmatic considerations and was purposive and quota driven. It attempted to include the voices of all NQF stakeholders, but stopped short of being representative:

The choice for the particular categories and strata was based on the need to represent all NQF stakeholders (those individuals and organisations that make use of the NQF) and partners (government departments and quality assurance bodies that participate in NQF implementation). Based on the Cycle 1 results, it was expected that the provider category would be the largest (SAQA, 2005b:20).

The second empirical source is 90 responses to three discussion documents released by the DoE and DoL: *The Study Team Report* (DoE and DoL, 2002), *The Consultative Document* (DoE and DoL, 2003) and *The Draft Higher Education Qualifications Framework Policy* (DoE, 2004). The responses are made by stakeholder groupings similar to those described in the interviews above. The responses are also available for public consumption and were therefore accessible for this research project.

All available responses were used. The distribution is shown in the table below. As was the case with the interviews and focus group data, discussed above, no attempt was made to adjust the

distribution – importantly, a significant number of responses (45 out of 90) originated from non-ETQA professional bodies and associations.

The stratification of the interviews and responses are summarised in the table below.

NQF stakeholder grouping	Range	Individuals involved in interviews and focus groups	Responses to discussion documents	Sub-totals
NQF Overseeing Agency	SAQA (Board) including representation from the DoE, DoL and other stakeholders	2	2	4
	SAQA (Staff) across all post levels	11	-	11
NQF Principals	DoE national and provincial	23	1	24
	DoL national and provincial	15	-	15
NQF Partners	CHE (and the HEQC)	1	1	2
	UMALUSI	-	1	1
NQF Quality Assurance Bodies	ETQAs (including some professional bodies and SETAs)	11	6	17
NQF Standards Setting Bodies	Consultative Panels (formerly NSBs) and SGBs	-	6	6
NQF Education and Training Providers	Providers of education and training: HET, FET and GET bands; public and private; schools, colleges, universities of technology and universities	62	14	76
Learners	From the providers listed above	76	-	76
Employers	Large to SMME; from various sectors	60	2	62
Organised Labour (Unions)	Education and non-education	21	5	26
Other government departments	National and provincial	-	-	-
Non-ETQA professional bodies and associations	All professions; statutory and non-statutory	17	45	62
Education and training consultants and other individuals	Individuals that function outside particular institutions or organisations	1	7	8
Non-Governmental Organisations (NGOs)	Organisations that receive no governmental funding	-	-	-
International agencies	Such as UNESCO and the ILO	-	-	-
Totals		300	90	390

Table 6: Stratification of interviews, focus groups and responses

* Estimated – attendance lists were not kept of all focus groups

The third source is 72 press articles that cover two periods of NQF development and implementation: *Establishment Period* (1995 to 1998) and *Review Period* (1999 to 2005). Articles from the initial *Conceptualisation Period* (early 1980s to 1994) did not include reference to the NQF

and were not included. The author gathered some of the articles between 2001 and 2005, whilst others were retrieved from an online media database (www.sabinet.co.za). Keyword searches (“NQF”, “education” and “training”) were conducted after which 72 articles were selected from more than 200 relevant articles. The selection was done so as to ensure a balanced distribution of articles over the two periods:

Period	Year	Number of articles	Subtotals
Establishment (1995-1998)	1995	17	36
	1996	7	
	1997	6	
	1998	6	
Review (1999-2005)	1999	1	36
	2000	8	
	2001	5	
	2002	6	
	2003	4	
	2004	10	
	2005	2	
Total		72	

Table 7: Stratification of news articles

A final point regarding the ATLAS.ti coding process is probably the most obvious. It relates to the actual codes that are used during the analysis. The codes are determined from the development of the archaeological and genealogical methods as they are applied in the specific context. The codes are described and listed later in this chapter.

1.5.4.5 Archaeology as qualitative research method

Foucauldian archaeology is developed and described in *Chapter 2*. The following is a brief summary:

Archaeology is the ‘...systematic description of a discourse object’ (Foucault, 1972:156). Also described as giving a “snapshot of the discourse”, archaeology describes the underlying knowledge structure that forms the NQF discourse. Archaeology also defines the NQF discourse as a set of practices obeying rules (Foucault, 1972:155), is not interpretive (Prior, 1997:77) and is not limited, regional and diversifying (Foucault, 1972:182).

The archaeological method involves three components:

- identification of objects within the NQF discourse;

- identification of unities within the NQF discourse; and
- description of strategies that emerge from identified objects and unities within the NQF discourse.

The identification of common *objects* that statements refer to includes the identification of: (1) Surfaces of emergence (those areas of difference that contribute to the status of different types of objects); (2) Authorities of delimitation (the extent to which specific bodies become major authorities recognised by public opinion, the law and the government); and (3) Grids of specification (the systems according to which different objects are divided, contrasted, related, regrouped and classified).

The identification of *unities* (statements, formal and informal, that refer to the same object), includes the: (1) Empirical selection of the field (a field in which the relations are numerous, dense and relatively easy to describe); and (2) Identification of unformalised groups of discourses (to understand statements not by the rules that govern their construction, but by the rules that govern their appearance).

The description of the formation of *strategies* associated with the objects and unities - the organisation of concepts, regrouping of objects, and types of enunciation that form themes and theories, considering: (1) Points of diffraction of discourse; and (2) Authorities that guide the choices that are made.

1.5.4.6 Genealogy as qualitative research method

Foucauldian genealogy is developed and described in *Chapter 2*. The following is a brief summary:

Genealogy is the '...union of erudite knowledge and local memories which allows us to establish a historical knowledge of struggles' (Foucault, 1980:83). Just as archaeology gives a snapshot of the NQF discourse, genealogy describes the processual aspects of the NQF discourse by identifying hidden origins and functions (Kendall and Wickham, 1999:29) and then revealing the NQF discourse as a system in which power is exercised.

The genealogical method involves three components (as well as a fourth combinatory step):

- identification of erudite knowledges within the NQF discourse;
- identification of local memories within the NQF discourse;
- identification of knowledges opposed to power within the NQF discourse; and

- identification of constraints within the NQF discourse.

The identification of *erudite knowledges* - the historical contents that have been buried and disguised in a functional or formal systemisation with an emphasis on power.

The identification of *local memories* – the set of knowledges that have been disqualified as inadequate to their task or insufficiently elaborated with an emphasis on power - those knowledges in the NQF discourse that are seen as inferior and non-scientific. The union of erudite knowledges and local memories makes it possible to know the historical knowledge of struggles within the NQF discourse.

The identification and description of *knowledges opposed to power* - knowledges that “rebel” against centralising powers and are linked to the functioning of the NQF discourse. A greater emphasis is placed on power by identifying and describing the insurrection of knowledges that are opposed to power in the NQF discourse.

The erudite knowledges, local memories and knowledges opposed to power are grouped together as subjugated knowledges – these are then used to identify a number of *constraints* which are interpreted as lineages of historical knowledge within the NQF discourse.

The results of the archaeological critique of the NQF discourse (the strategies, see *Table 26* in *Chapter 4*) and the genealogical critique of the NQF discourse (the constraints, see *Table 30* in *Chapter 4*) are then used together to describe power in the NQF discourse (see *Table 31* in *Chapter 5*). The sequential application of both methods is used in this study, as illustrated in the diagram below.

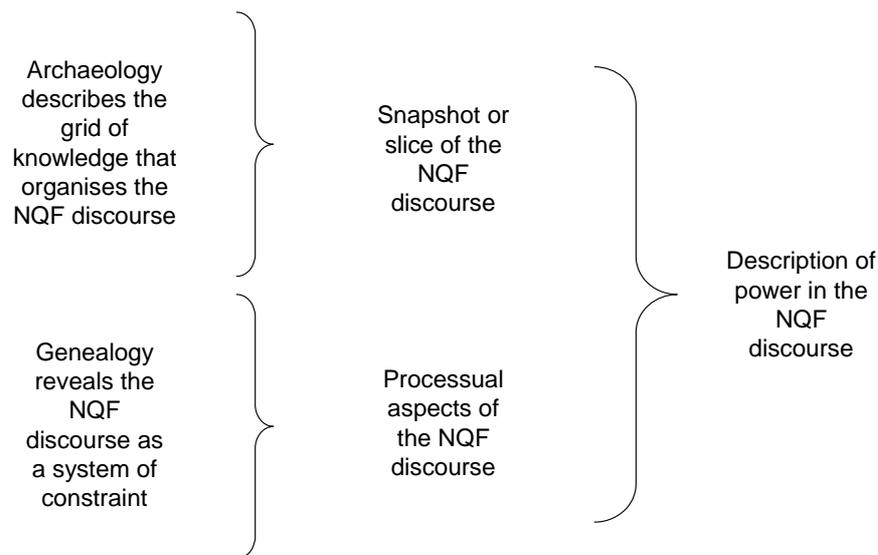


Diagram 2: Combined application of the Foucauldian research methods

1.5.4.7 Sequencing of the qualitative analysis

The application of archaeology and genealogy is facilitated by the qualitative analysis, as performed with ATLAS.ti, and includes extensive list coding. The analysis is structured according to the components (as listed above) of the archaeological and genealogical methods.

List coding is used for both archaeology and genealogy. The two coding processes are described below (the components of the research methods, as listed in the previous section, are underlined for ease of reference).

List codes, based on the NQF typology (discussed in *Chapter 3*), are allocated based on the NQF typological components, which are pre-identified as the objects within the NQF discourse. The decision is based on the assumption that the NQF typological components are the objects in the NQF discourse, or, at the very least, are in some way or another, linked to other objects in the NQF discourse. The list codes are therefore: *Guiding philosophy, Purpose, Scope, Prescriptiveness, Incrementalism, Policy breadth, Architecture, Governance*.

The empirical sources or primary documents (the interviews and focus groups, the responses to the discussion documents and the news articles) are then list coded in the ATLAS.ti hermeneutic unit in order to identify unities within the NQF discourse – effectively, all statements that refer to the same object (a specific NQF typological component) are grouped together. The common

denominator is the fact that the statements refer to the same objects, and not that they are necessarily in unison.

Corresponding coded sections of the primary documents are either *hyperlinked* in the hermeneutic unit, or linked by building networks of common themes and theories that emerge from the identified objects and unities – this is the identification of strategies within the NQF discourse.

The second part of the qualitative analysis, the genealogical critique, involves the naming and categorisation of erudite knowledges, local memories and knowledges opposed to power – list coding was also done in the ATLAS.ti hermeneutic unit. The final stage of the genealogical critique, the identification of constraints, did not require coding as it was based on the results of the identification of the erudite knowledges, local memories and knowledges opposed to power.

In summary, the list coding was done to facilitate the description of the NQF discourse through the application of archaeology, and to reveal the NQF discourse as a system of constraint through the application of genealogy.

1.5.5 Summary

The research design for this critique of the development and implementation of the South African NQF consists of two components: a Foucauldian theoretical framework that provides the logical structure and boundaries within which the study takes place; and qualitative research methods, developed from primary and secondary Foucauldian writings, that are applied to the NQF discourse.

The selection of an overly sophisticated research design that includes a complex theoretical framework and a range of research methods is surely a mistake often made by novice researchers. During the initial stages of the research design of this research project on power in the NQF similar mistakes could not be avoided, yet the awareness that they occurred, and the actions that were taken to redress them, are the factors that add value to the eventual applied research design. In retrospect, the exercise made it possible to ensure that “all the bases were covered”, as expressed by the following:

...an essential step in structure building is to *purposely* complicate and make more comprehensive the initial structure so that the scope of enquiry can be examined for missing categories or inappropriate causal constructs; that is, to make sure the bases are covered with regard to validity and unity. The researcher is then in a better position to make

appropriate limiting and delimiting choices that shrink the endeavour back down to manageable parameters... (<http://mutans.astate.edu>, accessed 28 January 2005).

It is suggested that this research design is best suited to this study, and although alternative designs may also be effective, it is the most pragmatic choice in that it accommodates available empirical data, focuses on the analysis of power, contains appropriate research tools, and moves beyond the institutional level of power relations. While it is acknowledged that the research design is peculiar to this study and that the findings and recommendations are limited to being interpreted within the Foucauldian theoretical framework, it is also acknowledged that the study is given a broader comparative and theoretical significance by placing it within the Foucauldian framework (cf. Jansen, 2001).

1.6 OUTLINE OF CHAPTERS

The thesis is structured according to five chapters. The first chapter has introduced the research project, elaborating on the importance and relevance of the investigation into the exercise of power during the development and implementation of the South African NQF. Four chapters follow:

1.6.1 Chapter 2: Periodic and thematic review of Foucauldian theory

Chapter 2 presents the findings of a literature review of Foucauldian theory. This includes a more detailed description (and also development) of the Foucauldian theoretical framework and the two research methods, archaeology and genealogy, that are applied during the critique. The chapter is structured according to periods and themes as they are identified from the literature review – in effect, the periods and themes form a matrix of the most relevant aspects of Foucauldian theory to this study. Four periods are discussed: Heideggerean, Archaeological, Genealogical and Ethical. Six themes, intersecting the periods, are discussed: History of the present, Subjectification, Discourse, Knowledge, Truth and Power. A significant part of the chapter focuses on Power – this section includes the description of a range of guises (or appearances) of power.

1.6.2 Chapter 3: Explication and identification of objects in the NQF discourse

In *Chapter 3* a literature review of NQF development and implementation is used to develop an NQF typology that forms the basis for the subsequent application of Foucauldian archaeology and

genealogy to the empirical dataset in *Chapter 4* – in brief, the literature review is conducted not only to make a number of important observations and to investigate the positioning of the South African NQF between the early 1980s and 2005, but also to explicate and identify common objects in the NQF discourse. In the process, eight NQF typological components are utilised to present the findings of the literature review, and are also identified as objects in the NQF discourse, namely: Underlying philosophy, Purpose, Scope, Prescriptiveness, Incrementalism, Policy breadth, Architecture and Governance. The discussion also includes some reflection on NQF development and implementation beyond South Africa.

1.6.3 Chapter 4: Archaeological and genealogical critiques of the NQF discourse

Chapter 4 is a summary of the results of the qualitative analysis of the NQF discourse. It is structured according to the sequential application of the archaeology and genealogy to the empirical dataset that consisted of 300 interviews (including focus groups), 90 responses to Departmental discussion documents and 72 news articles published between 1995 and 2005. Through the archaeological critique a number of strategies are identified, in effect describing the NQF discourse. Through the genealogical critique a number of constraints are identified, representing the processual aspects of the NQF discourse.

1.6.4 Chapter 5: Findings and recommendations

Chapter 5 presents the findings and recommendations of the study that emanate from the results of the qualitative analysis of the NQF discourse. The chapter presents a detailed description of power in the NQF discourse based on the six guises of power: forms of power, power relations, techniques of power, manifestations of power, effects of power and the origins of power. The chapter also includes a discussion of the limitations of the study and a reflection on the use of the Foucauldian theoretical framework and research methods.

1.7 SUMMARY

This chapter has systematically presented the theme and methodology of this study. The urgency and relevance of this study for NQF development and implementation has been emphasised and contextualised with a detailed description of NQF development and implementation to date. The intention to contribute to the improved development and implementation of the South African NQF through a Foucauldian critique of the exercise of power has been juxtaposed with the identified problem, namely that power struggles are having a detrimental effect on NQF development and implementation. The following three chapters are used to develop and describe the selected theoretical framework, including the research methods; to describe the NQF discourse in more detail; and finally to apply the research methods to the NQF discourse. The final chapter presents the findings and recommendations arising from this study.

CHAPTER 2: PERIODIC AND THEMATIC REVIEW OF FOUCAULDIAN THEORY

2.1 INTRODUCTION

2.1.1 Purpose of this chapter

The purpose of this chapter is to present the findings of a review of Foucauldian theory that was conducted to:

- describe the theoretical framework within which the critique of the South African NQF is couched – this also including a Foucauldian understanding of power; and
- develop and describe two Foucauldian research methods that form an integral part of the research design of the research project, i.e. archaeology and genealogy.

It is shown in this chapter how various characteristics of Foucauldian theory, including an emphasis on empirical evidence, a relentless preoccupation with the analysis of power, customised research tools and an extra-institutional focus, makes this choice particularly suitable to this research project that aims to improve the future development and implementation of the South African NQF.

2.1.2 Structure of this chapter

The decision to use Foucauldian research methods was not made without having engaged in an extended investigation that included a review of both primary and secondary Foucauldian literature. The nature of Foucauldian theory, described by many as overwhelming and elusive, is reflected in the following statements:

[Foucault] remains consciously, frustratingly elusive... (Dreyfus and Rabinow, 1983:xiivi)

Anyone tempted to master it [secondary literature on Foucault] would doubtless soon give up, out of a combination of boredom and fatigue altogether at odds with the impact left by Foucault's work itself (Miller, 1993:6).

Foucault even criticises his own earlier works and makes corrections to these in later publications. He admits to writing to 'lose myself and appear at last to eyes that I will never have to meet again...' (1969:19).

Hoy (1986) and Visker (1995) suggest that many commentators deal with these changes and complexities by identifying various periods in Foucault's development. Three periods (or levels of analysis) are mentioned: archaeological, genealogical and ethical. Dreyfus and Rabinow (1983) make a similar argument, but add an initial Heideggerean period. According to them the influence of Heidegger on Foucault also necessitates a reflection on phenomenology. Taking heed of Hoy and Visker's suggestion to identify periods in Foucault's development, this chapter is first organised according to a periodic classification. Greater emphasis is placed on the periods during which the tools to study power relations are developed, as well as the particular aspects of Foucault's work that contribute to a better understanding of applying his work as theoretical framework for this study.

The following four periods are investigated:

- Period 1: Heideggerean (1960s)
Publications include: *Madness and civilization; A History of insanity in the age of reason* (1965).
- Period 2: Archaeological (late 1960s, early 1970s)
Publications include: *The Order of Things. An Archaeology of the Human Sciences* (1966); *The Archaeology of Knowledge* (1972); *The Birth of the Clinic. An Archaeology of Medical Perception* (1973).
- Period 3: Genealogical (mid to late 1970s)
Publications include: *Nietzsche, Genealogy, History* (1977); *Discipline and Punish. The birth of the Prison* (1979); *Power/Knowledge. Selected Interviews and other Writings 1972-1977* (1980).
- Period 4: Ethical (1980s)
Publications include: *The subject and power* (1982); *Practicing Criticism* (1977-1984); *Last interview* (1985); *On the Genealogy of Ethics* (1983); The three volumes of *The History of Sexuality* (1981, 1990, 1988bd).

The periodic classification is but one manner in which to organise Foucault's notoriously elusive reasoning. Another, equally valid approach, is found in the common themes that form recognisable threads across the four periods. To some extent the themes emerge from the periodic classification – clearly evident in one or more, then absent, only to reappear in another.

The following six themes are identified and used as a second parallel organising mechanism for reviewing Foucauldian literature:

Theme 1: History of the present

Publications include: *Madness and civilization; A History of insanity in the age of reason* (1965); *The Order of Things. An Archaeology of the Human Sciences* (1966); *The Archaeology of Knowledge* (1972); *Nietzsche, Genealogy, History* (1977); The three volumes of *The History of Sexuality* (1981, 1990, 1988bd).

Theme 2: Subjectification

Publications include: *The subject and power* (1982); *The Archaeology of Knowledge* (1972).

Theme 3: Discourse

Publications include: *The Archaeology of Knowledge* (1972); *Practicing Criticism* (1977-1984).

Theme 4: Knowledge

Publications include: *The Archaeology of Knowledge* (1972); *Power/Knowledge. Selected Interviews and other Writings 1972-1977* (1980).

Theme 5: Truth

Publications include: *Power/Knowledge. Selected Interviews and other Writings 1972-1977* (1980).

Theme 6: Power

Publications include: *Nietzsche, Genealogy, History* (1977); *Discipline and Punish. The birth of the Prison* (1979); *Power/Knowledge. Selected Interviews and other Writings 1972-1977* (1980); *The subject and power* (1982).

In summary, this chapter is structured according to both the periods and themes associated with Foucault's work. The parallel approach may seem unnecessarily cumbersome, but was chosen to ensure adequate coverage and understanding of the theoretical framework and research methods employed in this research project.

The following statement by Hoy (1986:2) seemingly supports such a structured approach within an obviously difficult terrain:

The task of giving critical assessments of Foucault is particularly difficult in that his career as an author shows him covering an astonishing range of topics. As he moves from one topic to another, however, his methods and purposes seem to change...

2.2 PERIODIC REVIEW OF FOUCAULDIAN THEORY

2.2.1 Introduction

Before investigating the four Foucauldian periods in more detail, it is necessary to briefly discuss Foucault's ability to utilise the dominant social theories available to study human beings, such as structuralism, phenomenology and hermeneutics, as this is an important key to understanding Foucault's thinking and therefore also forms an important part of the description of the Foucauldian theoretical framework.

As explained in *Chapter 1*, the NQF as social construct is not necessarily fixed within a particular school of thought, but tends to evolve towards particular theoretical directions as a consequence of intellectual scrutiny (Isaacs, 2001). In this regard it is important to note that Foucault also manages to avoid being constricted to a particular school of thought. For example, Dreyfus and Rabinow (1983:xxvii) explain how he manages to steer between hermeneutics and structuralism:

...criticize and to utilize – in a highly original way – the two dominant methods available for the study of human beings [hermeneutics and structuralism].

Dreyfus and Rabinow refer to the fact that the development of social theory has, to a large extent, been divided into two distinct schools of thought, both of which originate as reactions to phenomenology, structuralism and hermeneutics. According to Dreyfus and Rabinow, Foucault tried to avoid the structuralist approach that attempts to:

...dispense with both meaning and subject by finding objective laws which govern all human activity (1983:xix).

Foucault also avoided the opposed position, taken by hermeneutics that gives up the phenomenologists' attempt to:

...understand man as a meaning-giving subject, but attempts to preserve meaning by locating it in the social practices and literary texts which man produces' (*Ibid.*).

Foucault's ability to negotiate between structuralism and hermeneutics, whilst also avoiding phenomenology, reveals an important characteristic evident in most of his work: the ability to simultaneously *oppose and utilise* different theories to support his own arguments. Although this characteristic of Foucault's work undoubtedly contributes to the difficulty of the "terrain", it also makes the Foucauldian theoretical framework all that more suited to critique of an NQF that is able to also move between different theoretical directions.

Foucault's "oppose and utilise" strategy is evident in the following four periods that are briefly discussed below as part of the periodic review of his work:

- Heideggerean Period
- Archaeological Period
- Genealogical Period
- Ethical Period.

The discussion of each period is concluded with particular comments on the relevance of the specific period to this study on NQF development and implementation.

2.2.2 Heideggerean Period

The connections and differences between Heidegger and Foucault have a profound influence on the way we think today, and more specifically on the way we understand and apply Foucault's methods. Foucault's well-known statement, made shortly before his death in 1984, points towards a need to carefully dissect the interaction between these two philosophers:

For me Heidegger has always been the essential philosopher... My entire philosophical development was determined by the reading of Heidegger (Foucault, 1985 in Marshall, 1996:22).

Even though they never met, and Heidegger was most probably not even aware of Foucault, reference to Heidegger's influence on Foucault's early and even later stages is often made (e.g.

Milchman and Rosenberg, 2003:4) albeit true that Foucault very sparingly referred to Heidegger in his work. Heidegger's influence on Foucault is most obvious in his earlier works (most notably *The Order of Things*, 1966 and *The Archaeology of Knowledge*, 1972). Hill (1989 in Milchman and Rosenberg, 2003:8) suggests that

...though Heidegger is seldom explicitly named in these contexts [the two works mentioned above], a comparison of these passages with the central views of *Being and Time* strongly suggests that it is primarily Heidegger that Foucault had in mind.

Deleuze (in Milchman and Rosenberg, 2003:4) prefers to refer to the interaction between the two philosophers as an encounter, and not an influence. Foucault was not a disciple of Heidegger; their origins are very different, yet they have much in common. Three such "interactions" are discussed below:

- Heidegger's Being and Foucault's Power
- Heidegger's hermeneutic ontology
- Historical situatedness.

2.2.2.1 Heidegger's Being and Foucault's Power

It is appropriate to start a comparison between the work of Heidegger and Foucault with the themes that were central to their work. For Heidegger, it was the notion of *Being* and for Foucault it was *Power*. According to Milchman and Rosenberg (2003) this comparison is the key to understanding the work of both philosophers. For Heidegger, the history of Being gives '...a perspective from which to understand how in our modern world *things* have turned into *objects*' (Milchman and Rosenberg, 2003:30, emphasis in the original) and ultimately shows how this history of being provides a technological understanding of being, 'to help us understand and overcome our current dealings with things as *objects* and *resources*' (*Ibid.*). Foucault's focus is different in that he uses *self* and how *selves* became *subjects* to analyse power to 'help us free ourselves from understanding ourselves as autonomous *subjects* and disciplined bodies' (*Ibid.*):

[J]ust as Heidegger prefers to write histories of the truth of Being rather than histories of the progress of knowledge, Foucault writes histories of the techniques of power/knowledge rather than histories of humanistic reform (Sawicki in Milchman and Rosenberg, 2003:64).

2.2.2.2 Heidegger's hermeneutic ontology

Foucault is not interested in recovering man's unnoticed everyday self-interpretation; he does not believe that a hidden truth is the cause of the misinterpretation embodied in our everyday self-understanding (Dreyfus and Rabinow, 1983). Foucault rather attempts to move beyond these alternatives for studying human beings by avoiding the phenomenological approach while simultaneously utilising structuralist and hermeneutic approaches. Foucault is sympathetic to Heidegger's hermeneutic ontology (Dreyfus and Rabinow, 1983, also see Dreyfus, 2002b) and claims to having uncovered a new domain of serious statements, which can be described as an autonomous realm: Foucault accepts that serious speakers know exactly what they mean (e.g. when an expert speaks as an expert).

2.2.2.3 Historical situatedness

Heidegger's influence is most noticeable in Foucault's emphasis on historically situated systems of institutions and discursive practices. Foucault argues that one cannot study individual speech acts in isolation from one another, but one can study sets or systems of such statements in isolation from the practical background.

2.2.2.4 Summary and relevance to the study

Recognising Foucault's ability to both criticise and utilise Heidegger's work, a number of key points have been raised in this section: Firstly, Foucault avoids writing histories of humanistic reform – he rather analyses “regimes of power” in an attempt to free individuals from understanding themselves as “autonomous subjects” and “disciplined bodies”. Secondly, Foucault disagrees with the notion that there is a hidden truth that causes misinterpretation – he rather claims that serious speakers know exactly what they mean. Thirdly, Foucault disagrees with studying speech acts in isolation from one another – he does however concede that systems of statements can be studied in isolation from their practical background. Finally, Miller (1993:50) provides a fitting summary of the Heidegger/Foucault “encounter”:

Foucault would later say that he did not know Heidegger well enough, but that he took heart from Heidegger's approach to philosophy can scarcely be doubted.

Before discussing the next period, the Archaeological Period, it is necessary to briefly reflect on the implications of Foucault's Heideggerean Period on the current research project that critiques the development and implementation of the South African NQF. Firstly, the qualitative analysis of interviews and literature has to consider that individuals' understandings are constructed by the

power/knowledge structures that impose order on their experiences. It is erroneous to assume that their understandings are constructed by the historical cultural practices in which they develop. Furthermore, the assumption has to be made that the interviewees and authors know exactly what they mean, in other words, avoiding the attempt to find the hidden meanings behind their statements. Lastly, it is necessary to study the interview texts and literature as a collective, not in isolation from one another, although in isolation from their background.

2.2.3 Archaeological Period

It is during the Archaeological Period that Foucault's archaeological method is defined, applied, redefined and eventually even abandoned for another method. As was the case in the previous, Heideggerean Period, Foucault once again uses a "criticise-utilise" strategy, in this instance to develop archaeology. Not surprisingly, the archaeological method itself becomes an object of Foucault's criticism that eventually results in the development of a second research method, genealogy (discussed in the next section).

This section therefore focuses on the identification and description of key components of archaeology as research method identified primarily from Foucault's four hypotheses to select a discursive formation in the *Archaeology of Knowledge* (Foucault, 1972:35-41):

- (1) ...statements different in form, and dispersed in time, form a group if they refer to one and the same object;
- (2) ...what one must characterize and individualize is the coexistence of these dispersed and heterogeneous statements; the system that governs their division, the degree to which they depend on one another, the way in which they interlock or exclude one another, the transformation that they undergo, and the play of their location, arrangements and replacement;
- (3) ...establish group of statements, by determining the system of permanent and coherent concepts involved; and
- (4) ...regroup the statements, describe their interconnection and account for the unitary forms under which they are presented: the identity and persistence of themes.

All four hypotheses suggest recognition of the notion, emanating from the Heideggerean Period, that individual speech acts should not be studied in isolation from one another. In these four hypotheses, Foucault starts to develop the archaeological method by suggesting how a group of statements (a discursive formation) should be selected. Using this as a guideline, three key components of archaeology as method are described in this section:

- the identification of objects of discourse (i.e. common categories or entities that statements under investigation refer to);
- the identification of unities of discourse (i.e. permanent and coherent concepts and themes); and
- the formation of strategies associated with objects and unities.

2.2.3.1 *Objects of discourse*

According to Foucault (1972), objects in a particular discourse can be identified through the mapping of surfaces of emergence, description of the authorities of delimitation and the analysis of grids of specification.

Surfaces of emergence are not the same for different societies, different periods or different forms of discourse (*Ibid.*). Foucault uses psychiatry to show how the differentiation within a discourse, as it differs from period to period, limits the discourse, ultimately making it a describable object:

In these fields of differentiation, in the distances, the discontinuities, and the thresholds that appear within it, psychiatric discourse finds a way of limiting its domain, of defining what it is talking about, of giving it the status of an object – and therefore making it manifest, nameable, and describable (1972:46).

In order to identify objects in the NQF discourse it is therefore important to consider how the discourse is limited, what has been included in it, and how that which has been included has changed. The interpretation of the NQF discourse, as employed in this study is an important starting point:

The NQF discourse is a dominant, influential and coherent amalgamation of divergent and even contradictory views, which support the development of an NQF that replaces all existing differentiated and divisive education and training structures.

The way in which the domain has been limited includes:

- explicit reference to the NQF
- acceptance and understanding that the NQF is different to the education and training structures which it replaces
- dominant and contradictory views.

Secondly, Foucault (*Ibid.*) suggests that we must describe the *authorities of delimitation*. Here he uses medicine in the nineteenth century as an example, explaining how medicine became that major authority in society that 'delimited, designated, named and established madness as an object' (*Ibid.*). Other examples include the law, religious authority and literary and art criticism. In a similar manner, it can be argued that NQF development and implementation has led to the establishment of institutions, groups of individuals and a body of knowledge and practice that is 'recognised by public opinion, the law, and government' (*Ibid.*).

Thirdly, we must analyse the *grids of specification*. Once again, referring to an example from Foucault, these are:

...the systems according to which the different "kinds of madness" are divided, contrasted, related, regrouped, classified, derived from one another as objects of psychiatric discourse...(Foucault, 1972:47).

In the context of the NQF discourse such grids of specification may refer to the systems according to which different types of qualifications, assessment methods and quality assurance practices are formulated.

Another important and related consideration pertaining to objects of a discourse, is that the formation of objects is made possible when a group of relations are established between authorities of emergence, delimitation and specification; but also if the particular object contains and "gives birth" to other mutually exclusive objects, without having to modify itself (*Ibid.*).

2.2.3.2 *Unities of discourse*

According to Foucault (1972) another important step in the systematic description of a discourse object (such as the NQF discourse) is the identification of unities. Foucault suggests that an empirical selection of the discourse object is done, one in which there are numerous relations that are relatively easy to describe:

On the one hand, we must choose, empirically, a field in which the relations are likely to be numerous, dense, and relatively easy to describe...(1972:32).

Foucault continues by suggesting that this "selection" should include "unformalised groups of discourses" so that statements can be understood, not by the rules that govern their construction, but by the rules that govern their appearance:

...on the other hand, what better way of grasping a statement, not the moment of its formal structure and laws of construction, but that of its existence and the rules that govern its appearance, if not by dealing with relatively unformalised groups of discourses, in which the statements do not seem necessarily to be built on the rules of pure syntax? (1972:33).

A second inclusion is also suggested by Foucault, the consideration of various statements that refer to the same field, both formal and informal:

Lastly, how can we be sure that we will not find ourselves in the grip of all those over-hasty unities and syntheses concerning the speaking subject, or the author of the text, in short, all anthropological categories? Unless, perhaps, we consider all statements out of which these categories are constituted – all the statements that have chosen the subject of discourse (their own subject) as their “object” and have undertaken to deploy it as their field of knowledge? (*Ibid.*).

On both counts, the NQF discourse, as represented by the empirical dataset (300 interviews [including focus groups], 90 responses to discussion documents and 72 news articles) satisfies the conditions to facilitate the identification of unities. Firstly, the empirical dataset includes numerous relations, more so, it is relatively easy to describe these relations. Examples include the relationships between SAQA and the ETQAs, the Departments and many others. Secondly, the empirical dataset covers intersections between various formal (e.g. pedagogy) and informal discourses (e.g. complaints from learners).

2.2.3.3 *Strategies of discourse*

The third component of the archaeological method involves the description of the formation of strategies associated with the identified objects and unities. A strategy is defined as follows:

Such discourses as economics, medicine, grammar, the science of living beings give rise to certain organisation of concepts, certain regrouping of objects, certain types of enunciation, which form, according to their degree of coherence, rigour and stability, themes or theories...Whatever their formal level may be, I shall call these themes and theories “strategies”. The problem is to discover how they are distributed in history (Foucault, 1972:71).

Once again, from Foucault (1972: 73-75), it follows that the formation of strategies include three aspects.

Firstly, determining the possible points of diffraction of discourse - according to Foucault these points are characterised in the first instance as points of incompatibility, but also as points of equivalence and systematisation.

Secondly, it is necessary to determine the authorities that guide the choices that are made:

In order to account for the choices that were made out of all those that could have been made (and those alone), one must describe the specific authorities that guided one's choice...(*Ibid.*)

Thirdly, the identification of strategies requires a determination of theoretical choices that are made:

The determination of the theoretical choices that were actually made is also dependent upon another authority. This authority is characterised first by the function that the discourse under study must carry out in a field of non-discursive practices...This authority also involves the rules and processes of appropriation of discourse...Lastly, this authority is characterised by the possible positions of desire in relation to discourse (*Ibid.*).

In the NQF discourse it is therefore necessary to review the identified objects and unities by looking for contradictions, equivalences and systematisation. It is also necessary to consider why specific choices are made by authors and interviewees, and to identify statements that are not necessarily historically contextualised.

2.2.3.4 Summary and relevance to the study

This section has briefly summarised the development of Foucault's archaeology as a research method that can be used to systematically describe a discourse object, such as the NQF:

[Archaeology] is the systematic description of a discourse-object (Foucault, 1972:156).

As was described in this section, archaeology involves three components or steps: (1) identification of objects, (2) identification of unities and (3) description of the formation of strategies associated with the objects and unities. In order for these steps to be utilised to describe the NQF discourse, it is useful to briefly formulate an interpretation of each, based on the preceding discussions, within the context of this study:

- *Object* – a category in the NQF discourse that exists through the establishment of a group of relations between authorities of emergence, delimitation and specification, and that contains other mutually exclusive sub-categories or components.
- *Unity* - an empirically selected group of all statements, both formal and informal, that refers to the same object in the NQF discourse.
- *Strategy* – coherent, rigorous and stable statements, associated with identified objects and unities that form themes and theories in the NQF discourse.

At this point it is also useful to reflect on a number of overarching comments related to the application of archaeology:

Archaeology shows how a succession of events can become an object of discourse:

Archaeology defines the rules of formation of a group of statements. In this way it shows how a succession of events may, in the same order in which it is presented, become an object of discourse, be recorded, described, explained, elaborated into concepts, and provide the opportunity for a theoretical choice (Foucault, 1972:184).

Archaeology defines discourses as practices obeying certain rules:

Archaeology tries to define not the thoughts, representations, images, themes, preoccupations that are concealed or revealed in discourses; but those discourses themselves, those discourses as practices obeying certain rules...It is not an interpretive discipline: it does not seek another, better-hidden discourse (Foucault, 1972:155).

Archaeology defines discourses in their own specificity:

Archaeology does not seek to rediscover the continuous insensible transition that relates discourses, on a gentle slope, to what precedes them, surrounds them, or follows them...On the contrary, its problem is to define discourses in their specificity; to show in what way the set of rules that they put into operation is irreducible to any other; to follow them the whole length of their exterior ridges, in order to underline them better (Foucault, 1972:156).

Archaeology does not try to restore the origin of the discourse:

Lastly, archaeology does not try to restore what has been thought, wished, aimed at, experienced, desired by men in the very moment at which they expressed the discourse...It

is not a return to the innermost secret of the origin; it is the systematic description of a discourse object (Foucault, 1972:175).

Archaeology is not an interpretive discipline:

[Archaeology] seeks to analyse the structure of discourse in its own terms. In order to undertake such an analysis, it is not always necessary to interrogate authors or other thinking subjects. (Indeed, such humanism would have been anathema to Foucault.) Instead we are free to focus on such issues as the rules governing what can and cannot be thought, the ways in which knowledge can be represented, the nature of the grid by means of which thought is expressed and classified, and the rules concerning who is, and who is not, entitled to pronounce on the nature of a given phenomenon (Prior, 1997:77).

Archaeology is limited, regional and diversifying:

In archaeological analysis comparison is always limited and regional...Archaeology is a comparative analysis that is not intended to reduce the diversity of discourses, and to outline the unity that must totalise them, but is intended to divide up their diversity into different figures. Archaeological comparison does not have a unifying, but a diversifying, effect (Foucault, 1972:182).

Archaeology helps us to explore what is said within a social context:

...explore the networks of what is said, and what can be seen in a set of social arrangements (Kendall and Wickham, 1999:25).

In summary, the implication of Foucault's Archaeological Period for the study on the development and implementation of the South African NQF is important: Archaeology as research method can be used to describe the NQF discourse by applying it to the empirical dataset (interviews, responses and news articles) – in effect, presenting a 'snapshot of the [NQF] discourse' (Keevy, 2004b: 22). This archaeological description of the NQF discourse forms an integral part of the research design of this study and is described in *Chapter 4*.

2.2.4 Genealogical Period

Towards the end of Foucault's Archaeological Period, Foucault expressed concern with the fragmented nature of his series of researches. In a similar manner as before, he negotiates

between structuralism and hermeneutics. Foucault reaches a stage where he criticises his own prior thinking and becomes critical of the archaeological method:

The character of the work I have presented to you has been at the same time fragmentary, repetitive and discontinuous could well be a reflection of something one might describe as a febrile indolence – a typical affliction of those enamoured libraries, documents, reference works, dusty tomes, texts that are never read, books that are no sooner printed than they are consigned to the shelves of libraries where they thereafter lie dormant to be taken up only some centuries later (Foucault, 1980: 79).

It is from this point of intense dissatisfaction with archaeology as an isolated tool of research that Foucault's work takes a different tack towards genealogy. Genealogy is developed as a 'weapon to help [Foucault] with his account of power' (Kendall and Wickham, 1999:29). The term is borrowed from Nietzsche (Hicks in Milchman and Rosenberg, 2003:96), but is distinctly different from the Nietzschean interpretation:

The only valid tribute to thought such as Nietzsche's is precisely to use it, to deform it, to make it groan and protest (Foucault, 1980:54).

Despite this critical stance towards archaeology, many authors, including Foucault himself, see archaeology as a complementary approach to his second genealogical method. It is argued that the two methods complement each other, and that while archaeology is more concerned with describing the discourse object, genealogy reveals the discourse object as a system of constraint:

Though genealogy is often seen as a replacement for archaeology, it is better to see the two as existing together, as two halves of a complementary approach... (Elden in Milchman and Rosenberg, 2003:198-199).

In this Foucauldian critique of the NQF discourse, genealogy is used to complement archaeology, revealing the NQF discourse object as a system of constraint – a system in which contestations and power struggles have influenced NQF development and implementation since the early 1980s up to the present day. It is argued that genealogy complements the archaeological description by adding a focus on power:

Foucault added to it [archaeology] a new concern with the analysis of power... (Kendall and Wickham, 1999:29).

This section is therefore structured in an attempt to identify and develop the key components of the genealogical method. Following from a reading of Foucault's work during his genealogical period, two main components of the genealogical method are described:

- the identification and unification of erudite knowledges and local memories; and
- the identification and description of knowledges opposed to power.

2.2.4.1 *Erudite knowledges and local memories*

For Foucault genealogy emerges from the insurrection of subjugated knowledges, which he defines as

...blocks of historical knowledge which were present but disguised within the body of functionalist and systematizing theory and which criticism...has been able to reveal (Foucault, 1980:82).

As a first step towards revealing a discourse as a system of constraint it is therefore necessary to reveal specific knowledges through critique. In his explanation, Foucault suggests that there are two such knowledges:

The historical contents that have been buried and disguised in a functional coherence or formal systemization...the products of meticulous erudite, exact historical knowledges (Foucault, 1980:81),

and:

A whole set of knowledges that have been disqualified as inadequate to their task or insufficiently elaborated: naïve knowledges, located low down on the hierarchy, beneath the required level of cognition or scientificity...local and specific knowledges (Foucault, 1980:82).

Stated differently, the historical knowledge of struggles within a particular discourse is made possible through the union of erudite knowledges, those knowledges that have become part of formal and systematic discourses, and local memories, those knowledges that are seen as inferior and non-scientific. The strength of the genealogical method lies in the association of these two knowledges into the same category of *subjugated* knowledges:

In the specialized areas of erudition as in the disqualified, popular knowledge there lay the memory of hostile encounters which even up to this day have been confined to the margins of knowledge (Foucault, 1980:83).

2.2.4.2 Knowledges opposed to power

The second component of the genealogical method involves a greater emphasis on power by identifying and describing the insurrection of knowledges that are opposed to power. A brief elaboration of what is meant by this statement is useful: Foucault (1980) suggests that the application of genealogy is mainly concerned with the insurrection (rebellion) of knowledges against centralising powers, which are linked to the 'functioning of an organised discourse' (1980: 84). Foucault explains further that this insurrection of knowledges is not primarily concerned with the contents, methods and concepts of a science.

2.2.4.3 Summary and relevance to the study

Foucault developed genealogy after becoming intensely dissatisfied with the fragmented results produced by archaeology. It is however important to note that the intention was never to replace archaeology but rather to complement it. Foucault suggests giving the term genealogy to:

...the union of erudite knowledge and local memories which allows us to establish a historical knowledge of struggles and to make use of this knowledge tactically today (1980:83).

As was discussed in this section, genealogy involves the following components: (1) identification of erudite knowledges; (2) identification of local memories; and (3) the identification and description of knowledges opposed to power.

A fourth component of the genealogical critique is also added: although this component has not been explicitly referred to in the discussion above, it is added as a grouping together of the results of the preceding erudite knowledges, local memories and knowledges opposed to power. The decision is based on an understanding that the strength of the genealogical method lies in the association of the different areas in the same category of subjugated knowledges (Foucault, 1980). In the context of this study the fourth step is defined as the *description of constraints* in the NQF discourse.

In order for these steps to be utilised to reveal the NQF discourse as a system of constraint, it is useful to briefly formulate an interpretation of each, based on the preceding discussions, within the context of this study:

- *Erudite knowledge* – historical contents within the NQF discourse that have been buried and disguised in a functional coherence or formal systemisation.
- *Local memory* – a local and specific knowledge within the NQF discourse that has been disqualified as inadequate to its task or insufficiently elaborated – these are naïve knowledges, located low down on the hierarchy, beneath the required level of cognition or scientificity.
- *Knowledge opposed to power* – a knowledge that is opposed not primarily to the contents, methods or concepts of a science, but to the effects of the centralising powers that are linked to the institution and functioning of the NQF discourse.
- *Constraint* – a lineage of historical knowledge within the NQF discourse which was present but disguised within the body of functionalist and systematising theory, and which criticism is able to reveal.

When considering application of the genealogical method it is also useful to reflect on a number of overarching comments:

Genealogy identifies hidden origins and functions:

...a methodological device with the same effect as a precocious child at a dinner party: genealogy makes the older guests at the table of intellectual analysis feel decidedly uncomfortable by pointing out things about their origins and functions that they would rather remain hidden (Kendall and Wickham, 1999:29).

Genealogy does not judge:

...does not judge as it rudely flushes out assumptions; claims about what is right and what is wrong have no place here...(Kendall and Wickham, 1999:30).

Kendall and Wickham (1999:34) also offer a particularly useful list of the underlying purposes of genealogy:

- describe statements but with an emphasis on power;

- introduce power through a 'history of the present', concerned with 'disreputable origins and unpalatable functions' by pointing out things about the origins and functions that remain hidden;
- describe statements as an ongoing process, rather than as a snapshot of the web of discourse; and
- concentrate on the strategic use of archaeology to answer problems about the present.

The combined application of both archaeology and genealogy also require some discussion. Although the two methods ultimately complement each other, genealogy was initially developed to replace archaeology:

By comparison, then, and in contrast to the various projects which aim to inscribe knowledges in the hierarchical order of power associated with science, a genealogy should be seen as a kind of attempt to emancipate historical knowledges from that subjection, to render them, that is, capable of opposition and struggle against the coercion of a theoretical, unitary, formal and scientific discourse. It is based on a reactivation of local knowledges...in opposition to the scientific hierarchisation of knowledges and the effects intrinsic to their power: this, then, is the project of these disordered and fragmented genealogies. If we were to characterize in two terms, then "archaeology" would be the appropriate methodology of this analysis of local discursivities, and "genealogy" would be the tactics whereby, on the basis of the descriptions of these local discursivities, the subjected knowledges which were thus released would be brought into play (Foucault, 1980:85).

The implications of Foucault's Genealogical Period for the study on the development and implementation of the South African NQF are important:

Firstly, genealogy as research method can be used to reveal the NQF discourse as a system of constraint.

Secondly, the parallel application of the archaeological and genealogical critiques to the NQF discourse, as represented by the empirical dataset, strengthen the research design, and more importantly add more credibility to the findings of the study: the two research methods are applied independently to the same empirical dataset (interviews, responses and news articles) (*Chapter 4*) after which the results are combined to describe power in the NQF discourse (*Chapter 5*).

2.2.5 Ethical Period

In Foucault's fourth period, he starts to deal with ethics. As was the case with the previous periods, the origin of this shift in focus was located in dissatisfaction with his previous work. Hoy (1986:15) suggests that the posthumous publication of Foucault's later works would support the reasoning that the genealogical method is not 'inherently functionalistic, nihilistic, fatalistic or relativistic', as his later works study a different level of human activity. Hoy is of the opinion that Foucault is now starting to deal with ethical issues about the formation of values, which means that he cannot be accused of ignoring values and being nihilistic. Thiele (in Milchman and Rosenberg, 2003:208) is in agreement:

Genealogical studies left Foucault convinced of the ubiquity of the disciplinary matrix. There would be no final liberation. The sticky, normalizing webs of power were inescapable and a "hermeneutics of suspicion" quashed any hope of gaining the ethical and political high ground.

2.2.5.1 *Ethics as a study of the self's relationship to itself*

According to Davidson (in Hoy, 1986:228) Foucault interprets ethics as 'a study of the self's relationship to itself'. He lists four major aspects of this relationship with oneself: ethical substance; mode of subjection; the means by which we change or elaborate ourselves in order to become ethical subjects; and the kind of being to which we aspire when we behave morally.

Ethical substance is 'that part of ourselves or our behaviour which is taken to be the relevant domain for ethical judgement' (Davidson in Hoy, 1986:228). The mode of subjectification is based on Foucault's earlier work and concerns the way in which people are encouraged to recognise their moral obligations. The third aspect is concerned with the means by which we change or elaborate ourselves in order to become ethical subjects. Davidson uses the example of techniques that 'permit one to liberate the true self...in allowing one to behave ethically'. The final aspect of ethics is the kind of being to which we aspire when we behave morally, also referred to as *telos*. He refers to Foucault's question that asked if we should become pure, immortal, free, or masters of ourselves.

Foucault's history of ethics is not a writing of the history of moral codes; his study of ethics 'is not of sets of principles that people explicitly espouse however much they live up to them' (Hoy, 1986:16):

For Hegel and Foucault the ethical substance includes the background of shared understanding of what it is to belong to a particular community and to aspire in practice to being a good person there.

2.2.5.2 Summary and relevance to the study

Foucault's ethical period forms an integral part of understanding the use of his work as a theoretical framework. Just as Foucault's Heideggerean period provided an improved understanding of the emphasis on historically situated systems of institutions and discursive practices, ethics contributes to the understanding of power. Foucault himself acknowledges that his lack of focus on ethics hampered him in his analysis of truth, power and individual conduct.

An example of the way in which ethics contribute to the understanding of power is given by Smart (in Hoy, 1986:169). Smart suggests that ethics leads to an analysis of how power is exercised, and a divergence from the confrontation/undermining of relations of power. This is the approach that is taken in the critique of the NQF discourse, the purpose of which is not to confront or weaken destructive power manifestations, but rather to, through an indirect approach, minimise the negative effects of power manifestations, by describing power in the NQF discourse.

This ethical stage is similar to Foucault's Heideggerean stage, as each demonstrates a shift in emphasis towards individual conduct and historically situated systems. Both the archaeological and Heideggerean stages differ from the archaeological and genealogical stages, as the latter are centered on the development and application of methods of analysis: archaeology as method to describe knowledge and genealogy as method to describe power. Davidson (in Hoy, 1986:230) makes an important observation:

Ethics neither displaces genealogy or archaeology nor makes them irrelevant, but it does alter the final methodological implication of both.

This section on ethics concludes the discussion of the four periods in Foucault's work. The relevance of each period to the critique of the NQF discourse has been highlighted with examples and suggestions.

2.2.6 Relevance of the periodic review

In brief, the review of the four periods of Foucauldian theory is of particular relevance to this research project as it contributes to an improved understanding of the theoretical framework. In particular, the periodic review has pointed out that:

- Individuals' understandings of the NQF are not only constructed by historical cultural practices, but by the power knowledge structures that impose order on their experiences.
- It is not necessary to find the hidden meanings behind statements made by interviewees, authors or journalists.
- It is necessary to study the empirical data as a collective: interviews, responses and news articles should not be analysed in isolation from one another, but in isolation from the background.
- It is important to emphasise individual conduct and historically situated systems in the NQF discourse.
- Attempts to confront, undermine or weaken power are futile – such efforts will be better spent in describing how power is exercised in the NQF discourse.

The periodic review has also contributed to the development and description of the research methods; in particular it has been shown that:

- Archaeology can be used to systematically describe the NQF discourse through the identification of objects and unities, and the description of strategies.
- Genealogy can be used to reveal the NQF discourse as a system of constraint through the identification and unification of erudite knowledges, local memories and knowledges opposed to power.
- The combined application of archaeology and genealogy will strengthen the research design and add credibility to the findings of the study.

What remains lacking at this point is a deeper understanding of Foucauldian power. For this reason the second parallel thematic review, discussed in the next section, focuses largely on power.

2.3 THEMATIC REVIEW OF FOUCAULDIAN THEORY

2.3.1 Introduction

Following the same format as the periodic review, six themes in Foucault's work are briefly discussed in order to further describe the theoretical framework, including Foucauldian power, and the two research methods. The six themes are:

- History of the present
- Subjectification
- Discourse
- Knowledge
- Truth
- Power.

As before, the relevance of each of the themes to the critique of NQF development and implementation is summarised at the end of every section.

2.3.2 History of the present

History is a central theme throughout Foucault's work and adds to the applicability of his methods:

Michel Foucault's works are now, due to their path-breaking sustainability and range of application, amongst the most commented upon and used corpus in the fields of historical/cultural/discourse analysis (Jenkins, 1997:117).

In describing Foucault's approach to history, three key features stand out:

- emphasis on the present
- the relationship between history and experience
- the emergence of a "new" history.

Each of these features is discussed below.

2.3.2.1 *Emphasis on the present*

Firstly, Foucault consistently reminds his reader that he is busy with a “history of the present” (cf. Kendall and Wickham, 1999 and Gordon, 1980) and tries to account for the way in which human beings have historically become the subject and object of discourses:

We can say that the object of Foucault’s critique is the status of the present. It is in this sense that Foucault characterizes his enterprise as the “history of the present” (Gordon, 1980:241).

Gordon continues by explaining that Foucault does not ‘question the “reality of the past”’ but rather tries to interrogate the ‘rationality of the present’ (*Ibid.*). It is mainly through Foucault’s genealogical method that an attempt is made to analyse the ‘multiplicity of political, social and institutional, technical and theoretical conditions’, in this way constructing a ‘system of relations and effects’ (Gordon, 1980:243).

2.3.2.2 *Relationship between history and experience*

Secondly, Foucault makes the link between history and experience, suggesting that we should consider the historicity of forms of experience (Horrocks, 1997:22). Later in his life (in 1969, during his archaeological stage) Foucault rethinks this approach to history, stating that history had become depersonalised and formed of complex relations and rules, which he defines as discursive formations (Foucault, 1972). Horrocks (1997:64) agrees:

[Archaeology] doesn’t assume that knowledge accumulates towards any historical conclusion. Archaeology ignores individuals and their histories. It prefers to excavate impersonal structures of knowledge.

2.3.2.3 *Emergence of a “new” history*

A third characteristic of Foucault’s history is his move from a *total/traditional history* to a *general/new history* (Foucault, 1972 and 1977, Jenkins, 1997, Kendall and Wickham, 1997). Foucault (1972:10) argues that a total history that imposes divisions on history is disappearing, and is being replaced with a general history that focuses more on divisions and transitions. Dean (1994, in Kendall and Wickham, 1997:24, emphasis added) provides a fitting description:

A *total history* seeks a governing principle of civilization, epoch or society, which accounts for its coherence; it seeks to establish a homogeneous network of relations and causality

across a clearly defined set of spatial and temporal coordinates; it imposes a totalistic form of transformation, and it is able to divide history into definite, cohesive, periods and stages...A *general history*, on the other hand...seeks series, divisions, differences in temporality and level, forms of continuity and mutation, particular types of transition and events, possible relations and so on.

The interpretation of new history is based on the interpretation that it is now history itself 'which transforms *documents* into *monuments*...it [history] now deploys a mass of elements that have to be grouped, made relevant, placed in relation to one another to form totalities' (Foucault, 1972:8, emphasis in the original).

The move from traditional history to the new history has several implications (Foucault, 1972:8-11): the surface effect of the 'proliferation of discontinuities in the history of ideas, and the emergence of long periods in history proper'; the notion of discontinuities assume an important role in historical disciplines; the new history is 'confronted by a number of methodological problems' including the building up of coherent and homogeneous corpora of documents, the establishment of a principle of choice, the definition of the level of analysis and of the relevant elements, the specification of the method of analysis, the delimitation of groups and sub-groups that articulate the material and the determination of relations that make it possible to characterise a group.

2.3.2.4 *Summary and relevance to the study*

Foucault's interpretation of history is relevant to the critique of the development and implementation of the NQF for the following reasons:

Through the application of genealogy it is possible to analyse the "multiplicity" of conditions that make up the NQF discourse – a construction of a "system of relations and effects" that are the NQF discourse. By avoiding a distracting focus on the "reality" of past NQF implementation, it is possible to rather 'interrogate the rationality of the present' (Gordon, 1980:243). What is important here is that Foucault does not suggest that history is ignored; rather that history be employed to explain the present.

When applying archaeology it is important to ignore individuals and their histories - it is argued that it is more advantageous to consider impersonal structures of knowledge. In this sense, the application of the archaeological method to interviews (see SAQA, 2004c-h and 2005c-g) and other relevant texts should not be concerned with individuals' experiences - in place of such a history of experience, it is of more importance to describe the complex relations and rules that describe the NQF discourse as a discursive formation:

Foucault has shown at length that official biographies and current received opinions of top intellectuals do not carry any transparent truth. Beyond the dossiers and the refined self-consciousness of any age are the organized historical practices which make possible, give meaning to, and situate in a political field these monuments of official discourse (Dreyfus and Rabinow, 1982:xvii).

Another consideration relevant to the current study is the use of a general history of the NQF; one in which series, divisions and differences are sought and are problem-based. This is in contrast to a total history that divides history into distinct and cohesive stages and is period-based. The description of the history of the NQF discourse has to avoid period-based generalisations and must rather remain focused on the problem at hand, namely that power struggles are having a detrimental effect on NQF development and implementation.

According to Kendall and Wickham (1999:23) history must be used as an analytical tool that settles on 'a patch of sensibleness in a field of strangeness'. History should not be used to make us comfortable, but must rather disturb the taken-for-granted. Kendall and Wickham suggest that we focus on contingencies and be as sceptical as possible of political arguments to guard against using history 'to see potential for progress in the future even if it has supposedly not been achieved in the present' (1999:9).

2.3.3 Subjectification

Foucault explains that the goal of his work has *not* been to analyse the phenomena of power, but instead:

...has been to create a history of the different modes by which, in our culture, human beings are made subjects (in Dreyfus and Rabinow, 1983:208).

Foucault suggests three modes of objectification that he uses to transform human beings into subjects (Foucault, 1982:208). The first is 'the modes of enquiry which try to give themselves the status of sciences'. Examples include the objectification of the speaking subject in linguistics, the objectification of being alive in natural history or biology. The second mode of objectification is 'dividing practices' where 'the subject is either divided in himself or divided from others. An example is the sick and the healthy, the mad and the sane. His third mode studies the way in which human beings turn themselves into subjects, for example 'how men have learned to recognize themselves as subjects of "sexuality"'.

2.3.3.1 Summary and relevance to the study

Subjectification is relevant to the study on power in the NQF discourse for the following reasons:

Foucault uses archaeological methods to disengage and relate the facts that structure the space governing the emergence of objects and subjects. The position of the subject is defined by:

...the situation that it is possible for him to occupy in relation to various domains or groups of objects (Foucault, 1972:57).

Other aspects relevant to the critique of the NQF discourse include expanding the definition of power to include the objectification of the subject, and understanding the position of the subject. The position of the subject is defined by the situation that s/he occupies in relation to various domains or objects. In the NQF discourse this position may vary from lecturer to learner, quality assurer to standards setter, manager to administrator, but in each case it is important to contextualise the statement of the speaker. Another aspect is the understanding that power is exercised only over free subjects, i.e. power can only be exercised in the NQF discourse if the subjects (e.g. learners, providers, employers, etc.) have freedom of expression, are able to challenge agents of power and are able to exercise choice.

2.3.4 Discourse

Foucault's description of discourse is based on statements as the building blocks of discourse:

[T]he statement appears as an ultimate, undecomposable element that can be isolated and introduced into a set of relations with other similar elements. A point without a surface, but a point that can be located in planes of divisions and specific groupings...The atom of discourse (Foucault, 1972:90).

At the end of the archaeological period, Foucault had 'a number of methodological options and possible domains of study available to him' (Dreyfus and Rabinow, 1982:17). Yet, Foucault chose to improve the formal aspects of his work:

[He] restricted his archaeological method to a more plausible (although ultimately untenable) attempt to discover the structural rules governing discourse alone...he played down his interest in social institutions and concentrated almost exclusively on discourse, its autonomy and discontinuous transformations (Dreyfus and Rabinow, 1982:16).

Both genealogy, describing the processual aspects of discourse, and archaeology, describing the investigation of NQF archives, are linked to discourse. Discourse is used to cluster objects that are linked to the NQF, using specific levels and rules of organisation. For Foucault (1981, in Kendall and Wickham, 1999:30) the main difference between archaeology and genealogy lies in the approach to discourse:

Where archaeology provides us with a snapshot, a slice through the discursive nexus, genealogy pays attention to the processual aspects of the web of discourse – its ongoing character.

2.3.4.1 Summary and relevance to the study

Foucault's discourse theme is of particular significance to this study for the following reasons:

Firstly, the discourse theme provides a way in which the earlier interpretation of the NQF discourse can be correlated within the Foucauldian theoretical framework. In *Chapter 1* the NQF discourse was interpreted as:

...a dominant, influential and coherent amalgamation of divergent and even contradictory views, which support the development of an NQF that replaces all existing differentiated and divisive education and training structures.

Exposing this interpretation of the NQF discourse with the preceding discussion raises a number of questions that in the case of the NQF discourse, are all answered in the affirmative:

- Are statements used as the building blocks of the NQF discourse?
- Can objects linked to the NQF be clustered?
- Will it be possible to, through the application of archaeology to the NQF discourse, describe a "snapshot" of the discourse?
- Will it be possible to, through the application of genealogy to the NQF discourse, describe the "processual" aspects of the discourse?

Secondly, the theme highlights the point that discourse and power relations are closely linked. In the case of this study, as located within the Foucauldian theoretical framework, it can safely be assumed that power relations cannot be established outside of the NQF discourse. Stated differently (as discussed in *Chapter 1*), the NQF discourse is a conducive medium for the establishment of power relations.

Thirdly, Foucault, influenced by Heidegger, argues that individual speech acts cannot be studied in isolation from one another, as they are causally linked. He rather suggests that sets or systems of statements are studied, but in isolation from their background. This means that for the critique of the development and implementation of the NQF, the interviews, responses and news articles should be studied as a collective, but also in isolation from the background – this point was also made during the periodic review.

2.3.5 Knowledge

Foucault distinguishes between two types of knowledges: particular knowledge (*connaissance*) that refers to a specific corpus of knowledge or discipline, e.g. biology or economics; and general knowledge (*savoir*) that is used in an underlying, rather than an overall way and refers to the totality of *connaissances* (from Foucault, 1972:16):

By *connaissance* I mean the relation of the subject to the object and the formal rules that govern it. *Savoir* refers to the conditions that are necessary in a particular period for this or that type of object to be given to *connaissance* and for this or that enunciation to be formulated...[I]t is this *savoir* I wanted to interrogate, as the condition of possibility of *connaissances*, of institutions and of practices (Foucault as quoted by Elden in Milchman and Rosenberg, 2003:197).

For Foucault (1972:201) there is no knowledge without a discursive practice, and any discursive practice is defined by the knowledge that it forms:

This group of elements, formed in a regular manner by a discursive practice; and which are indispensable to the constitution of a science, although they are not necessarily destined to give rise to one, can be called *knowledge*. Knowledge is that of which one can speak in a discursive practice, and which is specified by that fact.

Certain similar forms of power give rise to bodies of knowledge that are extremely difficult 'both in their object and in their structure' (Foucault, 1988c: 264):

We must go back to the problem of the relations between knowledge and power. I know that, as far as the general public is concerned, I am the guy who said that knowledge merged with power, that it was no more than a thin mask thrown over the structures of domination and that those structures were always ones of oppression, confinement, and so on. The first point is so absurd as to be laughable. If I had said, or meant, that knowledge

was power, I would have said so, and, having said so, I would have had nothing more to say, since, having made them identical, I don't see why I would have taken the trouble to show the different relations between them (*Ibid.*).

Foucault (1980:84) further suggests that we should be concerned with knowledges that are opposed to 'centralizing powers which are linked to the institution and functioning of an organized discourse'.

2.3.5.1 Summary and relevance to the study

Foucault (1988c) explains that knowledge is not power, but that there is a complex relationship between the two. For Foucault, it is the forms of power that give rise to bodies of knowledge. In the NQF discourse it can be argued that the way in which power is exercised has contributed to the development of knowledges of qualification design, integration of education and training, and so on. On the other hand these *savoir* knowledges can, in many instances, also induce effects of power (Elden in Milchman and Rosenberg, 2003).

2.3.6 Truth

Foucault's understanding of truth is probably best illustrated with the way in which truth is interpreted when applying the methods of archaeology and genealogy:

...archaeology looks at the truth as a system of "ordered procedures for the production, regulation, distribution, circulation and operation of *enoncés* [events that can be thought of in different ways depending on the circumstances] (the strategies and the institutions) in which they occur and the purposes for which they were designed" (Elden in Milchman and Rosenberg, 2003:199).

...genealogy sees truth as "linked in a circular relation with systems of power which produce and sustain it" (*Ibid.*).

The following is a list of aspects to note when considering the role of truth:

We are subjected to the production of truth through power and we cannot exercise power except through the production of truth? (Foucault, 1980:93).

There is no truth so pure that it would not be discursively defined...There is no truth outside discourse. Discourse is “truth” itself. Or again: for Foucault “truth” is discourse (Visker in Milchman and Rosenberg, 2003:300).

[T]ruth isn't outside power, or lacking in power...Truth is a thing of this world: it is produced only by virtue of multiple forms of constraint. And it induces regular effects of power...“Truth” is to be understood as a system of ordered procedures for the production, regulation, distribution, circulation and operation of statements...“Truth” is linked in a circular relation with systems of power which produce and sustain it, and to effects of power which it induces and which extend it (Foucault, 1980:131, 133).

For Foucault (1980), each society has its own ‘regime of truth’, that is the types of discourses ‘which it accepts and makes function as true’, which is characterised by five important traits: truth is centered on the form of scientific discourse and the institutions which produce it; truth is subject to constant economic and political incitement; truth is the object of immense diffusion and consumption; truth is produced and transmitted under the control of a few great political and economic apparatuses; truth is the issue of political debate and social confrontation.

2.3.6.1 Summary and relevance to the study

The relevance of a Foucauldian understanding of truth to this research project is as follows:

Archaeology can be used to systematically describe the NQF discourse – it does *not* try to uncover the ‘innermost secrets of the origin’ (Foucault, 1972:156), but rather interprets truth as a system of ordered procedures for the ‘production, regulation, distribution and operation of statements [*énoncés*’] (Foucault, 1980:133). The application of archaeology, as a step towards showing how power operates in the NQF discourse, has to include a description of the events and the circumstances within which they occur.

Genealogy is a methodological device that can be used to describe power that is linked to truth, and which is sustained and produced by it even though genealogy does not try to make judgements about what is truth and what is not.

2.3.7 Power

2.3.7.1 Introduction

This final section of the thematic review of Foucauldian theory focuses on power. The discussion is very important, as this study is placed within a Foucauldian framework and is further delimited by considering only a Foucauldian interpretation of power. Importantly, the Foucauldian framework, together with the Foucauldian research methods, are used to make sense of the data collected and create a vantage point or “window” through which the effects of power in the NQF discourse can be recognised.

Both primary and secondary Foucauldian literature is saturated with descriptions, interpretations and comments on power as social phenomenon. A brief overview of each is given below and is followed by a discussion of the different appearances (or guises) of power that are used to facilitate the description of power in *Chapter 5* of this thesis.

2.3.7.2 Understanding power from primary Foucauldian literature

Foucault (1980:89-90) describes power as something that is ‘...neither given, nor exchanged, nor recovered, but rather exercised, and that it [power] only exists in action’. Furthermore power ‘...is essentially that which represses. Power represses nature, the instincts, a class, individuals’. From Foucault’s description it is easy to make the (incorrect) assumption that all power is negative. This is not the case. As will be shown in this section, various “forms” and “techniques” of power exist, some which have positive “effects”, others negative:

The conception of power as an original right that is given up in the establishment of the sovereignty, and the contract, as matrix of political power, provide its points of articulation. A power so constituted risks becoming oppression whenever it overextends itself...[t]hus we have contract-power, with oppression as its limit, or rather as the transgression of this limit (*Ibid.*).

Both primary and secondary Foucauldian literature contain numerous references to the various manners in which power appears (e.g. forms, techniques, effects, etc.). In this thesis the “appearances” of power in discourse are collectively referred to as “guises” of power. This choice of terminology is not based on similar usage identifiable in relevant literature, as it appears that no such description exists:

It is evident that many appearances of power are hidden, even cloaked or masked, to avoid discovery, and even more importantly, to avoid analysis (Keevy, 2004:9).

Another point raised by Foucault (1979:27) is that *power and knowledge are inextricably linked*, to the point that there can be no power relations without knowledge:

We should admit rather that power produces knowledge (and not simply by encouraging it because it serves power or by applying it because it is useful); that power and knowledge directly imply one another; that there is no power relation without the correlative constitution of a field of knowledge, nor any knowledge that does not presuppose and constitute at the same time power relations.

Foucault also offers an explanation of the nature of power (in Dreyfus and Rabinow, 1983:219, 221), further emphasising that *power exists only in action*, but also reflecting on the fact that *power can only be exercised over free subjects*:

The exercise of power is not simply a relationship between partners, individual or collective; it is a way in which certain actions modify others...Power exists only when it is put into action...Power is exercised only over free subjects, and only insofar as they are free.

Foucault adds that *power relations can only be established within discourse*:

...in a society such as ours, but basically in any society, there are manifold relations of power which permeate, characterize and constitute the social body, and these relations of power cannot themselves be established, consolidated nor implemented without the production, accumulation, circulation and functioning of a discourse (Foucault, 1980:93).

The intention has not been to present a definitive overview of all primary Foucauldian texts on power in this section. The intention has rather been to highlight some of the key characteristics of power as described by Foucault, allowing for a more overarching explanation to permeate much of the remaining text of this thesis.

In summary, the following points concerning the nature of power have been identified from primary Foucauldian texts: power exists only in that it is exercised; power represses; various guises of power exist (e.g. forms of power, techniques of power, effects of power, etc.); the effects of power can be both positive and negative; power and knowledge are inextricably linked; power can only be exercised over free subjects; and power relations can only be established within discourse.

2.3.7.3 Understanding power from secondary Foucauldian literature

Turning to secondary literature to further describe Foucauldian power, the list above is elaborated:

Smart (in Hoy, 1986:169) states that *there can be no 'power-free or power-less society'*. According to Smart the objective is to critically analyse how power is exercised, and *not* to develop 'confrontation strategies through which the relations of power might finally be undermined':

...to say that there cannot be a society without power relations is not to say either that those which are established are necessary, or, in any case, that power constitutes a fatality at the heart of societies, such that it cannot be undermined. Instead I would say that the analysis, elaboration, and bringing into question of power relations and the intransitivity of freedom is a permanent political task inherent in all social existence (*Ibid.*).

In a later publication, Smart (1994:7, emphasis added) offers more insight into the nature of power, suggesting that power is a complex strategical situation that produces reality:

It is the means by which power is exercised, and the effects of its exercise, with which Foucault is primarily preoccupied, rather than with answering the question "what is power and where does it come from". Power is not conceptualised as a property or possession which excludes, represses, masks or conceals, but as a *complex strategical situation or relation which produces reality*.

Davidson (in Hoy, 1986) suggests that Foucauldian power is *described in terms of its own specificity*, without reducing it to a consequence of legislation and social structure only. Although numerous pieces of legislation could be associated with a particular discourse, it cannot be said that the legislation is in itself responsible for power in the discourse. It may rather be a case of legislation being drawn up to strengthen the positions and domains of agents of power.

McWhorter (in Milchman and Rosenberg, 2003:114) agrees with Foucault (1980) that power exists only in that it is exercised, and adds that it occurs in a set of complex relations:

Power is an event not a thing – it is not a cause that generates effects external to it – it only exists in exercise, its occurrence, and it occurs only as sets of relations.

Elden agrees with Foucault (1979) that power is inextricably linked, but not synonymous, to knowledge:

[F]or Foucault, knowledge and power are linked and dependent on each other, but not that they are synonymous: the exercise of power perpetually creates knowledge and, conversely, knowledge constantly induces effects of power (Elden in Milchman and Rosenberg, 2003:198).

As before, this list from secondary Foucauldian literature is not intended to be exhaustive. The intention has been to present a brief overview of the key characteristics of Foucauldian power as they are interpreted and can be applied in this study. In addition to the list of characteristics identified from primary Foucauldian texts, the following characteristics can be added from the discussion on secondary Foucauldian texts: the objective is to critically analyse how power is exercised, and not to develop confrontation strategies to undermine power; power is a complex set of relations; and power is described in terms of its own specificity – power should not be reduced to a consequence of legislation and social structure.

2.3.7.4 Guises of power

From both the primary and secondary Foucauldian literature, six key areas of analysis, or “guises” of power (as discussed in *Chapter 1* and the introduction to this theme), are identified. Although Foucault does not use the term “guise”, it has been suggested in this thesis as a collective term for six appearances of power, namely:

- Forms of power
- Techniques of power
- Power relations
- Origins of power
- Manifestations of power
- Effects of power.

The identification of examples of each of these guises as contained in the empirical dataset, and brought to attention by the archaeological and genealogical critiques, form an integral part of the research design. The particular sequence is also of importance, as will be shown in *Chapter 5*. In other words, the guises of power facilitate the description of power.

Each of the six guises of power is discussed in more detail below.

Forms of power

Foucault (1983) states that the main objective of struggles is not to attack an institution of power, a group or a class, but rather a form (or technique) of power. Foucault describes the form of power as follows:

...[the form of power] applies itself to immediate everyday life which categorises the individual, marks him by his own individuality, attaches him to his own identity, imposes a law of truth on him which he must recognize and which others have to recognize in him (in Dreyfus and Rabinow, 1983:212).

The following are different categories of *forms of power* that are identified from literature:

Bio-power

'[T]his form of power is exercised on the body and it carries a specifically anatomical and biological aspect. It is exercised over members of a population so that their sexuality and individuality are constituted in certain ways that are connected with issues of national policy, including the machinery of production' (Marshall, 1996:2).

Busno-power

'[I]s directed at the subjectivity of the person, not through the body but through the mind, through forms of educational practice and pedagogy which, through choices in education, shape the subjectivities of autonomous choosers...in the exercise of busno-power there is a merger of the economic, the social and the activity of the government' (Marshall, 1996:4).

Disciplinary power

'A form of surveillance which is internalized. With disciplinary power, each person disciplines him or herself. Disciplinary power is also one of the poles of bio-power. The basic goal of disciplinary power is to produce a person who is docile' (Dreyfus and Rabinow, 1983 in Shawver, 1999).

Governmentality

Also referred to as modern power, it is '...directed towards governmentality and a form of political domination' (Marshall, 1996:216); A centralization and increased government power. This power is not negative. In fact, it produces reality through "rituals of truth" and it creates a particular style of subjectivity that one conforms to or resists. Because the individuals are taken into this subjectivity, they become part of the normalising force. Governmentality also includes a growing body of knowledge that presents itself as "scientific", and which contributes to the power of governmentality'? (Shawver, 1999:1).

Legal power

'...it's important to exploit the areas of law which are properly formulated and then perhaps to act directly against those areas of laws which simply ratify some system of power' (<http://dusan.satori.sk>, accessed 5 July 2004).

Negative power

'Negative power is "power that says no." It is the power that says that something cannot be done and that acts to enforce this law' (Shawver, 1999 and Foucault, 1980:139).

Pastoral power

Referred to as an 'old power technique which originated in Christian institutions' (Foucault in Dreyfus and Rabinow, 1983:214). It is a form of power that attempts to ensure individual salvation in the next world; does not only command, but must also be prepared to sacrifice; looks after the community and individuals; it implies a knowledge of conscience and ability to direct it.

Police

'In the seventeenth and eighteenth centuries, "police" signified a programme of government rationality. This can be characterised as a project to create a system of regulation of the general conduct of individuals whereby everything would be controlled to the point of self-sustenance, without the need for intervention' (Foucault in Leach, 1997:367); 'The job of the police is the articulation and administration of techniques of bio-power so as to increase the state's control over its inhabitants' (www.california.com, accessed 6 July 2004).

Political power

'Power is that concrete power which every individual holds, and whose partial or total cession enables political power or sovereignty to be established. This theoretical construction is essentially based on the idea that the construction of political power obeys the model of a legal transaction involving a contractual type of exchange...' (Foucault, 1980:88). Political power is also linked to the economy: '...we have a political power whose formal model is discoverable in the process of exchange, the economic circulation of commodities' (1980:89).

Positive power

'Positive power inspires and solves certain problems, enables, serves use to someone' (www.california.com, accessed 6 July 2004).

Royal power

Reveals '...the monarch as the effective embodiment of sovereignty, to demonstrate that his power, for all that it was absolute, was exactly that which befitted his fundamental right' (Foucault, 1980:95).

Techniques of power

Foucault (1983:223) lists a number of examples of how power relations can be brought into being:

...by the effects of the word, by means of economic disparities, by more or less complex means of control, by forms of surveillance, with or without archives, according to rules which are or are not explicit, fixed or modifiable...

Using various sources (mainly Foucault, 1972, but also Gore [in Popkewitz and Brennan, 1998] and Rajchman [in Smart, 1994]) the following categories of *techniques of power* have been identified. Each is followed by a short description.

Archivisation

The formation and transformation of statements.

Bureaucratisation

To make into a system of government that is based on unnecessary official procedures, divisions and hierarchy of authority.

Centralisation

To unify, consolidate, integrate and bring under central control.

Classification

Differentiating groups or individuals from one another.

Colonialisation

To take possession of and lay claim over that which is weaker.

Control

To command, limit and restrain (this includes regulation and directing).

Distribution

Arranging, isolating, separating and ranking of bodies.

Economisation

The overt or covert differentiation between specific groups to limit financial support or expenditure that leads to economic disparities.

Exclusion

The defining of the pathological (the negative side of normalisation).

Individualisation

Giving individual character to oneself or another.

Normalisation

Invoking, requiring, setting or confronting a standard - defining the normal.

Regulation

Controlling by rule, to subject to restrictions, invoking a rule, including sanction, reward and/or punishment.

Spatialisation

The way power is given to be seen (power's workings become acceptable because one sees of it only what it lets one to see, only what makes it visible).

Surveillance

Supervising, closely observing, watching, threatening to watch, expecting to be watched.

Totalisation

The specification of collectivities - giving collective character.

Verbalisation

The effects of the spoken word, including the voicing or articulation of something that may or may not exist in reality.

Power relations

For Foucault, power relations are more than just relationships:

The exercise of power is not simply a relationship between “partners”, individuals or collective; it is a way in which some act on others (Foucault, 1982 in Faubion, 1994:340).

Foucault (in Dreyfus and Rabinow, 1983:210) also suggests that we need 'a new economy of power relations', emphasising the need to use an indirect and more empirical method to analyse power relations:

I would like to suggest another way to go further towards a new economy of power relations, a way which is much more empirical, more directly related to our present situation, and which implies more relations between theory and practice. It consists of taking the forms of resistance against different forms of power as a starting point. To use another metaphor, it consists of using this resistance as a chemical catalyst so as to bring to light power relations, locate their position, find out their point of application and the methods used. Rather than analyzing power from the point of view of its internal rationality, it consists of analyzing power relations through the antagonism of strategies (*Ibid.*).

According to Foucault (in Dreyfus and Rabinow, 1983:211) power relations can be understood by investigating forms of resistance and series of oppositions 'which have developed over the last few years'. He uses the opposition to the power of men over women, parents over children and psychiatry over the mentally ill as examples and defines what each of these has in common:

- They are transversal struggles; they are not limited to a particular country, political economic form or government.
- The aim of these struggles is the power effects as such; he uses the example of the medical profession that is not criticised because it is a profit-making concern, but because it 'exercises uncontrolled power over people's bodies, their health and their life and death'.
- The struggles are immediate in that people criticise instances of power closest to them, 'those which exercise their actions on individuals. They do not look for the "chief enemy", but for the immediate enemy'. They do not anticipate finding a solution to their problem.
- They are struggles which question the status of the individual: '...they assert the right to be different and they underline everything which makes individuals truly individual'. He compares this with an attack on everything 'which separates the individual, breaks his links with others, splits up community life, forces the individual back on himself and ties him to his own identity in a constraining way'.
- 'They are an opposition to the effects of power, which are linked with knowledge, competence, and qualification: struggles against the privileges of knowledge'.
- They all present struggles around the question: Who are we?

Foucault suggests that power relations and relationships of communication should not be confused. In this regard it is firstly necessary to 'distinguish that which is exerted over things and gives the ability to modify, use, consume, or destroy them' (Dreyfus and Rabinow, 1983:217). In

the second place he refers to the fact that power 'brings into play relations between individuals (or between groups)' (Dreyfus and Rabinow, 1983:217). It is also necessary to

...distinguish power relations from relationships of communication which transmit information by means of language, a system of signs, or any other symbolic medium (Dreyfus and Rabinow, 1983:217).

Furthermore, the analysis of power is not focused on the institutions of power, but on the dissociation of the matrix of power relations that these institutions are embattled in:

[We] should not attempt to consider power from its internal point of view and that it should refrain from posing the labyrinthian and unanswerable question: "who then has power and what has he in mind? What is the aim of someone who possesses power?" Instead, it is a case of studying power at the point where its intention, if it has one, is completely invested in its real and effective practices (Foucault, 1980:97).

...the fundamental point of [power] relationships, even if they are embodied and crystallized in an institution, is to be found outside the institution (Foucault, 1983 in Popkewitz and Brennan, 1998:234).

This point requires more discussion as it forms an integral part of the approach used in this study as well as one of the reasons for selecting a Foucauldian theoretical framework (see *Chapter 1*). Foucault (1983:222) admits that it is perfectly legitimate to analyse power relations by 'focusing on carefully defined institutions', but cautions against doing so. He raises a number of important concerns: The fact that an institution will implement mechanisms to ensure self-preservation 'brings with it the risk of deciphering functions which are essentially reproductive, especially in power relations between institutions' - analysing power relations from the standpoint of institutions is an attempt at explaining 'power to power'. Foucault describes this as 'seeking the explanation and the origin of the former in the latter'. There is a risk of overemphasising one of two elements: the apparatus or the regulations of the institution. An overemphasis on the apparatus of the institution could possibly result in misinterpretation, seeing in it only oppression and inflection.

Origins of power

Foucault cautions that asking questions about "how" power is exercised would limit the analysis to only describing power's effects without relating the effects to causes or even to a basic nature. For Foucault

...power is something which exists with three different qualities: its origin, its basic nature, and its manifestations (in Dreyfus and Rabinow, 1983:217).

Manifestations of power

Foucault (1980:99) suggests an ascending approach to the analysis of power. Starting with the 'infinitesimal mechanisms' of power and then seeing how they have been 'invested, colonised, utilised, involuted, transformed, displaced, extended, etc.'. He repeats this idea on various occasions, e.g:

...it is a case of studying power at the point where its intention, if it has one, is completely invested in its real and effective practices. What is needed is a study of power in its external visage, at the point where it is in direct and immediate relationship with that which we can provisionally call its object, its target, its field of application, there – that is to say – where it installs itself and produces its real effects (Foucault, 1980:97).

Effects of power

As was discussed with respect to the relations of power, Foucault (1980:99) suggests that what is needed is to study power at the point of its effect:

What is needed is a study of power in its external visage, at the point where it is in direct and immediate relationship with that which we can provisionally call its object, its target, its field of application, there – that is to say – where it installs itself and produces its real effects (Foucault, 1980:97).

In all, six guises of power have been described in this section based on the review of Foucauldian literature. The relevance of these guises of power, as well as the preceding readings of primary and secondary Foucauldian literature to the study on NQF development and implementation, is discussed in the following section.

2.3.7.5 Summary and relevance to the study

This section has described Foucault's power, which is broadly interpreted as follows in the context of the critique of the NQF:

[Power is] that which represses. Power represses nature, the instincts, a class, individuals (Foucault, 1980:89).

According to Davidson (in Hoy, 1986:226), Foucault's preoccupation with genealogy resulted in the formulation of general rules for the study of power, 'providing not so much a new theory of power as a new approach to the problems of power in modern societies'. The following rules are listed by Davidson (based on Foucault, 1979) and have been applied to the current context:

- do not study power in the NQF discourse merely as a form of repression or prohibition, but look at its positive effects, at what it produces; and
- analyse power and its techniques in the NQF discourse in terms of their own specificity, and do not reduce it to a consequence of legislation and social structure.

From a review of both primary and secondary literature it was found that the nature of Foucauldian power could be described in many ways. Applied to the NQF discourse, these findings imply that:

- power in the NQF discourse exists only in that it is exercised;
- the effects of power in the NQF discourse can be positive and/or negative;
- power and knowledge in the NQF discourse are inextricably linked;
- power relations require the NQF discourse to be established;
- the NQF discourse cannot be power-free;
- power in the NQF discourse is a "complex strategical relation that produces reality";
- one should not ask "what is power in the NQF discourse?" or "where does power in the NQF discourse come from?", but one should rather focus on the means by which power is exercised (techniques) and the effects of its exercise in the NQF discourse;
- power in the NQF discourse should be described in terms of its own specificity and not reduced to a consequence of legislation and social structure only;
- power relations in the NQF discourse should be analysed by using an indirect empirical method that focuses on forms of resistance against different forms of power;
- power relations in the NQF discourse are different to relationships of communication; and
- one should not ask "who has power in the NQF discourse?" or "what is the aim of someone who possesses power in the NQF discourse?", but one should rather focus outside the institutions, on the point where power is invested in its real and effective practices.

Each of these points are important to the critique of the development and implementation of the NQF in that they contribute to an improved understanding of Foucauldian power, which in turn further describes the Foucauldian theoretical framework.

In addition to the characteristics of power, six guises or appearances of power were also identified. In order for these guises to be utilised to facilitate the description of power in the NQF discourse, it

is useful to briefly formulate an interpretation of each, based on the preceding discussions, within the context of this study:

- *Forms of power* - the characterisable and unique mode in which power appears within the NQF discourse.
- *Techniques of power* - the methods or systems by which power is exercised in the NQF discourse.
- *Power relations* - the web of overt and covert interactions and associations between and amongst NQF stakeholders.
- *Origins of power* - the primary sources, starting points and/or catalysts that are directly linked to the noticeable way in which power appears at the point of its direct relationship with the NQF.
- *Manifestations of power* - the noticeable and observable appearances of power at the point where they are in direct and immediate relationship with objects within the NQF discourse, where they are installed and produce real effects.
- *Effects of power* - the outcome or result of the manifestation of power in the NQF discourse.

The following table summarises the six guises of power discussed in this section:

Guise	Interpretation
Form	Characterisable and unique mode in which power appears
Technique	Method or system by which power is exercised
Relation	Web of overt and covert interactions and associations between roleplayers
Origin	Primary source, starting point and/or catalyst of a specific manifestation of power
Manifestation	Noticeable and observable appearance of power at the point where it is in direct and immediate relationship with its target or field of application
Effect	Outcome or result of the manifestation of power

Table 8: Guises of power

2.3.8 Relevance of the thematic review

Six themes have been used in this section to further describe the Foucauldian theoretical framework and the research methods.

Particular points related to the Foucauldian theoretical framework included:

- A “general” history of the NQF must be considered, and not a “total” history that may lead to period-based generalisations.
- The position of the subject in the NQF discourse is defined by the situation that s/he occupies in relation to the objects in the NQF discourse.
- The suggested interpretation of the NQF discourse is suited to the Foucauldian theoretical framework.
- The NQF discourse is inextricably linked to power relations.
- Interviews, responses and news articles should be studied collectively, but in isolation from the background.
- There is a complex relationship between knowledge and power in the NQF discourse.

Other points related to power were summarised in the preceding section and have therefore not been repeated here.

Particular points related to the research methods included:

- Through the application of genealogy, the history of the NQF can be employed to explain the present situation.
- When applying archaeology it is important to ignore individuals and their histories.
- Archaeology can be used to identify objects in the NQF discourse by disengaging and relating the facts that structure the space governing the emergence of the objects.
- Archaeology can be used to systematically describe the NQF discourse and should include a description of the events and circumstances in which they occur.
- Genealogy can be used to describe power, but does not make judgements about what is truth and what is not.

2.4 OVERVIEW OF PERIODIC AND THEMATIC FINDINGS

The overarching purpose of this chapter has been to describe the Foucauldian theoretical framework within which the research project is based. This included the description (and to some extent also the development) of the two Foucauldian research methods, archaeology and genealogy, within the particular context of this study.

As was mentioned in the introduction to this chapter, the “frustratingly elusive” nature of Foucault’s work led to the decision to employ a binary approach to the analysis. Using both a periodic classification (suggested by Hoy, 1986 and others) and a thematic review it has been possible to,

albeit only in the context of this study, develop and describe the research methods and the theoretical framework to be employed in this study. The matrix below gives an overview of the periodic and thematic reviews of Foucauldian theory.

Themes	Periods	Heidegger	Archaeology	Genealogy	Ethics
History		Consider the historicity of forms of experience	History had become depersonalised and formed of complex relations and rules	History as a will to power	Turn history into a counter-memory
Subject		Consider how <i>self</i> and how <i>selves</i> become <i>objects</i>	Position of the subject is defined by relative situation	Historicising of the subject led to the development of genealogy	The subject as a subject of ethical actions
Discourse		Study statements in isolation from background	Archaeology is a systematic description of the discourse-object	Genealogy reveals the discourse-object as a system of constraint	Ethics alters the methodological implication of archaeology and genealogy
Truth		Reject the notion that a hidden truth is the cause of the misinterpretation embodied in our everyday self-understanding	Archaeology is not a return to the innermost secret of the origin	Genealogy is non-judgemental	Truth must be considered in conjunction with power and individual conduct
Knowledge		Write histories of the techniques of power/knowledge	Archaeology describes and questions knowledge	Genealogy is the union of erudite knowledge and local memories	Ethics contributes to an understanding of the relations of power and knowledge
Power		Self as product of imposed power/knowledge structures	Archaeology describes the grid of knowledge so genealogy can reveal it as a system of constraint	Genealogy is developed as weapon to analyse power	Active, personal and positive sense of power

Table 9: Overview of periodic and thematic review of Foucauldian theory

Following from the discussion of theoretical frameworks in *Chapter 1*, it is important to reflect briefly on the nature of the Foucauldian theoretical framework, but also, more importantly, to provide evidence that this choice is most relevant to the critique of the NQF discourse, in effect, showing that this framework has more advantages than any other. For the purposes of this study the Foucauldian theoretical framework is a methodological device, premised entirely on Foucauldian theory, that focuses data collection and gives the study on power in the NQF discourse a broader comparative and theoretical significance. The selection of the Foucauldian theoretical framework excludes from view other perspectives that might also shed light on the problem, but this is purposely done to bring greater clarity to the particular study.

The reasons for selecting the Foucauldian framework are (also see *Chapter 1*) as follows:

Firstly, the Foucauldian framework supports the inclusion, collection and analysis of empirical evidence, therefore allowing for the available empirical resources to be utilised. Secondly, the Foucauldian framework includes extensive engagement with power as social phenomenon, thus

supporting the necessary analysis of power in the NQF discourse. Thirdly, the Foucauldian framework contains embedded research methods (archaeology and genealogy) developed particularly to study power relations, and therefore also appropriate to this study. Foucault explains (in Dreyfus and Rabinow, 1983:209) the original thinking behind the development of his methods: it soon appeared to him that individuals are placed in complex power relations and he was not able to analyse these power relations as ‘...for power relations we had no tools of study’.

In addition to the empirical and power foci, as well as the research methods, the Foucauldian theoretical framework also includes a range of other characteristics that make it appropriate for the critique of the NQF discourse – these are listed below and are followed by a list of characteristics of a Foucauldian interpretation of power as discussed in this chapter.

The Foucauldian framework	
1	Is not based within a particular school of thought, it avoids phenomenology, criticises and utilises structuralism and hermeneutics
2	Recognises that serious speakers know exactly what they mean although it ignores individuals and their histories
3	Acknowledges that speech acts cannot be studied in isolation from one another, but sets of such statements can be studied in isolation from the practical background
4	Recognises that statements form a group if they refer to the same object and that discourse can be used to cluster objects that are linked to the NQF
5	Is a non-interpretive discipline – it does not seek another underlying discourse, discourses are defined in terms of their own specificity – it does not try to unearth that relations between discourses
6	Is non-judgemental and not nihilistic
7	Uses history to explain the present, this is a general history that focuses on divisions and transitions and avoids period-based generalisations
8	Interrogates <i>savoir</i> knowledge – the general knowledge that underlies disciplines

Table 10: Characteristics of the Foucauldian framework

Foucauldian interpretation of power	
1	There is no power-free society
2	Power exists only in action - power should be analysed in how it is exercised and what its effects are without developing strategies to undermine power
3	Power represses
4	Power is exercised only over free subjects
5	Power is extra-institutional
6	Power is described in terms of its own specificity
7	Power also has positive effects - power should not be studied as a form of repression, its positive effects must also be considered
8	Power exists in a complex relationship with knowledge
9	Power appears in a variety of guises
10	Power can only be established within discourse

Table 11: Characteristics of a Foucauldian interpretation of power

2.5 SUMMARY

It has been shown in this chapter that the Foucauldian theoretical framework is well suited to the critique of the development and implementation of the South African NQF. By conducting a periodic and thematic review of Foucauldian theory, the Foucauldian theoretical framework and the two Foucauldian research methods, archaeology and genealogy, have been described. It has also been shown that archaeology, in particular, can be used to describe the grid of knowledge that organises the NQF discourse, while genealogy can be used to reveal the NQF discourse as a system of constraint.

Importantly, this review of Foucauldian theory is not by any means a detailed critique and exposition of Foucault's work. Such a critique was not attempted, nor does it lie within the scope of this research project. The intention has rather been to provide a descriptive reference to Foucault's work in order to support the choice of theoretical framework made for this study, and to describe this theoretical framework in sufficient detail that it can be employed in the study.

Having provided the thematological and methodological orientation to this study in *Chapter 1* and a description of the theoretical framework and research methods in this chapter, it is now possible to proceed to the next chapter. *Chapter 3* is a detailed presentation of NQF literature review that was conducted mainly to explicate and identify categories in the NQF discourse that contain other mutually exclusive sub-categories or components – i.e. common objects in the NQF discourse. In effect *Chapter 3* constitutes the first step in the archaeological critique of the NQF discourse that is continued in *Chapter 4*, and it is therefore also the first step in identifying and minimising the negative effects of power struggles in the NQF discourse to improve the future development and implementation of the South African NQF.

CHAPTER 3: EXPLICATION AND IDENTIFICATION OF OBJECTS IN THE NQF DISCOURSE

3.1 INTRODUCTION

3.1.1 Purpose of this chapter

The purpose of this chapter is to not only present the findings of a detailed review of NQF literature, but to also use the literature review to explicate and identify common objects (or categories in the NQF discourse that contain other mutually exclusive sub-categories or components) in the NQF discourse that will form the basis for the qualitative analysis presented in *Chapter 4*. More than twenty five NQFs, and three Regional Qualification Frameworks (RQFs) are included in the discussion – even so, the main focus is on the South African NQF, while the characteristics of other NQFs are used to show the range and polarisation of the characteristics of the South African NQF.

In order to contextualise the literature review the following aspects are briefly addressed in the introduction to this chapter:

- Identification of the NQF typological components
- Objects in the NQF discourse
- Guises of power in the NQF discourse
- Structure of the chapter.

3.1.2 Identification of the NQF typological components

As discussed in *Chapter 1*, NQFs are associated with more than just the organising and arranging of qualifications. It was pointed out that:

NQFs are complex social constructs with specific overt and/or covert purposes implemented and overseen by government bureaucracies.

It was also noted that NQFs have a range of diverse features, which include:

- a grid of levels and structures, also described as a map of qualifications (Kraak and Young, 2001);
- national standards and qualifications (NZQA, 19991 and 2002);
- scope, i.e. the types (e.g. vocational and educational) and levels (schooling and higher education) of qualifications (AQF, 2005);
- overt or covert purpose (SCQF, 2003);
- regulatory dimension (Ireland, 1999);
- comparability, harmonisation and benchmarking (TCCA, 2005);
- range of design features (e.g. quality assurance) (Lesotho MSTF, 2004); and
- organisation of bureaucracy (Kraak and Young, 2001).

NQF literature contains a variety of references to such components, aspects and characteristics of qualifications frameworks, yet limited progress has been made towards a consolidated internationally accepted classification of NQFs:

The organisation of qualifications is one of the most basic features of any system of education and training. However until recently it has been little debated or researched. It may be that it is for this reason that those proposing the introduction of National Qualifications Frameworks rarely recognise the radical implications of the changes involved (Young, 2005:8).

Authors such as Raffe (1988, 2002, 2003 and 2005), Raffe *et al* (1994), Granville (2003 and 2004), Boudier (2003), Tuck *et al* (2004 and 2005) and Young (2003 and 2005) all provide information on possible categories. In this section, these various discussions are integrated into a suggested NQF typology. The components of the suggested typology are not presented as discrete sets, and substantial overlaps are possible. Eight categories of an NQF typology were identified and proved to be useful conceptual tools that shed light on NQF matters, as supported by SAQA (2005b:43):

A typology of national qualifications frameworks is emerging through international debate on the usefulness and implementation of such frameworks...as a conceptual tool that may shed some light on the debates on the South African NQF.

The eight typological categories identified in this study are:

- *Guiding philosophy* – the underlying thinking that implicitly, often covertly, underlies the development and implementation of the NQF.
- *Purpose* – the explicit, usually overt, reasons for the development and implementation of the NQF.
- *Scope* – the measure of integration of levels, sectors and types of qualifications as well as the relationships between each on the NQF.
- *Prescriptiveness* – the stringency of the criteria which qualifications have to satisfy in order to be included on the NQF.
- *Incrementalism* – rate and manner of implementation of the NQF.
- *Policy breadth* – extent to which an NQF is directly and explicitly linked with other measures that influence how the framework is used.
- *Architecture* – the configuration of structural arrangements that make up the design of the NQF.
- *Governance* – all activities that can be seen as purposeful efforts to guide, steer, control or manage institutions, sectors or processes associated with the NQF.

3.1.3 Objects in the NQF discourse

The initial purpose of the literature review was more limited, and focused only on the description of the NQF. Although this descriptive exercise alone presented a major task, it was soon realised that the literature review could offer more value to the study. Importantly for this study, the typological components were therefore not only used as a conceptual tool to shed light on NQF matters, but also provided invaluable information on the way in which power is exercised in the South African NQF discourse.

More specifically, the typological components satisfied the requirements within the Foucauldian theoretical framework to be identified as *objects* within the NQF discourse, namely as:

...categories in the NQF discourse that exists through the establishment of a group of relations between surfaces of emergence, authorities of delimitation, and grids of specification and that also contain other mutually exclusive sub-categories or components.

Surfaces of emergence, authorities of delimitation, and grids of specification are interpreted as follows by Foucault (1972):

- Surfaces of emergence are those areas of difference that contribute to the status of different types of objects.
- Authorities of delimitation refer to the extent to which specific bodies become major authorities recognised by public opinion, the law and the government.
- Grids of specification are the systems according to which different objects are divided, contrasted, related, regrouped and classified.

As explained in *Chapter 2*, the explication and identification of these objects in the NQF discourse constitutes an important step in the application of archaeology to the empirical dataset that is continued in *Chapter 4* with the identification of unities and the description of the formation of strategies associated with the objects and unities. The application of archaeology is then followed by the application of genealogy to the same empirical dataset.

3.1.4 Guises of power in the NQF discourse

In addition to the identification of objects, the literature review also results in the identification of various manners in which power appears. As explained in *Chapter 2*, these “appearances” of power in discourse are collectively referred to as “guises” of power, and include forms of power, techniques of power, power relations, origins of power, manifestations of power and effects of power. Importantly though, the guises of power identified during the literature review are used to support the findings of the application of archaeology and genealogy to the empirical dataset, and not *vice versa*.

3.1.5 Structure of this chapter

This literature review is purposely located within the Foucauldian theoretical framework in order to explicate and identify objects and guises of power within the NQF discourse – this in turn facilitates the application of the Foucauldian research methods to the empirical dataset, as presented in *Chapter 4*.

In the final section of the chapter the South African NQF is described, using the identified objects (or categories in the NQF discourse), at four points during its implementation:

- (1) the way the NQF was conceptualised (the period up to 1994);
- (2) the way in which the NQF was legislated, i.e. from the SAQA Act (SA, 1995c) to the regulations, policy and criteria and guidelines;
- (3) the recommended changes to the NQF as contained in the review documents, particularly the *Study Team Report* (DoE and DoL, 2002), the *Consultative Document* (DoE and DoL, 2003) and *The HEQF* discussion document (DoE, 2004); and
- (4) the most recent considerations, as yet mostly undocumented. This section is included as it represents a useful contextualised summary of the preceding, rather lengthy, explication of the objects in the NQF discourse.

In summary the chapter is structured as follows:

- Description of the origin of the NQF.
- Sequential explication of the eight NQF typological components, including the rationale for the identification of each component as object within the NQF discourse.
- Positioning of the South African NQF at four points during its implementation.

3.2 ORIGIN OF THE NQF

3.2.1 Introduction

According to SAQA (2005:43) the origin of the NQF is found only 20 years ago in the United Kingdom (UK):

...the term “NQF” was closely associated with Anglophone countries such as Scotland, New Zealand and Australia, but increasingly many other countries are exploring and developing qualifications frameworks. Some member states of the European Union (EU), the Accession countries, some former Soviet Republics and many of the Southern African Development Community (SADC) countries, such as Mauritius, Namibia, Botswana, Tanzania, Zambia and the Seychelles, are at various stages of NQF development and implementation.

In a report for the International Labour Organisation (ILO), Young (2005) gives a more detailed description of the Anglophone roots of NQFs. According to Young, one of the first points of

departure of NQF development was in England during the late 1980s, early 1990s, in the context of the then emerging neo-liberal policies that 'emphasised the primary role of the private sector in economic development' (2005:5). He argues that these early developments were rooted in the competence approach to vocational education:

The idea of a national qualifications framework has its intellectual roots in the competence approach to vocational education which was broadened by Jessup (1990) and others in England who developed the idea that all qualifications could (and should) be expressed in terms of outcomes without prescribing learning pathway or programme (*Ibid.*).

Young also notes that the early NQF developments first surfaced as National Vocational Qualifications (NVQs) with a very particular political function, namely to transfer 'the control of vocational education from providers to employers' (2005:6). NVQs aimed to certify youth on training schemes for unqualified school leavers, creating the perception that NVQs were of a substandard quality:

It is not surprising that NVQs became associated with low-level qualifications with limited currency in the labour market (*Ibid.*).

Concurrent with the development of the English competence-based model, the development of the Scottish outcomes-based approach, with a strong focus on lifelong learning (SCQF, 2003:1), provided a useful alternative platform for NQF development in the UK:

We believe in a culture of lifelong learning where the education system, provision of learning and the benefits of the new technology are focused on making it easier for people to participate in learning at any stage of their lives.

Later, in the mid 1990s, with renewed interest in lifelong learning, the idea of an NQF resurfaced:

An NQF appeared to offer the possibility of promoting lifelong learning by accrediting all types of learning wherever it took place and whatever the age of the learner (Young, 2005:7).

3.2.2 Early NQF implementation

As mentioned on various previous occasions, the roots of NQFs can be traced back to the original NQF thinking that took place in England, Scotland and New Zealand:

A growing number of countries, at very different stages of economic development and with very different cultural and political histories, either have introduced or are in the process of introducing some form of National Qualifications Framework. The policy documents that describe these developments point to considerable agreement on both the form that these national frameworks are taking and the policy goals that it is hoped they will achieve. There is also evidence of considerable “borrowing” of structures and design principles that were originally formulated in industrial countries such as England, Scotland and New Zealand, where the early NQF developments were introduced in the 1980s (Young, 2005:1).

Although it cannot be disputed that England and Scotland provided the “intellectual roots” of NQF development, the first NQF was developed in New Zealand in 1989 (Blackmur, 2004). The New Zealand NQF was developed within its own context and did not try to replicate the progress made in the UK. Australia and South Africa followed in 1995 (Keating, 2003 and SA, 1995). As might be expected, the contexts in the different countries vary, and more significantly, the purpose, period of implementation, and scope of NQFs differ; even so, they all show remnants of the early thinking as well as a distinct political connotation, as noted by Samuels and Keevy (2005b:3) in a discussion on the SADCQF:

The origins of national qualifications frameworks as we know them today can be found within the confines of our former colonial powers...Importantly, these early NQF roots are also associated with significant political manoeuvring...

In many cases, NQF critics use and target this underlying thinking in an attempt to further their cause. NQF implementers, such as governments and regional consortia, also further their own agendas by advocating a school of thought that is best suited to them. NQF implementers also argue that it is this fundamental basis of an NQF that is to the best advantage of the education and training system in a particular country. The conflicting agendas more often than not, lead to significant contestations and challenges for power – in some cases evident during the conceptualisation period, in others they surface much later, often resulting in the withdrawal of a particular sector or stakeholder grouping from the NQF process. In most countries, with the exception of South Africa, the withdrawal and/or initial distancing of the Higher Education sector was the most apparent example of such conflicting agendas.

By 2005, there were at least six countries with active and implemented NQFs (*1st generation*), seven countries in various intermediate stages of implementation (*2nd generation*) and eighteen more in the early stages of NQF development (*3rd generation*) (see *Chapter 1*). Three regional initiatives, one in SADC (Pesenai, 2005 and TCCA, 2005), one in the Caribbean Community (CARICOM) (Zuniga, 2004 and McArdle, 2004) and the other in the EU (CEDEFOP, 2004), were also progressing towards implementation phases.

Virtually without exception, each of the *1st generation* NQFs (England, Wales and Northern Ireland, Scotland, Australia, New Zealand, South Africa and Ireland) have undergone significant changes in structure and governance since their inceptions. Even within this dynamic group, the South African NQF stands out as having undergone the most stringent process of scrutiny with the most radical changes being suggested. By 2005 the proposed changes have yet to be implemented and the South African NQF remains “under siege” by its main steering agency; SAQA finding itself in an *impasse* (Samuels *et al*, 2005). These characteristics make the South African NQF a very appropriate research object. An NQF that is under continual review is most probably also an NQF that provides fertile ground for contestations and power struggles, as noted by Nkomo (2004:1):

...the very origin of the NQF, as an idea to build a world-class education and training system that was followed by the systemic design, continues to surface as contestation, and I might add as a manifestation of incessant power struggles.

3.2.3 Summary

This section has highlighted the point that NQFs are a relatively recent phenomenon – the earliest thinking can be traced back to the 1980s, barely 25 years ago. It has also been noted that NQFs originated from the vocational sector and that this root has contributed significantly to the extent to which the educational sector, particularly higher education, has had difficulty in embracing NQF development and implementation. Finally, it has also been noted that NQF development and implementation is inextricably linked to contestations and power struggles.

3.2.4 Relevance to the study

The findings of this section of the literature review are of particular relevance to this study as they already start to contribute to evidence that supports the problem that is being addressed through the study, namely that power struggles are having a negative effect on the development and implementation of the South African NQF.

In particular, the findings support the additional underlying problem of the NQF being rooted in contestations. The question posed in *Chapter 1*, namely: Have contestations have been part of NQF development and implementation even since its conceptualisation?, appears to have already been answered. Importantly though, these relevant findings from the literature review do not constitute the outcomes of the Foucauldian critique of the NQF discourse – these are only identified when archaeology and genealogy are applied to the empirical dataset (the interviews, responses and news articles) in *Chapter 4*. The findings from the literature review are nonetheless important and are used in *Chapter 5* to support the “empirical findings”.

3.3 GUIDING PHILOSOPHY AS OBJECT IN THE NQF DISCOURSE

3.3.1 Rationale for inclusion in typology

The inclusion of “Guiding philosophy” in the suggested NQF typology was not made without considering that such a discussion would to some extent overlap with another category, namely “Purpose”. Considering that the various components of the typology are not discrete categories, and that the guiding philosophy probably presents some of the more covert purposes of NQFs, it has been retained.

The point to be made is that the explicit purposes of NQFs are not always the same as the purposes that implicitly (even covertly) underlie their development and implementation. Tuck (personal correspondence, 18 February 2005) suggests that this distinction leads to an understanding that:

...the explicit purposes of NQFs are not their “real” purposes or at least that there is a tension between the democratic ideals of NQFs and the neo-liberal economic objectives of governments.

Isaacs (2000:4), although focusing on more specific aspects, argues in a similar manner:

The most critical threat to the successful implementation of the NQF are the overt and covert agendas of the SAQA members [the SAQA Board], SAQA staff, government departments, professional councils and bodies, consultants, providers, industrial sectors and other stakeholders.

3.3.2 Guiding philosophies influencing the South African NQF

As discussed in *Chapter 1* and the previous section, the origin of the South African NQF was characterised by influences from the Old Commonwealth (e.g. Australia and England). To a large extent the NQF was also developed in reaction to the policies of the previous Nationalist Government as, according to McGrath (1997:181), it offered the then “progressive forces” with the only ‘coherent and feasible alternative response...in the aftermath of apartheid’.

Other dominant characteristics of the NQF during the conceptualisation period included significant trade union involvement (SAQA, 2004), agreement that the NQF was to be the vehicle for developing coherence across the previously fragmented system (NTB, 1994), inclusion of a range of generic principles (NTB, 1994 and HSRC, 1995), and the need to build coherent linkages between historically segregated organisations and areas (NTB, 1994).

The origin of the NQF concept (discussed in the previous section) also suggested a range of underlying philosophies, such as the neo-liberal policies of the late 1980s and the competence approach to vocational education, particularly the political agenda to transfer the control of vocational education from providers to employers (Young, 2005); outcomes-based approach and lifelong learning (SCQF, 2003); and the borrowing of design principles that were originally formulated in industrial countries (Young, 2005).

A further, more focused investigation into the underlying philosophies that influence the South African process results in the identification of even more possibilities, often expressed as concerns about covert influences. These are discussed below.

In the very early stages of NQF implementation in South Africa McGrath (1997:171) raised concerns about possible *post-Fordism* influences (also see Young, 1998:57):

Such a [national exclusivist NQF] model, if it had an overall guiding philosophy, might owe most to pro-employer versions of post-Fordism, with work intensification and flexibilisation as preferred responses to the challenge of globalisation.

Allias (also see Young, 2003) recently raised concerns about *neo-liberalism*, arguing that the decision to introduce an NQF in South Africa was influenced by two pressures: (1) political pressure for a more equitable and more democratic education system; and (2) economic pressure to extend the market principle to a wider set of activities and series. According to Young (2003), Allias is of the opinion that it is the contradiction between these two sets of pressures that has

shaped the implementation problems that have been faced in South Africa, as also noted by Tuck *et al* (2004:4):

Some commentators believe that the real purposes of NQFs are based on hidden political and economic agendas. Allias (2003), for example, argues that while the rhetoric of the South African NQF relates to democratic transformation, its content is derived from the political goal of developing a neo-liberal economy.

In a similar manner, Fataar (2003) argued that a struggle for alignment existed between South African policy discourse and the state's emergent macro-development orientation.

Concerns, particularly from the higher education sector (Lockett, 1999:1) often include reference to a more *technical humanistic* paradigm, within which the focus of the education system is on economic advance:

Operating within the requirements of the NQF demands a shift to a more technical paradigm, in which vocational/human capital discourse is overlaid with radical humanist discourses...education is now viewed as having to serve an economic rather than social good.

Concerns about the *unconstitutional limitation of academic freedom* were also noted:

We want to argue that the way the NQF is taking shape will unconstitutionally limit academic freedom to the detriment of higher education in particular and a democratic South Africa in general (Malherbe and Berkhout, 2001:68).

In 1998 Gevers raised concerns, identified from the Australian and New Zealand processes, of a drift towards *vocationalism* and undesirable *standardisation* – an emphasis on outcomes, which were overly reductionist and behaviourist. McGrath (1997), as well as Allias and Shalem (2005), appear to support the concern expressed by Gevers:

...the more serious and rigorous the attempts to specify the domain being assessed, the narrower and narrower the domain itself becomes, without, in fact, becoming fully transparent. The attempt to map our free-standing content and standards leads, again and again, to a never-ending spiral of specification which never manages to remove the ambiguity from the standards (Wolf, 1995 in Allias and Shalem, 2005:5).

The forced integration of the *epistemological different modes of learning* was also raised by some authors. According to Ensor (2003) the very fact that the South African NQF was trying to equate “academic” and “everyday knowledge” (cf. Young, 2003) is extremely problematic and has led to a lack of attention to knowledge content:

Formal education and the NQF thus rest on two fundamentally different assumptions about knowledge, knowing and identity. Formal education and training aim to specialise academic and or professional identities through induction into largely disciplinary-based forms of knowledge, whereas the NQF wishes to background knowledge and emphasise a generic capacity to learn (Ensor, 2003:341).

Heyns and Needham (2004:42) note that the concerns about epistemological differences may underlie the more obvious political power struggles:

We are also not convinced that the *Consultative Document* [DoE and DoL, 2003], in particular, is honest about its concerns about epistemological differences – for observers it seems that it is the political power struggles, rather than the epistemological concerns, that are inhibiting the development of a common, agreed understanding of an integrated national framework for learning achievements.

Lifelong learning was an important influence on the NQF. Even more recently, various authors, both within the South African context (see Walters, 2003, OECD, 2003, and Aitchison, 2004) and outside (e.g. in Latin America and the Caribbean) query the extent to which NQFs facilitate lifelong learning:

The concept of an NQF has a direct connection with lifelong learning which “encompasses all learning activities undertaken throughout life for the development of competencies and qualifications”. One of the greatest benefits of an NQF is that it facilitates a reference for lifelong learning and for progress in work and social life (Zuniga, 2004:12).

In a 1999 paper, Kraak argued that the conditions in South Africa at that time were conducive to “*Mode 2*” research (*Mode 2* knowledge is described as problem solving knowledge, whereas *Mode 1* knowledge is the more traditional disciplinary knowledge) that would ‘contribute to a vibrant democracy and a healthy economy’ (1999:4) (also see Parker, 1999:43). Clearly Kraak was concerned about how the NQF would accommodate these differences:

A vibrant debate has begun in the international literature on knowledge production centred on the premise that fundamental changes are occurring in the mode of production of new knowledge (Kraak, 1999:1).

The underlying influences on thinking about power on the development and implementation of NQFs are also important. This study on the development and implementation of the South African NQF bears testimony to such influences, as various aspects of power within the NQF discourse are identified and discussed at length. In addition to this study being located within a Foucauldian theoretical framework, it is also recognised that a Foucauldian understanding of power has influenced the development and implementation of NQFs (Tobias, 1999), as has the understanding of power by other leading intellectuals, such as the significant influence of Paulo Freire in South Africa (cf. Isaacs, 2001 and Cosser, 2001). Freire (1921-1997) was a Brazilian educationalist who engaged in thinking about progressive practice, informal education and popular education in particular (www.infed.org, accessed 18 May 2005). Familiar references to Freirean thinking include 'Making the NQF road by walking reflectively, accountable and boldly' (Isaacs, 2001:124 and Bell *et al*, 1990).

Important for this study, however, is the strong comparison between Freire and Foucault's interpretation of power. Although some authors argue that they differ (cf. Tobias, 1999) it is apparent that there are also strong similarities. For example, both Freire and Foucault:

- view power as both a negative and positive force (Freire, 1985 and Foucault, 1979)
- maintain that power as a form of domination cannot be regarded as only something imposed by state agencies, but as something that is also expressed in the production of knowledge and social relations (Freire, 1985 and Foucault, 1980).

3.3.3 Summary

Tobias (1999:117) summarises the influences of political and economic forces and ideologies on NQF development and implementation as follows:

We must go on to use the framework to legitimate educational and action programmes which encourage participants to question and challenge the structure of inequality and subordination, and we must work politically and educationally to secure a place in the sun for those programmes which do not fit within the qualification framework. Finally, we must ourselves continue to raise awkward political questions and promote alternative democratic discourses and the development of educational and action strategies which lead to the

development of policies and practices that advance the collective interest and liberation of all people.

As shown above, scholars note a variety of possible underlying philosophies associated with the South African NQF - most of them well argued and substantiated. It is more than probable that similar overviews of literature related to other NQFs will produce a similar, and even more extensive list of underlying philosophies.

3.3.3.1 NQFs are influenced by underlying philosophies

The question that may be asked is, what was the purpose of discussing these various underlying philosophies? The intention has been to show *that NQFs, whether established or just emerging, are influenced, even covertly guided, by the implicit underlying thinking from which they emerge.*

The proposed SADCQF is a case in point. The focus in many of the SADC countries has traditionally been on Vocational Education and Training (VET); therefore the qualifications framework is influenced by vocationalism and unitisation. The stakeholders that are currently involved in the establishment of the SADCQF are mostly from this constituency (see TCCA, 2005, Appendix 2).

More examples are found in the recent developments in Latin America and the Caribbean. Interestingly these developments have publicly embraced the labour competency approach that characterised the early NQF developments in England in the early 1990s (Zuniga, 2004). Although this move is completely overt, it is also an example of a region that is to a large extent only starting to engage with NQF-related issues, importantly (and ironically) with exactly the same issues that influenced other NQFs when they were just starting.

3.3.3.2 The original purpose of the NQF was to unite diverse philosophies

According to Oberholzer (1994:27) the original purpose of the NQF was to accommodate the tensions between opposing philosophies. She argues as follows:

Clearly before the [NQF] concept will gain acceptability, the tensions between the opposing philosophies have to be carefully thought through and, where possible, opposing voices accommodated.

This attempt to try and unite diverse philosophies may have contributed to the continual contestations in the NQF discourse – this suspicion is in agreement with the warning from Deacon

and Parker (1999) that a new *unifying discourse* was emerging from the reconciliatory process that characterised the 1994 period. According to Deacon and Parker this discourse was characterised by contradictory amalgamations of other discourses that are continually struggling for hegemony.

3.3.4 Identification of Guiding philosophy as object

Based on the preceding explication, *Guiding philosophy* is identified as an object in the NQF discourse that is used to facilitate the archaeological critique of the empirical dataset presented in *Chapter 4*. The following points are raised in support of this proposal:

As an object *Guiding philosophy* represents a category in the NQF discourse that exists through the establishment of a group of relations between authorities of emergence, delimitation, and specification – an example from this section is the largely unchallenged initial implementation of the NQF, despite the fact that it constituted such a radical departure from the philosophy that underpinned the apartheid education and training system.

It has also been shown that *Guiding philosophy* is a category that contains other mutually exclusive sub-categories or components, such as:

- Post-Fordism;
- Neo-liberalism;
- Vocationalism;
- Standardisation; and
- Freireanism.

This section of the literature review has also highlighted particular guises of power. As discussed in *Chapter 2*, the guises of power identified from the literature review are used to support the identification from the empirical dataset – this description is presented in *Chapter 5*. The following are some examples of guises of power that can be identified from this section:

- Parker's (1999) description of the new unifying discourse included references to struggle for hegemony but also the extent to which government employs a language of bureaucracy – this is an example of governmentality as form of power in the NQF discourse.
- NQFs are influenced and guided by the underlying philosophy from which they emerge – this example is related to an origin of power in the NQF discourse.

3.4 PURPOSE AS OBJECT IN THE NQF DISCOURSE

3.4.1 Introduction

Closely linked to the previously mentioned “covert purposes” or guiding philosophies of NQFs, are the more overt and explicit purposes. It is argued that the tensions between the two sets of purposes are more often than not the cause of significant contestations (this is not to say that tensions within each category cannot exist and so also exact similar influences).

Although the overarching purpose of all NQFs is to ‘increase the seamlessness of education and training systems’ (Keating, 2003:280, also see Tuck *et al*, 2004), it is possible to identify a number of more specific “clusters” that describe the purposes of NQFs. According to Tuck *et al* (2004), drawing on Granville (2003), the main purposes for developing an NQF can be clustered as follows:

- addressing issues of social justice;
- improving access to the qualifications system and progression within it; and
- establishing standards, achieving comparability and intra-national or international benchmarking.

Two more dimensions of purpose are suggested by Boudier (2003):

- qualifications as instruments of communication; and
- qualifications as instruments of regulation.

Each of the clusters is discussed below (keeping in mind that they are not necessarily distinct).

3.4.2 Addressing social justice purpose

When looking for an example of an NQF that aims to address issues of social justice, the South African NQF features prominently (Granville, 2003). Granville (2004:4) also points out that it is this overt concern that makes the South African situation of particular interest to the international community:

The South African situation is therefore of particular interest to the international community because of its overt concern with the meaning of citizenship and participatory democracy.

One of the explicit objectives of the South African NQF is to:

Accelerate the redress of past unfair discrimination in education, training and employment opportunities (SAQA, 2000b:5, NQF objective 4, emphasis added).

Another is to:

*Contribute to the full personal development of each learner and the *social and economic development* of the nation at large (SAQA, 2000b:5, NQF objective 5, emphasis added).*

The 1994 transition from apartheid to democracy created a particularly conducive environment in which an NQF of this nature could be implemented without the opposition that might have been expected in different circumstances. Isaacs (2001:138) refers to this as a ‘unique creative space shaped by [South Africa’s] historical trajectory and the struggle for freedom and democracy’. This is not to say that a number of underlying murmurs were not present, such as the NQF “promising much where was no alternatives” (McGrath, 1997); possible resistance from institutions that would play key roles (CIDA, 1995); a “contradictory amalgamation” of discourses (Deacon and Parker, 1999); and the “unconstitutional limitation of academic freedom” (Malherbe and Berkhout, 2001).

The following statement from French (2005:3) summarises the social purpose of the South African NQF:

...the South African NQF was set up to redress the effects of a hated order, and to promote new paths to recognition and access that would be real, and not merely symbolic corrective acts. The NQF was to be an instrument for human dignity and human rights. It was to encompass the whole provision of education and training, not merely post-secondary preparation for work. It was intent on revolutionising both the curriculum and the institutions of provision.

In some other countries, such as Namibia, social justice also features prominently:

The [Namibian] NQF is not a re-arrangement and/or collation of existing qualifications, but implies a transformation of education and training and the recognition of learning and qualifications which result from it (Gertze, 2003:74).

This is in contrast to other countries such as Lesotho (2004), New Zealand (see Richardson, 1999), Scotland and Ireland where the ‘primary focus of the NQF is on access and progression’ (Tuck *et al*, 2004:3):

The SCQF's aims are more limited than those of frameworks which set out to develop new qualifications, standards or curricula, or to enhance the quality of education and training. Above all, the SCQF is an enabling or descriptive framework; it "is not a regulatory framework" (Raffe, 2003:241).

The aim of qualifications frameworks is to clarify (for students, parents, employers and policy makers) the main routes to a particular qualification, how progress within the system can be made, to which extent transfer is allowed and on which basis decisions on recognition are taken (European Commission, 2004:1).

The point to be made is that most NQFs have a social purpose to some extent. Placed on a continuum, South Africa is on the most radical extreme, while Scotland and Ireland are on the other. The more recent developments of regional qualifications frameworks (RQFs) in SADC, CARICOM and the EU show limited focus on addressing social justice.

3.4.3 Improving access and progression purpose

As was argued for *social purpose*, most NQFs also incorporate at least some elements of *access and progression*. Young (2003:224) refers to three goals 'which appear to be widely shared across different countries and are found in almost every national and international policy document on qualifications frameworks':

- transparency of what the NQF signifies and what learners have to achieve;
- minimise barriers to progression; and
- maximise access, flexibility and portability between different sectors of education and work and different sites of learning.

As an example, the second objective of the South African NQF is to:

Facilitate *access* to and *mobility* and *progression* within education, training and career paths (SAQA, 2000b:5, NQF Objective 2, emphasis added).

More examples are identified from other NQFs:

[The purpose of the SADCQF is to fulfil] the SADC Protocol on education and training, including harmonisation of qualifications and learning programmes along with improved *mobility* and *exchange* of learners and trained labour (TCCA, 2005:9, emphasis added).

The SCQF provides a national vocabulary for describing learning opportunities and thereby makes the relationships between qualifications clearer. It will clarify entry and exit points, and *routes for progression* within and across education and training sectors and increase the *opportunities for credit transfer* (SCQF, 2003:vi, emphasis added).

The [Irish] national framework of qualifications and associated programme provision should be structured to *facilitate learner entry* and to *promote transfer and progression* (NQAI, 2003:7, emphasis added).

[NQFs] lower barriers to *access* and *progression* (Clark, 2005:3, emphasis added).

According to Tuck *et al* (2004) this cluster normally includes objectives such as making the qualifications system easier to understand; making progression routes easier and so improving career mobility; increasing and improving credit transfer between qualifications; improving the recognition of prior learning (RPL); and improving access to education and training opportunities.

3.4.4 Establishing standards, comparability and benchmarking purpose

The two remaining objectives of the South African NQF (i.e. other than the three already mentioned in this section) are to:

Create an integrated national framework for learning achievements (SAQA, 2000b:5, NQF Objective 1).

And to:

Enhance the quality of education and training (SAQA, 2000b:5, NQF Objective 3).

Although the first objective is probably the most controversial, and has therefore also led to the most contestations (see Kraak, 1998 and Samuels *et al*, 2005), it does imply a standardisation and unification of previously fragmented and divisive systems. Quality of education and training speaks

to issues of improved comparability and benchmarking. The point is that standards, comparability and benchmarking are common purposes of most NQFs, including the South African NQF.

RQFs, such as the proposed SADCQF, Caribbean RQF and the EQF, stand out as the most extreme examples of frameworks that aim mainly to achieve benchmarking and comparability:

The proposed SADCQF is a regional qualifications framework that consists of a set of agreed principles, practices, procedures and *standardised terminology* intended to ensure effective *comparability* of qualifications and credits across borders in the SADC region, to facilitate *mutual recognition* of qualifications by Member States, to *harmonise* qualifications wherever possible, and to create *regional standards* where appropriate (TCCA, 2005:29, emphasis added).

An EQF could thus add value to national education and training systems by facilitating *comparisons* between frameworks and systems (European Commission, 2004:2, emphasis added).

The objective here is purely *descriptive*, the aim is to facilitate *comparisons* and to review the progress of the competencies approach in the [Caribbean] region (Zuniga, 2004:11, emphasis added).

It is, however, not only the RQFs that aim to establish standards, comparability and benchmarking. Other examples include the New Zealand NQF designed to rationalise historically diverse qualifications and so to provide a common structure onto which new qualifications could be added (Richardson, 1999), and the Mexican model that aims to initiate structural reform to raise quality, flexibility and relevance (CONOCER, 1999).

It is important to note that comparability and benchmarking are not regarded by all as obtainable. Blackmur (2004:272), in his *Critique of the concept of an NQF*, argues that the Scottish authorities 'have accepted that equivalence has a quicksilver dimension to it and that "broadly comparable" is the best that can be hoped for'.

A number of overarching objectives of this third cluster are noted by Tuck *et al* (2004): rationalising qualifications by removing duplication of provision; ensuring that qualifications are relevant to perceived social and economic needs; ensuring that education and training standards are defined and applied consistently; ensuring that education and training providers meet certain quality standards; and securing international recognition for national qualifications.

3.4.5 Instruments of communication purpose

Young (2005) argues that all NQFs have a communicative role in that they describe interrelationships between qualifications and how learners can progress from one level to another. Young goes on to suggest that these more limited frameworks, focusing mainly on communication, are “enabling” frameworks as opposed to the more prescriptive, regulatory role that other frameworks can take (discussed in the next section). Frameworks focusing mainly on communication are also less prone to contestation, but on the other hand, can have a much more limited role, as they are based on voluntary participation and relying on agreements between stakeholders.

Three frameworks stand out as enabling/communicative frameworks: Australia's AQF, Scotland's SCQF and the proposed French framework. It is important to note that the French development has recently moved closer to the more restrictive ‘Anglo-Saxon notion’ of an NQF, giving the State ‘a powerful tool to organise the qualification “market”’ (Bouder, 2003:356). This is in contradiction to the more general trend of NQFs becoming less restrictive (e.g. the 3rd generation NQFs).

The proposed RQFs focus strongly on communication. For example, Gordon (2005:4) states that the EQF is required to ‘facilitate communication’ between the NQFs of the Member States and systems.

Although the South African NQF has elements of communication, for example, one of the principles of the NQF is the guidance of learners (SAQA, 2000:5); it is much more of an instrument of regulation. Even in the early stages of implementation concerns regarding this regulatory function were raised - these included the limitation of academic freedom (Malherbe and Berkout, 2001) and significant hesitance from the higher education sector to participate in the proposed standards setting structures:

I think that it is possible that the enthusiasm of those involved in the attempt to implement the admirable objectives of the NQF has led to insufficient attention being given to the sad side-effects of taking the SGB [Standards Generating Body] route...I believe that South African universities would be within their rights, as protected by the Constitution, to treat the prescriptions of SGBs as being advisory in nature, or to ignore them altogether (Brimer, 2001:3).

3.4.6 Instruments of regulation purpose

Starting with a more general view of regulation, Niklasson (1996:268) argues that regulation is used as a general term for 'government steering and control' and suggests that 'the regulator should, as the English proverb goes, "speak softly and carry a big stick"' (996:271).

Moja *et al* (in Cloete *et al*, 2002:89) introduce three types of state regulation:

- *State control* – effective and systematic administration of education and training.
- *State supervision* – government provides the broad regulatory framework within which providers of education and training are expected to produce the results which governments desire.
- *State interference* – arbitrary forms of crisis intervention, and includes a conflation of the political and professional.

The three types of regulation appear to be positioned in three distinct levels, with state control being the most severe form of regulation, and state interference suggesting a much more arbitrary and non-continuous approach. The current South African situation would most probably be best placed in the "State control" position, although it has elements of "State supervision" in that the state has a direct interest but also provides a strong regulatory framework.

In addition to the link between governmental control and the level of this control, Berka *et al* (2000:21) suggest that there are five areas of control:

- pedagogical-didactical area;
- structure of the education system;
- curriculum and its assessment;
- human resources; and
- financial and material matters.

Focusing the discussion on regulation on NQFs, Young (2003, in Tuck *et al*, 2004:4) argues that governments embrace the idea of an NQF because it 'provides mechanisms for accountability and control'. Seen as part of an international trend on the part of governments, qualifications are used as *drivers of educational reform*. Young suggests that this may be because government agendas are not necessarily focused on improving the quality of education and training – NQFs rather provide governments with instruments of accountability.

A recent statement from South Africa's Deputy Minister of Education supports this argument (referring to a finding from SAQA's NQF Impact Study [SAQA, 2004 and 2005b]):

...the government must make explicit what the NQF is expected to achieve and the purposes for which it will be used. A democratically elected government is entitled to use qualifications for the purposes of accountability if it so chooses (Surty, 2004:2).

In a more recent report, Young (2005:1) emphasises the political purpose of NQFs again:

...new proposals appear to take little account of the considerable difficulties faced by countries that have already attempted to implement NQFs. This suggests that NQFs may be being introduced less for their proven educational benefits and more for broader political reasons.

Ironically, the political purpose of the South African NQF was not fully realised (much less communicated to stakeholders) during the conceptualisation period as noted by Oberholzer (1994:11, emphasis added):

Provided the NQF and its controlling body, SAQA, remain autonomous, South Africa may be able to ensure that *education is not hijacked by politicians as it was in 1948* and that *the government will not be able to control education and dictate who can progress through the system or what types of learning will be recognised...* Measurement and selection with all the associated ills of social manipulation, are inextricably linked and for those who wish to subjugate education to politics, *such a system can provide a powerful tool*.

Despite these concerns, by 2005 the South African NQF stands out as an extreme example of the use of an NQF to regulate an education and training system (Blackmur, 2004, also see Blackmur 2003 and 2004b). The NQF had indeed become a very powerful tool and education had without any doubt stayed subjugated to politics.

Was there opposition to the regulatory approach from the South African government? Yes, but much less than expected - in part due to the "unique creative space" (as noted by Isaacs, 2001) created by South Africa's struggle for democracy in which all things associated with the apartheid regime came to be seen as bad and unacceptable, and all things different and new were accepted, virtually on face value only. Strong labour movement involvement during the conceptualisation period (early 1980s to 1994) of the NQF may also have contributed to the less than expected opposition to the new regulations. The most significant opposition came from academics (notably not always as a coherent higher education voice, but significant nonetheless). Some such

examples have already been discussed in this chapter, and include the perceived limitation of academic freedom (see Malherbe and Berkhout, 2001, Brimer, 2001 and Isaacs, 2001c) and forced integration of epistemologically different modes of learning (Ensor, 2003 and Kraak, 1999).

On face value, the regulatory purposes of some NQFs may seem to be the main cause for contestation and power struggles. In the case of the implementation and development of the South African NQF, regulatory purpose may be a contributing factor, probably the most obvious, but by far, not the most significant.

3.4.7 Summary

This section, focusing on the purposes of NQFs, has highlighted a number of relevant considerations for this study:

3.4.7.1 Tensions exist between the overt and covert purposes of NQFs

Philosophies that underlie NQFs, more often than not, stand at odds with their more overt purposes. Covert purposes, whether originating from the underlying philosophies or not, whether explicit or implicit, form part of NQF implementation across the world. The evidence has shown that NQFs are influenced by both sets of purposes, which in turn can lead to increased contestations and power struggles.

3.4.7.2 Some purposes are common to most NQFs

1st, 2nd and 3rd generation NQFs all aim to improve access and progression, establish standards, comparability and benchmarking, and communication, albeit with different degrees of emphasis. Although social purpose and regulation also feature as purposes of many NQFs, they do so on much greater levels of extremity. These “common” purposes appear less prone to contestations and are more focused on commonly accepted principles.

3.4.7.3 Some purposes are common to only some NQFs

Social justice, interpreted as a more extreme version of social transformation, and regulation stand out as two purposes that are *not* common to most NQFs, at least in their more extreme manifestations. Both the South African and New Zealand NQFs are such examples – both NQFs were continually plagued by contestations and subsequent review processes. Obviously social justice and regulation purposes are an important factor to consider when investigating the NQF

development and implementation, although this led to another question: to what extent would NQFs be NQFs without some measure of social and regulatory purpose? Tuck *et al* (2004:3) go some way to answering the question:

The essence of the distinction is between using a framework to describe the existing system and seeking to effect change using an NQF as the vehicle.

These points are further discussed in *Chapter 5* once the findings of the qualitative analysis have been presented.

3.4.8 Identification of Purpose as object

Based on the preceding explication, *Purpose* is identified as a second object in the NQF discourse. As before, the following points are raised in support of this proposal:

As an object *Purpose* also presents a category in the NQF discourse that exists through the establishment of a group of relations between authorities of emergence, delimitation, and specification. An example from this section is the extent to which the particular purpose of the NQF is enforced, but also the way this purpose can evolve and still be enforced.

It has also been shown that *Purpose* is a category that contains other mutually exclusive sub-categories or components, such as:

- addressing social justice purpose;
- improving access and progression purpose;
- establishing standards, comparability and benchmarking purpose;
- instruments of communication purpose; and
- instruments of regulation purpose.

The following examples of guises of power can also be identified from this section:

- The tensions between the overt and covert purposes of the NQF lead to contestations and power struggles – this is an example of political power as form of power in the NQF discourse.
- The radical purpose of the South African NQF not being contested is an example of an origin of power in the NQF discourse.

3.5 SCOPE AS OBJECT IN THE NQF DISCOURSE

3.5.1 Introduction

The scope of NQFs includes two dimensions:

The *first dimension* refers to the integration of levels (e.g. inclusion of university qualifications); sectors (e.g. occupational sector and geographical region); and types (e.g. academic, vocational, private, public) of qualifications that form part of NQFs, which vary from country to country. In many SADC countries, but also to some extent in the UK, developments have focused mainly on the vocational education and training (VET) sector. General education, specifically higher education, is often excluded, both during the development of the framework, and in actual registration of qualifications on the framework. This dimension of scope can be seen as a continuum ranging from *partial* to *comprehensive* (Raffe, 2005).

The *second dimension* of scope is the relationships between the categories or systems, depending on how these are structured in the relevant countries. In some cases these relationships are explicitly defined, even prescribed, whilst in others they are left for roleplayers to negotiate.

A classification system developed by Howieson, Raffe and Tinklin (2000) is particularly useful to further define the scope of NQFs. They suggest three systems, each based on a different relationship between education and vocational systems:

- *unified* (all systems are integrated);
- *linked* (separate systems but with common structures for transferability); and
- *tracked* (separate systems with limited transferability).

Proposing a similar classification, Young (2005) suggests a “partial” to “comprehensive” continuum.

3.5.2 Unified scope

In a unified system there are no tracks - vocational and educational qualifications form part of the same unified system. Raffe (2002) defines unification as bringing academic education and vocational training closer together. Above all, Raffe warns that unification is a *political process* that will conflict with the goals and interests of stakeholders:

...unification is not simply a technical matter of designing and implementing a better system; it is above all a political process. The goals of unification may conflict with the interests of stakeholders who have the power to block, neutralise or modify them (Raffe, 2002:7).

Raffe argues that three different unifying measures bring academic and vocational learning closer together:

- Measures that aim to unify academic and vocational *curricula* – Raffe (*Ibid.*) suggests that this can be done through an: (1) *additive approach* that ‘encourages a greater mixing of academic and vocational components, but does not try to blur the differences between them’ (2002:3); (2) *integrative approach* that ‘aims to create a new kind of curriculum, rather than simply mix academic and vocational elements’ (*Ibid.*).
- Measures that aim to reduce the *organisational* distance between academic and vocational learning – in this case unification is the process of linking tracks or pathways, such as vocational, technical, general or academic.
- Measures that aim to reduce the distance between vocational and academic learning in *longitudinal* terms – this may involve measures to ‘make learning available in more flexible forms and in a variety of modes and contexts, which transcend the barriers often associated with the distinction between academic and vocational study’ (*Ibid.*).

Raffe defines the terms “vocational” and “academic” in terms of the three unifying measures:

Curricular	Organisational	Longitudinal
Distinction based on content of learning and the extent to which this is designed to prepare individuals for roles in the labour market	Terms describe the main tracks or pathways to which upper-secondary students are allocated, and the expected progression from these tracks	Terms describe the individual purposes for learning

Table 12: Vocational and academic distinctions

As was the case with the purposes of NQFs (discussed in the previous section) the two NQFs that stand out again are those of South Africa and New Zealand (Richardson, 1999 and Philips, 2003) - a concerted effort was made to integrate all levels, sectors and types of qualifications into a single unified framework:

...a further reason for the establishment of [the South African] NQF is to provide a coherent structure for education, a means by which divisions between sectors of learning and the

variety of providers of education can be bridged and the division between “theory” associated with general education and “application” associated with vocational education and training can be diminished (Oberholzer, 1994:3).

[New Zealand] Government policy in the early 1990s centred on the creation of a seamless education system, based on unit standards. This was to integrate secondary education, industry training and tertiary education. The NQF was to bring together the developments in general education and vocational education and training into an integrated model (Richardson, 1999:4).

In both cases, but particularly in the South African NQF, integration has been a major area of contestation. The first objective of the South African NQF is ‘to create an integrated national framework for learning achievements’ (SA, 200b:5). According to Heyns and Needham (2004), the *Study Team Report* (DoE and DoL, 2002) seems to suggest that one of the main reasons for the many contestations surrounding the proposed integration is related to the multitude of interpretations. They argue that integration should be interpreted on three levels:

- *macro level* – the socio-political or systemic level;
- *meso level* – philosophical and epistemological issues; and
- *micro level* – integration as experienced by education and training practitioners.

Very early during the South African process stakeholders came to common agreement that integration was to be interpreted as “an integrative approach”, one in which the vision of a unified system is pursued but not enforced. It suggested a working towards an eventual unified system that would develop according to the needs of the various sectors. The following two statements emphasise the differences between the original intentions for an “integrated system” vs an “integrated approach”:

An integrated system implies a view of learning which rejects a rigid division between “academic” and “applied”, between “theory” and “practice”...Such divisions have...helped to reproduce very old occupational and class distinctions...and have been closely associated in the past with ethnic structure of opportunity *and power* (DoE and DoL, 2002 in Heyns and Needham, 2004:10, emphasis added).

...two systems running side by side and if you occasionally look over the fence dividing the two, that’s the *integrated approach* (Isaacs, 2002 in Heyns and Needham, 2004:6, emphasis added).

This change in emphasis was one of the main departures made from the initial vision of the NQF. Mehl's (2004, in Heyns and Needham, 2004:7) argument that this was 'a significant departure from the original integrating vision of the NQF' further suggests that the original intention of the NQF to be unified was watered down to a linked system. Interestingly, the two Departmental review processes (DoE and DoL, 2002 and 2003) as well as *The HEQF* discussion document (DoE, 2004) focused on integration, proposing that a more linked approach should be followed – suggesting that even the integrated *approach* was still too *unified*.

Heyns and Needham (2004) conclude that it is in the area of partnerships where the most effective models of practice are emerging, 'often despite systemic and political divides' (2004:13) – clearly, in the South African case, the original interpretation of integration as an inclusion of all levels, sectors and types of qualifications (*first dimension* of scope) was systematically replaced by an interpretation focusing on the voluntary relationships between the categories or systems (*second dimension*). In response, French (2005) argues that the original interpretation, and also consensus that Heyns and Needham (2004) imply, never existed, as the NQF was created in an environment of distrust:

...the NQF was created with little sense of community between the official providers of education and training at all levels, and with the deepest distrust of the structures of provision on the part of the main players (French, 2005:4).

3.5.3 Linked scope

In a linked system, the vocational and educational tracks are still separate, but with significant common structures to enable effective transfer between the tracks. All three the proposed RQFs appear to favour a linked scope:

[The proposed SADCQF] covers all forms, levels and categories of education and training including qualifications that vary from country to country. The basic principle is one of inclusiveness encompassing areas within general education, the vocational education and training sector, the higher education sector and recognition for non-formal learning (TCCA, 2005:20).

[The proposed EQF] will not only link qualifications framework systems in different countries but will build bridges between different settings for learning, whether school, university, the workplace or in civic or personal life (Gordon, 2005:2).

One activity in particular which stands out in bringing together government, employers and unions to better co-ordinate the linkage between competencies and jobs has been the development of common vocational qualifications [in the Caribbean] (Gamerdinger, 2000 in Zuniga, 2004:66).

Australia, Mexico (see CONOCER, 1999) and the UK (excluding Scotland) are examples of linked systems, even though they appear to be moving towards a combination of unified and linked scope (Tuck *et al*, 2004).

3.5.4 Tracked scope

Before the advent of NQFs, most education and training systems were tracked systems in which schooling, VET and university education were seen as distinct and largely unrelated. In a tracked system, vocational and educational tracks are separate, with very limited transferability. Placed at the very extreme of the scope continuum, some even argue that tracked systems are not NQFs at all (see Tuck *et al*, 2004).

The South African NQF was envisioned as a unified system although, after some concessions were made, it started out as a linked system (see the discussion above). From the subsequent review processes, yet to be concluded, suggestions ranged from a combination of unified and linked, to completely tracked (DoE, 2004).

3.5.5 Summary

Most countries have opted for a linked or unified system, often ending up with a combination of the two (Howieson *et al*, 2000:2, also Tuck *et al*, 2004):

Each national system is likely to be a mixture of the three types [unified, linked and tracked]: its position on the continuum between tracked and unified systems may vary across different dimensions of systemic change.

In developing a conceptual framework for studying the unification of academic and vocational learning in post-compulsory education and training systems, Howieson *et al* (2000) suggest three elements that require consideration:

- (1) distinction among the three types of systems;

- (2) dimensions of systemic change (grouped into four areas: content and processes, system architecture, delivery, and government and regulation);
- (3) distinction between *open* and *grouped* unified systems - an *open* unified system is described as having a 'weak prescription of the content, volume, level, mode and duration of study; the emphasis is on choice and flexible entry and exit points' (*Ibid.*), whereas a *grouped* unified system, although based on common learning requirements, has stronger focus on 'prescription of content, volume and level of study' (*Ibid.*). Importantly, they note that the extent to which a unified system is open or grouped depends on the role of the national state in the governance of the system.

The following table (adapted from Howieson *et al*, 2000 and SAQA, 2005b) summarises the dimensions of systemic change:

Dimension of systemic change	Scope		
	Unified	Linked	Tracked
Overview	No tracks, single system	Different tracks exist with emphasis on similarities and equivalence, common structures and limited credit transfer between tracks	Vocational and general education organised in separate and distinctive tracks
Content and process	Multiple purposes, pluralist ethos, curriculum integrates academic and vocational, common assessment methodology	Overlaps and common elements and features	Distinct purpose, ethos, content, learning processes and assessment methodologies for each track
System architecture	Single certification system, flexible entry points, credit accumulation, single progression ladder, all programmes lead to Higher Education	Certification that links tracks (e.g. overarching diplomas), course structures allow transfer and combinations, conditions of progression vary across tracks	Different certification for each track, different course structures, progression to higher education not always possible
Delivery	Single type of institution, single system covers different modes	Variable/overlapping institutions, tracks partially based on mode	Different institutions and modes for different tracks
Government and regulation	Single administrative and regulatory system	Mixed/variable organisational structures	Different structures for different tracks

Table 13: Unification matrix

In summary, the following relevant points have emerged from the discussion on the scope of NQFs:

3.5.5.1 Pressures to pursue unification exist

Raffe (2002:6) argues that 'most countries pursue all three types of unification but with differences in emphasis'. He ascribes this to two types of pressures:

External pressures (i.e. external to the education system), such as *globalisation* - it is claimed that new skills are required which transcend the dichotomy between academic and vocational learning; and *social pressures*:

There are pressures for education to become more inclusive, to extend access, to make learning opportunities more flexible, to unblock dead-ends and to reduce the risks associated with participation and progression in education (Raffe, 2002:5).

Stromquist (2004:7) makes a similar argument by suggesting that '[g]lobalisation brings education to the front lines' and answering the question of what globalisation is doing to knowledge: 'It is becoming a commodity...When knowledge is a commodity, then schools and universities are market places, not terrains that contribute to redress inequalities' (*Ibid.*).

Internal pressures are specific to each country, e.g. the need for redress and parity of esteem between vocational training and education in South Africa. They usually have generic origins, including attempts to promote parity of esteem (the example mentioned above), responses to academic drift (the tendency for young people to choose academic courses even if they are not the most appropriate), and the expansion of post-compulsory education and training systems:

Unification is the response to this growing functional interdependence and the resulting needs for co-ordination and coherence. Academic drift, expansion and functional complexity are generic problems which affect nearly all countries, but they are manifested in different ways in each country (Raffe, 2002:5).

Raffe (2002:9) then asks the obvious question: is unification leading systems to converge? It appears *not* to be the case. He refers to a number of studies on the effects of globalisation that 'cast doubt on the notion of convergence'. These studies show that:

- most education systems face similar challenges and pressures;
- countries often use common concepts and policy rhetoric (lifelong learning, parity of esteem, flexibility of pathways) to analyse these challenges and to design policy responses;

- there is considerable variation in the strategies and policies which countries adopt and even more variation in the outcomes of the policies; and
- there is *limited evidence of convergence* in the structure of education and training systems.

From these results it is evident that South Africa fits the mould extremely well. The South African education and training system has without a doubt faced far-reaching challenges and pressures in the aftermath of apartheid. Policy rhetoric, as interpreted above, saturates the current system, to the extent that some authors refer to the NQF principles as “mantra-like” features (Aitchison, 2004).

The third finding suggests that there is a great variation in strategies that countries adopt – although not in complete disagreement with this statement, it is evident that NQFs have increasingly become the strategy that countries adopt to cope with external and internal pressures.

The last finding is, in the context of this study, the most important. Despite the various attempts by countries, through NQFs or otherwise, to unify educational and vocational systems, it appears as if very little progress has been made. This is confirmed by the results of the longitudinal and comparative NQF Impact Study (SAQA, 2005b). Samuels *et al* (2005) and Heyns (2005) suggest that such a unifying objective is intractable – it may never be possible to achieve (this is discussed further in *Chapter 5*).

3.5.5.2 *There is an aggregation towards unified/linked systems*

Young (2003:223) asks a rhetorical question: who (at least at the level of ‘rhetoric or broad goals’) would disagree with qualifications that are to be ‘more linked to each other and to exhibit greater transparency?’ From the discussion in this section it is apparent that most NQFs, whether 1st, 2nd or 3rd generational, and largely unrelated to their specific purposes, appear to be moving towards a scope somewhere between unified and linked, in which qualifications are linked to each other in more open and transparent systems.

A tracked scope appears to be too limited for NQFs as, to a large extent, it represents education and training systems before the advent of NQFs. Arguments that tracked systems are not NQFs at all, support this notion. Even the French system, based mainly on an existing (tracked) classification system, appears to be moving towards a more unified position, as exemplified in Boudier's (2003) description of France's NQF legislation:

[The proposed French NQF is] a superstructure into which all qualifications would have to be squeezed.

The Irish NQF (NQAI, 2003:8, emphasis added), that focuses more on access and progression, also clearly embraces a more unified scope:

The vision for the [Irish] framework is it would be inclusive and comprehensive. The aim is that it will be the “*single, nationally and internationally accepted entity*, through which *all* learning achievements may be measured and related to each other”.

3.5.5.3 There is an aggregation towards the “relationships” dimension of scope

The first dimension of scope (integration of levels, sectors and types) appears to be less than successful – possibly not due to the fact that it is less achievable, or even less desired, but more so as the push for total integration acts as a catalyst for power struggles in the different levels, sectors and constituencies. The South African debate of “integration” vs an “integrated approach” is a good example where the initial position was systematically replaced (even re-interpreted) with less contradictory relationships. The Howieson *et al* (2000) conceptual framework provides a useful starting point for considering the implications for the different dimensions of systemic change of the aggregation of NQFs towards unified/linked scopes.

3.5.5.4 Unification leads to diversification

This point relates to the previous one. The limited evidence of convergence in the structure of education and training systems does not necessarily mean that unification is impossible to achieve; it could also mean that it is just too soon to say (Samuels *et al*, 2005) – this argument may very well work in the South African context, but what about countries that have had a longer period of NQF implementation? With the exception of South Africa, not one of the other five 1st generation NQFs proclaim to be unified any longer, even if they were so in earlier years – New Zealand is a case in point; neither does any of the remaining 2nd and 3rd generation NQFs.

3.5.5.5 Barriers to unification exist

According to Raffe (2005) there are three broad types of barriers to integration (or unification):

Epistemological

Academic schools have resisted the incorporation of their qualifications as it is seen to ‘fit the epistemological assumptions of industrialised training’ (Raffe, 2005:58), while vocational

constituencies have expressed concerns that a 'common qualification system could undermine the integrity of vocational learning' (*Ibid.*). Raffe points out that many of the epistemological barriers had more to do with the design of the particular NQF than with integration: 'The problem was the model, not integration' (*Ibid.*).

Political

Referring to Young's (2005) comments that NQFs attempt to bring about "revolutionary change", Raffe argues that 'it is hardly surprising that [NQFs] may meet political resistance' (Raffe, 2005:59). In this case, Raffe points out that such political barriers are more difficult to overcome if:

...the different interests of education and training are represented by different departments of government or different regulatory systems (*Ibid.*).

Institutional

Thirdly, Raffe identifies institutional barriers that 'arise as unintended consequences of the way institutions work, and of the operation of social structures such as the labour market' (2005:60). Raffe points out that such different institutional logics may be as a direct result of the 'separation of education and training at government level' (*Ibid.*).

3.5.6 Identification of Scope as object

Based on the preceding explication, *Scope* is identified as third object in the NQF discourse and is used in *Chapter 4* as part of the archaeological critique. The following points are raised in support of this proposal:

As an object *Scope* presents a category in the NQF discourse that exists through the establishment of a group of relations between authorities of emergence, delimitation, and specification. The initial unified scope of the NQF seems to be making way for a more linked, even tracked scope.

It has also been shown that *Scope* is a category that contains other mutually exclusive sub-categories or components, such as:

- unified scope;
- linked scope; and
- tracked scope.

The following examples of guises of power can also be identified from the discussion:

- Scope stands out as one of the most contested typological components – the proposals to integrate all levels, sectors and types of qualifications into a single unified framework is an example of centralisation as technique of power in the NQF discourse.
- The goals of unification conflicting with the interests of stakeholders is related to an example of an origin of power in the NQF discourse.

3.6 PRESCRIPTIVENESS AS OBJECT IN THE NQF DISCOURSE

3.6.1 Introduction

Raffe (2003, in Tuck *et al*, 2004:5) defines perceptiveness as:

...the stringency of the criteria which qualifications have to satisfy in order to be included.

Raffe suggests two dimensions of prescriptiveness: the *micro level stringency* of criteria which qualifications have to satisfy in order to be included on the NQF, and the *systemic requirements* such as quality assurance and standards setting processes.

In comparison Young (2005:14) defines prescriptiveness as the:

...capacity of a [NQF] to achieve the goals set out by government.

Young also suggests two dimensions of prescriptiveness: the *number of criteria* that are listed in defining the NQF; and the *degree of prescription* that is used.

Raffe's first, as well as Young's two dimensions of prescriptiveness are very similar, in that they refer to the extent of the *micro level requirements* and criteria associated with an NQF. Examples include the format of qualifications and the specification of RPL possibilities for a particular qualification. Raffe's second dimension is concerned with the extent of *systemic requirements*. Examples are the criteria education and training providers have to meet before they can be accredited, and the requirement that all new qualifications have to developed (and approved) through standards setting structures.

Young (2003) argues for two extremes on a prescriptiveness continuum: *strong* frameworks that are very prescriptive about qualification design and quality assurance across a range of, if not across all sectors; *weak* frameworks that are based on general agreement and focus much more on practicalities. Tuck *et al* (2004) suggest that the term *weak* has derogatory connotations and should be replaced with *loose*, and therefore also *strong* with *tight*.

3.6.2 Loose prescriptiveness

Loose NQFs are characterised by general agreement between stakeholders, a focus on practicalities, limited criteria that qualifications have to meet in order to be registered on the NQF and few systemic requirements. According to Tuck *et al* (2004) most loose frameworks have the following characteristics:

- acknowledge differences between sectors;
- aim to be instruments of communication, regulating only to some extent; and
- have a linked or unified scope.

Examples of loose frameworks that are somewhat prescriptive at micro and systemic levels, include the Australian Qualifications Framework (AQF), which allows a high degree of autonomy to sectors, but still prescribes clear guidelines for minimum compliance:

The quality assurance processes integral to the [Australian] NQF are systemic and non-prescriptive. Qualification developers and providers must provide evidence that their products and services meet publicly documented criteria (Richardson, 1999:4).

Importantly, in the Australian context, the decision was taken very soon that a “single-model-fits-all” approach was not feasible (*Ibid.*)

All three the proposed RQFs, the EQF, the Caribbean RQF and the SADCQF are significantly orientated towards looseness, e.g. the proposed EQF is implemented on a voluntary basis without any legal obligations (European Commission, 2004); the proposed SADCQF ‘allows for sectoral interests to predominate and counteract any idea of prescriptiveness’ (Samuels and Keevy, 2005:9).

Loose frameworks, such as those mentioned above, do not, in most cases, have a regulatory purpose. In this context, the AQF is somewhat of an anomaly. Despite the accommodation of autonomy in sectors and its claims of non-prescriptiveness, it does prescribe minimum micro level

compliance. In effect the AQF anomaly highlights an important characteristic of NQFs: very few NQFs, that is, other than the three regional developments, can claim to be completely non-prescriptive. In some cases NQFs are less prescriptive at a systemic level (such as the AQF) but are still prescriptive at a micro level. As was argued earlier in the case of a linked scope, it may even be doubtful if an NQF that is positioned on the furthest extreme of the loose-tight continuum is an NQF at all.

3.6.3 Tight prescriptiveness

Tight NQFs are prescriptive about qualification design and quality assurance and prescribe very stringent criteria that qualifications have to meet in order to be registered on the NQF. Extensive accreditation and standards setting systems are usually established:

In strong [tight] frameworks, strict requirements are laid down for including a qualification on the framework (Young, 2005:14).

According to Tuck *et al* (2004) most *tight* frameworks have the following characteristics:

- assume that one size fits all, i.e. common rules and procedures can be applied to different sectors of education and training;
- aim to address issues of social justice;
- aim to be instruments of regulation; and
- a unified scope, particularly when they apply the same regulatory mechanisms across all sectors.

South Africa, New Zealand and even some features of the Scottish system are associated with tight frameworks (Tuck *et al*, 2004:7). The following is an example of tightness in the New Zealand NQF:

...the key components of the [New Zealand] NQF would be the national register of qualifications meeting specified criteria...mechanisms for registration of providers and accreditation of courses or programmes leading to qualifications... (Philips, 2003:291).

In general, tight frameworks become powerful tools in the hands of governments that use their NQFs for social justice purposes and regulating national education and training systems:

Governments tend to want to move towards strong [tight] frameworks as they provide greater potential both in relation to coordination and accountability (Young, 2005:14).

3.6.4 Summary

The following relevant points have emerged from the prescriptiveness discussion:

3.6.4.1 *Prescriptiveness is contentious*

Most authors would agree that the degree of prescriptiveness has been one of the most contentious aspects of the implementation of NQFs, more so in the case of the 1st generation NQFs:

The implementation of tight frameworks has generally been associated with controversy and contestation, largely arising from resistance in the university and school sectors to what may be perceived as the imposition of alien and inappropriate ideas and processes imported from VET (Tuck *et al*, 2004:7).

South Africa and New Zealand (to some extent even Scotland) stand out as NQFs that have been reviewed and reinvented often to the detriment of their education and training systems. Although the New Zealand system appears to have settled much more towards the looser side of the continuum, the South Africa NQF officially still remains highly prescriptive and regulatory – imminent changes regarding its scope (i.e. to be less unified, probably even tracked) and architecture (significant structural changes are envisaged) prove the point. In contrast, neither the overt purpose of the South African NQF, nor its incrementalism (see the next section) or policy breadth (also discussed in a later section) have been scrutinised to any similar extent.

3.6.4.2 *Tight frameworks are less likely to remain unified*

According to Tuck *et al* tight and loose frameworks ‘are distinguished primarily by the position taken on *integration*’ (2004:5, emphasis in the original). As was discussed in the previous section on *scope*, the degree of integration required in a unified NQF is extremely contentious. Attempts at suggesting an “integrated approach” rather than an integrated framework was one way of dealing with the problem (Raffe, 2002), as noted by Heyns and Needham (2004:5):

...the goal of an integrated system was replaced by the idea of an “integrated approach” to education and training. The notion of an “integrated approach” was considered a setback to the development and implementation of the NQF. Isaacs, for example, predicted [in 1998] that this shift in nuance “is going to come back and haunt us”. Indeed.

Young (2005:14) argues that:

...the stronger the framework the harder it is likely to be to achieve agreement and for the framework to be able to include a wide diversity of learning needs.

Governments often want to use very prescriptive frameworks to bring greater parity of esteem between education and vocational training, in effect to achieve greater unification. As Raffe (2002) pointed out in the discussion on *scope*, there is virtually no empirical evidence to show that this has worked – the opposite has rather happened: the push for unification has led to diversification. The point is that tight frameworks will naturally evolve into linked and even tracked frameworks, whereas loose frameworks may even gradually become more unified (see the next section on incrementalism).

3.6.4.3 There is a migration towards tight and linked NQFs

As both *scope* and *prescriptiveness* can be represented on a continuum, the following matrix is suggested (the other components of the NQF typology are not excluded, but constitute additional dimensions) as additional mechanism to describe NQF implementation:

Loose and Tracked (arguably this is not an NQF)	Tight and Tracked (possible)
Loose and Linked (MEX, AUS, SADC, EU, CARIBB, UK)	Tight and Linked (SCOT, FRA)
Loose and Unified (possible)	Tight and Unified (e.g. SA, NZ)

Diagram 3: Scope/prescriptiveness matrix

The following observations are made from the diagram and the preceding discussions on scope and prescriptiveness:

- No *loose and tracked* NQFs exist. As argued before, it is doubtful if such characteristics constitute an NQF at all; this combination rather represents education and training systems before any form of NQF development or implementation took place.
- *Tight and tracked* NQFs may be possible, but no current examples exist. The South African NQF may be moving to this position.

- *Loose and linked* NQFs is the most frequent category. This may be because this category is the least likely to be controversial – such an NQF may be prescriptive but will not necessarily impose integration.
- The SCQF is unique in that it is gradually moving from a linked to a more unified position (Raffe, 2003).
- *Tight and unified* is the most contentious category. The New Zealand NQF no longer fits this category and the South African NQF is precariously placed here – the reviews place it in either *the tight and linked* or *tight and tracked* category.

The last observation is the most significant. The *tight and linked* category may very well be scarcely populated at present, but there is a definite migration towards this category. This category presents the best position of compromise for governments: such NQFs are regulatory and can therefore be used to effect large-scale transformation; they are not completely tracked and do offer some progress towards greater parity of esteem between general education and vocational training. Young (2003:226) agrees that many countries are moving towards strong (tight) and comprehensive (unified or linked) NQFs and that this trend is matched by a trend of increased resistance, usually from ‘upper secondary schools and universities’. As was argued earlier, even loose frameworks have some extent of prescriptiveness, and more importantly, governments cannot use loose frameworks to achieve transformation. The proposed French NQF is a good example of a looser “classification” type of development that has gradually become tighter:

It appears that many of these [legal] developments [in France] bring the French system closer to the Anglo-Saxon notion of a national qualifications framework...There are also parallels with the Anglophone model in that the Law gives the State a powerful tool to organise the qualification “market” (Bouder, 2003:356).

3.6.5 Identification of Prescriptiveness as object

Based on the preceding explication *Prescriptiveness* is identified as fourth object in the NQF discourse. The following points are raised in support of this proposal:

As an object *Prescriptiveness* presents a category in the NQF discourse that exists through the establishment of a group of relations between authorities of emergence, delimitation, and specification. The prescriptiveness of the NQF is an example in that it also leads to: differentiations in the NQF discourse; the establishment of bodies and legislation that enforce such delimitation; and a system in which objects are organised in the NQF discourse.

It has also been shown that *Prescriptiveness* is a category that contains other mutually exclusive sub-categories or components, such as:

- loose prescriptiveness; and
- tight prescriptiveness.

The following examples of guises of power can also be identified from the discussion:

- A certain amount of prescriptiveness was unavoidable in order for the South African NQF to achieve its goals of redress and transformation – this can be seen as an example of legal power as form of power in the NQF discourse.
- Tight-loose prescriptiveness is also an example of an exchange process associated with political power as form of power in the NQF discourse.
- The extreme prescriptiveness of the South African NQF compared to other NQFs, has led to considerable contestations and is an example of control as technique of power in the NQF discourse.

3.7 INCREMENTALISM AS OBJECT IN THE NQF DISCOURSE

3.7.1 Introduction

Incrementalism is interpreted as either the *time* elapsed since the NQF was implemented or the *extent* of the implementation. Three such interpretations are discussed below and followed by a more succinct interpretation that is included in the NQF typology.

3.7.1.1 Time-based categorisation of NQFs

The *first* interpretation is a generational *time-based* categorisation first suggested by Tuck *et al* (2004) and further applied by Samuels and Keevy (2005b). This interpretation has been further developed and applied in this thesis. Three generations of NQFs are recognised:

- 1st generation – these are the very first NQFs. Their development can be traced back to the early 1980s, although the first was established in New Zealand in 1989. England, Wales and Northern Ireland, Scotland, Australia, Ireland and South Africa are also included in this group.

- 2nd generation – most 2nd generation NQFs are now fully implemented, although their development started in the late 1990s, even early 2000s. Mexico, Singapore, Trinidad and Tobago, Philippines, Namibia, Mauritius and Malaysia are included.
- 3rd generation – these are the most recently developed NQFs, most of which are still in the early stages of implementation. At least 22 countries (these include some European Member States, all the SADC Member States, most countries that constitute the Caribbean Community [CARICOM] and some former Soviet Republics) and four regions (SADC, the EU, the Pacific Islands and the Caribbean) fall into this category.

1st Generation (implemented since 1995)	2nd Generation (implementation and development started in the late 1990s, early 2000s)	3rd Generation (currently under consideration)
Australia; England, Wales and Northern Ireland; Ireland; New Zealand; Scotland; South Africa	Mauritius; Malaysia; Mexico; Namibia; Singapore; Trinidad and Tobago	Angola; Barbados; Botswana; Brazil; Chile; China; Colombia; Caribbean (regional); Democratic Republic of Congo; EU (regional); France; Jamaica; Lesotho; Macedonia; Malawi; Mozambique; Pacific Islands (regional); Philippines; SADC (regional); Slovenia; Uzbekistan; Tanzania; Turkey; Uganda; Zambia; Zimbabwe

Table 14: Time-based categorisation of NQFs

3.7.1.2 Progress-based categorisation of NQFs

The *second* interpretation of incrementalism is one that has been extensively applied in the SADC region. The SADC TCCA (2005) developed a progress-based categorisation that is used to determine the level of NQFs in SADC Member States. Five stages are recognised:

- *Stage 0* - No progress made, no reports received.
- *Stage 1* - Background work being done, initial discussion with politicians and education and training officials, some advocacy done.
- *Stage 2* - Initial development, task team or steering committees established, conceptual papers developed, implementation plans developed.
- *Stage 3a (Implementation)* - Draft legislation formulated, some structures already in place.
- *Stage 3b (Implementation)* - Legislation formulated and passed, Authority established, structures established, development of procedures and processes, development of standards, quality assurance systems and management of information system.
- *Stage 4* - Advanced implementation, system has been functioning for 5-10 years.

- *Review and reflection* - At any stage, reviews in place and progress evaluated, adjustments in place.

The table below has been adapted from the *SADCQF Concept Paper* (TCCA, 2005):

Stage 0	Stage 1	Stage 2	Stage 3a	Stage 3b	Stage 4
Democratic Republic of Congo (DRC)	Angola, Malawi, Tanzania	Mozambique, Swaziland, Zambia	Botswana, Lesotho, Zimbabwe	Mauritius	Namibia, South Africa

Table 15: Progress-based classification of NQFs in SADC Member States

An important feature of the implementation of the SADCQF is that Member States have accepted, and are encouraged, to simultaneously develop their own NQFs:

The simultaneous development of NQFs in SADC Member States and the RQF is critical both to progress in the Member States, but also in the region. RQF development dependent on fully implemented NQFs in Member States is not seen as feasible, on the other hand, the RQF would function most effectively if all Member States were at least on Level 3b. The decision was therefore taken to actively encourage Member States, while concurrently developing the RQF. In this manner those NQFs that are still in the early stages of development can benefit from the RQF process (TCCA, 2005:16).

3.7.1.3 Scope-based categorisation of NQFs

The *third* interpretation is applied in the Caribbean Community (CARICOM) (Zuniga, 2004). It is based on the scope and coverage of NQFs and assumes that NQFs would progress from relatively separate sub-systems to a unified state (see the earlier discussion on *Scope*). Three levels are recognised:

- *Level A* – least coverage, sectoral and even geographically restricted with limited funding that contributes to sustainability concerns. Sectoral interest groups drive the process.
- *Level B* – national coverage, including different sectors of economic activity and different occupational areas. National training institutions oversee the development of the NQF.
- *Level C* – all social actors are involved, usually when countries have national human resource development programmes. According to Zuniga (2004:17) this level of NQF ‘comes closest to the creation of an NQF in its original sense’. A national authority or ministry is responsible for NQF implementation and development.

3.7.1.4 Dimensions of incrementalism

Collectively the three interpretations point towards two dimensions of incrementalism:

- *rate* (progress/time) of implementation – ranging from gradual to rapid; and
- *manner* of implementation – ranging from phased to comprehensive.

The possible permutations of the two dimensions lead to four possibilities. In many cases, a gradual implementation is combined with a phased, sector-by-sector approach; a rapid implementation is often combined with a comprehensive approach. There are, however, some exceptions.

The four permutations of the dimensions of incrementalism discussed below, are:

- gradual and phased;
- gradual and comprehensive;
- rapid and phased; and
- rapid and comprehensive.

3.7.2 Gradual and phased incrementalism

Some first generation NQFs, such as those of Scotland and Ireland, have been implemented in a gradual and phased manner – to the extent that the original decisions in Scotland, though eventually leading to the SCQF, never even had an NQF in mind. The Scottish system represents twenty years of reform while the Irish NQF was only established after a long initial setting up period. Second and third generation NQFs on the other hand, appear to have taken heed of the dangers of implementation that is too fast, in that extreme caution is being taken to ensure gradual and systematic implementation with full support from most roleplayers.

In 1996 the *Dearing Review* made numerous proposals to alter the English landscape. This included a focus on the establishment of a coherent national framework of qualifications and included three distinct pathways (academic, general vocational and work-based vocational) with an incrementalist approach to reform, a single government Department and a single regulatory authority (Young, 1998).

The trend in Latin America also suggests preference towards a more gradual and phased approach starting with the gradual development of a classification and focusing on specific sectors (Zuniga, 2004).

3.7.3 Gradual and comprehensive incrementalism

Raffe (2003 in Granville, 2004) explains that most NQFs that have evolved on an incremental basis were preceded by existing national systems. Granville (2004:4) argues that even in such cases a significant amount of 'tweaking, adjusting and making sense retrospectively of systems that have evolved', was necessary. Referring to Deanne and Watters (2004), Granville goes as far as to suggest that even the proposed EQF 'is still a contested idea since its first mooted in 1985' (*Ibid.*). These remarks are extremely important when considering the South African NQF that is barely ten years in the making, and even more so for the proposed SADCQF that is planned to be fully implemented by 2010.

"Too soon to say" is a phrase that has become commonplace in the NQF discourse. In this case, however, the lack of gradual and comprehensive examples may be well suited to such a description, or else may simply be an unobtainable ideal as the push for unification, gradual or rapid, appears to rather be creating even more diverse systems (see Raffe, 2002).

3.7.4 Rapid and phased incrementalism

The proposed SADCQF first focuses on 'specific areas and sectors that find common ground' (Samuels and Keevy, 2005b:9). The SADCQF also prefers a phased implementation, mainly because it is reliant on the development of NQFs in Member States, although the decision was taken more recently to follow a parallel approach:

The SADCQF recognises the principle that development should occur in a pragmatic phase-by-phase manner. Feasible practical steps should be taken to reach the outlined vision (*Ibid.*)

Feasible, practical steps to attain the vision should be taken so that positive and concrete achievements can be measured as the vision is being fully implemented (TCCA, 2005:8).

The SADCQF, and probably also the Caribbean RQF seem to be opting for a phased and rapid approach. The EQF on the other hand (see Granville, 2004) has been long in the making and the

current more prominent developments may appear to be rapid, but are preceded by developments stating in 1985:

Nevertheless, “second-generation NQF countries” may wish to consider the merits of some kind of incrementalist approach that concentrates initial framework-building activities in areas which will have maximum impact in relation to the intended social or educational goals such as expanding vocational education or widening access to higher education (Tuck *et al*, 2004: 7).

3.7.5 Rapid and comprehensive incrementalism

Amongst the first generation of NQFs, the South African example stands out as the most rapid and comprehensive of implementations:

Countries such as South Africa, aiming for radical transformation, understandably wish to build their frameworks more quickly (Tuck *et al*, 2004: 7).

Granville (2004:3) agrees that the South African NQF was implemented at a rapid (even careless) rate of implementation:

...five years is hardly enough time to understand a simple and restricted framework, let alone bring to fruition the comprehensive and all embracing South African model.

He further explains that the implementation of the South African NQF to date, has not been phased either:

...in South Africa, the NQF grew from an idea first, then a system was constructed to carry the idea. The organic and pragmatic progress of growth associated with European developments was missing (*Ibid.*).

Similar criticism of the South African NQF's hasty implementation is also identified from within the country. The following comment from Lolwana (2005:15) is but one such example:

The [South African] NQF was and is a replacement system, which did not build on the strengths and weaknesses of the existing system.

Crouch (2005:14), although speaking in the context of the educational system as a whole and not only of the NQF, suggests that South Africa's 'innovativeness and careful dedication in reforming the equity and quality issues' can be a lesson to other countries. She does however express reservations about too rapid implementation:

South Africa – eight years after sowing the seeds of transformation – is only now beginning to reap the fruits, further example to the world that such profound reforms take years to design, more years to implement, and even more years to bear fruit (*Ibid.*)

New Zealand had a similar rapid and comprehensive approach:

Instead of starting with a specific problem, the New Zealand policy makers started with a grand design; only later did they find that the grand design had to be “rolled back” (Young, 2005:24).

3.7.6 Summary

The following points have emerged from the discussion on incrementalism:

3.7.6.1 Gradual and phased implementation is not always appealing

Young (2005:25) suggests that 'governments who feel the situation of their country is one of great urgency, as in the case of South Africa', may not find the way of least resistance (in this case the gradual and phased approach) appealing. Facing significant external and internal pressures (see Raffe, 2002) newly elected governments, such as the 1994 South African government, had no choice – the NQF had to be implemented over a short period in the most comprehensive manner possible – it did not matter if the NQF was the best idea at the time, it promised much and presented a feasible alternative to 'the new challenges of power in the era of globalisation and the aftermath of apartheid' (McGrath, 1997:81).

Granville (2003:269), referring to the Irish framework, echoes the sentiment:

The [Irish] framework, if it is too weak, will be purely a technical mechanism; if it is too strong, it may overpower the nuanced set of varied learning experiences from which it has grown.

3.7.6.2 Rapid and comprehensive implementation has not worked

According to Young (2005), countries such as South Africa and New Zealand that made the most radical break from their previous systems, also had the most serious difficulties. He argues that a radical break creates a vacuum, with no benchmarks to test new ideas. Such radical breaks are more often than not impeded by structural constraints.

3.7.6.3 Gradual and phased implementation is least prone to power struggles

Young (2005) argues that although more incremental approaches may be less appealing to governments with a greater sense of urgency (such as that of South Africa), they do 'minimise the likelihood that ideologies will intervene and as a result are more likely to avoid polarised positions' (2005:25).

The SCQF is an excellent example of a gradual and phased implementation that has been very successful – to the point that it is seen as a catalyst for greater unification. Despite the normally contested nature of frameworks that aim to unify all sectors, the Scottish process seems to be well on track:

The goal is to include all qualifications within the [Scottish] Framework, including community-based, employment-based and professional qualifications... (Raffe, 2003:240).

As before, a matrix offers an accessible presentation:

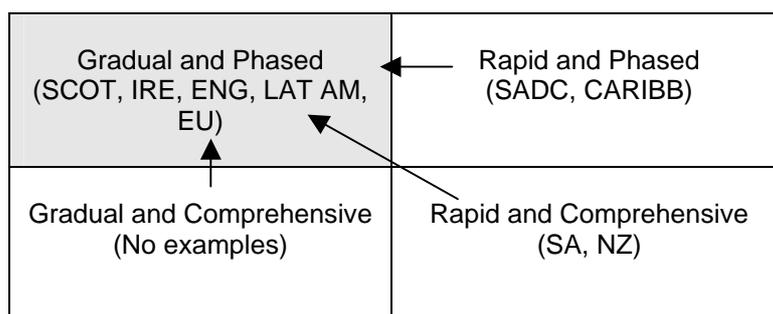


Diagram 4: Incrementalism matrix

The following observations are made from the diagram and the preceding discussions on scope and prescriptiveness:

- New Zealand and South Africa once again find themselves in the most tenuous category – one that has been plagued by contestations.

- Although gradual and phased implementation may be less appealing to new governments, they are definitely working for more established ones. This category is probably also the least prone to contestations; on the other hand it is also least likely to affect purposes of social transformation and redress.

Given enough time, all NQFs will be implemented over an extended period of time and most probably also in a phased manner. As the more radical attempts are reviewed and adjusted, it appears, at least from the examples discussed here, that a gradual and comprehensive incrementalist approach may be the most likely to succeed.

3.7.7 Identification of Incrementalism as object

Based on the preceding explication *Incrementalism* is identified as a fifth object in the NQF discourse and is used in the archaeological critique of the empirical dataset presented in *Chapter 4*. The following points are raised in support of this proposal:

As an object *Incrementalism* presents a category in the NQF discourse that exists through the establishment of a group of relations between authorities of emergence, delimitation, and specification. One example from this section is the often unrealistic timeframes that are associated with NQF development and implementation starting with the initial implementation in 1997, to the somewhat premature reviews since 1999, and the recent suggestions that the current legislation can be amended by 2006.

It has also been shown that *Incrementalism* is a category that contains other mutually exclusive sub-categories or components, such as:

- gradual and phased incrementalism;
- gradual and comprehensive incrementalism;
- rapid and phased incrementalism; and
- rapid and comprehensive incrementalism.

The following example of a guise of power is identified from the discussion:

- Voicing of the unrealistically short time in which it was expected that the NQF would bring about change is an example of verbalisation as technique of power in the NQF discourse.

3.8 POLICY BREADTH AS OBJECT IN THE NQF DISCOURSE

3.8.1 Introduction

Raffe (2003, in Tuck *et al*, 2004:7) describes policy breadth as:

...the extent to which the establishment of the framework is directly and explicitly linked with other measures to influence how the framework is used.

Raffe suggests distinguishing between *intrinsic logic* of a system and the *institutional logic* in which the system is embedded:

- *Intrinsic logic* refers to the adequacy of the inherent *design features* of an NQF, whereas
- *institutional logic* refers to the extent to which external *systems and policies*, including those of specific institutions, are related to an NQF.

3.8.2 Intrinsic logic

The *intrinsic logic* of an NQF arises from its design features, such as its flexible pathways and the establishment of equivalences between different qualifications. Design features also include structural arrangements such as level descriptors, assessment systems and credit requirements (see the next section on NQF architecture).

Young (2005) agrees with Raffe's interpretation of intrinsic logic, but suggests a more general interpretation that refers to conditions such as availability of assessment systems, re-training of teachers, sectoral organisations and new partnerships 'without which an NQF can never be more than a "map"' (2005:26).

According to SAQA (2005b), international practice has shown that progressive pathways alone are not sufficient - it is argued that "communities of trust" need to be built to support NQF implementation (see also Hargreaves, 2001). The Study Team (DoE and DoL, 2002) gave similar advice, suggesting that even though outcomes-based systems were successful across the world, one should note that there is still 'much to admire in another reputable qualifications tradition [such as in Denmark and Germany] which is process- or institution-based' (2002:58). They continue by explaining the strength of the approach in that qualifications are seen 'as an organic part of the whole education and training system' (*Ibid.*) and stress reliance on 'shared practice that is rooted in tradition and past experience' (*Ibid.*). If outcomes-based NQF qualifications are not trusted and accepted in the provider and user communities, they will not be used.

Young (2005:38) agrees that NQFs cannot be seen in isolation:

Anything other than a cautious approach aware on the one hand of the limited role of an NQF in achieving change and on the other hand that NQFs can never be seen in isolation, is likely to face the kind of difficulties experienced in the implementation of the South African NQF.

Examples of frameworks with low intrinsic logic are Australia and SADC:

Since 2002, the Australian NQF has had no levels and no authority (Keating, 2003).

It is recommended that the design features of the proposed SADCQF be determined [by] allowing the proposed implementation agency to carefully, and in full consultation with key stakeholders, determine the design features (TCCA, 2005:23).

Despite the initial lack of commitment to specific design features, the TCCA did recommend some design features for the SADCQF (TCCA, 2005:25-26):

- *standardised terminology* to improve understanding and facilitate implementation;
- *levels* (eight or ten) and an agreed set of level descriptors to ensure common understanding and allow for benchmarking;
- *credit value* – the SADCQF will have to recognise the variety of credits awarded by Member States and develop a matrix that allows for comparability and transfer – this may evolve into a Credit Accumulation and Transfer (CAT) system and importantly, also facilitate Recognition of Prior Learning (RPL) processes;
- *common standards and procedures* that can be used to validate standards from Member States;
- *common quality assurance criteria and procedures* that can be used to monitor regional education and training providers; and
- *regional database* that includes relevant information, an on-line forum and a register of all standards in use in Member States as well as a register of regional standards approved and registered throughout the SADC region.

The proposed SADCQF is a good example of a framework that initially has a low intrinsic logic, but that may increase as implementation commences.

An example of an NQF with high intrinsic logic is found in South Africa. The South African NQF is premised on principles (SAQA, 2000) that all, in some way or another, point towards the need for a

variety of intrinsic components. Examples include vertical and horizontal progression routes, credit transfer, articulation arrangements and equivalencies (CONOCER, 1999). At present Namibia, New Zealand, Mauritius (Phoolchund, 2003) and Lesotho can all be regarded as NQFs with high intrinsic logic.

According to Samuels *et al* (2005) there are many examples in the South African NQF where intrinsic logic (design features of an NQF that are associated with compliance) is becoming institutional logic (the extent to which the social justice issues and quality, etc., are becoming embedded in practice). The point to be made is that high intrinsic logic without some measure of institutional logic, does not constitute adequate policy breadth: both dimensions are required for effective NQF implementation, even more so with tight frameworks that aim to achieve redress and social transformation.

3.8.3 Institutional logic

According to Tuck *et al* (2004) institutional logic comprises of the:

...opportunities, incentives and constraints arising from such factors as the policies of educational institutions (in their roles as providers and selectors), funding and regulatory requirements, timetabling and resource constraints, the relative status of different fields of study and the influence of the labour market and the social structure.

Bouder (2003:347) agrees with Raffe (1992) that NQFs cannot be put in place just for their own sake, 'as a self-sustaining mechanism relatively removed from real aspirations of intended outcomes'. She also agrees with Young (2001) that a NQF that 'neglects the institutional logic within which it is implemented has little or no chance of playing a real role in the social organisations and acceptance of qualifications' (Bouder, 2003:348).

Tuck *et al* (2004) argue that a framework may be ineffective if it is not complemented by measures to reform the surrounding institutional logic – these could include local institutional agreements to promote credit transfer (cf. Heyns, 2005) or the encouragement of employers to reflect credit values in their selection processes. Other measures include the development of communities of trust and increased parity of esteem (Young, 2003 in Heyns, 2005). On all counts the importance of high, rather than low, institutional logic is emphasised.

According to Zuniga (2004:76) the connection between 'local and or sectoral efforts and national training policies' can be a critical weak point that contributes to a lack of co-ordination. Zuniga

further emphasises that significant effort is needed to co-ordinate various initiatives (such as funding and public and private work-related) to ensure synergy at a national level.

Legislation and other regulatory requirements also have a significant influence on intrinsic logic. As before, a wide range of examples exist: in Australia the AQF has 'no legislative base' (Keating, 2003:278); in comparison, South Africa has an extensive array of acts and regulations that have led to the establishment of a qualifications authority (SAQA Act, No. 58 of 1995), quality assurance bodies (ETQA Regulations [SA, 1998a]; Higher Education Act, No. 101 of 1997; GENFETQA Act, No. 58 of 2001), NSBs and SGBs (NSB Regulations [SA, 1998b]). Many countries in the process of implementing 3rd generation NQFs are at various stages of developing legislation. Examples include: Lesotho (Lesotho, 2004), Malaysia and Trinidad and Tobago (www.logos-net.net/ilo, accessed 15 April 2005).

Another prominent aspect of institutional logic is the degree to which NQFs contribute to, and articulate with other national strategies and developments. In South African a concerted effort has been made to determine the NQF's contribution (SAQA, 2005b) to the Human Resource Development Strategy and the National Skills Development Strategy. The results have shown that:

There is significant evidence that the NQF has made a positive contribution to the achievement of national strategies (SAQA, 2005b:93).

The government intends the NQF to make a major impact...but the goals themselves – access, mobility, progression, quality, redress and development – are wider and deeper than the NQF. They describe the major part of the permanent combined education and training agendas of the Ministries of Education and Labour, and require a range of other actions, including appropriate laws and policies, institutions, budgetary allocations, infrastructure development, professional development for teachers and trainers, and provision of learning resource materials (DoE and DoL, 2002:65).

According to SAQA (2005:47) there is sufficient evidence 'from the Irish and Scottish experiences that a single strategy is not enough to lead to deep change'. NQF implementation, particularly where the NQF is tight, prescriptive and aims to achieve social transformation, necessitates high institutional logic.

Examples of NQFs with *low* institutional logic are those of sub-Saharan countries (including SADC):

The sub-Saharan countries ...are attempting to introduce an NQF with relatively low levels of institutional provision (Young, 2005:16).

The SADCQF is remarkably quiet about the linkages of the RQF with other areas of the education and training system and how it fits into the entire process. More work is certainly required to see the RQF as part of other strategies for change (Samuels and Keevy, 2005:10).

Examples of NQFs with *high* institutional logic are found in Singapore and the Caribbean:

Singapore has a high level of institutional provision for both general and vocational education, the NQF is being introduced to further co-ordinate this provision and to link it to the accreditation of work based learning (Young, 2005:16).

[Caribbean NQF developments] define the links and connections between different levels of training and the ways of entering, re-entering and recognising paths for progress in educational itineraries, and areas and levels of competency (Zuniga, 2004:13).

3.8.4 Summary

The following points have emerged from the discussion on policy breadth:

3.8.4.1 Lack of institutional logic can lead to unrealistic expectations

In South Africa the expectations of what the NQF could achieve were unrealistic, particularly when seen as distinct from the Human Resource Development and the National Skills Development Strategies (Tuck *et al*, 2004). The sentiment is further supported by SAQA (2005b) and earlier in the *Study Team Report* (DoE and DoL, 2002:66):

Given its origins and scope, many South Africans have justifiably high expectations of the NQF in the transformation of education and training. However, the NQF was never intended to achieve transformation on its own and could not do so.

Widespread and unrealistic expectations of what the NQF could achieve, often seen in isolation from the broader policy context, soon resulted in disillusionment and criticism:

It has become quite clear, according to the Impact Study that the NQF cannot by itself deliver on its stated objectives. Factors both within and outside South Africa militate against these changes (Republic of Seychelles, 2004:22).

...there are widespread and unrealistic expectations of what an NQF can achieve in isolation from other policies and initiatives... the “real” objectives of the NQF are different from its explicit objectives. It could be argued that the means of resolution of both issues is the same: that the government must make explicit what the NQF is expected to achieve and the purposes for which it will be used. A democratically-elected government is entitled to use qualifications for the purpose of accountability if it so chooses. However, it should make transparent what these purposes are and open up the possibility of debate on potential conflict between particular purposes. Also, the NQF must be seen as an element (albeit a central one) of a wider plan for the transformation of education and training. Such a plan must address issues of infrastructure and professional development (SAQA, 2004:29).

3.8.4.2 Combination of high intrinsic logic and high institutional logic is preferable

Tuck *et al* (2004:10) argue that it is necessary to combine Raffé's categories, while also having strong leadership and resourcing:

...combine intrinsic and institutional logics while not subordinating social and educational goals to the needs of specific institutional interest groups.

3.8.4.3 There is a need for communities of trust

On various fronts, the need for improved policy breadth presupposes the existence of communities of trust between sectors and constituencies. The lack of such communities of trust contribute significantly to the obstacles faced during NQF implementation. The South African NQF is a case in point:

Building communities of trust is pivotal to any transformation of an education system. The strength and weakness of any reform will be judged not only on its outcomes related to aims, but also in the way the reform has succeeded in galvanising large groups of people to participate, debate the reform and often come to a consensus about the new system (Lolwana, 2005:14).

The following matrix illustrates the policy breadths of different NQFs:

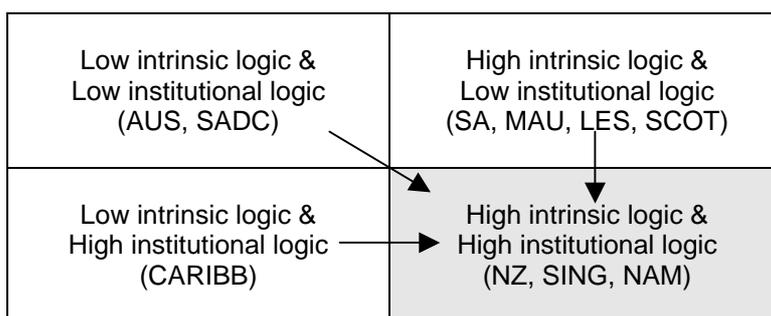


Diagram 5: Policy breadth matrix

It is observed from the diagram that NQF development in most countries and regions appear to be gravitating towards high intrinsic/high institutional logic, although there are exceptions such as that in New Zealand.

3.8.5 Identification of Policy breadth as object

Based on the preceding explication *Policy breadth* is identified as a sixth object in the NQF discourse. The following points are raised in support of this proposal:

As an object *Policy breadth* presents a category in the NQF discourse that exists through the establishment of a group of relations between authorities of emergence, delimitation, and specification. An example is the extent to which a high institutional logic requires comprehensive alignment and articulation between institutions and NQF policies and systems – in effect demarcating the areas of difference in order to remove them, but also the establishment of new systems according to which objects are grouped and classified.

It has also been shown that *Policy breadth* is a category that contains other mutually exclusive sub-categories or components, such as:

- intrinsic logic; and
- institutional logic.

The following examples of guises of power can also be identified from the discussion:

- The need for communities of trust is an example of how individuality can be influenced by the NQF and related policies, i.e. an example of bio-power.

- A range of policies and systems are needed to achieve the NQF's overt purposes. Stated differently, NQFs are implemented through legislation. This is an example of legal power as form of power in the NQF discourse.
- The need to increase institutional and intrinsic logics represent a positive form of power as long as social and educational goals are not ignored.
- High institutional and intrinsic logics also mean that the NQF is linked to other systems and measures which have a standardising effect to ensure increased compatibility. This is an example of normalisation as technique of power in the NQF discourse.
- Placing pressure on the system and implementers by voicing unrealistic expectations of what the NQF can achieve is an example of verbalisation as technique of power in the NQF discourse.
- Lack of communities of trust can also be seen as an example of an effect of power in the NQF discourse.

3.9 ARCHITECTURE AS OBJECT IN THE NQF DISCOURSE

3.9.1 Introduction

NQF architecture is understood to be the particular configuration of structural arrangements that make up the design of an NQF.

The difference between NQF architecture and the other typological components is best explained by reverting back to an earlier "framework" interpretation of an NQF (see *Chapter 1*) by Mavimbela (2001) and Cosser (2001). According to them, the very basic understanding of an NQF is that of a "constructional system" made up of, *inter alia*, various (non-physical) levels that form a grid upon which qualifications are pinned. Another way of explaining the architecture is to take the NQF as complex social construct (also from Cosser, 2001) and removing from this the underlying philosophies, overt purposes, scope, prescriptiveness, incrementalism and policy breadth, thus retaining the construction only.

As noted before, this is not a comparative study, although examples outside South Africa do make it easier to understand the position of the South African NQF. For this reason, the NQF architecture of other NQFs are included in the discussion below, although as before, these are only summarised. Despite the fact that significant amounts of relevant data were available to the author, the inclusion of a more detailed architectural overview of other NQFs would be misplaced in a

study that attempts to offer a more in-depth critique of the development and implementation of the South African NQF.

The following NQF architectural components are discussed in this section:

- *Qualifications* – the types, classes and registration requirements, as they are required to be aligned to NQF objectives and principles.
- *Outcomes-based education and training (OBET)* – the “reinvention” of OBET for the NQF.
- *Credit requirements and accumulation* – the differences and similarities between NQFs and Credit and Accumulation and Transfer (CAT) systems.
- *Qualifications register* – the databases that contain the qualifications, learner information, etc. that all relate to the NQF.
- *Bands, levels and pathways* – including debates about level descriptors, the “quicksilver” dimension of equivalence and broad comparability.
- *Assessment* – an NQF as a fair, credible and non-exclusionary assessment system.
- *Quality assurance* – an NQF as a quality assurance system.
- *Standards setting* – the specifying of end results and competencies and not the development of curricula.
- *Organising fields* – the way in which the NQF categorises, organises and accepts knowledge.

3.9.2 Qualifications

3.9.2.1 Overview

In South Africa a qualification is defined as follows:

...a planned combination of learning outcomes with a defined purpose or purposes, including applied competence and a basis for further learning (SAQA, 2000c:8).

Samuels and Keevy (2005:3) describe the two *classes* of qualifications on the South African NQF as follows:

Unit standard-based qualifications: Qualifications that are made up of a specific grouping of unit standards so that specific rules of combination for a qualification are adhered to – this refers mainly to the fundamental, core and elective components of the qualification. These

qualifications also have their own sets of outcomes and assessment criteria, but are characterised by the matrix of unit standards that are attached to them.

Non-unit standard-based qualifications: These are qualifications that specify only the exit level outcomes and assessment criteria...and are not made up of distinct unit standards. These qualifications are described by broad exit level outcomes and assessment criteria to ensure that a planned combination of learning outcomes is presented.

According to the NSB Regulations (SA, 1998b) a qualification may lead to a total of 120 or more credits on the NQF. A unit standard, on the other hand, may lead to any number of credits (although usually less than 120) and is defined as follows:

Unit standards are thus not qualifications and will rarely or never meet all the competencies described in the set of level descriptor statements at a particular NQF level. The breadth and depth of learning provided by particular unit standards must be enough however, to allow their registration at a particular level of the framework (SAQA, 2001b:12).

The NSB Regulations (SA, 1998b, Section 8[3]) prescribe three *types* of qualifications:

- (1) National Certificate at levels 1 to 8 that has 120 (one hundred and twenty) or more credits with 72 (seventy two) credits at or above the level at which the certificate is registered.
- (2) National Diploma that has a minimum of 240 (two hundred and forty) credits, of which at least 72 (seventy two) credits shall be at level 5 or above.
- (3) National First Degree that has a minimum of 360 (three hundred and sixty) credits of which at least 72 (seventy two) credits shall be at level 6 or above.

In order for a qualification to be registered on the South African NQF, it needs to be 'relevant, up to date and acceptable to major stakeholder and user groups' (SAQA, 2000c:22). Furthermore, NSBs (and to some extent SGBs) ensure that qualifications 'meet the NQF's transformational objectives of access, portability, and articulation' (*Ibid.*). In addition to these requirements, qualifications also have to meet specific technical requirements such as formatting to improve comparability, articulation and capturing on the national register of qualifications (SAQA, 2000e, also see Basel, 2005). These registration requirements are enforced through the NSB Regulations (SA, 1998b).

Once a qualification is registered on the NQF, it is placed in the public domain and is accessible to all stakeholders, downloadable from the SAQA website. This applies to all qualifications registered on the NQF, independent of how and where they were developed and is done to discourage exclusionary practices:

Through the requirement for articulation in nationally-registered qualifications and standards, the NQF has challenged directly what is perceived to be one of the most problematic social uses of qualifications, i.e. the practice of exclusion (SAQA, 2000d:9).

The initial qualification nomenclature, as prescribed by the NSB Regulations (SA, 1998b) was reasonably well accepted by the education and training community, although some attempts have been made to introduce more specific types of qualifications, such as in the Higher Education sector (DoE, 2004).

As is happening in Ireland (NQAI, 2003) and elsewhere, professional qualifications, or rather the lack of such a type of qualification is a current topic of debate. In South Africa there is common understanding that *professional qualifications* are those qualifications that are required by a particular professional/awarding body as partial prerequisite to obtain a professional status, whereas *professional designation* is generally understood as the “license to practice” in a particular field or sector. Professional designation is the ‘advanced professional standing of an individual based on recognition from a particular professional/awarding body’ (Keevy, 2005:12, also see Morrow, 2005).

An important feature of the qualifications that are currently registered on the South African NQF is the existence of a significant number of “historical” qualifications (approximately 92% of all the qualifications on the NQF [Keevy, 2005b]) - these are ‘qualifications that existed prior to NQF implementation and were registered by providers between July 1998 and June 2003’ (SAQA, 2005b:53). It is significant that *all* South African qualifications, including the “historical” qualifications, are registered on the NQF. The registration of the historical qualifications required that they had to be presented in an outcomes-based format. This process was not without complications. In many cases providers simply complied with the requirements through an artificial adding of outcomes to their qualifications. In other cases, the qualifications were carefully reconsidered, even “redesigned” to make sure that they were in fact outcomes-based:

It was also an attempt to give existing providers the opportunity to gradually align their qualifications to the NQF requirements, specifically placing the qualifications within an outcomes-based framework (Keevy, 2005b:4).

Blackmur (2003) raises an important point in his *Critique of the Concept of an NQF* when he states that ‘NQFs operate in an environment in which nomenclature is virtually meaningless’ (2003:279). That is despite the fact that the educational reforms of the 1990s intended to do exactly the opposite. Blackmur argues that the inclusion of “non-conforming” (or “historical” as discussed above) qualifications, mainly due to political and other circumstances, within NQF classification

structures by many qualifications authorities (also see Samuels and Keevy, 2005b), has led to different qualifications being assigned to the same NQF level. This in turn has led to inaccurate and unreliable information being conveyed to reliant labour markets.

Since the 2001 release of the CHE's draft *New Academic Policy* (CHE, 2001), there has been consensus that a nested approach to qualification specialisation would be followed in South Africa:

...the description of learning [moves] from the general and generic to the specialised and specific, with the more specific standards or qualifications always meeting the requirements of the more generic within which they are nested or framed (CHE, 2001:42).

The diagram below illustrates the nested approach to qualification design (also see Gevers, 2005 for a more detailed discussion).

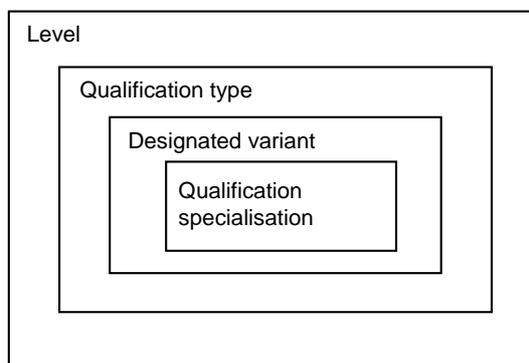


Diagram 6: Nested approach to standards generation and qualification specialisation

3.9.2.2 *Qualifications on other NQFs*

In Lesotho qualification nomenclature supports the comparability and portability of qualifications, the easy understanding of the outcomes of qualifications, and regional and international recognition of qualifications (Lesotho, 2004).

In Trinidad and Tobago National Vocational Qualifications (TTNVQs) are based on national occupational standards and developed in response to the needs of industry and the global market. TTNVQs are ideally combined with more general academic Caribbean qualifications. A qualification is defined as:

A certificate for a particular achievement that specifies the awarding body, the type of qualification and its title (www.logos-net.net/ilo, accessed 15 April 2005).

As from 2001, all Scottish qualifications have been included on the SCQF. Qualifications are described in terms of their level and volume (credit value) where:

...the volume of the outcome is estimated by the amount of time required by the “average” learner, at a particular level, to achieve the outcomes (SCQF, 2003:4).

In the process of moving from a classification system to a catalogue (and eventually a framework), the French National Commission of Certifications (CNC) points out that qualifications will need to be linked to the workplace and designed with the inclusion of social partners (Bouder, 2003:355):

To satisfy the long-standing goal to design qualifications as closely matched as possible with actual content of work, it will be expected that qualifications are designed by a joint commission in which social partners play a main role.

Although the New Zealand quality assurance is described as systemic and non-prescriptive, qualification developers must ‘provide evidence that their products... meet publicly documented criteria’ (Richardson, 1999:4).

3.9.2.3 Summary

The following points have emerged from the discussion of qualifications:

Qualification nomenclature is prescriptive

Qualifications obviously form an integral part of qualification frameworks – their definitions are definitive and prescriptive and linked to level of difficulty and volume. Furthermore, qualifications have to be aligned to the principles and objectives of an NQF and therefore also have to be developed in such a way that the principles and objectives are reflected, e.g. including representative stakeholder groupings or social partners.

Qualification nomenclature is dynamic

Although there is common agreement that a nested approach to qualification specialisation will benefit the system, various aspects of qualification nomenclature are currently being debated – this includes the definition of professional qualifications.

Qualification nomenclature can become unreliable

Despite the prescriptive criteria applicable to the registration of qualifications on the NQF, a significant portion of the qualifications on the NQF are “historical qualifications” that have been reformatted into an outcomes-based format – in some cases simply as an act of compliance. It is

argued by some that inclusion of “non-conforming” qualifications has led to a “mixed bag” of qualifications on NQFs; to the extent that nomenclature can become virtually meaningless, resulting in unreliable information being conveyed to labour markets:

Governments must set up quality procedures that help institutions develop a capacity for self-regulation and self-development. Indeed, research shows that institutions will set up internal procedures of quality to respond to external demands of the state; most will not go beyond that (Sursock, 2001:4).

Unitisation is contested

The inclusion of unit standards that are not qualifications and seldom meet all the required competencies required at a specific level, is often contested. To a large extent the labour market and vocational sector see advantages in unitisation. Higher Education on the other hand, argues that this is an example of a dominant technical humanist paradigm in which education has to serve an economic rather than a social good (Luckett, 1999), leading to a never-ending spiral of specification (Wolf, 2002).

Modularisation needs to be debated

The decision by most higher education providers, particularly the universities, to offer “whole qualifications” (non-unit standard-based qualifications), has led to a situation where portability and transfer of credits has been limited (also see Young, 2005). The possibility of agreeing to a more modularised approach may offer a viable solution to this problem. Oberholzer agreed as early as 1994:

The debates surrounding modularised programmes of study and whole-qualification programmes are familiar and in many respects are related to different philosophies of how learning takes place and what education is (Oberholzer, 1994b:26).

Placing qualifications in the public domain has implications

The functionality of NQFs requires that all registered qualifications become public property. In some cases, e.g. where qualifications have been developed by education and training providers (the so-called “historical qualifications”), providers’ competitive advantages are impacted on.

3.9.3 Outcomes-based education and training

3.9.3.1 Overview

Arguably a discussion on outcomes-based education and training (OBET) or an outcomes-based philosophy would be better placed in the earlier section on “Guiding philosophies” of NQFs, i.e. the underlying thinking that influences (usually covertly) the development and implementation of an NQF. The description of qualifications in terms of learning outcomes has however become such an integral part of NQF development that it cannot be considered as a covert influence anymore – the South African NQF is a case in point:

The [South African] NQF with its commitment to outcomes-based education and training is the means that South Africa has chosen to bring about systemic change in the nature of the education and training system (SAQA, 2000b:7).

Isaacs (2001) argues that the shift to OBET was not fully debated in the early stages of NQF implementation, and as a result, meant that OBET became ‘caricatured with often narrow, technician and behaviourist curriculum reform initiatives’ (2001:128). For Isaacs OBET was all about systemic change:

Our OBET is primarily about systemic change, and we have reinvented OBET for our purposes in an holistic and educationally sound manner (*Ibid.*).

Isaacs continues his argument by explaining that the debate has been further confused with school reform initiatives, such as Curriculum 2005, in that the NQF is regarded as synonymous when it should not be:

Such confusion [between OBET and Curriculum 2005] bedevils systemic change (*Ibid.*).

More recently, in the NQF Impact Study (SAQA, 2005b) a concerted effort was made to distinguish between outcomes-based education (OBE) as associated with Curriculum 2005 and an outcomes-based approach. It was however found that the terms are still conflated:

...the schooling sector, in particular, conflated the Department of Education’s outcomes-based education (OBE), with the NQF’s outcomes-based approach. It is recommended that targeted research is undertaken in this area, specifically in terms of the conceptual

differences and practice between OBE in schools and an outcomes-based approach as understood as a key underpinning principle of the NQF (SAQA, 2005b:32).

SAQA (2000b) lists a number of imperatives that resulted in the South African NQF being based on outcomes:

The first is a *historical imperative*. The fragmented South African society in 1994 was partly due to the fact that 'where the qualification was obtained was more important than what qualifying students actually new and could do' (2000b:6). In addition to the problem of a lack of access (and also parity of esteem between institutions), portability was limited. Institutions could arbitrarily decide to recognise or refuse qualifications achieved at other institutions. This inappropriate social use of qualifications required a focus on what learners know and can do, i.e. the learning outcomes that learners can demonstrate:

Outcomes-based education means clearly focusing and organising everything in an educational system around what is essential for all students to be able to do successfully at the end of their learning experience (Spady, 1994 in SAQA, 2000d:11),

The second imperative for using outcomes emerged from *global trends and discussions*. As argued by Raffe (2002), external pressures, such as globalisation, have resulted in a move towards more unified and integrated systems, albeit less than successful. The South African NQF was also affected - clearly articulated outcomes of learning achievements were seen as a viable manner in which to inculcate understandings of lifelong learning, the elimination of artificial hierarchies and new knowledge development. Here Kraak (1998) argues that by 1998, the education and training transformation process had become sidetracked, mainly due to the dominance of OBET:

The education and training reform has lost sight of its original purpose in seeking to create a unified and integrated system which would consciously address social inequalities...(1998:32).

A third imperative is *international comparability*. The international trend towards 'describing qualifications in terms of achieved learning outcomes' (SAQA, 2000b:7), and the resulting need for articulation between South African and international qualifications, were seen to be facilitated by using an outcomes-based approach.

SAQA (2001b) observes that few qualification frameworks are part of OBET systems. They argue that this places limitations on the extent to which qualifications can be pegged on higher education levels. This is further complicated by a lack of reliance on level descriptors 'that describe in a general way what the outcomes are that one would expect' (2001b:13).

The NQF's alignment with outcomes-based education is at the systems organisation level (SAQA, 2000d) and the combination is therefore most appropriate to effecting systemic change:

....outcomes-based education is primarily about systemic change [as advocated by Spady, 1994] and not curriculum change. The NQF then in its commitment to a system of education and training that is organised around the notion of learning outcomes, is about systemic change (SAQA, 2000d:11).

A key feature of OBET is that it is aligned with the goals of the NQF and posits mechanisms for structuring learning programmes in the form of unit standards...and course credits (Kraak, 1998:21).

Like many others, Mehl (1997) questioned whether the decision to premise the NQF on OBET was an attempt at a "quick fix". This thinking was supported by McGrath's concern, also in 1997, that government chose the NQF as vehicle of transformation simply because there was no feasible alternative. Mehl is however of the opinion that this was *not* the case with OBET:

Given the enormity of South Africa's human resource development problems, it would be seductive for policy makers to attempt some short-term remediation. It is to their credit that it does not appear as if this is the intention with the introduction of OBET (1997:3).

Mehl further associates OBET with learner-centeredness, accountability and a broader definition of a learning institution if a nation of lifelong learners are to be created:

A complete break with the past is called for. OBET can well be the vehicle to achieve this (1997:6).

Kraak (1998) argues in a similar manner – according to him, systemic discourses, which represented the ANC/COSATU view (mainly in the 1990-1994 period), were displaced as the driver for educational reform by an outcomes-based discourse. According to Kraak this rise of OBET was the product of three "historical antecedents" that were merged together to 'create a hybrid educational methodology' (1998:17):

- resurrection of the radical rhetoric of Peoples Education that emerged in the 1980s;
- the ascendancy of competency-based modular education and training in South African industry after 1985; and
- adoption of Australian and British “outcomes” models in the ANC and COSATU policy developments in the early 1990s.

Oberholzer (1994:12) agreed that SAQA needed to take note of the debates on OBET:

I would suggest that the caution expressed by opponents of an outcomes-based education system is ignored at peril.

SAQA raises similar concerns, most particularly around the expectations of OBET and RPL:

The danger that threatens the system is that outcomes-based education is perceived as the panacea for all ills in the South African education and training system. This is clearly not the case (SAQA, 2000d:13).

RPL in South Africa has, unlike similar initiatives in other countries, a very specific agenda. RPL is meant to support *transformation* of the education and training system of the country (SAQA, 2002b:11, emphasis in original).

French (personal correspondence, 27 July 2005) adds a final important point pertaining to the introduction of outcomes in South Africa as an alternative to the industrial-based competency model:

The logic and appeal of competency and criterion-based learning were very powerful. However, they had been used in industrial contexts in ways that had debased their currency. This was especially so in the case of “competence” which had been handled in a trivialising, reductive way, allowing box-ticking of discrete operations rather than the deeper judgements of the applied integration of knowledge, skills and values. “Outcomes” were seen as a term that could redeem the original rich meaning of competence.

3.9.3.2 OBET in other NQFs

Along with South Africa, the NZQF is ‘possibly the most comprehensive in the world’ (Philips, 2003:289). Philips argues that this is mainly due to the inclusion of an outcomes-based approach in both the South African and New Zealand NQFs.

The Scottish Credit and Qualification Framework (Raffe, 2003) and the proposed Lesotho NQF are also “outcomes-based” frameworks. For each qualification there must be statement of learning outcomes, which include the relevant knowledge, skills and attitudes as well as the combined purpose of the qualification (Lesotho, 2004).

The Irish framework is explicitly based on a ‘learning-outcomes model’ that is ‘agnostic on learning processes, curriculum specifications and teaching and learning methodologies’ (Granville, 2003:267). Granville argues that although this approach has been internationally accepted in the vocational sector, it ‘remains deeply alien’ (*Ibid.*) to educationalists, resulting in fears of utilitarianism, functionalism and reductionism.

3.9.3.3 Summary

The following points have emerged from the discussion on OBET:

The inclusion of OBET in qualifications can be attributed to external pressures

The decision to follow an outcomes-approach in the South African NQF was based on three imperatives: historical (the previous inappropriate use of qualifications), global (pressure towards unification) and international comparability. As is the case with a push for greater unification (although largely unsuccessful), globalisation in particular, has had a significant influence on the design of NQFs.

The NQF’s “reinvented” OBET is problematic

OBET is understood as a ‘key underpinning principle of the NQF’ (SAQA, 2005b:32) and is even “reinvented” to suit the purposes of the NQF (Isaacs, 2001). The reinvention process opens NQF developers and implementers to a Pandora’s box of possible criticisms, many of which have surfaced during the review period (also see Oberholzer, 1994 and Kraak’s [1998] argument that South Africa created a “hybrid educational methodology”). The confusion between the NQF’s “reinvented” OBET and OBE as implemented in schools is an example of one such manifestation.

Spady’s outcomes-based education is about systemic change and so is the South African NQF. This makes for improved compatibility with the South African NQF’s transformative purpose but also further contributes to the confusion between NQF initiatives and other, sometimes unsuccessful, initiatives.

OBET as the panacea for all ills

Since its implementation the NQF has been seen by many as a “quick fix” – a solution to all the deficiencies in the South African education and training system. As the unrealistic expectations

were not met, they were transferred to OBET. With the obstacles faced during the implementation of Curriculum 2005 (and the association thereof with the NQF), a third transfer of expectations to RPL took place. The current expectations of the use of RPL to achieve redress and system transformation are again unrealistic, particularly in the light of the early stages of infrastructural developments by education and training providers in an attempt to offer RPL services.

The NQF is agnostic

The NQF as a learning-outcomes model is agnostic on learning processes, curriculum specifications and teaching and learning methodologies (Granville, 2003). This has resulted in significant fears from educationalists.

In the South African NQF, outcomes (in the form of unit standards and qualifications) have been separated from inputs (learning programmes) (SAQA, 2000c). Education and training providers are responsible to develop learning programmes based on NQF-registered qualifications and unit standards.

UMALUSI raises the same concern:

An outcomes-based education system, though welcome, brings with it many problems relating to the issue of provision. For example, the separation of curriculum from outcome statements or unit standards is proving to be a greater challenge than originally thought (UMALUSI, 2004:4).

3.9.4 Credit requirements and accumulation

3.9.4.1 Overview

Most, if not all NQFs, use a system of quantifying the time taken to complete a qualification at a certain level of difficulty in a manner that makes it possible to better describe the qualification, but also to enable greater comparability and transferability of partial or complete fulfilment of the requirements of the particular qualification. Although these credits are determined in different manners in different countries, there is general consensus that the quantification is necessary:

...whilst most frameworks use at least a form of credit-rating, some frameworks are, or have been, primarily concerned with qualifications and may not be designed to facilitate the use of credit, for example the English frameworks to date. Of those which do have credit systems, not all are full CAT systems, since some are more focused on credit accumulation

and others on credit transfer. The South African system seems to be mainly concerned with accumulation at present, while, as its title suggests, [the European Credit Transfer System] is designed for transfer. The Scottish Credit and Qualifications Framework (SCQF) is designed to be a full CAT system (Hart, 2005:76).

In South Africa the time taken to complete a qualification (including the time spent during assessment, preparation, tuition and even in the workplace) is defined as “notional hours” that are directly linked to a number of credits:

SAQA uses a credit system based on the idea that one credit equals ten notional hours of learning, motivated in context in each case (SAQA, 2000c:9).

The credits are also linked to different types of knowledge:

Credits are obtained for the achievement of fundamental (basic knowledge and skills to master the outcomes of the qualification), core (the compulsory learning relevant to the outcomes), and elective (choice of credits that may or may not relate directly to the purpose of the qualification) knowledge that is integral to all qualifications that are recorded on the framework (Republic of Seychelles, 2004:15).

Young (2005) suggests that, during 2000, governments' interest in NQFs took a variety of forms, most significantly focusing on credit accumulation and transfer (CAT). As example the credit system associated with the South African NQF includes a focus on the completion of partial qualifications:

[CAT] is the process whereby a learner's achievements are recognised and contribute to further learning even if the learner does not achieve a qualification (DoE, 2004:10).

Naude *et al* (2005) argue that in the international context, CAT systems are generally *not* well supported and are only at the early stages of implementation. According to them, CAT schemes exist, or are being developed, mainly in England, Wales and Northern Ireland (examples include the European Credit Transfer System [ECTS]), Scotland (SCOTCATS) and Ireland (NICATS).

Kraak (1998) identifies three key characteristics of CAT schemes:

- facilitate movement across all divisions within education and training;

- they provide a flexible framework that allows maximum choice, exploration, pacing and specialisation – opening up the curriculum to students who would not have been in formal learning; and
- they allow for the development of new forms of knowledge which reflect new social developments that pose new possibilities for relating the vocational and academic in the curriculum.

SAQA (2005j) makes an important distinction between credit *accumulation* and credit *transfer*. According to SAQA (2005j:13) credit accumulation is the ‘accumulation of general credits toward a qualification’, is mainly localised and limited to a particular institution and on a particular level. Credit transfer on the other hand involves ‘vertical and/or horizontal transfer of specific credits towards a qualification’ (*Ibid.*), is often generalisable between different institutions, and can occur on the same or different levels.

Trowler (1998) associates the CAT system in the UK with two types of managerialism: hard managerialism that ‘seeks to rationalise and reshape higher education making fundamental changes to it...’(1998:31) and soft managerialism that ‘sees the framework as providing a solution for the economic crisis in higher education...a solution with limited or no ill-effects and limited impact on power and the role of the academic community’ (*Ibid.*).

Blackmur (2004) argues that the location of different size qualifications on the same levels (one qualification can be associated with a number of outcomes at a certain level, while another qualification may be associated with fewer outcomes at the same level) makes it very difficult to determine ‘how long it took a nominated individual to achieve or demonstrate the relevant outcomes’ (2004:274) – in brief, there is no direct correlation between the number of credits and the time taken to achieve the qualification.

Another serious objection raised by Blackmur is the lack of correlation between credits and modes of delivery, that also limits the international comparability of qualifications:

The proposition that credits are somehow meaningfully independent of modes of delivery or assessment is, at the very least, highly contentious. Credit values ought, in fact, to be intimately related to both the mode of delivery and assessment (*Ibid.*).

In contrast to Blackmur’s argument for greater alignment between credits and time taken to complete a qualification, SAQA has rather argued for a more flexible approach, one in which the time taken to complete a qualification becomes less important than the learner’s ability to demonstrate competence, regardless of the time taken (SAQA, 2002b).

3.9.4.2 Credits in other NQFs

The SCQF is probably the best example of an NQF that is also a CAT scheme. Credits on the SCQF represent ten notional hours of learning and qualifications 'provide the foundations of a learning and credit transfer framework' (SCQF, 2003:1) that is implemented throughout Scotland.

The European Credit Transfer System (ECTS) is seen to be the basis for the establishment of a common frame of reference to be overseen by the European Network for Quality Assurance in Higher Education in co-operation with the higher education community (DoE and DoL, 2002:41).

The soon to be established Lesotho Qualifications Framework (LQF) proposes that a credit value be attached to each qualification, defined as 'the average amount of learning and assessment time that would be required for one to gain a qualification or attain skills and knowledge associated with a training standard and is measured in terms of "notional hours"' (Lesotho, 2004:19) where ten notional hours is equivalent to one credit.

The NZQA's credit points are based on notional hours of learning. Different to the Scottish system, but similar to the South African one, this includes the time spent on assignments and in assessment (Blackmur, 2003).

Since 2003 the National Qualifications Authority of Ireland (NQAI) has been involved in developing policies and guidelines for a national approach to credit transfer (www.logos-net.net/ilo, accessed 15 April 2005).

3.9.4.3 Summary

The following points have emerged from the discussion on credit requirements and accumulation:

NQFs quantify learning but are not necessarily CAT systems

Credits as a quantification of knowledge acquired, the time taken to complete a qualification and the level of difficulty, form an integral part of the architecture of most NQFs, to the extent that some NQFs, such as the SCQF, are CAT systems. However, not all NQFs are CAT systems.

Limited correlation between credits, time taken and mode of delivery and assessment

Just as Granville (2003) refers to the "agnosticism of NQFs", authors such as Blackmur (2004) have expressed serious concerns pertaining to the difficulties in interpreting credits in terms of the time taken to complete a qualification, and the mode of delivery and assessment.

3.9.5 Qualifications register

3.9.5.1 Overview

Without exception, NQFs are mirrored in large national qualifications registers, such as the National Learners' Records Database (NLRD) in South Africa:

The National Learners' Records Database (NLRD) is an electronic management information system to facilitate the management of the National Qualifications Framework and enable the South African Qualifications Authority to report accurately on most aspects of the education and training system of South Africa (www.saqa.org.za, accessed 18 April 2005).

These databases typically contain (Keevy, 2003b):

- all qualifications and unit standards registered on the NQF;
- individual records of learners who achieve the outcomes of standards and qualifications registered on the NQF;
- learner achievements;
- details of quality assurance bodies; and
- details of accredited providers, assessors and moderators.

The NLRD was developed with substantial support from the Canadian International Development Agency (CIDA). The complexity and challenges of the task, however, resulted in insufficient skills transfer to SAQA staff, which led to concerns of sustainability, particularly during the extended review period:

An area of great concern is SAQA's ability to maintain and continue the development of the NLRD to meet new and changing requirements (EU, 2002:52).

In order for the national register to be continually updated, education and training providers, and more importantly, ETQAs need to develop and maintain compatible databases. SAQA (2001c) requires ETQAs to maintain databases that have the capacity to store:

- NQF standards and qualifications;
- related NSB information (including moderation and accreditation criteria);
- constituent assessors and moderating bodies;

- constituent providers; and
- learner records (including details of all certificates awarded to learners on achievement of NQF standards or qualifications).

To ensure that these information systems are “acceptable”, they have to meet the criteria of: flexibility in combining methods and tools; coherence in reporting through a common format; and management of information (including security of information and rights to privacy) (SAQA, 2001c:35).

3.9.5.2 *Qualifications registers of other NQFs*

The SADCQF *Concept Paper* (TCCA, 2005) explicitly details the need for a SADCQF database linked to a well-managed website. This should also include (2005:23):

- standardised corrigible lexicon of official or approved terminology;
- information about all key education and training structures and institutions, standards authorities, quality assurance systems, accreditation agencies, and recognition systems in the region; and
- analytical data relating to commonalities and differences of qualifications in the region.

According to the *Concept Paper* there will also be a need for a register of standards in general use within the region, ‘even if only in one member country (whether international, approved, historical)’ (TCCA, 2005:24). It is clear that the regional database will be a pivotal part of the development and implementation of the SADCQF.

3.9.5.3 *Summary*

The following points have emerged from the discussion on qualifications registers:

Qualifications registers are resource intensive

National and regional databases that facilitate the management of NQFs are costly to set up and require continual maintenance from highly skilled staff. This factor has a significant influence on the development of a qualifications register in developing countries, more so if there is limited skills transfer from donor agencies.

Compatibility with the national register is necessary

All other databases (e.g. those of providers and ETQAs) must to some extent be compatible with the national database. This expected standardisation of historical (and even new) databases is difficult to achieve and contributes to a highly prescriptive and regulatory environment.

Integration and a single national register

In countries such as South Africa that have set out to build a unified framework, a single national register leads to improved parity of esteem between educational and vocational sector qualifications, as well as those offered by different education and training providers.

3.9.6 Levels, bands and pathways

3.9.6.1 Overview

At present the South African NQF consists of eight levels, three bands (GET, FET and HET), and one unified pathway, as illustrated in the diagram below.

NQF level	Band	Pathway
8	HET	SINGLE UNIFIED SYSTEM
7		
6		
5		
4	FET	
3		
2		
1	GET	

Diagram 7: Levels, bands and pathway of the South African NQF

In contrast to most other NQFs, the South African NQF makes no distinction between different pathways. It does, however, appear certain that this position will change, as the tight and unified position has been prone to continual contestations.

In the South African context “level descriptor” means:

...that statement describing a particular level of the eight levels of the National Qualifications Framework (SA, 1998b).

The level descriptors also link directly to the qualification types:

...the construction of the frameworks reflect a one-to-one relationship between a qualification type and the level on the framework. Thus there is one set of descriptors (and one level of the framework) for each qualification type. This means that the level descriptors (where they exist) are actually qualifications descriptors (SAQA, 2001b:19).

A single set of level descriptors describes the level of competency required on each of the eight levels. The development of the level descriptors has not been without controversy. An initial discussion document was released by SAQA (2000f), after which a first set was developed (as required in the SAQA Act and NSB Regulations) (SAQA, 2001b) by a joint SAQA, SAUVCA and the CHE task team. These were also published in the CHE's *Draft New Academic Policy* (CHE, 2001). At present, Levels 1 to 4 have been gazetted (SA, 2004), while the remaining levels still have to be finalised.

Mehl's (2004:17) advice that the development of level descriptors should be approached with caution, is important in this regard:

Level Descriptor definition is not an exact science. And thus, while it is possible to define a Level with as many outcomes as you like, it will never be sufficient. It is therefore probably better to err on the side of brevity.

A similar proposal was made as early as 1996:

The level descriptors will be brief and very broad. They simply indicate a level of complexity in a cross-curricular way (DoE, 1996:38).

Blackmur (2004) is critical of the notion that placing qualifications on the same level implies that they are equivalent. He argues that the Scottish acceptance of "broadly comparable" 'is the best that can be hoped for' (2004:272). For Blackmur an NQF based on levels (and therefore also level descriptors) imposes serious limitations on the NQF, most notably the fact that it becomes 'logically possible to assign qualifications that have nothing in common to the same level' (2004:272) and the NQF is therefore also less able to offer the labour market useful information.

Although the three bands of the NQF have never been contested, the unified pathway has been a major topic for debate. This is because the pathway, or rather pathways, reflect the extent to the NQF is unified, linked or tracked (Raffe, 2002). Rejection of the single pathway has symbolised the

opposition by many stakeholders to the integrated approach embedded in the SAQA Act's (SA, 1995c) interpretation of the NQF.

3.9.6.2 Levels, bands and pathways of other NQFs

The SCQF has 12 levels and is made up of three distinct and linked tracks (there is, however, a strong, although gradual and phased drive towards a unified framework) based on origin of development, namely: the Scottish Qualifications Authority (SQA), Higher Education providers and the vocational sector. Importantly, various level-related aspects are currently under debate, such as the correspondence between Scottish Vocational Qualification (SVQ) levels and SCQF levels (Raffe, 2003).

The proposed Lesotho Qualifications Framework will have ten levels and a single set of level descriptors (Lesotho, 2004). Reference is made to the co-ordination (and stronger linkages) between three "worlds" or pathways: schooling, higher education and Technical and Vocational Education and Training (TVET).

The Philippines' TVET qualification framework has four certificate levels and is modular in structure (www.logos-net.net/ilo, accessed 15 April 2005).

3.9.6.3 Summary

The following points have emerged from the discussion on levels, bands and pathways:

Pathways are contested

Due to the fact that multiple pathways represent the possibility for linked or tracked systems, and therefore also a single pathway representing a unified system, the pathways of the South African NQF have been severely contested.

Level descriptors should be broad

Various attempts to develop definitive level descriptors have been unsuccessful in South Africa, mainly due to the fact that has been virtually impossible for all roleplayers to agree on such a description, resulting in some stakeholders suggesting that it may be better to 'err on the side of brevity' (Mehl, 2004).

Equivalence has a quicksilver dimension

Qualifications on the same level are seen as equivalent, even if they differ in credit values. Blackmur (2004) argues that this is extremely problematic, as it can deceive the labour market.

3.9.7 Assessment procedures

3.9.7.1 Overview

According to SAQA (2002b:5), assessment is:

...the process of gathering and weighing evidence in order to determine whether learners have demonstrated specific outcomes in unit standards and/or qualifications registered on the NQF.

The principles related to assessment in the South African context are: integration (also see SAQA, 2005k and SAQA, 2000c), recognition of achievements, access, progression, portability and articulation, legitimacy and credibility, flexibility, guidance of learners (SAQA, 2000:17) and RPL (in England, Wales and Northern Ireland, RPL is known as Accreditation of Prior Learning [APL]):

Recognition of prior learning is giving credit to what learners already know and can do regardless of whether learning was achieved formally, informally or non-formally (SAQA, 2001d:44).

Just as the NQF itself, RPL implementation is prone to contestations:

...an enabling environment demonstrating commitment to RPL is essential. Unless proper policies, structures and resources are allocated to a credible assessment process, it can easily become an area of contestation and conflict (SAQA, 2002b:18).

According to SAQA (2000) the registration of assessors and the establishment of moderation systems is a critical element of the quality management of NQF processes:

The register of assessors is a means of ensuring that there is a pool of assessors that are deemed to have the appropriate experience and expertise to assess according to principles and to the assessment requirements of the unit standard (SAQA, 2000c:19).

The resistance from some stakeholders, mostly the higher education sector, to register assessors (and therefore also to comply with the requirements, [SAQA, 2001e]) became an important feature of NQF implementation, to the extent that the Study Team (DoE and DoL, 2002) made numerous recommendations around the use of registered assessors, including that assessors employed by accredited providers may be exempted.

An important feature of NQF-related assessment was the focus on inclusivity:

A critical shift in the thinking behind the NQF in South Africa is the recognition that assessment in education should not aim to select and sort learners with a view to restrict progression, but that the assessment should aim to include a much larger proportion in learning (Oberholzer, 1994:4).

Oberholzer (1994) also noted the practical difficulties in establishing credible assessment procedures that would meet the needs of learners going to school for the first time at the normal age, or at the age of twelve or thirteen, or even adults who had no access to formal education. Although she says that '[s]ome would argue that it is simply not possible and nor is it desirable' (1994:4) she is of the opinion that 'a way must be found' to do so. She suggests that an NQF could be such a vehicle:

At this time I do not see many possibilities for bringing some sense and order to the mess and chaos that faces education reform and reconstruction in South Africa. One possibility is the establishment of an NQF (1994:5).

Oberholzer (*Ibid.*) also makes the important point that teachers were not equipped to deal with the radical shift in assessment practices associated with the NQF. This is supported by the results of the NQF Impact Study (SAQA, 2005).

Muller (2004) is of the opinion that assessment and qualifications, as a 'compound instrument regulating learner movement through the education system' (2004:221) is more often than not bitterly contested. According to Muller, there are two axes of contestation: an individualising purpose: those who distinguish between different modes of knowledge, learning and qualification (*dualists*), and those who don't (*monists*); and an aggregating purpose: those for whom assessment for pedagogic purposes is central (*centralisers*), and those for whom assessment as a signalling system for systemic performance is primary (*decentralisers*).

UMALUSI raises the concern that NQF assessments are so customised that they are difficult to quality assure:

The NQF has introduced an approach of quality assurance where assessments are customised to programmes and learning sites. This approach contextualises quality in local needs and priorities and has a more diversified model of trust regarding learning outcomes. This approach, whilst valid, has the inherent weaknesses of widely varying standards as well as limited and uncertain progression routes to higher education (UMALUSI, 2004:5).

3.9.7.2 Assessment procedures in other NQFs

In Zambia the NQF is seen as a vital part of a fair assessment system:

An NQF is believed to provide a fair assessment system, which measures achievements against agreed national standards and a quality assurance system. In the absence of the [Zambian] NQF, the quality of assessment and certification may be questionable (Kazonga, 2003:5).

3.9.7.3 Summary

The following points have emerged from the discussion on assessment procedures:

RPL requires an enabling environment

To avoid contestations, RPL implementation requires that policies, structures and resources be put in place.

More flexibility required for the registration of assessors

The required registration of assessors, though a good idea in principle, has been contested in the non-vocational sector. Greater flexibility around this issue, particularly for qualified educationalists and accredited providers, has been mooted.

NQFs bring about a radical shift in assessment practices

Following from the principles of OBET, NQFs advocate that assessment should be inclusive, and should not 'select and sort learners with a view to restrict progression' (Oberholzer, 1994:4).

Assessments will be contested

In the context of NQF implementation, assessment is used in a regulatory manner to control learner movement in the education system (Muller, 2004) to the extent that the quality assessment, in the absence of an NQF, may even be questionable (Kazonga, 2003). Such control will always be contested.

NQF assessments are difficult to quality assure

UMALUSI (2004) argues that extensive customisation of assessment, such as is possible within the NQF quality assurance system, complicates quality assurance and can lead to a variation in standards and limited progression to higher education.

3.9.8 Quality assurance

3.9.8.1 Overview

SAQA defines the NQF as a quality assurance system:

The NQF is essentially a quality assurance system with the development and registration of standards and qualifications as the first important step in implementing a quality education and training system in South Africa (SAQA, 2000c:3).

Quality is seen as a process:

[The SAQA] quality assurance system enhances quality of the institution and their learning programmes in terms of fitness for purpose. The emphasis is on quality as a process... (Naude, 2003:276).

According to SAQA (2000) there are three common understandings of quality that can be associated with the NQF. The first is premised on:

...representative and participatory processes and structures in which a variety of views, thinking and practice and experiences are brought together...the definition and understanding of quality is arrived at through broad participation, negotiation and synthesis (2000:4).

The second understanding of quality is based on the five objectives of the NQF in that the NQF 'seeks to establish a coherent, integrative education and training system that provides a platform for a unifying approach' (*Ibid.*).

The third is linked to the implementation processes of the NQF - mainly the establishment and registration of standards (through the SGBs and NSBs) that is complemented by the quality assurance and management of the achievement of standards (through the ETQAs):

The quality assurance system adopted is one in which [ETQAs] are accredited to safeguard and improve the delivery and achievement of NQF-registered standards and qualifications. It is through these structures that the needs of society and the learner can be brought together in balanced and accommodative ways (SAQA, 2000:10).

The SAQA Act (Act 58 of 1995) distinctly separates quality assurance and education and training provision:

The principle of separating “referee” and “player” makes it necessary to distinguish clearly between providers, assessors, [quality] assurance, and assessment achievements. In short, ETQAs cannot apply for accreditation as constituent providers (SAQA, 2001c:37).

Before the SAQA Act (SA, 1995c) was passed, the DoE (1996:44) suggested two categories of ETQAs: provincial departments of education that would set up ETQAs for their province; and SETAs. The suggestion was partially realised in that ETQAs were eventually accredited from two distinct sectors (see SAQA, 2001:14): the Education and training sub-system (HEQC and GENFETQA) and the Economic sector (SETAs, Professional Statutory Councils, Professional Institutes). The function and composition of ETQAs, particularly the two band ETQAs, HEQC and UMALUSI (previously GENFETQA), were continually contested, more so because they were required to report to SAQA, which was not deemed a body correctly positioned to be able to offer such oversight. Despite the contestations, SAQA required ETQAs to have national stakeholder representation at decision-making level in terms of the primary focus of the particular ETQA. SAQA also accommodated a variety of forms of ETQAs:

...ETQA models range from statutorily constituted single focus bodies to line functions within other bodies and structures (SAQA, 2001c:39).

Shalem, Allias and Steinberg (2004) offer a noteworthy critique of outcomes-based quality assurance: they argue that the quality of an academic course cannot be evaluated by judging it against pre-specified outcomes. According to Allias (2003 in Shalem *et al*, 2004) the lack of critique in South Africa, as compared to elsewhere in the world, can be ascribed to the democratisation process – she describes the South African quality assurance system as stemming from both the desire to protect learners and improve quality, and the ‘need for the state to create a regulatory framework’ (2003:54).

They further argue that the use of such regulatory (and bureaucratic) processes to address problems of conceptual misalignment have led to a marginalised quality assurance process – one that is unable to judge the quality of a course. They advise academics to refrain from complying with “the new regime of regulation” as this will be tantamount to becoming an accessory to the *creation of new knowledge production* that ‘flattens depth, eradicates the value of the tradition, [and] increases serious mistrust in academic practice’ (2003:74).

SAQA's (2000) counter argument was that the South African NQF is built on two basic tenets: A balance between the society's needs and the needs of the individual; and knowledge creation through partnerships between societal groupings:

...from academics and researchers to business, from workers to professional experts, from government to community organisations, from learners to professors (SAQA, 2000:3).

Allias and Shalem (2005:8) also argue that there are severe limitations of 'thinking about quality in higher education through the discourse of outcomes-based standards'. They suggest that the "dangers of postmodernism" (such as flawed conceptions of knowledge, bad teaching, weak forms of assessment and bad forms of curriculum design) are unlikely to be resolved by quality assurance processes, as 'the problem lies in the way in which knowledge is developed rather than in the way in which it is measured procedurally' (*Ibid.*):

...the outcomes-based approach [to quality assurance] is costly, time consuming, and could be used to disguise bad practice through forms of window dressing... (*Ibid.*).

Stephenson (2003), in a very similar argument to the one offered by Shalem *et al* (2004), argues for saving quality from quality assurance. He is concerned that although quality assurance systems may begin with the best intentions, they often end up 'spawning a "tick box" mentality' that eventually damages the reputation of higher education. His concerns are based on Barnett's (1994) theory that control over 'academic endeavour' is gradually being transferred to administrators – administrators that welcome quality assurance systems:

No wonder that academics are wary: the control and steering inherent in quality assurance systems is irresistibly tempting for administrators and policy makers (Stephenson, 2003:333).

Importantly, Stephenson supports Webbstock's (2001) argument that the newly established quality assurance system in South Africa (implying the NQF) should remain cheap and simple, and not become too bureaucratic and resource intensive. Instead, they argue, the South African system has begun:

...so complex, so resource-intensive, so bureaucratic in its orientation, that institutions are likely to wilt under the weight of compliance, or attempt to circumvent this particular system altogether...(Webbstock, 2001 in Stephenson, 2003:33).

In summary, Stephenson lists a number of lessons to be learnt to improve the quality of quality assurance and to avoid South Africa becoming another “global casualty”:

- bureaucracy must be minimised;
- an external quality assurance agency (such as the HEQC and/or SAQA) should position itself as a support mechanism rather than an inspectorate (see UMALUSI’s [2004:5] suggestions for moving in exactly the opposite direction, i.e. to establish a national inspection system);
- ‘There is a real danger of making the measurable important when the important is unmeasurable’ (Stephenson, 2003:334) – this practice fosters a “league-table mentality” which can lead to wide-spread window-dressing;
- a developmental approach to quality assurance is necessary; and
- ‘In order to save quality from the quality assurance bureaucracy, responsibility and control must ultimately rest with staff and students within higher education institutions’ (Stephenson, 2003:337).

The CHE has expressed concerns about the inconsistency in the use of terms in quality assurance nomenclature:

The use of key quality assurance terms is not the same across the board. For example, the HEQC uses the term programme accreditation, some organisations use the term programme approval...There is thus considerable potential for confusion on the part of providers... (CHE, 2004b:6).

3.9.8.2 Quality assurance in other NQFs

The main objective of the Qualifications Framework for Lesotho (QFL) is quality assurance through the setting of standards, assessment, moderation and verification, and accreditation (Lesotho, 2004).

It is widely acknowledged that the separation of accreditation from the issuing and recognition of qualifications has been problematic in the English system (www.logos-net.net/ilo, accessed 15 April 2005).

3.9.8.3 Summary

The following points have emerged from the discussion on quality assurance:

The NQF is a quality assurance system

Although not all NQFs are CAT systems, all NQFs are quality assurance systems. Whatever the purpose of a particular NQF, there is always some element of quality assurance and development of standards – importantly, based on a common understanding of what quality is.

Separate quality assurance and education and training provisioning

The principle of separating the referee and player is generally accepted and implemented. There have however been isolated instances where ETQAs were involved in the development of learning materials and even the delivery of training. Such instances have resulted in an outcry from education and training providers, particularly small-, medium- and micro enterprises (SMMEs). The total separation of quality assurance and the issuing of certificates, on the other hand, has proved to be problematic in the United Kingdom.

The composition and the role of quality assurance bodies are severely contested

Various proposals for the reconfiguration of ETQAs, including changes to roles and responsibilities, have plagued South African NQF implementation. In 1994 the DoE suggested that SETAs and Provincial Education Departments be accredited as ETQAs, while the SAQA Act (1995) allowed for the accreditation of professional bodies as well. More recent proposals for the elevation of the two band ETQAs to Qualifications and Quality Assurance Councils (QCs) to have a greater say in the quality assurance of the HET and GET/FET bands respectively, is another example. The difficulties ETQAs experience to co-operate in common areas, e.g. the lack of Memoranda of Understanding (MoUs) between the band ETQAs and the SETA ETQAs, is another example.

Except for the disagreements between the DoE and DoL, the contestations related to inter-ETQA matters, stand out as some of the most obvious manifestations of power struggles.

Outcomes-based quality assurance is contentious

Shalem *et al* (2004) have found significant support for their argument that the quality of academic courses cannot be evaluated by judging them against pre-specified outcomes. Whether in agreement with their argument or not, they present a position of extreme criticism of current quality assurance practices – a position that is more likely to gather momentum than to recede. UMALUSI echoes similar sentiments:

...the introduction of the NQF has also resulted in highly decentralised processes, responsibilities and quality assurance of curriculum development. It is not clear how the many and divergent ways adopted will ever culminate to one qualification that means and has the same currency (UMALUSI, 2004:4).

Quality assurance must be supportive and developmental

Stephenson (2003) calls for a quality assurance system that has minimal bureaucracy, is supportive rather than inspection-orientated, developmental and decentralised.

Quality assurance terminology is used inconsistently

The use of terms such as accreditation, registration and programme approval (e.g. CHE, 2004c) across different ETQAs is inconsistent and leads to the confusion of providers, but more importantly, creates loopholes within the national quality assurance system that can be exploited by certain providers. The fact that SAQA has developed a wide range of policies and criteria and guideline documents to avoid this problem, suggests that the inconsistency may rather be purposeful attempts to show some independence from SAQA.

3.9.9 Standards setting

3.9.9.1 Overview

According to SAQA (2000:11) the 'form in which the standards and qualifications are registered on the NQF' is an integral part of the quality of the national education and training system. Through its NSBs and SGBs, SAQA has established a hierarchy of bodies that are able to develop standards and qualifications in such a form that includes (SA, 1998b):

- specific outcomes to be assessed;
- assessment criteria and moderation process; and
- range statements (guide for the scope, context and level).

An NSB represents the interests of a specific field and consists of stakeholder groupings that play the role of "wise elders". They do not necessarily have the expertise to generate standards for every sub-field, this is delegated to the SGBs that are made up of subject matter experts (SAQA, 2000).

Standards setting is seen as separate from curriculum, learning programme content and assessment:

...standards setting [in South Africa] is not about developing a curriculum or syllabus (learning programme) but about specifying end results or competencies which the learner should have achieved on being awarded the qualification (Seychelles, 2004:14).

In terms of the registration of unit standards and qualifications, the point needs to be made that *courses*, i.e. the learning content of a *learning programme* is not registered on the NQF. What is registered on the NQF is a description of the outcome, or the *result of learning*. The course (content) therefore is the vehicle whereby providers of education and training ensure that learners meet the requirements of the unit standard and/or qualification. Learning programmes/learning content may be subject to programme evaluation initiated by the Education and Training Quality Assurance Body (ETQA), but will never appear as such on the NQF (SAQA, 2004j:12, emphasis in original).

Ultimately, standards setting is the process of the development of national standards that specify, through outcomes, the end results or competencies which the learner should achieve. The NSB Regulations (SA, 1998b) describe such standards as:

...specific descriptions of learning achievements agreed by all major stakeholders in the particular area of learning.

SAQA (2000:16) goes even further, arguing that national standards are:

...agreed repositories of knowledge about “quality practice” or competence, as well as about legitimate criteria for assessing such competence.

According to SAQA (2000) the primary *users* of such national standards are: the world of work (e.g. in performance appraisal, recruitment and career progression); the world of curricula; and the professional world (i.e. professional bodies require standards against which professionals can be licensed [cf. Keevy, 2005]). On the other hand the *uses* of standards are as follows: a guide to learners and educators; descriptions of end points of learning and what must be assessed; and a means of recognising achievements.

Since the early 1990s the NQF has included a strong focus on the separation of the quality assurance and standards setting systems. More recently (DoE and DoL, 2003 and DoE, 2004) suggestions have been made to allow both processes to be placed under one roof. This is in direct contradiction to SAQA's long-standing position that the integrity of the NQF will be affected:

...the integrity of the NQF is established by the separate and yet, inter-linked process of standards setting and quality auditing of learning provision. The separation breaks down elitist power enclaves that could result in narrow, inward looking definitions of quality and, therefore, the delivery of learning provision whose beneficial impact on personal development and national socio-economic development...is inadequate, inappropriate and irrelevant (SAQA, 2000:7)

3.9.9.2 *Standards setting in other NQFs*

According to Granville (2001), many NQFs have separated standards setting from curriculum and assessment design, although Ireland and Scotland are exceptions:

The process of standards setting in the NQF is explicitly separated from the function of curriculum and assessment design. In other systems, notably Scotland and Ireland, this distinction is not as absolute (2001:14).

3.9.9.3 *Summary*

The following points have emerged from the discussion on standards setting:

The composition and the role of standards setting bodies are severely contested

As has been the case with the ETQAs, the role and function of the NSBs and SGBs have been debated within most discussion documents. Originally intended to be temporary bodies that would evolve into *Standards Review Bodies* (HSRC, 1995), the NSBs were still fully functional at the end of 2004. More recently it has been suggested that the NSBs be transformed into *Consultative Panels* (also referred to as Fit-for-purpose Panels) that will function in close collaboration with the proposed two QCs: HI-ED Qualifications and Quality Assurance Council (QC) and GENFET QC.

Separate quality assurance and standards setting

As was the case with quality assurance and education and training provisioning, the separation of quality assurance and standards setting has been a cornerstone of NQF development and implementation in South Africa. Originally envisaged as a mechanism to break down 'elitist power enclaves' (SAQA, 2000:7), the approach has been rejected as unnecessarily onerous and bureaucratic. Recent proposals (e.g. DoE and DoL, 2003 and DoE, 2004) seem to suggest that quality assurance and standards setting will be combined.

Agnosticism on standards setting

Many NQFs (with the exception of Ireland and Scotland) separate standards setting from curriculum and assessment design. Just as NQFs are agnostic on learning processes, the separation of curriculum and assessment design can further contribute to concerns from educationalists.

3.9.10 Organising fields

3.9.10.1 Overview

In order to categorise different types of learning (and knowledge), NQFs divide education and training into a number of organising fields. South Africa has twelve organising fields with a range of sub-fields (SAQA, 2000c:6):

1. Agriculture and Nature conservation
2. Culture and Arts
3. Business, Commerce and Management
4. Communication Studies and Language
5. Education, Training and Development
6. Manufacturing, Engineering and Technology
7. Human and Social Studies
8. Law, Military Science and Security
9. Health Sciences and Social Services
10. Mathematical, Physical, Computer and Life Sciences
11. Services
12. Physical Planning and Construction.

The twelve fields were slightly amended from those proposed during the conceptualisation period (NTB, 1994).

3.9.10.2 Organising fields in other NQFs

In Brazil some twenty organising areas are used (Zuniga, 2004:35); in Mexico a classification of twelve areas and 70 sub-areas is used; in Australia national industry competencies are recognised at four levels in a wide range of trades, industries and enterprises; and in Trinidad and Tobago the TTNVQ covers six specific industries (www.logos-net.net/ilo, accessed 15 April 2005).

3.9.10.3 Summary

The following point has emerged from the discussion on organising fields:

Organising Fields are not as contested

The broad and overarching non-exclusionary nature of the Organising Fields may be the reason why there is only limited evidence that the categorisation of knowledge and qualifications as associated with NQFs, is contested. Many categorisations are similar, often industry-based (e.g. the Standard Industrial Classification [SIC] codes), but are also aligned to traditional educational classifications or disciplines. According to Mehl (2004:9) there are three ways in which the South African NQF could categorise knowledge:

- 12 NQF Organising Fields;
- 25 SETAs plus their chambers, resulting in 150 domains; and
- normal disciplinary divisions.

3.9.11 Overview of NQF architecture

This section has covered a range of different architectural components of NQFs, including qualifications, OBET, credits, databases, level, assessment, quality assurance, standards setting and organising fields. Each section has also included some component-specific findings as they pertain to the development and implementation of the South African NQF. The following are some overarching observations:

3.9.11.1 The NQF is agnostic

The South African NQF is agnostic on learning processes, curriculum specifications, teaching and learning methodologies (Granville, 2003), and assessment design (SAQA, 2004j). The NQF is also institution-free, i.e. qualifications are viewed as equivalent, independent from the education and training provider, as long as the provider meets the minimum accreditation requirements (Oberholzer, 1994b). Furthermore, the NQF separates outcomes (in the form of unit standards and qualifications) from inputs (learning programmes) (SAQA, 2000c). There is also limited correlation between credits, time taken and the mode of delivery and assessment (Blackmur, 2004).

As Granville (2003) points out, this agnosticism has the potential to invoke fears from educationalists of utilitarianism, functionalism and reductionism, but also, as Oberholzer warns, to cast doubt on the integrity of the NQF:

Although in theory a NQF is institution-free, in reality I believe it is not possible to separate a qualification from the providing institution and more specifically from the philosophy that governs the provider. If the NQF ignores this, the market place will make its own assumptions of the value of the qualification and the integrity of the NQF is lost! (Oberholzer, 1994:22).

3.9.11.2 *There are contested and uncontested NQF architectural aspects*

As noted before, several aspects of NQF architecture have come under review and changes have been proposed, primarily because most stakeholders view the NQF as only a constructional system, and not a complex social construct implemented by governments with both overt and covert purposes. In many, if not most cases, the contested architectural aspect therefore implies a deeper disagreement. The following examples have been identified – the associated typological component is noted in the third column:

Contested architectural aspect	Comments	Typological component
Qualification nomenclature	Regarded as prescriptive and lacking contextualisation	Prescriptiveness
Unitisation	Unit standards are seen as not meeting the required competencies for a specific level	Underlying philosophy
Pathways	Various suggestions for amendments	Scope
Quality assurance and standards setting bodies	Composition and roles are critiqued as well as separate/combined quality assurance and standards setting processes	Purpose, Governance and Policy breadth
Level descriptors	Need to be redrafted or still incomplete	Scope
Registration of assessors	Resistance and discussions on exemptions	Prescriptiveness
Outcomes-based quality assurance	Compliance is regarded as creating knowledge without any depth	Underlying philosophy and Prescriptiveness
Reinvented OBET	Confused with other OBE initiatives	Policy breadth
Quality assurance terminology	Used inconsistently	Underlying philosophy and Prescriptiveness

Table 16: Architecture-related contestations

3.9.11.3 *The NQF is seen as a panacea*

Unrealistic expectations, first of the NQF, then of OBET and thereafter of RPL, have continually plagued South African NQF implementation. Following from McGrath's (1997) "no feasible alternative response" and Weick's (1995, in Granville, 2003) "when you're lost, any old map will

do...when you're confused, any old strategic plan will do", it seems as if South Africans have indeed been frantically looking for a panacea for the ills that the apartheid legacy had left behind. This does not necessarily mean that the NQF idea was faulty, but does pose questions as to appropriateness, as Granville (2003:262) points out:

The danger is, however, that ideas and practices that have evolved in one set of circumstances may be taken and adapted to another, quite different, set of management requirements. In this case, the requirements may be those of bureaucratic sanity at the expense of innovative practice.

3.9.11.4 The NQF is a regulatory mechanism

Various examples support the notion that the purpose of the South African NQF is not only to effect social transformation, but also to regulate. There are, however, various calls for a simple, developmental and non-bureaucratic system.

Diverging views exist of the extent to which ETQAs regulate their sectors. Authors express concerns about prescriptive nomenclature (that can become redundant) and the quantification of learning (i.e. making the measurable important when the important is unmeasurable [Stephenson, 2003]). Some ETQAs, on the other hand, are of the opinion that state control in some sectors, e.g. private provisioning, is inadequate:

Currently, the controls exercised by the state on private provision in all sectors are weak, if non-existent (UMALUSI, 2004:3).

3.9.11.5 NQFs bring about change

Radical shift in assessment practices, the placement of qualifications in the public domain, and the establishment of a single national qualifications register, are examples of how the South African NQF has brought about change.

3.9.11.6 The NQF is influenced by external pressures

The inclusion of OBET in qualifications and lifelong learning are two examples of how the South African NQF has been influenced by international developments. The NQF, OBET and lifelong learning share a number of similarities: they are all contested, are often linked to vocationalism, are associated with systemic transformation and most importantly, are "reinvented" in individual countries.

According to Walters (2003), one of the first steps in South Africa was to develop a contextual working definition of lifelong learning that also has some international currency. The same happened to OBET (Isaacs, 2001) and the NQF itself, consisting of varying ranges of typological components across different countries. Walters draws on the work of Taylor *et al* (2002) to show that lifelong learning is, amongst others, associated with vocationalism and performativity, social control and incorporation, radical social purpose and community development.

The NQF, OBET and lifelong learning may have become uneasy (although very compatible) bedfellows as a result of the commonalities that they share, but also due to similar external pressures that influence their implementation.

3.9.12 Identification of Architecture as object

Based on the preceding explication *Architecture* is identified as another object in the NQF discourse. The following points are raised in support of this proposal:

As an object *Architecture* presents another category in the NQF. Architecture is particularly well qualified as an object as it focuses almost exclusively on authorities of delimitation (e.g. the prerequisites for a qualification to be registered on the NQF) and grids of specification (e.g. quality assurance and standards setting systems).

It has also been shown that *Architecture* is a category that contains other mutually exclusive sub-categories or components, such as:

- qualifications;
- OBET;
- CAT;
- qualifications register;
- levels, bands and pathways;
- assessment;
- quality assurance;
- standards setting; and
- organising fields.

The following examples of guises of power can also be identified from the discussion:

- Support for the NQF objectives camouflaged the fact that interpretations vary and are even contradictory – this is an example of archivisation as technique of power in the NQF discourse.
- The control and steering inherent in quality assurance systems, such as those associated with the NQF, are mostly contested – an example of control as technique in the NQF discourse.
- Agnosticism of the NQF with regards to curriculum, assessment and institutions in particular, resulting in increased parity of esteem between qualifications, is an example of distribution as technique of power in the NQF discourse.
- The use of learning outcomes represents a normalisation that prescribes conformation or exclusion – an obvious example of normalisation as technique of power in the NQF discourse.
- Stakeholders express views that the NQF is the panacea to the legacy of apartheid – an example of verbalisation as technique of power in the NQF discourse.

3.10 GOVERNANCE AS OBJECT IN THE NQF DISCOURSE

3.10.1 Introduction

According to a recent CHE report (Hall *et al*, 2002:14) governance includes:

...all activities that can be seen as purposeful efforts to guide, steer, control or manage an institution, sector or process.

SAQA and CIDA (2003) add another co-operative dimension to governance. Referring to statements by Ministers Asmal and Bengu, they explain that the concept of co-operative governance was proposed by the National Commission on Higher Education (NCHE) when defining the relationship between the higher education sector and the state. Key characteristics include: democracy; a strong state model; assertive government bureaucracy with adequate capacity; multiplicity of autonomous civil society constituencies which 'acknowledge their different interests, maintain separate identities and acknowledge their mutual interdependence and responsibilities for a common goal' (NCHE, 1996 in SAQA and CIDA, 2003:8).

Drawing from the CHE report (Hall *et al*, 2002:14) again, good NQF governance will ensure that:

...policies and systems are in place in order to manage and administer institutions in an effective and efficient manner to achieve their, as well as the [NQF's], objectives.

Drawing on the same report (*Ibid.*), Badat (2004:3) distinguishes between the *governance of quality* and the *quality of the governance of quality*. Badat suggest that the *governance of quality* should include the activities as noted above, and that the *quality of the governance of quality* is a consequence of three related factors:

- quality assurance system building and implementation;
- thoughtful, creative, imaginative and innovative, and highly consultative systems building including frameworks, policies, criteria, etc.; and
- forging of democratic consensus.

Badat's comments are relevant to NQF development and implementation in that they offer a means of evaluating the quality of the governance as associated with the NQF. Aspects that are highlighted are: the achievement of the overt purposes of the NQF through specific activities; the range of policies and systems that are in place to achieve the NQF's purposes; and the extent to which NQF governance is participatory and consensus-based. These aspects will be revisited at the end of this section.

Applying this understanding of governance to the NQF, and bearing in mind that NQFs also have covert purposes, the following interpretation of governance is made in the context of this study:

NQF governance includes all activities that are overt and/or covert efforts to guide, steer and control NQF development and implementation.

This section also includes a number of international examples although, as before, the discussion focuses on national legislation and regional agreements that affect the South African NQF in particular.

The following aspects related to NQF governance are discussed in this section:

- *Regional conventions, NQF-related legislation in South Africa (and in other countries) and memoranda of understanding (MoUs)* – conventions and declarations applicable to the South African NQF, relevant South African legislation, and the agreements between ETQAs are discussed.
- *Implementing agencies* – the qualification authorities and other main overseeing and implementing agencies tasked to develop and implement NQFs.

- *Government departments* – the South African Departments of Education and Labour.
- *International roleplayers* – such as the OECD, ILO and UNESCO.
- *Other stakeholders* – including education and training providers, the public associations, lecturers and teachers.
- *Funding* – the various sources of NQF funding and the impact of extensive donor involvement.

3.10.2 Regional conventions, national legislation and memoranda of understanding

Three levels of agreements relevant to NQF governance are discussed. The first is regional and does not include enforceable legislation, but is based on voluntary participation, trust and agreements. The regional frameworks, and to some extent the national frameworks that focus on international comparability, are heavily dependent on regional agreements and conventions. An awareness of cross-border challenges also exists:

Meeting the challenges of cross-border education will require a coherent effort not only by higher education providers, but also by governments and competent authorities within nations (International Association of Universities and others, 2005:4).

The second level is national legislation. Most, but not all NQFs are established through rigorous legislative processes that include consultations and eventually parliamentary approval of NQF Acts. Strong and prescriptive frameworks, such as the South African NQF, cannot function without a legislative basis, whereas looser and weaker frameworks, such as those of Australia, SADC and the EU, are less dependent on legislation:

[The proposed EQF] will therefore be entirely voluntary without legal obligations on Member States (Gordon, 2005:4).

The third level of governance originates from voluntary processes between quality assurance bodies, but becomes legally enforceable once MoUs are signed.

3.10.2.1 Regional conventions

The main African regional agreements that influence academic mobility and credit transfer in the region are:

- Arusha Convention (2003) (UNESCO, 2004)
- SADC Education and Training Protocol (2000) (SADC Secretariat, 1997)
- Accra Declaration on GATS and the internationalisation of higher education in Africa (2004) (Knight, 2004, also see World Trade Organisation [WTO], 1999).

Another related agreement is the Common Market for Eastern and Southern Africa (COMESA) Treaty concluded in 1994.

Similar conventions and developments exist in the EU. Examples include the Lisbon Strategy (2000), the Bologna Declaration (1999), the European Common Quality Assurance Framework (CQAF) (2003) (CEDEFOP, 2004) and CARICOM (see Zuniga, 2004):

Meeting the challenges of cross-border education will require a coherent effort not only by higher education providers, but also by governments and competent authorities within nations (International Association of Universities [IAU] and others, 2005:4).

Governments can be influential in promoting adequate quality assurance, accreditation and recognition of qualifications in all countries and may have overall policy coordination in most higher education systems (OECD and UNESCO, 2005:3).

Arusha Convention (1981, amended 2003)

According to the Arusha Convention (Arusha Regional Committee, 2003) African countries have been 'long thwarted by colonial domination and the consequent division of the African continent' (www.dakar.unesco.org, accessed May 2005). The Arusha convention calls for intensive co-operation between African states whilst respecting the character of their education and training systems. It is a regional convention on the recognition of higher education studies and degrees in Africa, and was adopted on 5 December 1981 in Arusha, Tanzania (cf. Sabaya, 2004), with a view to promoting regional co-operation through the academic mobility of lecturers and students. The Arusha Convention is a framework agreement which provides general guidelines meant to facilitate the implementation of regional co-operation relative to the recognition of studies and degrees through national, bilateral, sub-regional and regional mechanisms that exist or are created for that purpose (UNESCO, 2004). The Arusha convention was revised in Cape Town (June 2002) and finally amended in Dakar (June 2003).

The Arusha convention is implemented at three different levels: a national level, by the national commissions for the recognition of studies and degrees; a sub-regional level, by sub-regional organs like the African and Malagasy Council for Higher Education and the technical committee of

the Southern African Development Community (SADC); and the regional level, by the Regional Committee in charge of implementing the Arusha Convention (*Ibid.*).

According to Allias (2004) the Arusha Convention aims to enforce African solidarity and promote African cultural identity by calling for the setting up of national and sub-regional bodies to implement activities. It calls not only for recognition of diplomas, but also for recognition of stages of study, and knowledge and experience required, in order to ensure greater mobility of students and people engaged in an occupation throughout the African continent.

SADC Education and Training Protocol (2000)

The SADC Education and Training Protocol entered into legal force in July 2000 (SADC Secretariat, 1997). The Protocol was adopted and signed by the Summit Heads of States of the SADC Member States as a policy framework and mechanism for regional co-operation in the improvement of education within the SADC region and to raise the standard of education and training systems. It seeks to create conditions intended to assist member countries to move progressively towards the attainment of equivalence and harmonisation of their education and training systems. It stresses the principles of information exchange and resource sharing through the promotion of regional centres of specialisation and centres of excellence. The movement and/or exchange of students, staff, teaching and learning materials, and the relaxation of immigration and customs procedures, are to be facilitated as basic features of the integrated regional system (Kunene, undated).

Accra Declaration on GATS and the internationalisation of higher education in Africa (1995)

According to the World Trade Organisation (WTO, 1999) the General Agreement on Trade in Services (GATS) is one of the most important developments in the multilateral trading system since 1948, bringing for the first time internationally-agreed rules and commitments into a huge and still rapidly growing area of international trade.

The GATS has three parts (Knight, 2004): a framework which contains the general principles and rules, national schedules that list a country's specific commitments on access to its domestic markets by foreigners, and annexes that detail specific limitations for each sector.

GATS has an emphasis on sharing knowledge, international co-operation, and using new technologies to reduce gaps in wealth, social well-being, and educational opportunity. GATS also cautions against the reduction of higher education to a tradeable commodity subject to international trade rules, and the loss of authority of national governments to regulate higher education according to national needs and priorities (Allias, 2004).

3.10.2.2 South African NQF-related legislation

The following acts and regulations, as related to the South African NQF, are briefly discussed in this section:

- Constitution of the Republic of South Africa (SA, 1996)
- South African Qualifications Authority Act (SA, 1995c), Education and Training Quality Assurance Bodies Regulations (SA, 1998a), National Standards Bodies Regulations (SA, 1998b)
- South African Schools Act (SA, 1996b)
- Higher Education Act (SA, 1997)
- Further Education and Training Act (SA, 1998d)
- Adult Basic Education and Training Act (SA, 2000)
- Draft Regulations on the Registration of Private Higher Education Institutions (DoE, 2002b)
- General and Further Education and Training Quality Assurance Act (No. 58 of 2001)
- Draft Regulations on the Registration of Private Further Education Institutions (DoE, 2002)
- Skills Development Act (SA, 1998c)
- Skills Development Levies Act (SA, 1999).

Constitution of the Republic of South Africa (No. 108 of 1996)

The South African Constitution 'involved many South Africans in the largest public participation programme ever carried out in South Africa' (Potgieter *et al*, 1997:20). The objective in this process was to ensure that the final Constitution is 'legitimate, credible and accepted by all South Africans'. The fundamental human rights of every person are protected (*Ibid.*). Education and training is affected in that all government bodies are subject to the constitution, and any law or conduct, including parliamentary legislation, inconsistent with the Constitution, is invalid and can be struck down by the courts (Bray in Berka *et al*, 2000:244).

South African Qualifications Authority Act (No. 58 of 1995)

The SAQA Act was promulgated to:

- provide for the development and implementation of the NQF;
- establish the South African Qualifications Authority; and
- provide for matters connected therewith.

The SAQA Act focuses on the establishment and function of SAQA, which is mainly to oversee the development of the NQF, and includes the registration of accreditation bodies (ETQAs) and

national standards and qualifications. SAQA is tasked to take the necessary steps to ensure that ETQAs comply with accreditation provisions.

Two sets of regulations are associated with the SAQA Act:

- *ETQA Regulations* (SAQA, 1998a) – which, according to SAQA (2001d:6) is but one layer of an enabling regulatory framework for the development and implementation of the NQF.
- *NSB Regulations* (SAQA, 1998b) - The NSB Regulations promulgate the structure of the NQF into eight levels, three bands and twelve organising fields. The Regulations also task SAQA to develop unique field and level descriptors. The requirements and procedures for the registration of standards and qualifications are listed. The establishment and registration of NSBs and SGBs are explained.

South African Schools Act (No. 108 of 1996)

The SA Schools Act was promulgated to provide for a uniform system of organisation, governance and funding of schools. This Act is an attempt to set uniform norms and standards for the education of learners, including compulsory attendance, code of conduct and the role and function of governing bodies. There is also a reference to the establishment and registration of independent schools.

De Groof *et al* (1998:51) argue that the Schools Act gives the State ‘a vice grip, which it can and probably will tighten, on the governance and management of public schools’.

Higher Education Act (No. 101 of 1997)

The HE Act was promulgated to regulate the HE sector and provide for the establishment, composition and functions of a Council on Higher Education (CHE). It also provides for the registration of private HE institutions and quality assurance and quality promotion in the HE sector.

Further Education and Training Act (No. 98 of 1998)

The purpose of the FET Act is to ‘establish a national co-ordinated FET system which promotes co-operative governance and provides for programme-based FET’ (SA, 1998d:5). The FET Act was promulgated to regulate the FET sector, provide for the registration of private FET institutions and quality assurance and quality promotion in the FET sector.

Skills Development Act (No. 97 of 1998)

The Skills Development Act was promulgated to ‘provide an institutional framework to devise and implement national, sector and workplace strategies to develop and improve the skills of the South African workforce...’ The institutional framework includes the establishment of a National Skills

Authority (NSA) and Sector Education and Training Authorities (SETAs). One of the main purposes of the Act is to ensure the quality of education and training in and for the workplace. The Act also prescribes that SETAs should apply to SAQA for accreditation as ETQAs.

Skills Development Levies Act (No. 9 of 1999)

The Skills Development Levies Act was promulgated to provide for the imposition of a skills development levy and related matters.

Adult Basic Education and Training Act (No. 52 of 2000)

The Adult Basic Education and Training (ABET) Act was promulgated to regulate adult basic education and training, to provide for the registration of private adult learning centres and quality assurance and quality promotion in ABET.

Draft regulations on the registration of private Higher Education institutions (DoE, 2001a)

The requirements for the registration of private HE institutions as suggested in the HE Act (No. 101 of 1997) are amended by these regulations. The requirements for registration are listed in much more detail and point towards a duplication of the SAQA/ETQA processes.

General and Further Education and Training Quality Assurance Act (No. 58 of 2001)

The GENFETQA Act was promulgated to provide for the establishment of the GENFETQA Council (later named UMALUSI), quality assurance in general and further education and training, and control over norms and standards of curriculum and assessment. All provincial education departments are deemed accredited as a public provider by the GENFETQA Council. The Act tasks the GENFETQA Council to develop criteria for the accreditation of private providers, which include independent schools (as defined in the SA Schools Act), private FET institutions (as defined in the FET Act) and private adult learning centres (as defined in the ABET Act).

Draft regulations on the registration of private Further Education and Training institutions (DoE, 2002)

The requirements for the registration of private FET institutions as suggested in the FET Act (No. 98 of 1998) are amended by these regulations, and suggest a much more aggressive approach. The requirements for registration are listed in much more detail and also point towards a duplication of the SAQA/ETQA processes. According to these regulations anyone that intends to establish and maintain a private further education and training institution must apply to the registrar. Registration is defined as 'the granting of an application to operate as a private further education and training institution in terms of the Act (FET Act, No. 98 of 1998), offering such programmes leading to registered qualifications on such sites as the registrar may approve in terms of these regulations' (DoE 2002:6).

3.10.2.3 NQF-related legislation in other countries

Two acts are important to NQF implementation in England, Wales and Northern Ireland: *Education Act* (1997) that established the Qualifications and Curriculum Authority (see QCA, 2004) and *the Learning and Skills Act* (2000) that established the Learning and Skills Council (LSC). In Ireland the *Qualifications (Education and Training) Act* (1999) established the National Qualifications Authority of Ireland (NQAI) and also outlined the Irish NQF. The Namibian Qualifications Authority (NQA) was established through the *Namibian Qualifications Act* (1996). The *Education Act* (Scotland) (1996) established the Scottish Qualifications Authority (SQA) (www.logos-net.net/ilo, accessed 15 April 2005).

There are some exceptions to the above. The Australian Qualifications Framework (AQF) has 'no legislative basis and no authority that has the capacity to accredit or regulate awards' (Keating, 2003:278). The AQF is rather based on agreements particularly for VET, while the higher education and schooling sectors remain autonomous. According to Keating this is also one of the reasons why the AQF has had little impact in these sectors.

Most countries that are in the early stages of NQF implementation, such as the SADC Member States, are either in the process of drafting NQF legislation, or have already passed NQF legislation. The SADCQF, however, appears to be taking a different tack:

In most (if not all) countries, NQFs are established through the promulgation of national acts. Depending on their particular purposes, such legislation also leads to the establishment of national agencies mandated to oversee the development and implementation of the NQF. In the case of the SADCQF, no similar regional legislative process is envisaged (TCCA, 2005:23).

Clearly the SADCQF, as an RQF, cannot be supported, nor established, by legislation, but has to revert to the earlier mentioned regional agreements and conventions – in this case the SADC Education and Training Protocol (2000). Similarly, the EQF is based on the Lisbon Strategy and the Bologna Process (Clark, 2004).

3.10.2.4 Memoranda of understanding

In 2004, the CHE prepared a working document that mapped out the CHE's plan for addressing the MoU dilemma. In the plan the CHE acknowledges the pressure that it is being faced with:

At the moment, for various reasons, the CHE/HEQC is under extreme pressure to sign MoUs with ETQAs (CHE, 2004b:3).

In brief, the CHE suggests a careful and cautious approach consisting of a number of phases:

1. The compilation of a directory of ETQAs and professional councils – this was completed in 2003 (CHE, 2003).
2. Examining the accreditation criteria, processes and procedures of each ETQA to identify areas of overlap and duplication – to be followed by the development of a generic MoU as well as tailor-made MoUs (based on the generic version) to suit each ETQA.
3. Signing and piloting of MoUs.
4. Constant monitoring of accreditation criteria, procedures and processes, including the annual review of MoUs.

The MoU models proposed by the CHE (2004) are:

- *Delegation* – if the ETQA/professional council has an effective quality management system, has aligned itself to the HEQC's programme accreditation criteria (see CHE, 2004c) and uses peer evaluation, etc.
- *Partial delegation* - if the HEQC is not sure/confident about the quality management systems of the ETQA/professional council.
- *Partnership* – if the ETQA/professional council has no quality management system.

In the *Consultative Document* the DoE and DoL (2003) express concerns about the lack of delineation of scope and responsibility within the current quality assurance system that had resulted in much effort being directed at the development of MoUs:

Some [MoUs] have been successful, but since MoUs must be agreed on a case-by-case basis they tend to be unwieldy and time-consuming to construct and operate. A clearer quality assurance framework would remove the need for such cumbersome processes (2003:10).

3.10.2.5 Summary

The following observations are made following from the section on regional conventions, NQF-related legislation and MoUs:

Most NQFs are based on national legislation

With the exception of Australia, most other NQFs have been established by legislation not older than ten years. Even for emerging NQFs, such as those in SADC Member States, legislation is being formulated and promulgated.

RQFs are based on regional conventions

Both the SADCQF and the EQF are premised on regional agreements. The CARICOM framework is still in an early stage of development, but shows signs of following a similar route (Zuniga, 2004). The SADC TCCA (2005) has expressed concerns about this void of legislation and the resulting inability to enforce regulations.

Effective NQFs have high institutional logic

According to Granville (2003) NQF legislation in Ireland is very much based on pre-existing systems. In countries such as South Africa, where a total overhaul of all legislation and systems have taken place, the new legislation has been much more controversial and contested (SAQA, 2005i and NRF, 1999).

Strained inter-ETQA relationships are symptomatic of deeper systemic problems

The difficulties related to the signing of MoUs (they are either contested or simply “agreements to agree”) point towards systemic problems, such as a lack of clarity on roles and responsibilities, and even of the power struggles between the ETQAs. The attempts by the CHE’s HEQC to quality assure all other ETQAs, and in doing this, to take over SAQA’s function, is an excellent example.

3.10.3 Implementing agencies

3.10.3.1 Overview

Implementing agencies are the main bodies established through legislation, and tasked by governments, to oversee the development and implementation of NQFs. In most countries a national qualifications authority has this responsibility and oversees a number of sector-, band- or level-specific bodies. The qualification authorities have varying degrees of independence and

autonomy from government departments. The extent to which they oversee other related bodies also differs, ranging from strong and prescriptive to co-ordinating and administrative.

In the case of RQFs, the implementing agencies usually consist of a Steering Committee with representatives from all the Member States, and is not established through legislation, but rather through inter-ministerial approval. The SADCQF is such an example:

The SADC [Qualifications Agency, SADCQA] functions as a voluntary association of SADC Member States, which individually join and support SADCQA...SADCQA reports through its *Regional Steering Committee* to the SADC Secretariat to a sub-committee of the [Integrated Council of Ministers, ICM] made up of Ministers of Education, Primary Secretaries and Directors-General. SADCQA is ultimately accountable to the SADC Council of Ministers (TCCA, 2005:27).

The following are examples of implementing agencies in various countries:

Country	Main implementing agency (agencies)	Examples of sector-, band- and level-specific bodies
South Africa	South African Qualifications Authority (SAQA)	Education and Training Quality Assurance bodies (ETQAs)
Scotland	Scottish Qualifications Authority (SQA)	Quality Assurance Agency (QAA)
Ireland	National Qualifications Authority of Ireland (NQAI)	Further Education and Training Awards Council (FETAC), Higher Education and Training Awards Council (HETAC)
New Zealand	New Zealand Qualifications Authority (NZQA)	Industry Training Organisations (ITOs), New Zealand Vice-Chancellors' Committee (NZVCC), Polytechnics Programme Committee (PPCAP), Colleges of Education Accreditation Committee (CEAC)
Australia	Australian National Training Authority (ANTA), Australian Qualifications Framework Advisory Board (AQFAB), Victorian Qualifications Authority (VQA), Australian Vice-Chancellors' Committee (AVCC)	National and State/Territory Industry Training Advisory Boards (ITABs)
SADC	Proposed SADC Qualifications Agency (SADCQA)	National qualifications authorities in SADC Member States are represented on the SADCQA Steering Committee
England, Wales and Northern Ireland	Qualifications and Curriculum Authority (QCA), Qualifications, Curriculum and Assessment Authority for Wales (ACCAC), Council for Examinations and Assessment for Northern Ireland (CCEA)	Quality Assurance Agency for Higher Education (QAA), Sector Skills Development Agency (SSDA), Sector Skills Councils (SSCs), Unitary Awarding Bodies, Learning and Skills Council (LSC)
Namibia	Namibian Qualifications Authority (NQA)	Namibian Training Authority (NTA), Technical Expert Committees
Trinidad and Tobago	National Training Agency (NTA)	Industry Training Organisations (ITOs), Specific Occupational Advisory Committees (SOACs)

Table 17: NQF Implementing agencies

3.10.3.2 Summary

The following points have emerged from the discussion on implementing agencies:

Implementing agencies differ in size

The number of staff and geographical representation of implementing agencies differ greatly. As an example, SAQA grew from a handful of core staff in the late 1990s to a present contingent of nearly 100 staff. SAQA has also attempted to establish regional offices in at least three regions, and had one in the Western Cape that functioned for a number of years. More recently, SAQA has

been instructed by the Minister of Education to close the Western Cape Regional Office and suspend all similar attempts.

In contrast, the Australian Qualifications Framework Advisory Board (AQFAB) has ten times less staff than the Victorian Qualifications Authority (Keating, 2003), while others, such as the Scottish Qualifications Authority (SQA), have considerably more than SAQA.

Implementing agencies exist in various models

From the previous table it is observed that three main models of implementing agencies exist:

Strong Authority

At present the South Africa Qualifications Authority (SAQA) is the only example of a *Strong Authority* that oversees all other bodies. This is, however, currently under debate and may probably not remain like this for much longer (DoE and DoL, 2003). Although New Zealand may have started out as a *Strong Authority*, it nearly became a *Co-ordinating Authority* with only co-ordinating powers (Philips, 2003), but gradually evolved into the weaker *Central Authority* configuration.

Central Authority

A *Central Authority* has responsibility for quality assurance and accreditation but *separate* awarding bodies exist for particular sectors and/or levels, such as for Schooling, VET and Higher Education. The *Central Authority* usually has some oversight function, but cannot prescribe to the awarding bodies. Examples are found in Ireland (NQAI, FETAC and HETAC), Scotland (SQA and QAA [see QAA, 2004]) and New Zealand (NZQA, NZVCC, PPCAP and CEAC).

Co-ordinating Authority

A *Co-ordinating Authority* has mainly *administrative and co-ordinating* powers and is influenced by powerful partners. The Australian Qualifications Framework (AQF) is such an example:

...the AQF is the weakest partner in a collection of national bodies, not having a ministerial council, substantial personnel and budget, direct constituencies, or the operational capacities of the other agencies. Its influence depends on the willingness of the powerful partners... (Keating, 2003:285).

The proposed SADCQF is another example of a *Co-ordinating Authority*:

The SADCQA acts as a coordinating, informing and facilitating body (TCCA, 2005:27).

Implementing agencies have vocational roots

Just as the NQF phenomenon itself (see Young, 2005), many of the implementing agencies have their origins in existing TVET agencies, boards and committees. This characteristic is particularly evident in the 2nd and 3rd generation of NQFs, but is not as apparent with the pioneering 1st generation of NQFs. This may be due to the fact that during the implementation of the 1st generation of NQFs, there was a strong drive to elevate qualification frameworks above TVET, to be more inclusive of other sectors, and therefore also purposely not to transform TVET agencies. Despite such attempts, the trails are still clear. In South Africa for example, Industry Training Boards (ITBs) were replaced by SETAs, after which SETAs were accredited as ETQAs, which are answerable to SAQA. Until the present day, these SETA ETQAs make up the majority of ETQAs (23 out of 33).

Implementing agencies have qualification council roots

Just as implementing agencies have strong links back to vocational agencies, they also often originate from, or at least function with, national qualifications councils. Examples include the involvement of many such councils in the development of the SADCQF (TCCA, 2005). Similar trends have occurred in the UK (e.g. the CCEA) and in the Caribbean (Zuniga, 2004). In South Africa, UMALUSI is such an example, evolving from the South African Certification Council.

Implementing agencies are part of social transformation

As much as NQFs are not only “qualifications ladders”, but are complex social constructs with very specific purposes, the implementing agencies tasked to oversee and develop them are also projects of social transformation (Granville, 2001) and cannot escape the contestations that accompany, in particular, the tighter frameworks:

The tendency by some qualifications authorities to act as if they could be ignored is arguably one of the reasons their efforts at reform have sometimes met with strenuous opposition and active resistance (Blackmur, 2004:268).

3.10.4 Government departments

3.10.4.1 Overview

Without exception NQFs are government-driven initiatives. In most cases, governments, through National Departments of Education or Labour, or a combination of the two, have a direct involvement in the development and implementation of NQFs. As discussed above, implementing agencies, with varying degrees of independence and powers, are established by the government departments to implement NQFs. In many countries, most notably South Africa and New Zealand (Philips, 2003), tensions have developed between the government departments and the implementing agencies, and even more so between the government departments themselves:

There is no doubt that developing a NQF cannot be left only to one ministry or one single institution...One of the most critical points in an NQF is the coordination between the education and the labour authorities (Zuniga, 2004:75).

The South African case is very complex. Initially SAQA was to answer to an integrated Ministry of Education and Training (NTB, 1994). The integrated Ministry was never established and SAQA ended up being linked to two separate departments, although answerable to the Minister of Education. In the meantime SAQA had secured significant donor funding, up to 80% of its annual budget (EU, 2002), mainly from the EU (lasting up to 2005), but also from CIDA, GTZ, DANIDA, USAID, The British Council, NUFFIC, HEDCO-Ireland and the Ford Foundation. Although concerns of sustainability were raised, the funding allowed SAQA to become increasingly independent from the government departments – a development that contributed significantly to strained relationships between SAQA and the DoE in the early years of NQF development:

Relationships with the DoL are fully satisfactory. Relationships with the DoE are less than satisfactory... (EU, 2002:55).

To complicate matters further, the relationship between the DoE and DoL came under pressure as their views on the changes to the NQF architecture diverged. Their attempt to put out a joint statement in this regard in 2003 (DoE and DoL, 2003), was not well accepted by stakeholders and they were accused of losing focus about important NQF matters in their attempt to find common ground (NAPTOSA, 2003).

Regional frameworks, such as in SADC and the EU are less vulnerable to the influence of government departments, but are nonetheless aware of the pitfalls associated with excessive state-driven uniformity and control:

The [EU] higher education community strongly supports [the moves to consolidate the European Higher Education Area] but sees in them a danger of excessive state-driven uniformity and control, in the service of a dominant ethic of economic competitiveness. They want governments to provide a framework for co-ordination and guidance towards convergence, but not to create a Europe-sized straightjacket (DoE and DoL, 2002:41).

3.10.4.2 Summary

The following points have emerged from the discussion on government departments:

Extent of autonomy of implementing agencies is contentious

Philips (2003) warns that implementing agencies are created by governments and can therefore also be disestablished by the same method. The South African and New Zealand NQFs are such examples, where the qualification authorities were established as “strong” authorities with high levels of independence, which came under intense scrutiny from government departments in later years.

Relationships between government departments is important

Inevitable differences between education and labour ministries have a significant influence on NQF implementation that can lead to the reconfiguration of NQF architecture and implementing agencies, more in an attempt to resolve differences and less because the system will benefit from the changes.

3.10.5 International agencies

3.10.5.1 Overview

International bodies have contributed significantly to the development of education and training systems the world over, but more so in developing countries such as in SADC. Since 1994 South Africa has received significant support from European-based agencies. Arguably most of this was in the form of funding, although concerted efforts were made to ensure sustainability and skills transfer as well.

An important point in this regard is that although it cannot be disputed that South Africa and the SADC region have benefited greatly from the involvement of international agencies, some questions regarding the transfer of Eurocentric models into the (South) African context beg answers. NQFs, having originated from the former colonial powers (see Tuck *et al*, 2005), have been supported and funded in the South African context, despite the fact that, for example in the EU, no significant similar attempts were being made. It is only more recently that the EQF initiative has gained momentum, hopefully not only because it was successfully piloted in the African region.

Four international agencies stand out as being involved in NQF development and implementation: the ILO, UNESCO, OECD and the EU.

3.10.5.2 International Labour Organisation

The ILO is a tripartite structure representing governments, organised employers and organised labour. Notably, since 2000, the ILO has committed to the establishment of NQFs:

The development of a [NQF] is in the interest of enterprises and workers as it facilitates lifelong learning, helps enterprises and employment agencies match skills demand and supply, and guides individuals in their choices of training and career (ILO, 2000 in DoE and DoL, 2002:39).

The ILO has been involved in NQF development in a number of countries and regions, over a considerable period. Some of these include Mexico (CONOCER, 1999), South Africa, the United Kingdom, the Caribbean (Zuniga, 2004) and Mauritius.

The ILO's involvement in NQF development is evident in a well-managed and up-to-date website that covers a range of NQFs across the world: www.logos-net.net/ilo.

3.10.5.3 United Nations Education, Scientific and Cultural Organisation

According to the *Study Team Report* (DoE and DoL, 2002) UNESCO's approach to NQFs has been less explicit, but nonetheless supportive, mainly due to their extended involvement on the equivalence of qualifications in the areas of higher education and TVET.

UNESCO has been involved in TVET initiatives, mostly in collaboration with the ILO, in a number of countries and regions: SADC (UNEVOC, 2003 and 2004; UNEVOC and the Ministry of Education of the Republic of Botswana, 2001; Keevy, 2003), West Africa (UNESCO and OECD,

2005), the Arab States, Central Asia and the small Pacific Island States. Most recently UNESCO has been directly involved in NQF development in Angola (UNISA, 2005).

3.10.5.4 Organisation for Economic Co-operation and Development

The OECD is made up of 30 industrialised democratic member states and has taken a 'keen interest in the NQF phenomenon in relation to lifelong learning' (DoE and DoL, 2002:40, also see Behringer and Coles, 2003). The OECD has also initiated research programmes on case studies of NQFs in a number of countries.

3.10.5.5 European Union

The EU is pursuing co-operation programmes (mainly in the field of higher education) in Latin America and the Caribbean, Slovenia, Macedonia and Arabic-speaking Mediterranean states (DoE and DoL, 2002).

The EU's involvement in supporting NQF development in SA has been extensive:

It is fitting to note that the EU has been the main financial sponsor of South Africa's NQF (DoE and DoL, 2002:42).

Over and above the financial contribution to the development and implementation of the NQF (see EU, 2002), the EU also contributed in research and capacity building. One such example is the involvement of NQF experts (funded by HEDCO-Ireland) in the NQF Impact Study between 2002 and 2005 (SAQA, 2004 and 2005b).

3.10.5.6 Summary

The following points have emerged from the discussion on international agencies:

Significant contribution to NQF development by international agencies

International agencies have made a significant contribution to NQF development and implementation in South Africa in particular. It is generally acknowledged that without this involvement the South African NQF could never have been implemented in such a rapid and comprehensive manner.

International agencies also have their own agendas

While benefiting developing countries, international agencies are in a position to pilot new ideas – such ideas, once refined, can then be implemented “at home”.

3.10.6 Other NQF stakeholders

3.10.6.1 Overview

As explained in *Chapter 1* of this study (see the repeat of *Table 4* from *Chapter 1* below), all individuals, organisations and institutions that in way another or influence, or are influenced by the NQF, are referred to as “NQF stakeholders” – including the implementing agencies (or qualifications authorities), government departments and international agencies discussed in the previous sections. The role of quality assurance and standards setting bodies have been discussed in the Architecture section and is not repeated here.

NQF stakeholder grouping	Description
Overseeing Agency	The SAQA Board and SAQA staff
Principals	DoE and DoL
Partners	CHE (including the HEQC) and UMALUSI
Quality Assurance Bodies	ETQAs (including some professional bodies and SETAs)
Standards Setting Bodies	Consultative Panels (formerly NSBs, also referred to as Fit-for-purpose Panels) and SGBs
Education and Training Providers	Public and private institutions that offer NQF qualifications
Learners	Learners that have completed NQF qualifications, that are currently completing NQF qualifications or are considering completing an NQF qualification
Employers	Companies ranging from SMMEs to large corporates
Organised Labour (Unions)	Education and non-education
Other government departments and organisations	National and provincial, such as the National Skills Authority (NSA) and the Institute for the National Development of Learnerships Employment Skills and Labour Assessments (INDLELA) (previously the Central Organisation for Trade Testing, COTT)
Non-ETQA professional bodies and associations	All professions, statutory and non-statutory
Education and training consultants and other individuals	Individuals that function outside particular institutions or organisations
Non-Governmental Organisations (NGOs)	Organisations that receive no governmental funding
International agencies	Such as UNESCO and the ILO
Others	This category includes any other institutions or organisations that do not fit into any of the categories above

Education and training providers in South Africa, ranging from public to private, large to SMME, ABET to Higher Education, are affected most by an NQF that has much more to it than just organising qualifications. From concerns that range from interference with academic freedom and over-regulation to the creation of low-level knowledge through standardisation and regulation, NQF implementing agencies often stand in the firing line of providers. Some providers want to be left alone, and hope that the NQF is the latest fad that will eventually disappear, while others welcome the advanced standing that they receive from complying with the quality assurance criteria. Through associations and committees, education and training providers are able to make a significant contribution to NQF development and implementation.

Learners, both young and mature, have very limited means of influencing NQF implementation. In many cases, learners are not even aware of the levels, pathways and articulation options that are associated with an NQF. In South Africa significant attempts have been made to include learners in systemic evaluations such as the NQF Impact Study (SAQA, 2004 and 2005b). Through focus groups learners have been able to voice their concerns and at least to some extent, influence NQF implementation (SAQA, 2004d).

Employers, through participation in other national initiatives such as skills development, often become more directly involved with NQF implementing agencies. In many cases, employers either conduct training for their own staff, or outsource it – on both counts they come into direct contact with quality assurance systems associated with NQFs. The further extents to which salaries, post levels and promotions are related to NQF levels, are also important indicators. In South Africa, government departments still use outdated Relative Value Coefficients (RVQs) and Relative Education Qualification Values (REQVs) to determine employability and salaries (SAQA, 2004l). This practice has had a spillover effect into the business community, resulting in only limited use of NQF levels.

The vocational origin of most NQFs (in some countries NQFs cover only TVET, e.g. Jamaica, Singapore and Trinidad and Tobago) often ensures greater alignment with, and benefits for, organised business.

Employees, just like learners, are in many cases not aware of the benefits of NQFs. Involvement is limited to sporadic attempts to ensure equivalence of qualifications and increasingly, in South Africa, for guidance on RPL possibilities.

Through *organised labour, unions and even political parties*, employees are able to have a much more direct influence on NQF implementation. In South Africa in particular, unions have played a significant role during the early conceptualisation period of the NQF (NTB, 1994), but also, albeit to

a lesser extent, during the more recent review period. Examples of those involved are NAPTOSA (2003) and SACP (2003).

The Boards of implementing agencies and quality assurance bodies are in most cases, representative of the various stakeholder groupings. In South Africa, the SAQA Board is appointed by the Minister of Education, and represents a broad range of stakeholders, such as private education, business and unions. Expert stakeholders also play an important role in the development of qualifications by serving on SGBs and NSBs.

Another way in which stakeholders influence NQF development is through submitting comment on discussion documents – such examples include the *Study Team Report* (DoE and DoL, 2002), the *Consultative Document* (DoE and DoL, 2003) and the *Higher Education Qualifications Framework* document (DoE, 2004). All SAQA policies and criteria and guideline documents are also published in the Government Gazette to allow for public comments. The same applies to all new qualifications before they are registered on the NQF.

As a last point, it is important to revisit the understanding of the South African NQF as a social construct whose ‘meaning has been, and will continue to be, negotiated for the people, by the people’ (Kraak and Young, 2001:30): despite the fact that the NQF is implemented by the government and a qualifications authority, it is ultimately “the people” (the stakeholders) that negotiate its meaning.

3.10.6.2 Summary

The following observation is made from the discussion on stakeholders:

Stakeholders have limited influence on NQF governance

Education and training stakeholders only steer and guide NQF development and implementation to a limited extent. This takes place mainly via associations and educational committees, and to some extent through representation on Boards, quality assurance and standards setting bodies.

Stakeholders are able to engage with NQF discussion documents although there is no guarantee that any of their comments will be heeded by agencies, nor is there any feedback mechanism for stakeholders to check that this has happened.

3.10.7 Funding

3.10.7.1 Overview

NQFs are government initiatives and are therefore also mostly government funded. In many countries, if not all, governments have been able to control NQF implementation through funding mechanisms. NQF agencies, such as qualifications authorities, that become too critical and too autonomous can be brought back into line by adjusting funding arrangements.

South Africa, some of the other SADC countries and also some of the CARICOM Member States may be regarded as exceptions, as much of their funding has not always originated from their governments. With the democratisation of South Africa, the worldwide acknowledgement of the importance of NEPAD, the establishment of the AU and many other home-grown initiatives, many first world countries have been willing to offer support in South and Southern Africa. As mentioned earlier, UNESCO, the OECD and the ILO have been supporting the improvement of education for many years – their involvement in NQF development and implementation in SADC countries is therefore also important.

The EU has been extremely committed to the South African NQF implementation and has offered both financial and technical support between 1999 and 2005:

80% of SAQA funding is received from donors; the DoE provides 17% of funding; 3% is self-generated by SAQA (EU, 2002:43)

It is beyond question that the implementation of the NQF has been made possible by European Union funds, whose local value has increased as the exchange value of the Rand has declined (DoE and DoL, 2002:120).

As mentioned before, smaller strategic grants were also received from CIDA, GTZ, DANIDA, USAID, British Council, NUFFIC, HEDCO-Ireland and the Ford Foundation (DoE and DoL, 2002:120). Unfortunately the substantial donor funding received by SAQA came at a price, impacting severely on sustainability:

The issue of sustainability of SAQA has been widely aired, and its dependency on donor funding increasingly poses a high risk to the organisation in terms of its sustainability (*Ibid.*).

By the end of 2004 SAQA was facing a financial crisis as the EU funding drew to a close and a significant budget shortfall became imminent. The crisis was temporarily averted when the National Skills Authority offered to cover the shortfall early in 2005.

3.10.7.2 Summary

The following observations follow from the discussion on funding:

Governments are able to control NQF implementation through funding

South Africa is an example of a country where a rift between government departments and the implementing agency, as well as various other related bodies, grew as a result of the independence of SAQA - an independence that was to a large extent obtained through the substantial donor funding it received. Now that the funding responsibility has returned to government, it is apparent that significant changes to SAQA's role and responsibilities will be undertaken.

NQFs are resource-intensive long-term investments

Systemic changes and improvement in the quality of education and training form an integral part of most NQFs. These are also changes that can only be measured over a significant number of years, no matter what form of incrementalism is adhered to. SAQA's NQF Impact Study (SAQA, 2005b) has shown that after nearly ten years of NQF implementation, it is still "too soon to say" whether the NQF has impacted on most of the aspects that were measured.

3.10.8 Overview of NQF governance

At the start of this section on governance, Badat's (2004) comments about the quality of the governance of quality were discussed. Based on his comments, it was suggested that three important aspects would have to be revisited. These were:

- achievement of the overt purposes of the NQF through specific activities;
- range of policies and systems that are in place to achieve the NQF's overt purposes; and
- the extent to which NQF governance is participatory and consensus-based.

Each of these aspects are discussed below and applied to the South African NQF.

3.10.8.1 The NQFs overt purposes can be achieved through targeted activities

According to the SAQA Act (SA, 1995c) the objectives of the South African NQF are to:

1. create an integrated national framework for learning achievements;
2. facilitate access to and mobility and progression within education, training and career paths;
3. enhance the quality of education and training;
4. accelerate the redress of past unfair discrimination in education, training and employment opportunities; and
5. contribute to the full personal development of each learner and the social and economic development of the nation at large.

On the other hand, the overt purposes of the South African NQF, as discussed under the Purpose section of this chapter, are (in sequence of priority) to:

- address social justice (links to Objectives 4 and 5);
- improve access and progression (links to Objective 2);
- regulation;
- comparability and benchmarking (links to Objectives 1 and 3); and
- communication.

The importance of the comparison between the *promulgated NQF objectives* and the *overt purposes* is that although all the NQF objectives are reflected in the overt purposes, there are two additional overt purposes (regulation and communication) that are not reflected in the overt purposes. Studies based only on the NQF objectives may therefore be skewed and result in incomplete measurements (also see Heyns, 2005 and Samuels *et al*, 2005).

Badat's question is not only *whether* the overt purposes of the NQF are being achieved, but *how* they are being achieved, i.e. what activities are being undertaken to improve the quality of the governance of quality in the NQF. The SAQA initiated longitudinal NQF Impact Study (SAQA, 2005b) is the most recent empirical investigation that provides some answers to this question (the findings were summarised in *Chapter 1*).

3.10.8.2 A range of policies and systems are needed to achieve the NQF's overt purposes

An extensive array of policies and guidelines has been developed by SAQA since 1998, covering virtually every aspect of NQF implementation. The following are some examples (most of which have already been noted in this chapter):

- Quality Assurance (SAQA, 2000)
- Standards Setting (SAQA, 2000c)
- Curriculum Development (SAQA, 2000d)
- Generation and evaluation of qualifications and standards (SAQA, 2000e)
- Level Descriptors (SAQA, 2000f and 2001b)
- Providers (SAQA, 2001)
- ETQAs (SAQA, 2001c)
- Assessment (SAQA, 2001d)
- Registration of Assessors (SAQA, 2001e)
- Recognition of Prior Learning (SAQA, 2002b)
- Short courses and skills programmes (SAQA, 2004k)
- Small-, Medium- and Micro Enterprises (SMMEs) (SAQA, 2004m)
- Credit Accumulation and Transfer (SAQA, 2005j)
- Integrated assessment (SAQA, 2005k).

At systems level the following developments have taken place (mainly from SAQA, 2005b):

- 35 ETQAs accredited by SAQA, using standardised (although contextually adjusted) quality assurance processes;
- 616 providers accredited by nine ETQAs;
- 12 NSBs and more than 100 SGBs established (SAQA, 2004);
- 8,553 outcomes-based qualifications and 8,208 unit standards registered –recorded on the NLRD; and
- 8,138 assessors registered by 12 ETQAs.

3.10.8.3 Implementing agencies differ according to context and purpose

Depending on the particular context of the country in which the NQF is implemented, as well as the particular purpose of the NQF, the implementing agencies differ greatly. The following are some examples of differing characteristics:

- *Size* – the number of staff, infrastructure and regional representivity.
- *Models* – ranging from strong, to central, to co-ordinating, the autonomy and influence differs.
- *Origin* – some implementing agencies have vocational roots, while others are reconfigurations of existing qualification councils.
- *Part of social transformation* – this is the case when the NQF has a very strong transformative purpose.

3.10.8.4 Stakeholder relationships are important

The various types and levels of relationships between NQF stakeholders form an integral part of NQF development and implementation. As will be shown in *Chapters 4 and 5*, power relations between these stakeholders are very important.

3.10.8.5 Participatory and consensus-based NQF governance is difficult to manage

The first two aspects of the quality of the governance of quality, as suggested by Badat (2004), seem reasonably well addressed as discussed above. The third aspect, the extent to which NQF governance is participatory and consensus-based, is more contentious however. From the various governance-related aspects discussed in this section it has been shown, at a number of levels, that there may be problems in this area. Examples include: strained inter-ETQA relationships, as manifested in the difficulties around MoUs; “Strong Authorities”, such as SAQA, although inherently part of social transformation, often have weak relationships with government departments and due to external pressures, gradually evolve into weaker configurations; and stakeholders have a limited influence on NQF governance.

In summary, it has been shown that the governance of the South African NQF is influenced by regional conventions, national legislation and local agreements. Governance also includes the role and functions of implementing agencies, usually qualifications authorities, government departments, international roleplayers and stakeholders. Funding, more accurately the source of funding, is also a significant factor. In general, it has been shown that on two counts the governance of the NQF is achieving the overt purposes of the NQF, but that there are problems in a third area, the extent to which NQF governance is participatory and consensus-based.

3.10.9 Identification of Governance as object

Based on the preceding explication *Governance* is identified as an eighth and final object in the NQF discourse. The following points are raised in support of this proposal:

As was the case with the *Architecture* object, *Governance* presents an important category in the NQF discourse that also includes relations between authorities of emergence, delimitation, and specification. Examples include the establishment of SAQA in place of a combined Ministry of Education and Training, establishment of NSBs and SGBs as the final authorities on qualifications, and the regulation of the relationships between the various implementing agencies.

It has also been shown that *Governance* is a category that contains other mutually exclusive sub-categories or components, such as:

- regional conventions, legislation and agreements;
- implementing agencies;
- government departments;
- international roleplayers;
- other stakeholders; and
- funding.

The following examples of guises of power can also be identified from the discussion:

- Tensions between the overt and covert agendas of NQF stakeholders is an example of political power as form of power in the NQF discourse.
- The fact that the NQF is overseen by a government bureaucracy and is therefore also an instrument of government is an example of bureaucratisation as technique of power in the NQF discourse.
- Funding of the NQF, or rather the lack thereof, is an example of economisation as technique of power in the NQF discourse.
- Calls for MoUs to be replaced with more stringent and non-voluntary rules of engagement is but one example of regulation as technique of power.
- The different models of implementing agencies (strong, central and co-ordinating) are all to a greater or lesser extent examples of surveillance as technique of power in the NQF discourse.

- SAQA's establishment as "fallback" when the joint Ministry of Education and Training was not established influenced the later relationship between SAQA, the DoE and DoL – this is an example of one of the power relations pertaining to the NQF overseeing agency.
- The stakeholder representation on NSBs and SGBs and the related overt and covert agendas is an example of what the power relations between standards setting bodies and stakeholders consisted of.
- Perceived lack of autonomy of higher education providers describes one aspect of the power relations between these providers and the NQF implementing agencies.
- Inconsistencies in legislation are an example of an effect of power.
- Limited collaboration between SAQA, the NQF principals and partners is also an example of an effect of power in the NQF discourse.

As with the previous seven objects, *Governance* as object in the NQF discourse is used in the first part of the archaeological critique of the empirical dataset, namely the identification of objects. This step is followed by the identification of unities and then the description of the formation of strategies associated with the identified objects and unities. This application is described in detail in *Chapter 4*.

3.11 SUMMARY OF OBSERVATIONS ASSOCIATED WITH OBJECTS IN THE NQF DISCOURSE

A range of diverse aspects of NQFs has been discussed in this chapter, resulting in the identification of eight objects in the NQF discourse. The following is a tabular summary of the identified objects and related observations:

Object in the NQF discourse	Related observation	
Guiding philosophy	1	NQFs are influenced by underlying philosophies
	2	The original purpose of the NQF was to unite diverse philosophies
Purpose	3	Tensions exist between the overt and covert purposes of NQFs
	4	Some purposes are common to most NQFs
	5	Some purposes are common to only some NQFs
Scope	6	Pressures to pursue unification exist
	7	There is an aggregation towards unified/linked systems
	8	There is an aggregation towards the “relationships” dimension of scope
	9	Unification leads to diversification
Prescriptiveness	10	Barriers to unification exist
	11	Prescriptiveness is contentious
	12	Tight frameworks are less likely to remain unified
	13	There is a migration towards tight and linked NQFs
Incrementalism	14	Gradual and phased implementation is not always appealing
	15	Rapid and comprehensive implementation has not worked
	16	Gradual and phased implementation is least prone to power struggles
Policy breadth	17	Lack of institutional logic can lead to unrealistic expectations
	18	Combination of high intrinsic logic and high institutional logic is preferable
	19	There is a need for communities of trust
Architecture	20	The NQF is agnostic
	21	There are contested and uncontested NQF architectural aspects
	22	The NQF is seen as a panacea
	23	The NQF is a regulatory mechanism
	24	NQFs bring about change
	25	The NQF is influenced by external pressures
Governance	26	The NQF's overt purposes can be achieved through targeted activities
	27	A range of policies and systems are needed to achieve the NQF's overt purposes
	28	Implementing agencies differ according to context and purpose
	29	Stakeholder relationships are important
	30	Participatory and consensus-based NQF governance is difficult to manage

Table 18: Summary of observations associated with objects in the NQF discourse

3.12 POSITIONING THE SOUTH AFRICAN NQF IN RELATION TO THE OBJECTS IN THE NQF DISCOURSE

3.12.1 Introduction

This section presents a useful contextualised summary of the preceding explication of the objects in the NQF discourse. It focuses on a comparison between the different permutations of objects at four positions during NQF development and implementation. The three periods of NQF implementation in South Africa each represent a different position, with some aspects being similar to the period that it precedes, and other aspects being very different. A fourth position (that represents the levels of authority as they are currently under consideration) also adds insight and although such a position may not be based on much available evidence, it is included nonetheless.

In summary, typological configurations at the following positions of NQF development and implementation are discussed:

Conceptualisation period (early 1980s to 1994) – this is the *envisaged* typological configuration – main sources are: *Discussion document on a national strategy initiative* (NTB, 1994), *Ways of seeing the NQF* (HSRC, 1995), *The proceedings of the conference on the NQF* (IMWG, 1996) and *Lifelong learning through an NQF* (DoE, 1996).

Establishment period (1995 to 1998) – this is the typological configuration of the NQF as it was established through *legislation* – main sources are the *SAQA Act* (SA, 1995c), *The NSB Regulations* (SA, 1998b) and *The ETQA Regulations* (SA, 1998).

Review period (1999 to 2005) – these are the *proposed amendments* to the previous legislatively established typological configuration – main sources are *Curriculum Restructuring in Higher Education* (NRF, 1999), *The Report of the Study Team on the implementation of the NQF* (DoE and DoL, 2002), *An interdependent NQF System: Consultative Document* (DoE and DoL, 2003), *The European Union Mid-Term Review* (EU, 2002), and *The Draft Higher Education Qualifications Framework Policy* (DoE, 2004).

Current considerations (2005) – these are the most *recently considered amendments* to the legislatively established typological configuration as it is evolving, mainly as a result of the current political manoeuvring and struggles for hegemony. The sources are limited, and where available, are still in draft format; as a result, only brief comments are included.

3.12.2 Guiding philosophy

Being part of the 1st generation of NQFs, the South African NQF shares a number of underlying characteristics with those developed in the United Kingdom, Australia and New Zealand. Many of the early ideas were also reactionary, in that they were an attempt to move away from the policies of the apartheid regime. The guiding philosophies remained largely unchanged throughout the periods of NQF implementation; there were, however, different emphases in each. The following guiding philosophies featured most prominently during the *conceptualisation period*:

- Post-Fordism (McGrath, 1997);
- Vocationalism and unitisation (Gevers, 1998);
- Competence approach to vocational education (Young, 2005);
- Lifelong learning (Aitchison, 2004);
- Integrated approach (NTB, 1994); and
- Freireanism (Isaacs, 2001).

The non-establishment of a single Ministry of Education and Training in 1994 had significant implications for the covert purposes of the NQF, most critically, for the drive to have a unified education and training system. Even so, the SAQA Act (SA, 1995c) supported the notion of an 'integrated framework for national achievements', and all was not lost for the proponents of unification. The guiding philosophies of the conceptualisation period remained largely unchanged, with the following additional emphases during the *establishment period*:

- Technical humanism (Lockett, 1999);
- Outcomes-based approach (SCQF, 2003);
- Unconstitutional limitation of academic freedom (Malherbe and Berkhout, 2001);
- The mode of new knowledge production (Kraak, 1999); and
- Reductionism and behaviourism (Gevers, 1998).

During the *review period* neo-liberalism (Tuck *et al*, 2004) and the forced integration of epistemologically different modes of learning (Ensor, 2003) were noted as influences. The most *current considerations* to influence NQF implementation appear to be globalisation, particularly with regards to the skills that are required to transcend the dichotomy between academic and vocational learning, but also as is evident in the doubts whether education systems are in fact converging (Raffe, 2002).

3.12.3 Purpose

As noted by Granville (2004:3), the scale and ambition of the South African NQF and its commitment to social transformation make it unique:

While the development of qualifications frameworks is an international phenomenon, there is something unique about the NQF in South Africa. It is the scale and ambition of the NQF rhetoric and its perceived centrality to the reconstruction of society in the political and social context of a post-apartheid regime that marks the NQF out from other such initiatives around the world.

The NQF objectives form one of the most accepted, and therefore also least contested, components of the South African NQF. Since their explicit formulation in the SAQA Act (SA, 1995c), there has been common agreement that the five objectives represented the purpose of the NQF, namely to:

- address social justice;
- improve access and progression; and
- ensure comparability and benchmarking.

Two additional purposes are also identified from literature (see the earlier section on *Purpose*), namely to:

- regulate the education and training system; and
- communicate.

The NQF Impact Study is a good example of how the NQF objectives are seen as a 'fixed point of reference' (SAQA, 2005b:16) upon which research can be based, a fixed point that is not contested by stakeholders:

...the NQF Objectives are taken as a given. There is no attempt to evaluate the rationale for these Objectives or to question whether these are the most appropriate objectives for South Africa (2005b:11).

According to the NQF Impact Study, it is not the NQF objectives, but the implementation that is contested:

...all espouse the objectives of the NQF, but see implementation differently (SAQA, 2005b:40).

The only signs of some interrogation of the NQF objectives have emerged after the results of the Impact Study have been discussed. Based on an interrogation of the methodology used during the NQF Impact Study, it was proposed that the NQF objectives be separated into categories and dimensions. These categories are based on comments by Paterson, whereas the dimensions are based on comments by Morrow and Granville (in Samuels *et al*, 2005). Paterson asks whether some of the NQF objectives are *intractable* ideals, i.e. which objectives may never be possible to achieve. This question led to two different categories: *Too soon to say* and *Intractable*. Morrow and Granville argue that the criteria used to rate the indicators appear to be conflating two distinct dimensions: the extent of the impact of the NQF on the education and training system – which seems to be mostly concerned with numbers and systemic changes; and the beneficial impact on the education and training system – which is more concerned with issues related to the fundamental purpose of the NQF (as reflected in the NQF objectives), e.g. quality, access, redress, etc.

The table below summarises the separations:

		NQF Objectives				
		1 (integration)	2 (access and mobility)	3 (quality)	4 (redress)	5 (development)
Paterson categories	Too soon to say			X		X
	Intractable	X	X		X	
Morrow/Granville dimensions	Extent of impact					
	Beneficial impact	X	X	X	X	X

Table 19: Interrogation of the NQF Objectives

The conclusion of the discussion was that certain NQF objectives (1, 2 and 4) are both *intractable* and strongly associated with the fundamental purpose of the NQF (the Morrow/Granville *beneficial impact* dimension) (Samuels *et al*, 2005). Clearly, this debate is still in its infancy, but the implications are important. For the first time since the development of the NQF started in South Africa, the purpose of the NQF is being questioned, more specifically, the extent to which the current purpose is attainable:

In order to adequately answer the question why these three objectives of the NQF are so far from being achieved, especially if they are located so close to the fundamental purpose of the NQF, we briefly presented the emerging NQF typology. This typology includes eight categories or characteristics of NQFs, three of which have received undue prominence, the remaining five appear to be unnoticed (Samuels *et al*, 2005:12).

As a final point, it may very well be that the feasibility of the purpose of the NQF, as exemplified in the NQF objectives, may not be of significant concern to NQF implementers. It may be that progress, however slow, towards some partial attainment of the purpose is satisfactory, even to the extent that the covert purposes of the NQF may be preferred over the overt purposes. Stated differently, government may be more interested to embed aspects such as lifelong learning and standardisation than, for example, the quality of the education and training system.

3.12.4 Scope

During the *conceptualisation period* there was significant consensus that the NQF would be the vehicle for an integrated approach (NTB, 1994), despite knowing that a single NQF for both education and training had not been successful anywhere else in the world:

A NQF for both education and training has not been established in any of the countries studied (NTB, 1994:22).

This thinking manifested in the single pathway framework that was *established* with the SAQA Act (SA, 1995c) in an attempt to integrate all levels, sectors and types of qualifications into a single unified framework.

During the *review period* integration became very contentious. Authors such as Heyns and Needham (2004) have argued that this was mainly due to a multitude of interpretations and although this may be true in one sense, it became clear that the scope of the NQF was being challenged.

The *Consultative Document* (DoE and DoL, 2003) suggested three interdependent pathways and emphasised the importance of 'respecting the different modes of learning...without compromising the unique value each brings to the whole' (2003:7). Recognising that the fundamental principle of the NQF was an integrated approach, the DoE and DoL suggested a much more linked system. The following year, *The Higher Education Qualification Framework (HEQF)* discussion document

(DoE, 2004) took many of these recommendations as *fait accompli* (SAQA, 2004i) and started the process of developing a “framework within a framework” that accommodated the “differences” between general, general vocational, and trade, occupational and professional (TOP) pathways. The move towards the linked system, some might even argue that this constitutes a tracked system (see Tuck *et al*, 2004), was of grave concern to some NQF stakeholders, who argued that this move was characteristic of the “pre-NQF” thinking of the apartheid regime:

The three pathways also bear an uncomfortable resemblance to those proposed in the pre-1994 Curriculum Model for South Africa (CUMSA) and the even earlier report of the De Lange Commission (NAPTOSA, 2004:23).

Most *current considerations*, as exemplified in *The HEQF* (DoE, 2004) and other discussion documents, suggest that the South African NQF is gradually moving towards less-linked tracks - a system in which vocational and general education are seen as separate, have distinct purposes and are associated with different institutions and regulatory structures.

3.12.5 Prescriptiveness

The South African NQF was conceptualised, established, reviewed and more recently considered as a tight framework. As was the case with the purpose of the NQF, the prescriptiveness seems to have been least contested, despite the expectancy that this would be the area that stakeholders would be most unwilling to accept. This may be largely due to the badly fragmented pre-1994 education and training system with many suspect providers and bogus certification. The new system, tight as it was, was welcomed, as it would be able to address many of these concerns.

The prescriptiveness of the NQF was not completely uncontested. Concerns about the unconstitutional limitation of academic freedom (Malherbe and Berkhout, 2001), technocratic language and complexity of the bureaucracy (Samson and Vally, 1996) were raised during the conceptualisation and establishment periods. Later concerns were raised about *forced* integration of epistemologically different modes of learning (Ensor, 2003), higher education institutions being subjected to governmental quality assurance practices (Luckett, 1999), and forced compliance (NRF, 1999). More recently, the creation of new knowledge that flattens depth and increases mistrust (Shalem *et al*, 2004) has been discussed.

As has been the case with the South African NQF, most tight NQFs are also associated with a regulatory and social purpose, but more significantly, with a unified scope (Tuck *et al*, 2004). Tight

frameworks are, however, also less likely to remain unified with overall migration towards tight and linked frameworks being more likely.

3.12.6 Incrementalism

The South African NQF is positioned at the extreme of incrementalism, being implemented both rapidly and comprehensively. With its regulatory and social purpose and the national expectations attributed to the NQF, most would probably argue that South Africa had no choice. The NQF was seen as the major vehicle to achieve large-scale transformation of the South African education and training system.

Critics and supporters alike, do however argue that these political and social pressures have contributed significantly to the implementation problems that South Africa faced (Allias, 2003 in Young, 2003). Others argue that the NQF 'promised what it could never deliver in practice' (Jansen, 2004b:4) and that South Africa got 'carried away'. The DoE and DoL (2002 and 2003) have argued that this is akin to zealotry and dogmatism, while Badat has described it as 'the post-apartheid South African social order is not yet indelibly defined and continues to be uncertain' (2004:4). Some even argue that the NQF was seen as a "quick fix" or "panacea for all ills".

The early NQF reviews (the first one was in 1999, only one year after SAQA had been established) are further evidence of the impatience South Africa has shown with NQF implementation. The system was being reviewed while it was still in its infancy – an act similar to subjecting a toddler to a senior school examination.

Despite these concerns, the rate of NQF implementation does not appear to be slowing down. There are, however, some signs of a more phased approach developing. Initiatives such as the draft HEQF (DoE, 2004) suggest that policymakers are considering the implications of one sector at a time, although such a move is unavoidably linked to a change in stance on the scope of the NQF.

3.12.7 Policy breadth

The South African NQF is seen as having a high intrinsic logic (i.e. with adequate design and architectural features to deliver on its purpose), but with a relatively low institutional logic (i.e. the linkages between the NQF and external systems and policies are weak).

The low institutional logic could be seen as a major weakness in the NQF design during the *conceptualisation* and even *implementation* periods. It was also most probably unavoidable due to the rapid and comprehensive implementation. No matter how much attention could have been given to articulation with other national initiatives, the NQF was the forerunner (the SAQA Act [SA, 1995c] was the first to be promulgated) and had to break new ground, or as Isaacs refers to the Freirean notion of “making the road by walking it” (Isaacs, 2001).

The high intrinsic logic was arguably the one factor that kept the NQF from faltering even under the most extreme pressures. The elaborate design and architectural features, even more elaborate than most NQFs that were established well before the South African one, created a rigid “framework” within which significant progress was possible.

During the *review period* a move towards greater alignment with the Human Resource Development (HRD) strategy and the National Skills Development Strategy (NSDS) were mooted, to the extent that the NQF is seen as one of the three pillars in transformation. More current consideration suggests a similar trend towards high institutional logic combined with high intrinsic logic.

3.12.8 Architecture

Due to the high intrinsic logic of the South African NQF, architectural debates often dominated NQF development and implementation, most explicitly during the review period: some architectural aspects were contested, while others remained uncontested and accepted.

3.12.8.1 Uncontested architectural aspects

The South African NQF, as is the case with most other NQFs, is based on *outcomes*. Despite some confusion between the NQF’s “reinvented” OBET and OBE in schools, there has been general agreement that this was an appropriate choice, mainly as a result of historical and global imperatives, but also in order to increase international comparability of South African qualifications.

Although considerable debate has taken place around the levels in the HET band, the three NQF *bands* (GET, FET and HET) have not been subjected to any specific criticism. The use of HE instead of HET, i.e. dropping the “training” from “education and training”, by many higher education stakeholders, including the HEQC, does however point to some resistance towards the inclusion of vocational qualifications in the HET band. More so, it points to a possible lack of parity of esteem between the two “types” of qualifications.

As is the case with OBET, most NQFs are *credit-based*. Time taken to complete a qualification on a specific level is quantified to improve comparability and transferability. Although some concerns have been expressed about the lack of correlation between the time taken and the number of credits (Blackmur, 2004), most stakeholders have welcomed the credit-based system.

The development of a CAT system, which was already mooted during the conceptualisation period, gained more prominence during the review period and later. Current recommendations are calling for the urgent development of a CAT system within the NQF (DoE, 2004). Naude *et al* (2005:1) argue that this move towards a CAT system is paradoxical in that a CAT system would lead to greater unification, whereas the South African system is rather moving towards a linked or even tracked system:

...CAT in Higher Education will make the South African education and training system more unified in that CAT will lead to greater comparability between education, specifically higher education, and the vocational or training sector.

The existence of a *national qualifications register*, in the South African case, the NLRD, has been welcomed by all. Concerns about a drain on resources and compatibility between the NLRD and other databases have been noted. The value of the NLRD as national register of NQF qualifications and achievements has continually been noted.

3.12.8.2 Contested architectural aspects

Qualification nomenclature, initially prescribed in the SAQA Act (SA, 1998) and applied thereafter, became increasingly debated during the review period and even more so in recent days. Regarded as unsuitable and overly prescriptive, attempts were made to circumvent the established nomenclature and replace it with one more suitable to higher education in particular (DoE, 2004).

Unitisation, i.e. the inclusion of unit standards on the NQF that do not meet the same criteria as qualifications, was continually questioned. Locally, authors such as Luckett (1999) expressed concerns about a dominant humanistic paradigm that serves an economic rather than a social good. Internationally, authors such as Wolf (2002) questioned the never-ending spiral of over-specification.

Although the NQF bands (GET, FET and HET) suggested since the conceptualisation period were never contested, the levels and pathways of the NQF were under continual scrutiny. Eight *levels* were suggested during the conceptualisation period and were established as such through the

SAQA Act (SA, 1995c). The symmetry of the established structure was significant, in that it presented a unified system (one pathway), but also in that it did not skew the framework towards the HET band, despite the fact that 94,3% of qualifications (Keevy, 2005b) still occur in this band:

The symmetry of the South African NQF...is important both *symbolically* as an indication of the *equal* importance of the two domains on either side of the level 4 – 5 interface, and operationally in order to make the NQF work in a unified and understandable way in this “crowded” area of articulation and progression (SAQA, 2001b:4, emphasis in original).

At that stage SAQA (2001b) argued the “open-endedness” of Level 8 would meet the needs of Higher Education without skewing the framework:

This is formally similar to adding three more NQF levels to the system, but has the clear advantage of preventing the NQF from becoming a construction dominated by higher education (with 7 out of 11 levels) (2001b:4).

Since the start of the review period, the “open-endedness” of Level 8 has been replaced by ten levels, six of which are to be in the HET band (DoE, 2002 and 2003). Current considerations suggest that the recommendations for a ten-level framework have been well accepted by all stakeholders and roleplayers.

Pathways, as the most apparent indication of the extent of unification of the NQF, moved from one extreme to the other. The three diagrams below illustrate how both the conceptualised and established NQF had a single pathway, how the reviews first suggested two pathways (with an articulation column) (DoE, 2002), but later three pathways (with two articulation columns) (DoE, 2003).

The articulation columns are added to establish links between the paths and so also to improve articulation:

To ensure that each pathway is not walled off from the next an articulation column is created between them to enable vertical, horizontal and diagonal articulation between qualifications (DoE, 2003:17).

NQF level	Band	Pathway
8	HET	SINGLE UNIFIED SYSTEM
7		
6		
5	FET	
4		
3		
2	GET	
1		

Diagram 8: Structure of the NQF (*Conceptualisation and establishment periods*)

NQF Level	Band	Pathway		
8	HET	GENERAL	ARTICULATION (HORIZONTAL AND DIAGONAL)	CAREER FOCUSED/VOCATIONAL
7				
6				
5	FET			
4				
3				
2	GET	ABET separately defined		
1				

Diagram 9: Structure of the NQF (*Review period, 2002*)

NQF Level	Band	Pathway				
10	HET	GENERAL	ARTICULATION COLUMN	GENERAL VOCATIONAL/CAREER FOCUSED	ARTICULATION COLUMN	TRADE, OCCUPATIONAL AND PROFESSIONAL
9						
8						
7						
6						
5	FET	GENERAL	ARTICULATION COLUMN	GENERAL VOCATIONAL/CAREER FOCUSED	ARTICULATION COLUMN	TRADE, OCCUPATIONAL AND PROFESSIONAL
4						
3						
2	GET	GENERAL	ARTICULATION COLUMN	GENERAL VOCATIONAL/CAREER FOCUSED	ARTICULATION COLUMN	TRADE, OCCUPATIONAL AND PROFESSIONAL
1						

Diagram 10: Structure of the NQF (*Review period, 2003 and under consideration*)

General consensus during the review period points towards the following paths (DoE and DoL, 2003):

- General (followed mainly in schools and FET colleges, leading to a Further Education and Training Certificate [FETC]).
- General vocational (relevant to 16 to 18-year-olds or unemployed adults who wish to progress to higher education in a career-focused pathway - a career focused FETC will most probably be the exit level qualification).
- Trade, occupational and professional (competency standards for trades, occupations and professions for individuals who are in, or who have access to a workplace).

Another contested architectural aspect is the composition and roles of the quality assurance and standards setting bodies. During the conceptualisation period the DoE proposed that SETAs and Provincial Education Departments be accredited as ETQAs. The SAQA Act (SA, 1995c) did not explicitly include the Provincial Education Departments, although it did allow for professional bodies to be accredited. During the review period it was recommended that the two band ETQAs, HEQC and UMALUSI, have a greater say in quality assurance and standards setting aspects. This trend appears to be escalating as the establishment of only two Qualification and Quality Assurance Councils (QCs) is being discussed.

One of the more radical suggestions during the review period was to place quality assurance and standards setting functions under a single QC – a move strongly opposed by SAQA (SAQA, 2000),

as it was argued that the very separation was an instrumental part of breaking down 'elitist power enclaves' (2000:7). The opposing move suggests that these power enclaves were in fact holding and even strengthening their positions.

The initial proposals for a single set of *level descriptors* were replaced with calls for at least three sets of pathway-specific level descriptors during the review period. More recent suggestions are for a single but "brief and very broad" set of level descriptors – a suggestion already made by the DoE in 1996.

The NQF's outcomes-based approach to *assessment* required a critical shift in thinking (Oberholzer, 1994) of stakeholders, and was therefore also contested. The most serious problems were the prescribed registration of assessors (DoE and DoL, 2002), the lack of training for educators and trainers to be able to implement the new approach (Oberholzer, 1994), the extent to which assessment was being used as a regulatory mechanism (Muller, 2004), and difficulties in quality assurance (UMALUSI, 2004).

Outcomes-based *quality assurance* was initially well accepted even within the review period. It is only more recently that more serious concerns about the fact that the quality of academic courses cannot be evaluated against pre-specified outcomes (compliance is regarded as creating knowledge without any depth [Shalem *et al*, 2004]), and that quality should be saved from quality assurance (Stephenson, 2003), have been articulated. Another important concern is the inconsistent use of quality assurance terminology (CHE, 2004c).

The so-called "reinvention" of *OBE* through the NQF led to confusion with other OBE initiatives, but more seriously, contributed to the increased affinity of the NQF discourse to power struggles.

3.12.9 Governance

3.12.9.1 Regional awareness, national legislation and MoUs

Together with NQF architecture, NQF governance has been very contested. *Regional awareness* was limited in the conceptualisation and implementation periods, but features very significantly in the review period, and even more so in the most recent position.

An NQF through the promulgation of *national legislation* was never questioned. The tight regulatory and transformative purpose of the South African NQF made it impossible to *not* go this route. During the review period and also more recently, calls have been made for a drastic review of the

established NQF legislation to accommodate the recommended changes (DoE and DoL, 2003). This was, however, not well accepted by all stakeholders (Association for Skills Development Facilitators [ASDFSA], personal correspondence, 21 July 2004).

MoUs were probably not anticipated during the conceptualisation period, but soon became necessary as SAQA accredited a range of ETQAs that covered similar areas of education and training. During the review period *MoUs* were seen as symptomatic of deeper underlying problems (DoE and DoL, 2003). The more recent suggestions from the CHE for delegation-based *MoU* models that would entail the quality assurance of all other ETQAs, are a clear sign of recent power struggles.

3.12.9.2 SAQA as implementing agency and levels of authority

In the conceptualisation period SAQA was envisaged as a *central authority* responsible to oversee the development and implementation of the NQF that would report to a single integrated Ministry of Education and Training. SAQA's primary functions would entail (NTB, 1994):

- the implementation of an NQF;
- the establishment of policies and criteria;
- the endorsement of certificates;
- liaison with international bodies;
- the generation of standards; and
- technical assistance.

A National Council for Learning (NCL), made up of representatives of key stakeholders, would be tasked to formulate policy and oversee the work of four statutory councils:

- Educare Council (EC) for early learning;
- National Education Council (NEC) to oversee compulsory schooling;
- National Education and Training Council (NETC) for the non-compulsory, pre-tertiary sector which would also oversee a range of Sector Education and Training Organisations (SETOs); and
- National Tertiary Council (NTC) for higher education.

The diagram below illustrates the levels of authority as they were conceptualised during the pre-1994 period.

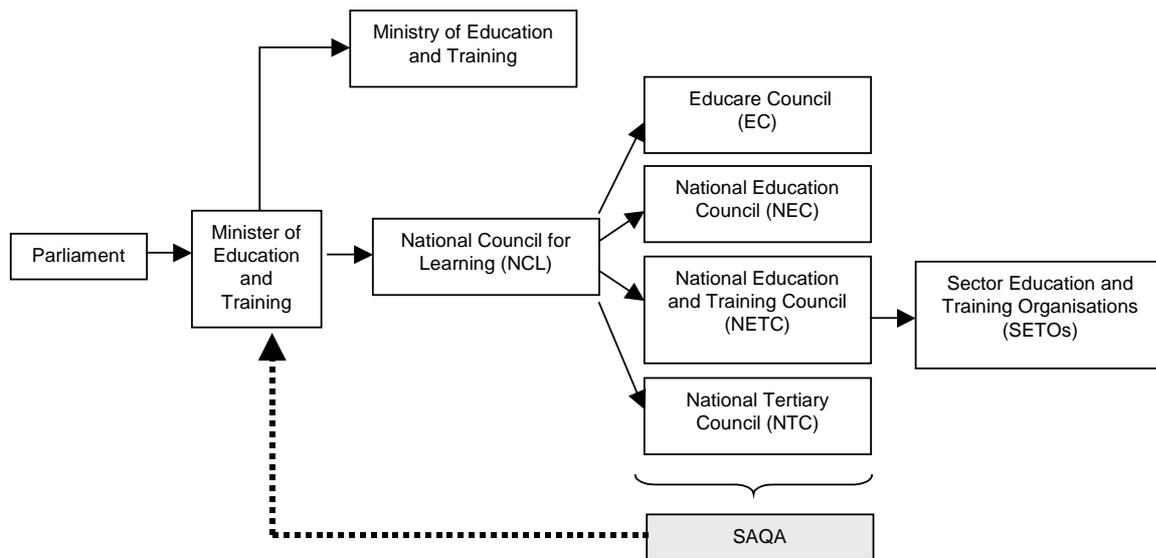


Diagram 11: Levels of authority (*Conceptualisation period*)

A significant move towards a more intricate design (and arguably one that was to become more prone to power struggles) of the levels of authority emerged less than a year later in the HSRC's *Ways of seeing the NQF* (1995:133). The establishment of two Ministries in 1994, one for Education and the other for Labour, necessitated a move away from the pre-1994 conceptualisation. This decision had severe and long-lasting implications for the development and implementation of the NQF. Sudden decisions had to be taken, mostly without the support of the longer gestation period that coincided with the conceptualised position of the NQF. It was agreed, as a fallback position, that SAQA would now become a *strong authority* with the mandate to oversee all other education and training bodies, including the well-established band ETQAs that were formed out of former councils:

The original goal of the social groups promoting the NQF was the establishment of a single Ministry of Education and Training in the post-1994 government. However they were unsuccessful in achieving this result. As an immediate *fallback position* the proposal was put forward for a single authority positioned between the various sectors of education and training and accountable to both ministers of education and training (EU, 2002:12, emphasis added).

Such forced decisions included that SAQA should oversee four sub-structures that were to be established:

- Qualification Councils to recommend qualifications and determine the rules of combination;

- Temporary National Standards Bodies (NSBs) to set standards in particular fields of learning which could eventually evolve into Standards Review Bodies;
- ETQAs to ensure delivery of standards in particular sectors; and
- Moderating bodies, specifically where more than one ETQA oversaw a qualification.

The proposal was also made that SAQA's functions be expanded to include a number of defining roles. These included (HSRC, 1995):

- the determination of the levels on the NQF;
- the format in which a unit standard had to be presented;
- the requirements for the registration of a qualification; and
- a range of policies and procedures, including for NSBs and ETQAs.

Although some might argue that the 1995 adjustments were necessitated by the establishment of separate Ministries of Education and Labour, even more might argue that these were some of the early warning signs of a gradual but continued digression away from the initially proposed levels of authority – one that would last well into the next decade:

Without a transcendental project, a paradigm shift or leap of faith, the NQF could become a tool of domination and fear (Parker, 1999:46).

The following diagram shows the levels of authority as established in October 1995 when the SAQA Bill was promulgated as the South African Qualifications Authority Act (SA, 1995c). Many of, if not all the suggestions as pre-empted by the HSRC (1995) earlier in the same year, were established.

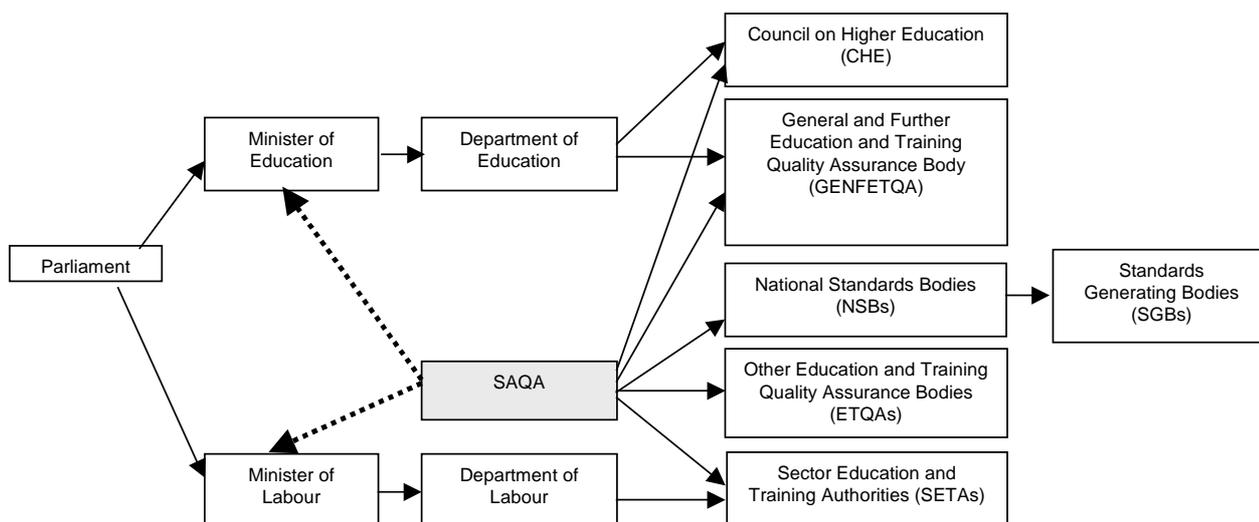


Diagram 12: Levels of authority (*Establishment period*)

SAQA, as represented by its Authority (the SAQA Board), was to be overseen by both the Ministries of Education and Labour, although it would be answerable to the Minister of Education. SAQA's promulgated powers enabled it to perform a variety of functions, including (SA, 1995c: Section 7):

- overseeing the development and implementation of the NQF;
- formulating and publishing policies and criteria for NSBs and ETQAs; and
- advising the Minister of Education on matters affecting the registration of standards and qualifications.

Largely in line with the HSRC (1995) recommendations, SAQA became a *strong authority* with many more powers than may have been envisaged during the conceptualisation period. SAQA was tasked to oversee a range of standards setting (NSBs and SGBs) and quality assurance bodies (ETQAs). The 1995 proposal that SAQA's functions would be expanded to include a number of defining roles became a central feature of NQF implementation, to the extent that the later NQF reviews became engrossed in attempting to redefine the role of SAQA.

Two band ETQAs were also established: (1) The Council on Higher Education's (CHE) Higher Education Quality Committee (HEQC), established in 1997 through the Higher Education Act (Act 101 of 1997) to provide for quality assurance and quality promotion in higher education; and (2) the General and Further Education and Training Quality Assurance Council (GENFETQA), established in 2001 through the GENFETQA Act (Act 58 of 2001) (previously the South African Certification

Council, later UMALUSI), to provide for quality assurance in general and further education and training.

With the promulgation of the Skills Development Act (SA, 1998d) three years after the SAQA Act, 25 SETAs (proposed as SETOs in 1994, but in essence with the same structure and purpose) were established. They were all subsequently accredited as ETQAs to quality assure sector-specific training.

This fallback position was prone to contestations and even set SAQA up for failure right from its establishment through the promulgation of the SAQA Act (SA, 1995c). The position of SAQA as the lever for integration in a fundamentally segregated system placed unrealistic and unreasonable pressure on SAQA to deliver on what it could not, and more importantly, was not designed to. Suggestions from stakeholders for an integrated Ministry, at least in principle, show some of these concerns:

Ensure the development of an integrated NQF as the country moves to the notion of a “Ministry of Learning” in principle, if not in practice (Mehl, 2004:20).

In 2002 the Study Team on the implementation of the NQF was tasked to recommend ways in which the implementation of the NQF (as established in terms of the SAQA Act) could be streamlined and accelerated (DoE and DoL, 2002). To a large extent, the *Study Team Report* remained true to its brief, as no significant changes to the levels of authority were recommended. Proposals were rather made on how the existing structures could function more effectively. In this regard an *NQF Strategic Partnership* between the DoE, DoL and SAQA was suggested – a suggestion that was later viewed as impracticable since the Departments’ and SAQA’s constitutional and statutory responsibilities were dissimilar (DoE and DoL, 2003). The Study Team did however make a range of recommendations on various other architectural matters such as the number of NQF levels and the development of generic standards on NQF Levels 1 to 4.

The role of SAQA was left largely unchanged, although a number of issues around funding and reporting lines (e.g. the *NQF Strategic Partnership*) were raised. A significant recommendation from the Study Team was to place ‘quality assurance and standards setting under the same roof’ (DoE and DoL, 2002:iv). This change in mindset had a significant influence on the constitution of NQF bodies in later years.

Slightly more than a year later, the Departments released the *Consultative Document* (2003). The *Consultative Document* recommended a range of far-reaching changes to NQF architectures and governance. These included the establishment of:

- An *Inter-departmental NQF Strategic Team* to ‘provide the bridge between SAQA and the two departments on NQF policy and strategy’ (DoE and DoL, 2003:38).
- Three *Qualifications and Quality Assurance Councils* (QCs): one for Higher Education and Training (HI-ED QC), one for General and Further Education and Training (GENFET QC) and one for the trade, occupational and professional qualifications (TOP QC).
- An *NQF Forum* to ‘review and discuss NQF development and implementation...a broad consultative not decision-making body’ (DoE and DoL, 2003:39).

It was recommended that the role of SAQA be significantly changed to ‘have much less direct responsibility for the generation of standards and qualifications’ (*Ibid.*), explicitly calling for the disbanding of the NSBs. SAQA would still have overall executive responsibility for the development and implementation of the NQF, with the following particular functions (*Ibid.*):

- executing the annual remit of the Ministers of Education and Labour;
- co-ordinating and facilitating the work of the three QCs;
- maintaining and developing the NQF level descriptors;
- maintaining the NLRD;
- evaluating foreign qualifications;
- secretariat to the *NQF Forum*;
- international liaison; and
- research on issues of importance.

SAQA’s proposed new *co-ordinating role*, as proposed during the review period, is illustrated in the diagram below.

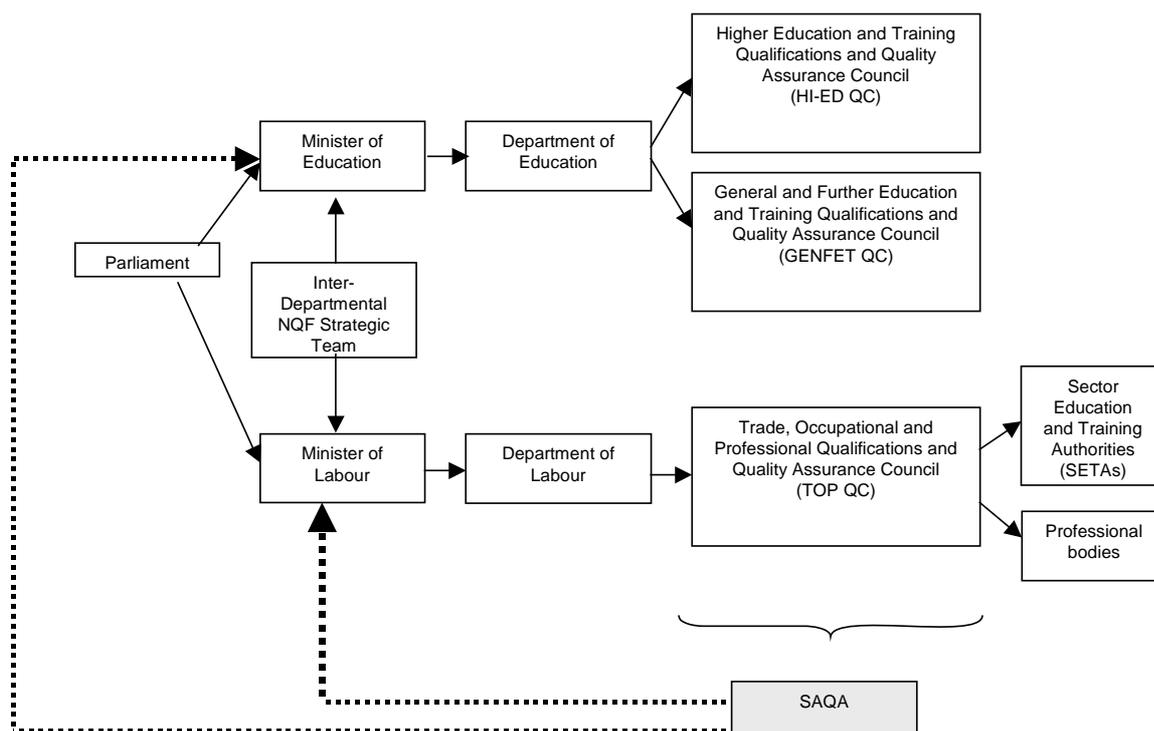


Diagram 13: Levels of authority (*Review period*)

Current considerations on NQF governance also point towards a more *co-ordinating* role for SAQA, with less involvement in policy development (this is to become the responsibility of the Ministry of Education) and standards *setting* (its established role was one of standards *generation*). The shift in the power base towards the Ministry of Education is not unique to South Africa, as noted by Young (2005:20):

A broader political lesson from the New Zealand case is that the more an NQF seeks to be comprehensive the more it can pose a threat to the very government Departments which launched it (Young, 2005:20).

Recent discussions suggest that only two QCs will be established, effectively pushing Labour (as possibly involved through the TOP QC) outside of NQF governance. SETAs could still fulfil a supporting role, but only as mandated by the two QCs. The process is also underway to establish Consultative Panels (also referred to as “Fit-for-purpose Panels”) that include both labour and education interests to take over the role and functions of the disbanded NSBs (see Isaacs, 2005).

The most probable levels of authority that are currently being considered are illustrated below.

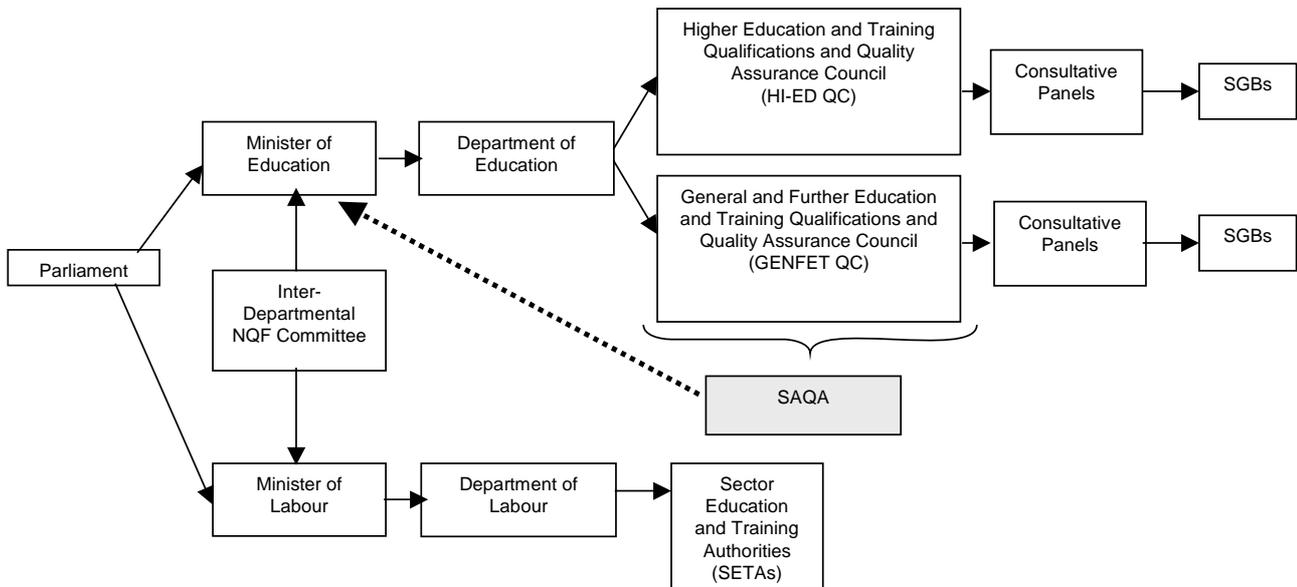


Diagram 14: Levels of authority (*Under consideration*)

A useful observation from the discussion above is the significant fluctuations in the number of direct relationships (e.g. reporting lines) and indirect relationships (e.g. overseeing and advisory roles) between SAQA and the other NQF bodies. These are summarised in the table below:

		Conceptualisation period	Establishment period	Review period	Under consideration
SAQA's subordinate relationships	Direct	0	37 (25 ETQAs and 12 NSBs)	0	0
	Indirect	4 (EC, NEC, NETC, NTC)	0	3 (HI-ED QC, GENFET QC, TOP QC)	2 (HI-ED QC, GENFET QC)
SAQA's super-ordinate relationships	Direct	1 (Minister of Education and Training)	1 (Minister of Education)	1 (Minister of Education)	1 (Minister of Education)
	Indirect	0	1 (Minister of Labour)	2 (Minister of Labour, Inter-dept NQF Strategic Team)	1 (Inter-dept NQF Committee)

Table 20: Sub- and superordinate relationships

The table is useful in determining the number of subordinate and superordinate reporting lines. Expressed as a ratio of *direct subordinate: indirect subordinate: direct superordinate: indirect superordinate*, the different periods show significant differences:

- SAQA was conceptualised as a *central authority* with separate awarding bodies – in this case the reporting line ratio was 0:4:1:0.
- SAQA was established as a *strong authority* mandated to oversee all other bodies – here the reporting line ratio was 37:0:1:1.
- During the review period SAQA was positioned as a *co-ordinating authority* with mainly administrative powers – in this case the reporting line ratio was 0:3:1:2.
- Current considerations still recommend that SAQA be a *co-ordinating authority*, but with a slightly different reporting line ratio of 0:2:1:1.

The following observations are made: the ratio under current consideration is closest to the conceptualised ratio; and the established ratio is the most cumbersome and possibly also the least stable.

3.12.9.3 *Involvement from the Departments*

As mentioned above, a single Ministry of Education and Training was never established, which led to a fallback position from which SAQA was set up to portray the integrated position, even if this was only in principle and not in practice.

The two established Departments of Education and Labour clearly had specific tasks and responsibilities for which they were separately responsible. The NQF project was however the one task where they had joint responsibility – juxtaposed, the Departments started out amicably, but heavily dependent on the vision of the Minister that headed them up.

During the establishment period, SAQA's relationship with the DoL and the SETAs was extremely good, although its relationship with the DoE was 'less than satisfactory' (EU, 2002:55). During the review period the relationship between the DoE and DoL became strained – a feature often depicted in the media, but also in the responses to the *Consultative Document* (DoE and DoL, 2003).

More recently, the probable establishment of only two QCs, the HEQC and UMALUSI, without TOP QC, points towards a greater alignment between SAQA and the DoE, possibly at the expense of the DoL relationship:

The unfolding new NQF environment, whilst welcome in many respects, also brings a number of uncertainties and further contestations. There are many issues that remain unresolved within this new framework. They will still be a source of constraint for UMALUSI's performance. In particular, issues around the Trade, Occupational and

Professional (TOP) qualifications and systems are bound to make working around this area a source of great difficulty still (UMALUSI, 2004:12).

3.12.9.4 *Involvement of international agencies*

The ILO, UNESCO and the OECD have supported NQF development in the SADC region for a considerable time. Their direct involvement with the South African NQF has however been limited. The EU's involvement, on the other hand, has been substantial (DoE and DoL, 2002), albeit mainly limited to funding.

Both during the review and more recently, suggestions have been made for more substantial engagement with international agencies. SAQA's original international "liaison" role would rather become a stronger international "representation" role.

3.12.9.5 *Involvement of stakeholders*

Stakeholder involvement during the conceptualisation period was considerable. Examples include representation through the ANC Education Department, the National Training Board, the Inter-Ministerial Working Group (IMWG), and the National Education Policy Initiative (NEPI). The failure by the new government to fully implement their conceptualised NQF model marked a point where stakeholder involvement was challenged.

The establishment of SAQA and the ETQAs, but more so the NSBs and SGBs, allowed for significant and direct stakeholder involvement in the NQF up to 2005.

During the review period the involvement of stakeholders was encouraged, but lacked credibility. Consideration of comments from stakeholders to the *Study Team Report* (DoE and DoL, 2002), the *Consultative Document* (DoE and DoL, 2003) and *The HEQF* discussion document (DoE, 2004) were questioned by many – to the extent that it appeared to some stakeholders as if discussion documents were being published for public comment despite the decision already having been taken, i.e. as *fait accompli*.

Stakeholder involvement under current consideration is based within the suggested Consultative Panels (see the previous diagram).

3.12.9.6 Funding

Initial suggestions were that government would fund the NQF; however this never materialised and SAQA proactively pursued international funding. Since the establishment period up to 2005, the South African NQF was largely funded by international donors, most notably the EU. During the review period numerous concerns about this dependence on donor funding were expressed. The decision has now been taken that SAQA's 2005/6 budget shortfall will be met by the National Skills Fund, and in the long term by the DoE.

The move by the DoE to provide funding, clearly on its own terms and within its own time, points towards a significant move to regain direct control of NQF development and implementation.

3.12.10 Overview

This discussion on the positioning of the NQF, using the identified objects, has shown that the suggested typology is a particular useful conceptual tool to shed light on NQF debates. The following table gives an overview of this discussion and is followed by some brief comments.

Object	Conceptualisation period	Establishment period	Review period	Current considerations
Guiding philosophy	Post-Fordism, Vocationalism, Unitisation, Competence approach, Lifelong learning, Integrated approach, Freireanism	Technical humanism, Outcomes-based approach, Limitation of academic freedom, New knowledge production, Reductionism, Behaviourism	Neo-liberalism, Forced integration of epistemologically different modes of learning	Globalisation
Purpose	Mainly: Social justice, Access and progression and Regulation. To a lesser extent: Comparability and benchmarking, and Communication. General acceptance of the NQF objectives			Some questions being asked about the intractability of the NQF objectives
Scope	Unified, single pathway, single regulatory system		Three linked tracks	Three tracks with weak links, possibly even tracked
Prescriptiveness	Tight			
Incrementalism	Rapid and comprehensive			Still rapid, but some signs of a more phased sector-by-sector approach
Policy breadth	High intrinsic and low institutional logic		High intrinsic and high institutional logic	
Architecture	Unitisation Prescriptive qualification nomenclature "Reinvented" OBET Credits, but not CAT National qualifications register 8 Levels, 3 bands, 1 pathway 1 set of level descriptors Separate SS and QA systems NSBs and SGBs 12 Organising Fields		Unitisation Prescriptive qualification nomenclature "Reinvented" OBET Credits and CAT National qualifications register 10 levels, 3 bands, 3 pathways 4 sets of level descriptors Combined SS and QA systems NSBs and SGBs 12 Organising Fields	Same as the Review Period, except for: 1 set of level descriptors Consultative Panels in place of NSBs
Governance	Limited regional awareness Envisaged national legislation No need for MoUs Central Authority Overseen by a single Ministry Limited role of international agencies Stakeholders should play an important role QCs Government funding required	Limited regional awareness National legislation MoUs Strong Authority Overseen by DoE and DoL Funding role of international agencies Stakeholders play an important role SAQA (no QCs) Dependence on donor funding	Regional awareness Revised national legislation Critical of MoUs Co-ordinating Authority More responsibility to DoE Greater engagement with international agencies required Stakeholders are less able to influence the process 3 QCs Less dependence on donor funding recommended	Regional awareness Revised national legislation No need for MoUs Co-ordinating Authority DoE oversees Greater engagement with international agencies required Stakeholders are less able to influence the process 2 QCs Government takes over funding

Table 21: Typological positioning of the South African NQF

Note: The guiding philosophy categorisation was based on available evidence and significant overlaps are possible as illustrated with the dotted separations.

3.12.10.1 Divergent guiding philosophies influence the South African NQF

As was noted before, a diverse range of underlying philosophies have influenced, and still are influencing, South African NQF development and implementation. Even though the examples mentioned above have been associated with particular periods of NQF implementation, other authors may argue, even more convincingly, for a different placement. The point is that the South African NQF is influenced by these philosophies, often expressed as concerns, but most obviously as the thinking that is associated with different stakeholder groupings. Such differences, in turn, result in divergence of opinion about how the NQF should be implemented – often manifesting as power struggles.

3.12.10.2 The objectives of the South African NQF have remained largely unchallenged

The purpose of the South African NQF is well accepted and widely supported. As embodied in the NQF objectives, the purpose has remained largely uncontested throughout the conceptualisation, establishment and even the review periods. It is only most recently that some questions have been raised regarding the intractability of some of the objectives. Tensions between overt and covert purposes remain a significant feature of the development and implementation of the South African NQF.

3.12.10.3 The scope of the South African NQF has evolved from unified to tracked

The South African NQF started out with a unified scope, this evolved to a linked scope during the review period, and most recently appears to be moving towards a tracked scope. As concerning as this may be to the “integrationalists”, the digression is not unique to the South African NQF. Raffe (2002) argues that most countries that have pursued such unification have been unsuccessful, mainly as a result of internal pressures, such as responses to academic drift and the expansion of post-compulsory sectors, as well as external pressures, such as globalisation.

3.12.10.4 The prescriptiveness of the South African NQF has remained tight

Despite the international trend towards looser and linked NQFs, the South African NQF has remained tight since its conceptualisation, although, as was discussed in the previous section, unification has been replaced with a more linked scope. The uniqueness of the South African context has accommodated this tight prescriptiveness contrary to international trends.

3.12.10.5 The incrementalism of the South African NQF has remained rapid and comprehensive

The NQF has been, and is still being implemented at a rapid rate and in a comprehensive manner. South Africa has most probably had no choice but to take this position on incrementalism. It has, however, contributed significantly to the extent of contestations and power struggles.

3.12.10.6 The policy breadth of the South African NQF has evolved to high intrinsic with high institutional logic

The NQF is moving from a position of high intrinsic/low institutional logic to high intrinsic/high institutional logic – a trend that is internationally recognisable. Furthermore, the initial lack of institutional logic contributed significantly to the unrealistic expectations of what the NQF could deliver (also see the previous section).

3.12.10.7 Some architectural aspects of the South African NQF have remained uncontested, others have been severely contested

Uncontested architectural aspects include: OBET, the NQF bands (GET, FET and HET), the need for credits and CAT, a national register (the NLRD) and, to a lesser extent, the NQF Organising Fields.

Contested architectural aspects include: Qualifications nomenclature, unitisation, levels and pathways, composition and roles of quality assurance and standards setting bodies, the combination of quality assurance and standards setting, level descriptors, assessment, and outcomes-based quality assurance.

3.12.10.8 Architecture has skewed the South African NQF debates

Proposals, recommendations and concerns about NQF architecture have featured significantly throughout all periods of NQF development and implementation to the extent that NQF debates have been skewed and have ignored other important typological components of the NQF. Attention to the NQF as a whole, as represented through the eight typological components (or objects), may have expedited the route to a revised NQF.

3.12.10.9 The governance of the South African NQF has been severely contested

NQF governance has been particularly prone to contestations with significant shifts in power bases being the order of the day. Although there still appear to be significant problems with regard to participation of stakeholders, current considerations appear to be reverting to the earlier conceptualised governance structures.

3.12.10.10 Departmental involvement in the South African NQF has been erratic

SAQA was established as a “fallback” position as a result of the establishment of the two ministries, one for education and one for labour. As a result, SAQA was precariously placed between two departments with the responsibility to fulfil tasks that certainly could be regarded as beyond its ambit. Consequently, involvement from the departments was also erratic. Initially both DoE and DoL were involved; the latter not with funding though. As implementation continued, the DoL slowly moved more to the background, while the DoE, mainly through the HEQC and UMALUSI, became more dominant.

3.12.10.11 Stakeholder involvement in the South African NQF has been extensive but not without problems

As mentioned earlier in this chapter, stakeholder involvement is a critical component of successful NQF implementation, but is also very difficult to manage, and even more importantly, is prone to power struggles as the agendas of different constituencies come into play.

3.12.10.12 The South African NQF has been funded in the main by donors

The development and implementation of the South African NQF, up to 2005, was funded mainly by donors – to the extent that less than 20% of funding came from the South African government. This state of affairs contributed significantly to the difficulties experienced, most explicitly, in the tensions between the Departments of Education and Labour and SAQA.

3.12.10.13 Summary of findings from the positioning of the NQF

The findings from this section are summarised in the table below.

Object in the NQF discourse	Finding	
Guiding philosophy	1	Divergent guiding philosophies influence the South African NQF
Purpose	2	The objectives of the South African NQF have remained largely unchallenged
Scope	3	The scope of the South African NQF has evolved from unified to tracked
Prescriptiveness	4	The prescriptiveness of the South African NQF has remained tight
Incrementalism	5	The incrementalism of the South African NQF has remained rapid and comprehensive
Policy breadth	6	The policy breadth of the South African NQF has evolved to high intrinsic with high institutional logic
Architecture	7	Some architectural aspects of the South African NQF have remained uncontested, others have been severely contested
	8	Architecture has skewed the South African NQF debates
Governance	9	The governance of the South African has been severely contested
	10	Departmental involvement in the South African NQF has been erratic
	11	Stakeholder involvement in the South African NQF has been extensive but not without problems
	12	The South African NQF has been funded in the main by donors

Table 22: Summary of findings from positioning the NQF

3.13 SUMMARY

This chapter has presented the findings of a detailed review of NQF literature. The chapter has also presented eight objects identified in the NQF discourse, based on the explication of eight typological components, namely:

1. Guiding philosophy
2. Purpose
3. Scope
4. Prescriptiveness
5. Incrementalism
6. Policy breadth
7. Architecture

8. Governance.

Furthermore it has been shown that the South African NQF is covertly influenced by historical and current underlying philosophies, but also that the purpose of the NQF, as radical as it may be, has remained largely unchallenged. Most importantly for this study, the typological positioning of the NQF reaffirmed the initially identified problem within the NQF discourse, namely that power struggles are having a detrimental effect on NQF development and implementation.

The chapter has however stopped short of providing empirical evidence to support the identification of the problem, and more importantly, the findings and recommendations that can be used to address the problem of the negative effects of power manifestations in the NQF discourse. In *Chapter 4*, an attempt is made to do just this by using the eight identified objects within the NQF discourse as a springboard to facilitate the application of the archaeological method to the empirical dataset. This is followed by the application of the genealogical method to the same empirical dataset. The results of both the archaeological and genealogical critiques are then used in *Chapter 5* to describe power in the NQF discourse.

CHAPTER 4: ARCHAEOLOGICAL AND GENEALOGICAL CRITIQUES OF THE NQF DISCOURSE

4.1 INTRODUCTION

4.1.1 Purpose of this chapter

The purpose of this chapter is to systematically describe power in the South African NQF discourse and to present a summary of the results of the Foucauldian critique of the development and implementation of the NQF. The qualitative analysis takes place within a Foucauldian theoretical framework and employs two Foucauldian research methods, archaeology and genealogy:

- Archaeology is used to describe the NQF discourse – in effect presenting a “snapshot” or slice of the discourse.
- Genealogy is used to reveal the NQF discourse as a system of constraint – describing various processual aspects within the discourse.

The qualitative analysis is preceded by a detailed coding process using ATLAS.ti software of an empirical dataset containing the transcripts of various interviews and focus groups with NQF stakeholders, responses by NQF stakeholders to discussion documents published by the Departments of Education and Labour, as well as a range of articles published in the news media between 1995 and 2005.

4.1.2 Summary of preceding discussions

In this chapter the qualitative analysis of the NQF discourse is presented. The analysis is heavily dependent on the work that precedes this chapter, namely:

- The purpose of the study and the problem that is being investigated (from *Chapter 1*)
- A description of the NQF discourse (also from *Chapter 1*)

- The Foucauldian theoretical framework and research methods (described in *Chapter 1* and developed in more detail in *Chapter 2*)
- Identification and explication of objects in the NQF discourse (from *Chapter 3*).

4.1.2.1 Purpose of the study and problem being investigated

As explained at the beginning of this thesis, the purpose of the Foucauldian critique of the development and implementation of the South African NQF is to support improved future development and implementation.

In order to achieve this purpose, the study is underpinned by an explicit recognition of the researcher's social location and three research assumptions, namely that the researcher has the legitimacy to speak about power in the NQF discourse, that the Foucauldian theoretical framework and research methods are best suited to the study, and that the qualitative research design is most appropriate for the study.

Based on a discussion in *Chapter 1* of the three periods of NQF development and implementation, namely the Conceptualisation period (early 1980s to 1994), Establishment period (1995 to 1998), and Review period (1999 to 2005), it was observed that the development and implementation of the South African NQF was being influenced on three fronts:

- “Rootedness” of the NQF in contestations
- Unrealistic expectations of the NQF by NQF stakeholders
- Negative effects of power struggles within the NQF discourse.

Following from these three observations, the following problem was formulated and is addressed throughout this study:

Power struggles are having a negative effect on the development and implementation of the South African NQF.

4.1.2.2 NQF discourse

The study has required a clear and concise understanding of the primary object being investigated. In *Chapter 1*, it was explained that the NQF is more than a framework of qualifications; that it is rather a complex social construct with specific overt and/or covert purposes that is implemented and overseen by the South African government. It was also explained that in order to critique the development and implementation of this NQF, it is necessary to look beyond a narrow definition of

the NQF to a broader interpretation that would encompass the diversity of objects that are associated with the NQF. After aligning the definition to the Foucauldian theoretical framework, the following definition of the NQF discourse was accepted:

The NQF discourse is a dominant, influential and coherent amalgamation of divergent and even contradictory views, which support the development of an NQF that replaces all existing differentiated and divisive education and training structures.

Importantly, it was suggested that for the purposes of this study, the NQF discourse would be suitably represented by the particular choice of the empirical dataset, namely 300 interviews (including focus groups), 90 responses to discussion documents and 72 news articles, as these sources contain a significant number of divergent and contradictory views as expressed by NQF stakeholders.

4.1.2.3 Foucauldian theoretical framework and research methods

As explained in *Chapters 1 and 2*, the Foucauldian theory provides the logical structure and fixed frame of reference within which the critique of the development and implementation of the South African NQF to date can take place. The *purpose* of the critique is to:

Support the improved future development and implementation of the South African NQF.

Foucauldian theory also provides a lens through which the *research problem* is viewed, namely that:

Power struggles are having a negative effect on the development and implementation of the South African NQF.

Within this framework, power is interpreted as: existing only in *action* - power should be analysed in *how it is exercised and what its effects are* without developing strategies to undermine power; power also has *positive effects* - power should not be studied as a form of repression, its *positive effects* must also be considered; power exists in a complex relationship with *knowledge*; power appears in a variety of *guises*; and power is only established within *discourse* – in this case, the NQF discourse.

The selection of the Foucauldian theoretical framework is based on the inclusion of empirical evidence, extensive engagement with power as social phenomenon, and the suitability of the two

embedded research methods, archaeology and genealogy, that were developed particularly to study power relations.

As discussed in the preceding chapters, archaeology is the ‘...systematic description of a discourse object’ (Foucault, 1972:156). In the context of this study, the discourse object is the NQF discourse, and archaeology is used, by applying it to the empirical dataset, to describe this NQF discourse. As also discussed earlier, the archaeological method involves three components: the identification of objects within the NQF discourse (these emerge from the typological positioning of the NQF in *Chapter 3* – see the discussion below); the identification of unities within the NQF discourse; and the description of strategies that emerge from identified objects and unities within the NQF discourse.

Genealogy, on the other hand, is the ‘...union of erudite knowledge and local memories which allows us to establish a historical knowledge of struggles’ (Foucault, 1980:83). Just as archaeology gives a “snapshot” of the NQF discourse, genealogy describes the processual aspects of the NQF discourse by identifying hidden origins and functions and then revealing the NQF discourse as a system in which power is exercised. The genealogical method involves three components (as well as a fourth combinatory step): the identification of erudite knowledges within the NQF discourse; the identification of local memories within the NQF discourse; the identification of knowledges opposed to power within the NQF discourse; and the identification of constraints within the NQF discourse.

An important feature of the research design is that both archaeology and genealogy are applied to the same empirical dataset, i.e. the dataset is coded twice and therefore also analysed twice. The different purposes of the two research methods, the one describes a “snapshot” of the NQF discourse, while the other describes the processual aspects of the NQF discourse, are seen to be complementary. Collectively the results of the two critiques give an improved multidimensional description of the NQF discourse – not only the one dimension of themes and theories that form a “slice” or “snapshot” of the NQF discourse, and not only the dimension of a range of “lineages” of historical knowledges that form the processual aspects of the NQF discourse, but a combination.

4.1.2.4 Identification and explication of objects in the NQF discourse

The NQF literature review, as presented in *Chapter 3*, had two important interlinked purposes. The first was to present the findings of a detailed review of NQF literature; the second was to identify common objects in the NQF discourse that would form the basis for the qualitative analysis presented in *Chapter 4*, most significantly for the archaeological critique. As a result, the outcomes of *Chapter 3* are also twofold. The literature review made it possible to make a number of important

observations (see *Table 18* in *Chapter 3*) and also to investigate the positioning of the South African NQF between the early 1980s and 2005. Secondly, it was found that the NQF typological components, as utilised during *Chapter 3* to present the findings of the literature review, constitute comprehensive descriptive categories of various aspects of NQF development and implementation. Consequently, the typological components constitute most of, if not all the common objects that statement in the NQF discourse could refer to. At the very least, the typological components are, in some way or another, linked to additional objects in the NQF discourse.

Arguably pragmatic, the identification of these objects - Guiding philosophy; Purpose; Scope; Prescriptiveness; Incrementalism; Policy breadth; Architecture; and Governance - proved to be useful and contributed to a simplified but effective analysis.

4.1.3 Structure of this chapter

Considering the preceding discussions, this chapter is structured into three distinct, but interrelated, sections:

- Coding of the empirical dataset
- Archaeology as critique
- Genealogy as critique.

The first section is a brief description of the coding of the empirical dataset, done within the ATLAS.ti environment, which precedes both the archaeological and genealogical critiques. The second section presents the findings of the list coding of the empirical dataset, based on the components of the NQF typology. This archaeological critique includes the identification of objects, unities and strategies in the NQF discourse. The third section presents the findings of the coding of the same empirical dataset. This genealogical critique includes the naming and categorisation of erudite knowledges, local memories and knowledges opposed to power, culminating in the identification of a number of constraints in the NQF discourse.

In *Chapter 5* the results of the application of archaeology (mainly the identified strategies) and genealogy (mainly the identified constraints) are used to describe power in the NQF discourse.

4.1.4 Referencing of empirical data

The empirical dataset (as contained within the ATLAS.ti hermeneutic unit) has been kept separate from other source documents. References to documents in the empirical dataset do *not* include page numbers, even when extracts are used as supporting evidence. References to other source documents include page numbers when cited. The empirical dataset, consisting of 300 interviews (including focus groups), 90 responses to discussion document and 72 news articles, is *not* included in the reference list. All other source documents are listed in the reference list.

4.2 CODING OF THE EMPIRICAL DATASET

4.2.1 Introduction

The first step in the qualitative analysis of the NQF discourse is the coding of the empirical dataset using ATLAS.ti software. The execution of this step takes place within the ATLAS.ti hermeneutic unit and as such does not warrant a detailed description (the hermeneutic unit, including all the primary documents, is available as an exported *html* file, but has not been included as an annexure in this thesis, as it was considered too lengthy; it is however available on the compact disc that accompanies this thesis).

The discussion is therefore limited to the following aspects:

- Empirical dataset that was included as primary documents
- List coding as part of the archaeological critique
- List coding as part of the genealogical critique.

4.2.2 The empirical dataset

The empirical dataset employed in this study consists of three distinct categories:

- 300 interviews (including focus groups) conducted as part of the NQF Impact Study (SAQA, 2004 and 2005b)
- 90 responses to Departmental discussion documents released between 2002 and 2004

- 72 news articles related to the NQF published between 1995 and 2005.

(Table 6 in Chapter 1 gives a detailed stratification of the interviews and responses across the different NQF stakeholder groupings.)

As explained in Chapter 1, this Foucauldian critique of the development and implementation of the South African NQF drew heavily on the wealth of empirical data that was available to the researcher (but also publicly released) as a result of his direct involvement in the NQF Impact Study (SAQA, 2004 and 2005b). In all, 300 NQF stakeholders were interviewed (this included approximately 10 focus groups covering 76 learners) as part of the NQF Impact Study between 2003 and 2004. All interviews were recorded and professionally transcribed. Most focus groups were also recorded, but due to environmental difficulties, transcriptions were of poor quality, and summaries had to be used. The interviews were grouped and analysed separately by more than one researcher, including the author of this thesis. A sub-report (or annexure) was compiled for each of the groupings. This exercise was repeated twice, the first time in 2003 when Cycle 1 of the NQF Impact Study was completed, and the second time in 2004 when Cycle 2 was completed. Eleven annexures, as listed below, were attached to the hermeneutic unit (original interview transcripts were not used, as these were confidential and not made available to the general public):

- Employers (SAQA, 2004d and SAQA, 2005g)
- Departments (SAQA, 2004f and SAQA, 2005d)
- Unions/Labour (SAQA, 2004g and SAQA, 2005f)
- Providers (SAQA, 2004h and SAQA, 2005e)
- Focus groups (SAQA, 2004e) – in the second cycle the focus groups' responses were combined with the interviews
- ETQAs (SAQA, 2005c) – in the first cycle interviews with ETQA representatives were combined with initial contextualisation interviews (SAQA, 2004c).

The second category within the empirical dataset consists of 90 responses to Departmental discussion documents released between 2002 and 2004. As is the case with the NQF Impact Study interviews discussed above, the responses are all public documents, in this case documents that were submitted to the Departments between 2002 and 2004. All 90 responses were attached to the hermeneutic unit.

Thirdly, 72 news articles related to the NQF and published between 1995 and 2005 were identified and attached to the hermeneutic unit. The articles were selected on the basis of relevance to the study and equal distribution across the period of investigation (see Table 7 in Chapter 1).

A total of 173 primary documents were included in the hermeneutic unit: 11 from the interviews, 90 discussion document responses and 72 news articles. As explained before, the empirical dataset, consisting of the 173 primary documents, was coded twice: the first time as part of the archaeological critique and the second time as part of the genealogical critique. These are described in more detail below.

4.2.3 List coding as part of the archaeological critique

As discussed on numerous previous occasions, the archaeological critique comprises of three steps:

- identification of objects within the NQF discourse;
- identification of unities within the NQF discourse; and
- description of strategies that emerge from identified objects and unities within the NQF discourse.

The first step in the archaeological critique was the list coding of the empirical dataset according to the objects in the NQF discourse. As explained earlier in this chapter, the objects were identified from the NQF literature review presented in *Chapter 3*. It was found that the NQF typological components constitute comprehensive descriptive categories of various aspects of NQF development and implementation – the common objects, and therefore also the codes used in the analysis that statement in the NQF discourse could refer to, namely:

- Guiding philosophy
- Purpose
- Scope
- Prescriptiveness
- Incrementalism
- Policy breadth
- Architecture
- Governance.

Included in the identification of the eight objects was a consideration of areas of difference that contribute to the status of different types of objects, the extent to which specific bodies become major authorities recognised by public opinion, the law and the government; and the systems according to which different objects are divided, contrasted, related, regrouped and classified. The results of the coding process (i.e. the links between the objects [codes] and sections of relevant

text [quotations]) including the hyperlinks and comments inserted by the researcher, were exported to an MS Word file.

Secondly, the MS Word file was used to identify unities in the NQF discourse. This was done by comparing the data and grouping similar incidents together in order to place them at the 'same conceptual level' (Smit, 2002:69). Included in this "grouping" process were considerations of the numerous and dense relations within the dataset, an understanding of statements not by the rules that govern their construction, but by the rules that govern their appearance; and also a consideration of all statements - even if they appeared to be inadequate.

The final step in the archaeological critique is the description of strategies that emerge from identified objects and unities within the NQF discourse. Once again, based on specific considerations (as necessary within the Foucauldian theoretical framework), namely points of incompatibility, equivalence and systematisation, as well as a determination of the theoretical choices that were made out of all those that could have been made, the preceding identification of objects and unities are collectively interrogated. In each case the links between the identified strategy and the specific objects and unities are clearly indicated (in tabular format). The distribution of each strategy within the NQF discourse is then discussed and summarised in diagrammatic format.

4.2.4 List coding as part of the genealogical critique

The steps in the genealogical critique have also been discussed before. They are:

- identification of erudite knowledges within the NQF discourse;
- identification of local memories within the NQF discourse;
- identification of knowledges opposed to power within the NQF discourse; and
- identification of constraints within the NQF discourse.

As with archaeology, open coding is used as part of the genealogical critique. Differently though, the first three steps involve independent coding, each resulting in an exported MS Word file. The three codes mirrored the steps in the genealogical critique, namely:

- Erudite knowledges
- Local memories
- Knowledges opposed to power.

The first code, erudite knowledges, was linked to texts that were associated with historical contents that had been buried and disguised in a functional or formal systematisation, with an emphasis on power. The second code, local memories, was linked to knowledges that had been disqualified as inadequate to their task or insufficiently elaborated, with an emphasis on power. The third code, knowledges opposed to power, was linked to knowledges that “rebel” against centralising powers and are linked to the functioning of the NQF discourse – the last code included a greater emphasis on power.

In each case the results of the coding process (the links between the objects [codes] and sections of relevant text [quotations]) including the hyperlinks and comments inserted by the researcher, were exported to MS Word files. Each of the files was then independently scrutinised to compare the data and group similar incidents (as done during the archaeological critique). As a result, each file contained specific contextualised examples of erudite knowledges, local memories and knowledges opposed to power.

The final step of the genealogical critique involved the grouping together (as subjugated knowledges) of the identified erudite knowledges, local memories and knowledges opposed to power to identify constraints within the NQF discourse. As for the archaeological critique, the links between the identified erudite knowledges, local memories and knowledges opposed to power, and the particular constraints are indicated in tabular format with more detailed discussion following the tables. This lineage of each constraint is then summarised in diagrammatic format.

4.2.5 Summary

The following table summarises the various aspects of the coding of the dataset as discussed in this section.

Description	Archaeology	Genealogy
Primary documents	11 Annexures (representing 300 interviews, including focus groups) 90 responses to Departmental documents 72 news articles	
Codes	<ul style="list-style-type: none"> • Guiding philosophy • Purpose • Scope • Prescriptiveness • Incrementalism • Policy breadth • Architecture • Governance 	<ul style="list-style-type: none"> • Erudite knowledges • Local memories • Knowledges opposed to power
Output	One MS Word file containing: links between <u>objects</u> and quotations	Three MS Word files containing: (1) links between <u>erudite knowledges</u> and quotations, (2) <u>local memories</u> and quotations, and (3) <u>knowledges opposed to power</u> and quotations
Subsequent steps	<ul style="list-style-type: none"> • Identification of <u>unities</u> • Description of <u>strategies</u> that emerge from identified objects and unities 	<ul style="list-style-type: none"> • Grouping together of the identified erudite knowledges, local memories and knowledges opposed to power to identify <u>constraints</u>

Table 23: Coding of the empirical dataset

4.3 ARCHAEOLOGY AS CRITIQUE

4.3.1 Introduction

In this section archaeology is used to describe the NQF discourse. This application consists of three distinct sequential components as previously discussed, namely the:

- identification of *objects* in the NQF discourse (as explained in the introduction to this chapter the identification and explication of objects in the NQF discourse was already completed in *Chapter 2*, and is therefore only summarised here);
- identification of *unities* in the NQF discourse; and
- description of the formation of *strategies* associated with the identified objects and unities in the NQF discourse.

This section is structured according to these three components.

4.3.2 Identification of *objects* in the NQF discourse

4.3.2.1 Introduction

As discussed in *Chapter 2*, an object in the NQF discourse is described as:

A category in the NQF discourse that exists through the establishment of a group of relations between authorities of emergence, delimitation, and specification and that contains other mutually exclusive sub-categories or components.

Following this interpretation of “object” within the context of this study, the identification of objects in the NQF discourse is achieved by identifying and analysing:

- *surfaces of emergence* - those areas of difference that contribute to the status of different types of objects;
- *authorities of delimitation* - the extent to which specific bodies become major authorities recognised by public opinion, the law and the government; and
- *grids of specification* - the systems according to which different objects are divided, contrasted, related, regrouped and classified.

The *surfaces of emergence* for the NQF discourse are most probably similar in countries where NQF implementation has proceeded beyond the initial stages such as Australia, New Zealand and Scotland. Even so, the South African experience is unique in that the conceptualisation of the NQF coincided with major political reforms starting in the early 1990s and culminating in the election of a new and radically different government in 1994. The SAQA Act (Act 58 of 1995) set the scene for the gradual implementation of the NQF from 1996 to the present day. The immediate post-apartheid period (1995 – 1998) can be described as one in which major reforms were welcomed, often simply because they offered different options to those that were available under the apartheid regime. This was a period during which validity, applicability, underlying philosophy, appropriateness and rigidity of the new suggestions were not necessarily questioned. From 1999, passive acceptance started to be replaced with a gradual dissatisfaction and criticism. It is in these periods that the NQF emerged as an object of discourse.

The *authorities of delimitation* that have functioned during these periods included: significant changes in legislation, of which the SAQA Act is just one example; a need for parity of esteem between education and training; national strategies such as the National Skills Development Strategy (NSDS), the Human Resource Development (HRD) strategy and the Department of Education’s Tirisano strategy. The South African education and training system was also starting to

recover after many decades of influence of Fundamental Pedagogics. The introduction of an outcomes-based approach, first in the schooling sector, but later across all sectors, further influenced NQF development and implementation, most notably in qualification and unit standard design.

The third strategy to understanding the formation of objects of the NQF discourse is an analysis of the *grids of specification*. In this study, and therefore also within the confines of the Foucauldian theoretical framework, grids of specification are interpreted as the systems according to which different kinds of qualifications, approaches, outcomes, assessment methods and quality assurance practices are divided, contrasted, related, regrouped, classified and derived from one another as objects of the NQF discourse. Examples include: an accreditation-based quality assurance system; a standards setting system that has evolved from the initial labour and training involvement; a national departmental registration system applicable to private providers of education; an assessment system that requires all assessors of NQF qualifications and unit standards to be registered by quality assurance bodies.

4.3.2.2 Summary of objects in the NQF discourse

As documented in *Chapter 3*, the eight typological NQF categories, identified and used as conceptual tools during the review of NQF literature, were identified as objects within the NQF discourse, as each of the typological categories represents a category in the NQF discourse that exists through the establishment of a group of relations between authorities of emergence, delimitation, and specification, and contains other mutually exclusive sub-categories or components:

Objects in the NQF discourse	
1	Guiding philosophy object
2	Purpose object
3	Scope object
4	Prescriptiveness object
5	Incrementalism object
6	Policy breadth object
7	Architecture object
8	Governance object

Table 24: Objects in the NQF discourse

4.3.3 Identification of *unities* in the NQF discourse

4.3.3.1 Introduction

In this second component of the archaeological critique a range of unities are identified from the empirical dataset. As discussed in *Chapter 2*, a unity in the NQF discourse is interpreted as:

An empirically selected group of all statements, both formal and informal, that refers to the same object in the NQF discourse.

Such groups of statements (unities) can be contradictory, but are all related to one of the eight (typological) objects within the NQF discourse, namely the Guiding philosophy object, Purpose object, Scope object, Prescriptiveness object, Incrementalism object, Policy breadth object, Architecture object and the Governance object.

Following from this interpretation of unity in the context of this study, the identification of unities includes:

- *the empirical selection of the field* - a field in which the relations are numerous, dense and relatively easy to describe;
- *selection of unformalised groups of discourses* - to understand statements not by the rules that govern their construction, but by the rules that govern their appearance; and
- *consideration of all statements* - even if they appear to be inadequate.

Firstly, the NQF discourse can be regarded as a field with multiple relations. Examples are numerous: the relationships between SAQA and ETQAs, the Education Department and private providers of education and training, learners and facilitators, assessors and evidence, regulations and institutions and individuals that are subservient to them, policy documents and stakeholders, government officials and consultants, professional bodies and public providers, and so forth. As can be seen from this list, the relations in the NQF discourse are relatively easy to describe, yet they are incredibly dense and numerous.

Secondly, it is necessary to deal with relatively unformalised groups of discourses in order to grasp the existence and rules that govern the appearance of statements. The NQF discourse is made up of various groups of discourses, some formal, but the majority are informal. The formal discourses include pedagogy, philosophy and politics. The informal discourses include complaints from learners, the interaction between quality assurance bodies and providers, debates on the

architecture of the NQF, and general public consent or dissatisfaction. In order to identify the unities in the NQF discourse, it is necessary to understand the rules that govern the appearance of these unformalised groups of “sub-discourses”.

Thirdly, it is important to include all statements that have chosen the NQF discourse as their “object” and have used it as their field of knowledge. The following example from the empirical dataset illustrates the point:

There are too many expectations of the NQF. These expectations have been personified....All that the NQF is, is that it is an enabling framework...People tend to rely on infrastructural arguments as opposed to the failure of individuals to use the NQF. People also objectify the NQF (e.g. the NQF has not done this etc), in similar ways that the RDP [Reconstruction and Development Programme] was objectified (Interview with University Principal, 18 July 2003).

(Note that as mentioned before the *interviews* contained in the empirical dataset, as contained within the ATLAS.ti hermeneutic unit, has been kept separate from other source documents. References to documents in the empirical dataset do *not* include page numbers.)

Considering these guidelines to identify unities in the NQF discourse, the remainder of this section consists of a summary of the unities identified from the empirical dataset. The unities associated with each of the eight objects are presented separately.

4.3.3.2 Unities associated with the Guiding philosophy object

Many of the “overt influences” or guiding philosophies that were discussed in *Chapter 3* were also identified through the qualitative analysis of the empirical data. Statements that refer to the Guiding philosophy object are discussed below.

Post-Fordism

In a response document, the Sector Education and Training Authority for Finance, Accounting, Management, Consulting, and other Financial Services (FASSET) (2003) argued that a “job delivery philosophy” drives training, but education is driven by a “subject philosophy”. FASSET suggested that the integrated NQF ‘illustrated the marrying of these two imperative aspects of workplace competence’ (*Ibid.*). This argument is very much in line with the principles of *post-Fordism*, particularly the demand for knowledge workers, more flexible specialisations and multi-skilled workers.

A decline in trade union membership, that is usually associated with post-Fordism, was not evident from the empirical data, although it was generally agreed that trade union involvement in NQF matters was on the decline, as the following comments from the National Union of Metal Workers of South Africa (NUMSA) shows: 'The academics now are taking over....the unions are also involved, but less and less...' (NUMSA in SAQA, 2004g). The union involvement was gradually being replaced with the "academics" as drivers:

What is often forgotten is that the framework was conceptualised by the trade unions...I think one of the key things missing is that unions believed that everything was in place now and they were looking to academics to now drive it (South African Council for Educators [SACE] in SAQA, 2004g).

(Note that as mentioned before references to *responses to discussion documents* do *not* include page numbers.)

Neo-liberalism

As early as 1996, the NQF was seen as narrowing the gap between educational outputs and economic needs. The then National Commission on Higher Education (NCHE) was blamed for the "massification" of the education and training system that tried to narrow the gap between educational outputs and economic needs:

[The commission] proposes a "massification" system that moves away from the present elitist and skewed base where the majority of whites and a minority of blacks are catered for...Its proposals are broadly in line with developments in higher education in industrialised countries trying to narrow the gap between educational outputs and economic needs (*The Mail and Guardian*, 19 April 1996).

(Note that as mentioned before references to *news articles* do *not* include page numbers.)

The over-emphasis on economic needs at the expense of social and political developmental needs was also evident in the various response documents. The Congress of South African Trade Unions (COSATU) (2003) goes as far as to say that '...we have observed that systems put in place tend to over-emphasise economic needs at the expense of social and political developmental needs'. According to COSATU this over-emphasis on the government's economic objectives was achieved at the expense of social and political needs, most critically, they argued, '[this] does not in any way facilitate the attainment of transformation in the education and training architecture as entrenched by the apartheid government'.

More evidence of a *neo-liberal* guiding philosophy is evident in the manner in which *The Higher Education Qualification Framework (HEQF)* discussion document (DoE, 2004) seems to be constructed around the funding model for higher education. The National Professional Teachers' Organisation of South Africa (NAPTOSA) (2004) argued that the 'HEQF is clearly conceptualised around the funding model for higher education', while SAQA (2004) suggested that this preference towards the funding model would not address social and economic development at all:

...the draft HEQF policy does not seem to attempt to address "social and economic development" at all - the fact that the draft HEQF policy seems to have been developed with funding and planning models in mind, gives a totally different message (SAQA, 2004).

Concerns about over-prescriptiveness were also raised, most notably by the higher education sector: The South African Universities Vice-Chancellors Association (SAUVCA) (2003) argued that 'national prescription, standardisation and regulation should happen only at the most generic levels'; Rand Afrikaans University (RAU) (2004) argued that the NQF was *not* flexible enough to accommodate different types of higher education institutions and, according to RAU, the NQF would not enable institutions to 'pursue their own curriculum goals with creativity and innovation'.

Comments on individual responsibility, the cutting of public expenditure for social services and privatisation were less explicit, although nothing to the contrary was found either.

Technicism

The attitude that seeks to resolve all problems with the use of scientific and technological methods and tools appears to be unanimously rejected in the empirical evidence: the Council on Higher Education (CHE) (2003) regretted the "technicist approach" to the definition of the new role for SAQA; the South African Democratic Teachers Union (SADTU) (2004) argued strongly that the NQF is a social and political construct that should *not* be 'viewed as a technical construct'. Halendorff and Wood (2004) noted that the draft HEQF (DoE, 2004) appeared to be a 'defence of "education" and sound educational values in the face of a mechanistic approach to learning that serves the ends of the workplace rather than the educational needs of individuals'.

Vocationalism

The fear of "lowering" of education to the vocational level, usually associated with vocationalism, remained unverballed - the exception was isolated comments from some higher education providers, such as reference to 'preference to the labour constituency' (University of Stellenbosch, 2003).

Many welcomed the emphasis on vocational training in education, even calling for an increase. Examples include the call for continued employer and employee involvement in National Standards Bodies (NSBs) and Standards Generating Bodies (SGBs) (and similar bodies, such as the proposed Qualifications and Quality Assurance Councils [QCs] and Consultative/Fit-for-purpose Panels) (Gibson, 2003), and the need for a paradigm shift amongst academics that are removed from the 'realities of the world of work' (Gibson, 2004).

Standardisation

Some, although limited, evidence of the rejection of standardisation in Higher Education was noted:

...the unit standard methodology of qualification design is not appropriate to the knowledge structure and pedagogy of higher education, and especially not to discipline-based knowledge. The key issue is that small units of learning (modules or courses) and their specific learning outcomes must not be required to be registered and standardised on the NQF for this will stifle innovation, creativity and academic freedom (SAUVCA, 2003).

Compared to the local and international literature, in which significant objections to standardisation are raised (cf. Allias and Shalem, 2005), the limited evidence in the empirical data suggests that such concerns may not be generalisable.

Epistemologically different modes of learning

The empirical data presented overwhelming evidence of a lack of attention in the discussion documents to epistemological differences between 'types of learning' (CHE, 2003), 'types of institutions' (Dixie, 2004), 'institutional learning and work-based learning' (UMALUSI, 2003), and even modes of delivery (Centre for Education Policy Development [CEPD], 2004). It was evident that the move towards increased recognition of epistemological differences was welcomed by many, although some were of the opinion that such a move would entrench the previously 'incorrect perceptions related to the differences (and status) between vocational or career-focused and academic qualifications' (Pretorius, 2004).

A useful point, based on Young's (2003) principles of "equivalence" and "difference", is raised by the CHE (2003) and SAUVCA (2003). The CHE was critical of the attempt to combine two "incompatible principles" in NQF development:

...a principle of *equivalence* whereby qualifications and the learning they represent are similar across different sites and modes of learning; and,

a principle of *difference* whereby important differences between modes and sites of learning are recognised (CHE, 2003, emphasis added).

The CHE further questioned how the tensions between the two principles would be resolved. SAUVCA (2003) took a slightly more accommodating tack, stating that the challenge was to accommodate these two conflicting principles. In this regard SAUVCA argues that, at least at a conceptual level, a continuum of purposes and modes of learning were 'increasingly becoming interdependent'. SAUVCA (*Ibid.*) noted that trends in higher education qualifications did in fact show a convergence towards 'the middle of the continuum of learning modes; i.e. for discipline-based learning to become more skills-based and employability conscious and for workplace learning increasingly to include some form of generic skills development'.

Similar to Heyns and Needham's (2004) argument that epistemological concerns underlie more obvious political power struggles, Dixie (2004) made the point that concerns about epistemological differences may be "consciously or unconsciously" used as a lever to protect the positions of particular institutions:

Many of those from a traditional university background and many of those from a traditional technikon background will argue against such a simple structure. They will say that the underlying educational philosophies of the two types of institutions are too different to allow a simple progression from one qualification to the next higher one. While consciously or unconsciously trying to "protect their turf", they will insist that a structure allowing parallel qualifications should be maintained.

Lifelong learning

Lifelong learning was acknowledged as an important influence on the NQF. It was argued that together with employability and the redress of past unfair discrimination, lifelong learning formed the basis of the NQF and its underpinning legislation (Association for Skills Development Facilitators of South Africa [ASDFSA], 2003). Lifelong learning was also seen as a logical and even obvious result of the global economic environment, where qualifications are not the destination, but where 'applied competency and lifelong learning are essential' (Gibson, 2004).

Different modes of knowledge

SAQA (2004) cautioned that the proposals contained in the draft HEQF (DoE, 2004) represented a 'philosophical return to a classical discipline-based approach to higher learning'; i.e. *Mode 1* knowledge (cf. Kraak, 1999). According to SAQA such a move would marginalise problem solving. *Mode 2* knowledge that is 'responsive to social and economic needs' would limit the international comparability of the higher education system.

Freireanism

The NQF was seen as the key instrument for the self-liberation of the oppressed. Through “massification”, dialogue and negotiation it was agreed that the NQF has contributed significantly to the transition from the fundamental pedagogics associated with the apartheid system:

I suppose the NQF has provided a completely new paradigm for the implementation and development of the country in terms of education and training, the whole premise of the NQF is completely contrary to the attrition model of the fundamental pedagogics and the apartheid structure (SAQA Manager in SAQA, 2004c).

Evidence also suggested agreement that the inappropriate social use of qualifications to discriminate or disadvantage particular groups or individuals was no longer acceptable (cf. SAQA, 2004c and NAPTOSA, 2003).

Globalisation

Globalisation, as a virtually inescapable influence, was noted on various occasions. In particular, the use of an outcomes-based approach (SAQA, 2004c) to make qualifications more internationally comparable were attributed to the effect of globalisation:

It started 1998 and all new programs are developed in outcome-based format...All our qualifications are outcomes-based. We use unit standards to develop modules. We are convinced that outcomes-based [education] and [the] NQF is the way to go. Our university [has] bought into that (Respondent from a public higher education institution in SAQA, 2004h).

Separationist ideology

SAQA (2003) raised the concern that the proposed new NQF architecture represents a “separationist ideology” that stood in direct opposition to the “integrationist ideology” associated with the current architecture:

Underlying the architecture for the new NQF structures proposed by the *Consultative Document* is a separationist ideology characterised by the metaphor that education and training is a continuum with education and training on either extreme, that education institutions are central to knowledge production, and that the differences between education and training must be clearly recognised in the system. This ideology tends to separate out education and training into the three streams academic, general vocational, and occupational as opposed to an integrationist ideology that would tend to build on the commonalities and establish the inter-connectedness.

Communities of trust

As a commonly occurring theme, communities of trust were emphasised on various occasions. A lack of common understanding of the term was prevalent – the CHE attempted to address this problem by explaining that:

- although consensus is important, communities of trust are not the same as consensus (CHE, 2003);
- there are two origins to the concept: the first (and also less significant) is from the idea of “communities of practice” that emphasise the fundamental social basis of learning; the second is in assessment literature and the debates on normative and criterion referenced assessment (cf. Wolf, 1995).

According to the CHE (2003):

Research has shown that it is never possible to develop criteria that are universally applicable to all situations - assessors cannot avoid invoking “norms” in making their judgements. Hence, the importance of “communities” with shared practical experience (which is often expertise in a subject or occupational field), which provides people with the basis for making judgements. In other words, criteria alone are never enough. In relation to qualifications, the idea of “communities of trust” stresses the importance of shared experience and usage.

Evidence suggested common agreement on the need to ‘transform SA from a bureaucratic and secretive society to a responsive and transparent one’ (*The Star*, 18 February 2003). Some concerns about a continuation of such unacceptable practices were however also raised:

It is unusual that the identity of “the interdepartmental team of senior officials”... responsible for drafting [the *Consultative Document*] remains undisclosed. This unfortunate omission undermines both the transparency of the process and the credibility of the *Consultative Document* (University of Stellenbosch, 2003).

Overarching comments on guiding philosophy

FASSET (2003) suggested that the NQF’s guiding philosophy should not be changed, but that the operational issues should rather be resolved:

Employers indicated that the implementation of an integrated NQF is starting to make a positive impact on the workplace. It seems premature to change the philosophy of the NQF that employers have eventually bought into. It is rather advisable to resolve the current

operational issues that are affecting a more efficient and effective implementation of the NQF.

Summary of unities associated with the Guiding philosophy object

From the evidence it was clear the South African NQF was (and is) influenced by a range of guiding philosophies that differ in level of prominence and influence across different periods of implementation. A number of unities emerged from the empirical data associated with the Guiding philosophy object:

Decline in trade union involvement as unity

In line with the post-Fordist notion of a decline in union involvement and union support, the NQF has on the one hand offered a mechanism to address the demand for knowledgeable and multi-skilled workers, whilst on the other hand sacrificed the extensive early trade union support in the process.

Over-emphasis on economic needs as unity

In line with neo-liberal thinking, the NQF has tried to narrow the gap between educational outputs and economic needs at the expense of social and political needs. As COSATU (2003) put it, this attempt has limited the 'attainment of transformation in the education and training architecture as entrenched by the apartheid government'.

Rejection of technicism, vocationalism and standardisation by higher education as unity

The technician approach was seen as serving the ends of the workplace rather than the individual's educational needs. The higher education sector associated vocationalism with the lowering of standards, while the unit standard-based methodology of qualification design was deemed inappropriate.

Lack of attention to epistemological differences as unity

The epistemological differences between types of learning, types of institutions and modes of delivery were ignored in some cases, while in other the very differences were used as a lever to protect positions. The attempt to combine the principles of equivalence and difference contributed to tensions that could be resolved by focusing on their interdependence.

General acceptance of the influences of lifelong learning, Freireanism and globalisation as unity

Acknowledged as important influences on the NQF, lifelong learning, Freireanism and globalisation were embraced without any opposition.

Need to build communities of trust as unity

Given the need for common understanding of the term, it was agreed that communities with shared practical experience needed to be built.

4.3.3.3 Unities associated with the Purpose object

Evidence relating to all five main purposes of NQFs was identified from the empirical sources. The five purposes were:

- addressing issues of social justice;
- improving access to the qualifications system and progression within it;
- establishing standards, achieving comparability and benchmarking;
- qualifications as instruments of communication;
- qualifications as instruments of regulation.

As before, the emphasis was on the *social justice* and *access and progression* purposes.

Addressing social justice purpose

Overwhelming support for the transformation agenda of the NQF, as embodied in NQF Objective 4 (cf. SAQA, 2005b), was evident. The need to move away from the apartheid system, and all the evils that it embraced, was seen as a more than adequate reason for embracing the social justice purpose of the NQF:

The transformation of education in SA was one which government regarded as top priority because successive regimes had used education to reproduce and perpetuate inequity (*Business Day*, 10 October 1996).

Support for the NQF's transformation agenda included statements by the Insurance Sector Education and Training Authority (INSETA) (2003), ASDFSA (2003), COSATU (2003), National Skills Authority (NSA) (2003), South African Communist Party (SACP) (2004), South African Institute for Chartered Accountants (SAICA) (2003) and Banking Sector Education and Training Authority (BANKSETA) (in SAQA 2005c), to mention but a few. INSETA (2003) did however note that such a transformation agenda would require power to succeed:

This kind of transformation requires innovation as well as the technical, political, bureaucratic, and popular will and power, to succeed.

SACE (in SAQA 2004g) argued that the experiencing of problems were indicative of a transformative model:

When we experience a problem it is an indication that it is a real task and it makes you think. If everything was going OK then we were using the old things, the fact that we constantly find problems is an indication that it is a transformative model.

In some cases, particularly in comments from Business and Labour, the commitment to the transformation agenda of the NQF was linked directly to SAQA:

Since the promulgation of the SAQA Act in 1996, BSA member organisations have committed vast sums of money to implementing and sustaining the system. This serves as proof of the extent of their commitment to SAQA and the NQF (Business South Africa [BSA], 2003).

The lack of criticism of the social justice purpose of the NQF was somewhat unexpected. Surely such a radical departure from what existed to a new and very different system would result in some concerns being raised, even if only from the periphery. Yet there was none to be found. Actually the opposite was found – the discussion documents, in particular the *Consultative Document* (DoE and DoL, 2003), were severely criticised for *not* advancing the transformation agenda:

The SACP believes that the proposals in the *Consultative Document* would effectively dismantle the NQF. If these new structures are established it will be impossible to maintain the drive for equity, redress and portability between learning pathways. It is essential that the country maintain one framework of qualifications, and that the commitment to equity and redress be reaffirmed (SACP, 2003).

This situation is probably best explained through Allias (2003) and Young's (2003) argument that there is a tendency for the distinction between *means* (the NQF and its outcomes basis) and *goals* (purpose or objectives, e.g. redress, access etc.) to be collapsed. They suggest that such a distortion has severe consequences, particularly in the South African context where the *means* of the NQF, as represented amongst others through the outcomes-based approach, have been uncritically endorsed. In effect the inability to separate the endorsement of the outcomes-based approach from the purpose of the NQF makes it virtually impossible to critique the purpose without being branded a traitor. Allias (2003, in Young 2003) suggests two such consequences:

One is that it tends to underplay the institutional elements of educational reform. The second is that any criticism of the NQF approach is dismissed as a critique of the broader transformational goals that the NQF is seen as a vehicle for.

Both the Committee of Technikon Principals (CTP) (2003) and the DoE (in SAQA, 2004f) emphasised the point that even though the NQF is transformative, it was not the only vehicle for redress:

The [NQF] has a role to play in redress but not a major role as expected. I think it is a misplaced kind of expectation, which is why I suppose part of the Study Team [DoE and DoL, 2002] comment was that the NQF is but one ... for the transformation of this country. Maybe that is more an indication of the ambition we had.

NAPTOSA (2004) warned that too much sectoral autonomy, as suggested in the draft HEQF (DoE, 2004), may impact negatively on the NQF's transformation agenda:

...NAPTOSA is extremely concerned that the implementation of the HEQF would result in full sectoral autonomy with the sector being accountable to no one but the Minister of Education. This begs the question how this move would impact on the intended transformation of education and training i.e. increased access, redress and equity (and quality?) (NAPTOSA, 2004).

Improving access and progression purpose

As was the case with the previous social justice purpose of the NQF, access and progression were strongly supported, even since the very early stages of implementation:

Mr Bengu said yesterday that the tabling of the National Education Policy Bill and the NQF Bill were "major occasions in the process of transforming the nation's education and training capacity". He said the NQF Bill, a joint effort of the ministries of education and labour, was a centrepiece of the national human resource development strategy. "It will inspire creative work on learning standards, programme design and assessment and will open doors to advancement in education which are now closed to many of our people." (*The Argus*, 5 September 1995).

The distortion between the *means* and *goals* of the NQF was evident in comments that related to the access and progression purpose of the NQF:

The CHE and HEQC are and remain committed to an *integrated approach* to education and training as an important inheritance of the national democratic struggle of the pre-1994 period and as the most appropriate *means* to achieve the goals of the NQF: namely an education and training system characterised by *equity of access*, opportunity and outcomes; high quality provision, learning and teaching; learner mobility and progression; and, articulation between programmes, qualifications and institutions (CHE, 2003, emphasis added).

The CHE argued that an integrated approach as a *means* to achieve the goals of the NQF could not be faulted. In this statement the CHE appears to be confusing means and purpose, possibly to avoid being criticised for not supporting the broader transformational goals of the NQF.

Establishing standards, comparability and benchmarking purpose

As mentioned before, comments linked to this purpose were limited, and are best summarised by a news article that informs the public of the need to change the education system to remain competitive in the information age:

There is a growing awareness throughout the world that the entire infrastructure of education and training will have to change drastically to equip individuals to follow successful career paths and make a decent living in the information age (*Business Day*, 28 January 2000).

Instruments of communication purpose

Although a distinction should be made between the NQF as instrument of communication and the communication of the NQF itself (i.e. advocacy of the NQF), evidence suggests that the South African NQF clearly does not focus primarily on communication, as a comment by a SAQA staff member shows:

SAQA and its NQF are not known to the people. Many people don't know anything...[The NQF] was developed but never communicated to the people (SAQA staff member in SAQA 2004c).

Instruments of regulation purpose

As discussed in *Chapter 3*, the South African NQF fits best somewhere between a “state control” and “state supervision” regulatory model. A respondent from the DoE supported the supervisory model, even though the comments were specific to the implementation of the outcomes-based curriculum in the schooling sector:

I see it [outcomes-based approach] only where government has forced it, which is in the schooling system. I do not think there is any major curriculum reform of this magnitude would happen voluntarily. I think it is a historical and global experience. Without a push from government nothing will happen. You need a push but it will happen over time, but in the meantime there is reduction in the quality of education. Any change brings its uncertainties (SAQA, 2004f).

Overarching comments on purpose

Transformation is a slow process: 'We must think and talk this through, sooner rather than later, in order to create a better system that delivers crucial value to a country still on a knife-edge of success or failure' (Gevers in *The Mail and Guardian*, 29 September 2000).

The NQF has ushered in a viable and sustainable education, training and development dispensation:

An NQF was a central objective of our national liberation. It was a critical element of the Reconstruction and Development Programme. It was to a great extent conceptualised and driven by organized labour, as it was understood that real democratic change was impossible without a complete restructuring of the education and training system (SACP, 2003).

Structure must follow purpose:

...structure must follow purpose; it is important to be reminded of the purpose of the NQF, and to decide whether the purpose has changed, and then only to resolve how the structures should be re-formed (University of the Witwatersrand, 2003).

The need for quick fixes is a major threat to the principles of the NQF:

...the tension about the short term pressure on political structures to demonstrate quick fixes is a major threat to some of the longer term principles of the NQF (SAQA Manager in SAQA, 2004c).

The NQF may be losing its original vision:

Maybe NQF is losing its original vision...Maybe the conceptualization of the NQF was [too] idealistic (Respondent from a private Adult Basic Education and Training [ABET] provider in SAQA, 2004h).

Both NAPTOSA (2003) and the National Board for Further Education and Training (NBFET) (2003) commented on the apparent “return to a model that was rejected”, referring to the Curriculum Model for Education in South Africa (CUMSA) that existed at the time of the conceptualisation of the NQF. According to NAPTOSA and NBFET, the more recent proposed changes to the NQF strongly resembled this earlier thinking.

Summary of unities associated with the Purpose object

The purposes of social justice and progression stood out as the most important, although other purposes were also commented on. The following unities are identified:

Support for the transformation, access and progression agendas of the NQF as unity

Virtually without exception the empirical evidence supported the notion of an NQF as a tool that would transform the evils of the apartheid system. Likewise, access and progression were supported, even since the early days of NQF implementation. However, the distortion between the *means* and the *goals* of the NQF resulted in the NQF's objectives becoming enclosed within a protective and impenetrable layer – equating any criticism of its objectives with a lack of support for transformation in general.

Loss of original vision as unity

The gradual shift away from the original vision of the NQF and a return to earlier rejected recommendations (e.g. CUMSA) suggested that the current NQF was much different to the NQF that was conceptualised in the early 1990s.

4.3.3.4 Unities associated with the Scope object

The scope of the South African NQF has been a source of major contestations mainly due to the fact that it is so radical. South Africa is the only country where the NQF remains both unified and tight. As a result, integration as a means to achieve increased unification, has not been easy:

The integration of education and training, as agreed in the policy debates of the early 1990s and which informed the current structures, was correct. However we also acknowledged

that the integration of education and training is not an easy thing, and that there are flaws and problems with the current arrangements (SACP, 2004).

As discussed in *Chapter 3*, the scope of an NQF includes two dimensions. The *first dimension* of scope focuses on architecture arrangements only and refers to the integration of levels, sectors and types of qualifications. The *second dimension* of scope includes a focus on architecture, but is more concerned with the relationships between different categories and systems, in most cases between education and training. Howieson and Raffe's (1992) classification system is based on these different relationships between the education and vocational systems. They suggest three systems, best represented on a continuum that ranges from unified, to linked, and tracked. Evidence from the empirical sources is arranged according to the three Howieson and Raffe systems and is followed by overarching comments.

Unified scope

A comment from a member of the Inter-Ministerial Working Group (IMWG), who was also involved in the 1994 National Training Board (NTB) processes, captures the originally intended unified scope of the South African NQF well:

The greatest achievement of the NQF initially was in bringing together all three levels of education and training...that was a major shift because you could not find it anywhere else in the world (IMWG member in SAQA, 2004c).

Overwhelming support for a more unified system was evident from the responses to the discussion documents (cf. Association of Private Providers of Education and Training [APPETD], 2004; INSETA, 2003; CEPD, 2004; CHE, 2003 and SAQA, 2003). Importantly, these supporting statements conflated various aspects and interpretations of unification – to the extent that they cast doubt on the level of support that was expressed.

The three levels of integration proposed by Heyns and Needham (2004) provide a useful mechanism to further unpack the different interpretations found in the empirical data:

Macro level (socio-political or systemic)

...a single qualifications track (CEPD, 2004).

...a single-track approach *rather than* the two-track approach proposed in the NAP [DoE, 2003] and the three-track approach in the Interdependent NQF *Consultative Document* [DoE and DoL, 2003] (CTP, 2004, emphasis added).

...including all types and levels of education and training including higher education (Young, 2003).

Meso level (philosophical and epistemological)

The DoE/DoL [Consultative] Document explicitly breaks with the SAQA approach by recognising that the NQF must be based on a recognition of the differences between two broad types of learning, which they refer to as institution-based and work-based (Young, 2003).

Although the term “interdependent” has obviously been carefully chosen to reflect some kind of compromise (or mid-way?) between “integrated” and “separate” (i.e. not completely separate) the model itself, rather awkwardly, attempts to create points of intersection (not interdependence) (NAPTOSA, 2003).

Advocates of integration in education and training really ignore the fundamental difference between epistemological basis of education. They can't integrate the two in the sense that people talk about it...we need to provide an integrated approach not an integration of education (Senior DoE official in SAQA, 2004c).

Micro level (as experienced by practitioners)

... a single qualifications framework for all higher education (South African Council for Natural Scientific Professions [SACNASP], 2004).

...the departmental task team does not see a single framework as being possible, and hence the clear indication is that there should be three distinct NQFs somehow maintained within a single framework (INSETA, 2003).

At the macro level, evidence points towards support for a single track NQF that includes all levels, sectors and types of qualifications, even those from higher education. In effect the evidence points towards agreement that at an architectural level (see the comments on the first dimension of scope above) the NQF should be completely unified. The lack of evidence related to the relationships between different categories and systems (second dimension of scope) suggests that many of the statements may border on rhetoric rather than on actual support:

The actual policy proposals (in both documents [*Consultative Document* and the *draft HEQF*]) do not provide any evidence that the stated support for integration is anything more than rhetoric (NAPTOSA, 2004).

At the meso level, strong arguments were being made that the NQF must be based on a recognition of the differences between institution-based and work-based learning – in effect arguing for an *integrated approach* where the ‘systems run side by side’ (Isaacs, 2002 in Heyns and Needham, 2004:6). Importantly, the evidence did not necessarily suggest that there was common agreement that the NQF should become less unified, as is illustrated in some of the objections (cf. NAPTOSA, 2003) to the use of the term “interdependent”.

At the micro level practitioners’ responses were mixed. In some cases the proposal for a separate higher education framework was supported, as it was seen to offer particular benefits to the higher education sector, yet no mention is made of the impact that this would have on the rest of the education and training system. The discussion documents, in particular the *Consultative Document* (DoE and DoL, 2003), were seen as advocating multiple frameworks – a move that was not unanimously supported.

In some cases, the responses suggested that the problem was not unification but sectoral territoriality and power struggles:

NAPTOSA does not believe that the problem lies with the concept of a single, integrated qualifications framework that applies equally to all education and training but that sectoral territoriality and power struggles have provided the impetus and momentum for sectors to retreat back into comfortable semi-isolation (NAPTOSA, 2004).

Linked scope

Placed on a continuum between a unified and a tracked scope, linked scope was not explicitly supported, but may nonetheless present the most likely point towards which aggregation takes place.

Identified comments pointed towards the emergence of ruptures and a gradual move away from the initial unified position. The “SAQA approach” was blamed for blurring the differences between different types of learning by introducing the NQF Organising Fields. The CHE (2003) argued that ‘the differences neglected by SAQA have emerged anyway’, that is ‘despite the inflexibility of the SAQA guidelines’ (*Ibid.*). UMALUSI (2003) made very similar comments:

...the worlds of discipline-based learning (schools, colleges and adult learning centres in our case) have co-existed uneasily within the common qualifications framework.

In an interview a SAQA staff member agreed:

There are cracks as the NQF tries to integrate vocational and academic training (in SAQA, 2004c).

Tracked scope

Empirical sources provided overwhelming evidence that a tracked scope was not supported. Although some peripheral comments were made that the three pathways presented a 'simpler structure than that developed by SAQA' and that 'the structure at least points to an organisational basis for limiting the proliferation of bodies involved in both qualification design and quality assurance' (Young, 2003), the idea of three pathways was not supported. Examples of such opposition included comments from INSETA (2003), CTP (2003), The South Africa Institute of Chartered Secretaries and Administrators (ICSA) (2003), NSA (2003), SAQA (2003), and SAUVCA (2003).

Examples of the need to ensure that the world of work was not being seen as something separate from education, were also identified:

Politically, the unhinging of education and training will result in the 'dumbing-down' of workplace learning and prevent access, mobility and progression for workers wishing to achieve worthwhile higher education and training qualifications (CHE, 2003).

In a number of cases, mention was made of the difficulties that would be experienced with the introduction of three pathways. Examples include: McGrath's (2003) point that a "general vocational" strand may result in such qualifications as being perceived 'of neither academic nor vocational quality'; COSATU's (2003) point that the proposed three QCs will entrench the dichotomy between workplace-based and institution-based learning.

Overarching comments on scope

INSETA (2003) made an important comment on the need for a single accountable structure that would be responsible for integration. According to INSETA the 'policy of an integrated approach to education and training was not sufficiently embedded to ensure buy-in from new institutions and department officials that had not been part of the initial debates and conceptual development'. INSETA warned that this problem could recur, '[s]ince we do not have any form of structural integration like that of a single ministry of education and training'.

Summary of unities associated with the Scope object

To date the unified scope of the South African NQF remains radical compared to the international context. As might be expected, the scope of the South African NQF was one of the most contested aspects, particularly during the review period. The following unities have been identified from the empirical evidence:

Unification is misunderstood as unity

Although the unified scope of the NQF received significant support, it was clear that unification was interpreted in a number of ways ranging from a single qualifications track, recognition for different types of learning, interdependence, an integrated approach rather than an integrated system, and separate frameworks for particular sectors.

Aggregation towards a linked scope as unity

Many argued that the relentless attempt to blur the differences between types of learning was bound to rupture sooner or later.

Need for a single accountable structure as unity

In the absence of a single Ministry of Education and Training it was argued, a single accountable structure was needed to take the responsibility for integration.

4.3.3.5 Unities associated with the Prescriptiveness object

Micro level requirements (such as the criteria which qualifications have to satisfy) and broader system level requirements, constitute two dimensions of prescriptiveness. In both cases these requirements can be applied more or less stringently. The continuum that ranges from very prescriptive (or tight) to being based on general agreements (or loose) is used below to structure the empirical findings.

Loose prescriptiveness

Despite the fact that the South African NQF can be placed on the *tight* extreme of the prescriptiveness continuum, only limited evidence was found to support a move towards a *looser* framework. Comments focused mainly on the need to avoid a “one size fits all” approach if any amendments were made to the current system:

...this one-size-fits-all approach fails to recognise institutional differences (*The Mail and Guardian*, 19 January 2001).

The draft HEQF policy implicitly suggests that all providers, public or private, are similar and need to be treated in a similar manner. SAQA is of the opinion that this is a fatal error (SAQA, 2004).

One size does not always fit all in education, as the experience with Curriculum 2005 showed (Sieborger, 2004).

Tight prescriptiveness

Comments on the tightness of the NQF can be divided into three distinct categories: (1) Initial concerns (mainly during the 1995 to 1999 period) that the framework would be too tight – mainly from the higher education sector; (2) Acknowledgement that some tightness was necessary; (3) Concerns that the current NQF as well as the proposed changes were resulting in a too tight framework. Each of these is discussed below.

Concerns that the NQF would be too tight were commonplace in the media during the implementation stage. Comments about the draft NQF Bill illustrate the point:

Unaware until recently that the draft Bill was about to slip through Parliament, the Committee of University Principals [CUP] called a hurried meeting earlier this month to inform members of the looming crisis (*The Eastern Province Herald*, 27 June 1995).

When Education Minister Bengu first mooted a Qualifications Framework Bill, South African universities agreed in principle, to the concept. There was, after all, a great deal to be said for promoting a system that would encourage citizens to become progressively qualified in a lifetime learning process. Unfortunately, Bengu's draft Bill failed to meet this requirement, prompting the Committee of University Principals to withdraw support. The CUP is justifiably concerned that if the Bill is enacted as is, the Government could force universities to teach a set curriculum and offer uniform qualifications (*The Star*, 5 July 1995).

Evidence also suggested that some tightness was necessary in order to transform the education and training system:

...I do consider that we were not going to be able to get there without having done what we've been doing ever since the SAQA Act was passed so I'm not undermining the work that has happened at SAQA but I'm simply saying that we need to do more (DoE representative in SAQA, 2005d).

Concerns over over-prescriptiveness focused on the effect on private education and training providers, mainly the exasperation of private institutions that have complied with regulations but have not benefited in the process, but included others, such as the stifling of academics. Comments from the Law Society that the implementation of legislation was 'dogmatic and bureaucratic' (2003) are also important, seeing that they come from a body that is in a position to make comments about legislation. A comment in *The Mail and Guardian* (26 May 2000) supported the notion:

The government's legislation is a minefield of jargon, acronyms and bureaucracy.

Overarching issues on prescriptiveness

It was evident that more consultation with providers was needed:

SAQA has come a long way and is slowly finding its feet. It must however be stated that more consultation with providers should take place instead of these bodies adopting a threatening attitude (De Wal, 2003).

In more than one case it was argued that universities and technikons were trying to maintain the status quo by only applying "surface changes" and/or "disguises":

Whatever reasons are given, and however they try to disguise what they are doing by changing titles of qualifications and by rewriting the descriptions of their qualifications in "SAQAnese", traditional universities and technikons are trying to maintain the status quo as far as their learning programmes are concerned (Dixie, 2004).

Academics are inflexible and resistant to change. They may feel like DoE is interfering with their autonomy, therefore they do not engage in real change but apply surface changes, for example programs are implemented before they are registered as [Further Diplomas in Education]. The old programs are just given a new name. It is more like they are in their comfort zone and protecting their own turf (Gauteng Department of Education [GDE] in SAQA, 2004f).

An important comment is made about the fact that when the initial NQF development took place, the demands/interests of all groups appeared to have been acknowledged equally:

Radical shake-up in tertiary education has been proposed by the National Commission on Higher Education [NCHE]. Chaired by Jairam Reddy, former rector of the University of Durban Westville, the commission appears to have met a wide range of needs without

bowing to the specific demands of any group. It embraces a vision for an integrated and highly co-ordinated higher education system which guarantees academic freedom (*The Mail and Guardian*, 19 April 1996).

Summary of unities associated with the Prescriptiveness object

The following unities associated with the prescriptiveness object were identified:

Avoid a “one size fits all” approach as unity

The necessity to recognise institutional differences even within a highly regulatory framework was noted.

Tight prescriptiveness was necessary as unity

The tight prescriptiveness of the South African NQF was seen as a necessary precondition to transform the pre-1994 fragmented system.

NQF legislation is too restrictive as unity

From the first draft of the NQF Bill in 1995 to the present day, the NQF legislation was perceived as a “looming crisis”, a “minefield of jargon, acronyms and bureaucracy”.

Universities have tried to maintain the status quo as unity

Universities have used various strategies to protect their positions within the NQF system. Ranging from making superficial changes to qualifications to influencing policy development, universities appeared to have been attempting to make as few changes as possible, possibly with the hope that the NQF was a passing fad that would not remain in vogue for very long.

The NQF is rooted in the equal acknowledgement of all groups as unity

Since the days of the NCHE it was noted that the NQF has attempted to meet the needs of all groups without bowing to the demands of any specific group – more recently, it appears as if this principle may have been compromised.

4.3.3.6 Unities associated with the Incrementalism object

As explained in detail in *Chapter 3*, incrementalism is made up of two distinct dimensions: the first is the rate of implementation, ranging from gradual to rapid; the second is the manner of implementation, ranging from phased to comprehensive.

Rate of implementation

Within less than a decade South Africa has attempted to implement major systemic changes that have taken generations in other countries. Such an approach would surely elicit significant objections, but the empirical evidence suggests a more considerate approach: ‘...changing an education system is a generation kind of issue and not a two to five year issue’ (SACE in SAQA, 2004g), and ‘It is too soon to come to absolute conclusions that the NQF and its structures have failed. The systems are not yet fully in place, and more time is needed...’ (SACP, 2003).

Numerous statements also suggested that the rate of implementation needed to be *increased even further*, as expressed by INSETA (2003): ‘It would be important to ensure that the momentum achieved with the NQF is monitored and speeded up’. The influence of the review process and the transition from *review* to *continued implementation* appeared to be an important factor that had contributed to the calls for accelerated implementation. In several cases arguments were based on the momentum that had been achieved thus far, and that it should not be lost. Importantly, these comments were not uniform - some referred to an increased rate of current NQF implementation, while others referred to the implementation of the changes to the NQF proposed in the discussion documents.

Several concerns were raised with regard to the timeframes in which the proposed changes to the NQF structures would be implemented. The resulting limited ability to consult with stakeholders and possible lack of credibility were noted:

The South African education system continues to be in dire need of change to ensure appropriate and quality skills are transferred to our youth. There is a desperate need to ensure that the NQF has credibility among its key stakeholders. However, if too much change is initiated too quickly, the credibility of development issues might be undermined in the sense that a perception is created among stakeholders that the architect of the framework lacks faith in its own creation (ASDFSA, 2003).

The timeline set for implementation is regarded as *too optimistic* if the amount of consultation proposed in the policy that must still be done is taken into consideration (Democratic Nursing Organisation of South Africa [DENOSA], 2004, emphasis added).

There was also strong agreement that despite the difficulties, progress has been made in a short time:

The enormity of the task we faced six years ago required of us that we move quickly and decisively to bring about changes in all spheres of government. Education was particularly fraught with the stench of apartheid, and we therefore had to achieve more than most countries have been able to achieve in a whole generation (*The Sunday Times*, 2 July 2000).

A lot has happened within the South African Educational arena in a short time period. The initial hesitation and wait and see attitude has certainly been laid to rest, cynics have had to step aside and a new breed of pro-active and positive 'educationalists' developed. Since 1998 the public, private and vocational educational environment has evolved into an educationally aware, compliant community (Lyceum College, 2003).

Despite the slow progress, when we look at similar initiatives across the globe, we can stand unashamed, we have indeed made significant progress (Surty in *The Sowetan*, 16 September 2004).

Manner of implementation

The second dimension of incrementalism, though related to the first, is about the phased or comprehensive manner in which the NQF is implemented. As discussed above, the rapid rate of implementation of the South African NQF was mostly supported, possibly due to the politically favourable climate. In contrast, the comprehensive manner of implementation was less accepted. A wide range of comments were critical of the manner of implementation, indicating that more time was needed for understanding and changed practice to become embedded:

Work with role-players, below senior levels, and in some cases even with key stakeholders, indicates that public understanding of the changes in education and training have taken a long time to become embedded. The slowness of transformational education change is well-known and is attributable to the time it takes for the development of people's understanding of the changes, their acceptance of the changes and then embedding the changes in their practice (INSETA, 2003).

Overarching comments on incrementalism

With regard to the proposed changes to the NQF system, it was clear that a gradual and phased implementation was preferred:

We believe that the incremental approach to change adopted in the Report of the Study Team, building on strengths within the present system while addressing weaknesses, provides a better approach to change. The radical recommendations proposed by the *Consultative Document*, if implemented, will have severe negative consequences for the education and training system and will hinder the implementation of the NQF and the effective achievement of the objectives of the government's Human Resource Development Strategy (CHE, 2003).

Growing appreciation for the stakeholder principle, even though it may cause delays, was expressed:

...there is a growing appreciation for the stakeholder principle and the significance of public participation, albeit that process delays are attributed to the need for multilevel consultation (INSETA, 2003).

There was overwhelming consensus that there was no need to have a major overhaul of the current system, as the system was only now achieving maturity. There was broad agreement that it was too soon for such changes. Examples included statements from COSATU (2003), ICOSA (2003), SAICA (2003), SACP (2004), SAQA (2004), SACE (in SAQA, 2004g) and the NSA (2003).

It was noted that short-term pressures may be a threat to longer-term principles:

My sense is that the NQF, at this stage of development, does provide a means to reflect the principles that were embedded in the NQF in its conceptualisation. I think some of those principles are under threat, partly for the reasons mentioned earlier - the tension about the short term pressure on political structures to demonstrate quick fixes is a major threat to some of the longer term principles of the NQF (SAQA Manager in SAQA, 2004c).

Importantly, the South African Council for Social Service Professions (SACSSP) (2003) also raised the danger of "NQF fatigue" setting in amongst stakeholders. According to the SACSSP the 'transformation processes have now reached the implementation phase...[s]hould new criteria be developed at this stage, resistance may be experienced'. They warned that the 'comprehensive change as proposed in the document may lead to "NQF fatigue" or a wholesale abandoning of the system'.

Summary of unities associated with the Incrementalism object

Both the rate and manner of implementation of the South African NQF elicited a number of comments. A more incremental approach makes more sense, yet there was common agreement that South Africa did not (and still does not) have the luxury of such an option.

Changing an education system takes generations as unity

With full awareness of the need for urgent redress and transformation of the South African education and training system, it was agreed that regardless of the significant efforts made, such transformation would not be achieved in a five-year period. The conclusion that the NQF has failed is therefore also premature – more time is needed.

NQF implementation must be accelerated even further as unity

Despite the highly ambitious nature of the South African NQF project, especially when it is compared to NQF development in other countries, respondents agreed that implementation should be speeded up even more. These calls appeared to be a result of the delayed and continuous review processes and the associated need to retain the momentum built up thus far.

Incremental approach is preferable as unity

In direct contradiction to the call for accelerated implementation, calls were also made for an incremental approach that builds on the strengths within the present system.

Concerns about limited stakeholder consultation as unity

The proposed timeframes within which the NQF would be restructured (initially proposed as 2006, but most probably delayed to 2007) were viewed as too short to allow for sufficient stakeholder engagement. Concerns that extensive stakeholder consultations could result in delays were also noted.

Significant progress has been made as unity

Despite the enormity of the task, respondents agreed that significant progress had been made. For most this was because South Africa had to rid itself of the “stench of apartheid”. There was overwhelming consensus that there was no need to do a major overhaul of the current system.

Short-term pressures are a threat to long-term principles as unity

The need for political structures to demonstrate quick fixes was noted a threat to the longer-term principles of the NQF.

Danger of NQF fatigue setting in as unity

It was greed that the continued shifting of goalposts and limited benefit to stakeholders would result in fatigue and even abandonment of support for the system.

4.3.3.7 Unities associated with the Policy breadth object

Two dimensions of policy breadth are recognised: intrinsic logic, as the adequacy of the inherent design features of the NQF; and institutional logic, as the extent to which external systems and policies are related to the NQF.

Intrinsic logic

There was overwhelming consensus that quality assurance processes and qualifications nomenclature needed to be simplified and aligned. The differences between the current SAQA definitions, and those applied by the ETQAs, the DoE and even SGBs and professional bodies were criticised. Examples included comments from the GDE (2003), University of the Orange Free State (UOFS) (2004) and SAUVCA (2004).

Institutional logic

In a number of cases concerns were expressed about the way in which the existing legislative framework was being disregarded during the review period.

The further “apparent” lack of uptake of comments from stakeholders and the dangerous precedent that was being set, were also mentioned:

It appears as if the current legislative framework is disregarded in favour of a new emerging framework that is yet to be agreed, let alone promulgated. This apparent disregard for transparency, due process and seeming lack of uptake of comments from education and training stakeholders is concerning and does not bode well for future NQF implementation (APPETD, 2004).

In this regard, the Departments were severely criticised for not complying with their “own legislation”:

Irrespective of whether or not departments believed in the merits of the NQF, the law is the law. Compliance is not optional. The departments obviously did not share equal and sufficient commitment to the process and did not comply equally...How enforceable is the law if a government department does not (or will not) comply with its own legislation? (NAPTOSA, 2003)

Overwhelming evidence suggested that the lack of alignment between national policies should be avoided. The New Academic Policy (NAP) (DoE, 2001) was singled out as an important policy that had to be considered if any changes to NQF legislation were to be undertaken:

We found the lack of alignment of national policy regarding education and training an obstacle. Discussion of the NQF cannot be divorced from policy that relates to its structure. In our view, a discussion of the structure of the NQF would have been more strategic had the New Academic Policy been finalised or near finalisation prior to the publication of the *Consultative Document* (CTP, 2003).

It was argued that the current policy framework inhibited higher education autonomy and independence:

South Africa does, however, have a legal and policy framework which enables, across sectors, all of that which the HEQF sets out to achieve for the higher education sector in isolation from the rest of the National Qualifications Framework...a framework in which higher education can be accommodated but without the sectoral autonomy and independence that it would acquire in terms of the HEQF (NAPTOSA, 2004).

The centrality of the SAQA Act was mentioned on numerous occasions:

All legislation quoted in this submission...is predated by the SAQA Act of 1995. Clearly, the references to the SAQA Act of 1995 in all of the legislation reflects the importance of the NQF - and a large-scale buy-in to the principles and objectives of the NQF. Each Act reinforces the notion of compliance with the SAQA Act in order to achieve the successful implementation of a single integrated, national qualifications framework (NAPTOSA, 2004).

Numerous statements supported the need for a high institutional logic. Examples included the call for a 'holistic view of the education and training systems' (Lombard and Pruis, 2004); '[p]olicies and strategies should be integrated in a coherent education and training strategy' (SACSSP, 2003); and:

[The NQFs] uniqueness lies in its institutional arrangements i.e. the way it is embedded in institutions (Senior DoL official in SAQA, 2004c).

It was also noted that the NQF had contributed to institutional development as institutions, public higher in particular, 'had to reconsider the positioning of our institution and programmes' (Respondent from a public higher education provider in SAQA, 2004h).

In another comment related to institutional logic, mention was made of the ease with which learners were able to transfer between institutions, despite a lack of communication between the institutions:

... the last thing that I ever expected in my industry was that there would be acceptance of what has gone before between institutions. They still don't speak to one another, they still don't exchange information, they still don't assist one another, but the learner just slots into the system, no problem (SAQA, 2005c).

Although the evidence supported the idea that the NQF was a major vehicle for transformation, it was emphasised that it was not the only vehicle, and that an emphasis on the role of institutional providers and implementation (SACP, 2003) was needed. The NQF was described as a "catalyst" (Respondent from a public higher education provider in SAQA, 2004h) and as having 'a role to play in redress but not a major role as expected' (DoE respondent in SAQA, 2004f). A statement from the CHE (2003) summarises the point well:

The NQF is a major vehicle for the transformation of education and training. However, the NQF is not the sole mechanism for transforming education and training and for realizing various social purposes and goals...The creation of a qualifications framework cannot on its own bring about fundamental change in education and training provision and practices. Ultimately, it is the concerted and deliberate building of the capabilities and capacities of institutional providers through the support of government and other agencies and through institutional initiatives in the areas of curriculum, learning, teaching and personnel expertise that are the crucial levers of fundamental transformation.

Overarching comments on policy breadth

Consultation, or rather the lack thereof, was an important theme that ran across a variety of comments. Views ranged from a need for more and continued consultation to ensure buy-in (University of Pretoria [UP], 2004) to some very strong statements on the way in which the *Consultative Document* (DoE and DoL, 2003) presented the public with already "cast" proposals, veiled as a request for comment:

If the proposals are implemented, this will be an absolute travesty of democracy and transparency as the proposals were developed behind closed doors by an anonymous panel and will be foisted on the public with detrimental effects, merely to attempt to placate warring factions - and it will fail. The proposals are already cast - thus "consultative" is an insult to all stakeholders, who have operated with the introduction of the current NQF structure in all good faith over the past difficult years (ICSA, 2003).

Various professional bodies made mention of the fact that they were being ignored in the NQF processes, particularly in the context of the discussion documents:

The proposals in [the Consultative] document once again ignore the specific and unique operations, value to the National Skills Development Strategy and professional functions of the non-statutory voluntary professional bodies such as ICSA [and others] (ICSA, 2003).

Although notions of “communities of trust” were associated with some of the other objects within the NQF discourse, they were most evident when linked to policy breadth. Below are a few selected comments that were made about communities of trust.

Communities of trust are *not the same as creating consensus* (CHE, 2003). The CHE argued that although consensus may be important, this focus on consensus misses the ‘practical “usage” element in the idea of a “community of trust”’. The CHE (*Ibid.*) supported their argument by explaining that the concept has two distinct origins:

... in the socio-cultural/anthropological literature on learning. Lave and Wenger (1991) use the idea of “communities of practice” to emphasise the fundamentally social basis of learning, whether formal or informal.

...[the idea of “communities of trust” are used] in the assessment literature and the debates on normative and criterion referenced assessment (see Wolf, 1995).

The CHE suggested that the second origin is of importance. In support, Young (2003) argued that the concept of communities of trust was not well understood - and that this was evident in the *Consultative Document* (DoE and DoL, 2003). Young explained (as was also included in the CHE [2003] response, see comments above) that in extreme cases, *normative referencing* provides the justification for excluding perfectly capable people. Its priority is not to enable candidates to demonstrate what they know, but to “maintain a standard”. In a *criterion-referenced* system ‘research has shown that it is never possible to develop criteria that are universally applicable to all situations’. According to Young this meant that assessors could not ‘avoid invoking “norms” in making their judgements’. Hence, Young argued, “communities” with shared practical experience (which is often expertise in a subject or occupational field) which provide people with the basis of making judgements’ are extremely important – ‘criteria alone are never enough’.

Young (2003) further stressed the ‘importance of shared experience and usage’ in relation to qualifications:

[Some qualifications] are trusted and rely on past experience and not just individual isolated judgements...If new qualifications are developed that are not based on these old communities new communities with real shared experience will need to develop.

Young summarised his point by arguing that a 'quality system cannot rely on criteria alone' - an NQF cannot be a criterion-referenced system only – this will lead to a possible 'over-emphasising [of] the specification of criteria or outcomes as a mechanism for achieving quality' at the expense of the more practical applications in which shared experiences can gradually develop. The CHE (2003) agreed that communities of trust take time to develop and need a conducive environment to mature:

...these [communities of trust] develop through relationships based on common commitments, integrity and clarity of responsibilities and functions, and are also facilitated by predictability of policies and authoritative leadership on the part of government departments and SAQA.

BSA (2003) and NBFET (2003) echoed the position of the CHE (2003) and Young (2003) to develop "new" communities of trust:

The aim of creating new communities of trust cannot be contested. In fact, it may be argued that the reliance on stakeholder representation on all structures and their involvement in all processes is intended to achieve this (BSA, 2003).

The aim of creating "new" communities of trust is supported (NBFET, 2003).

ICSA (2003) argued that trust had already been created and that it may be in jeopardy if the NQF system was changed once again:

With all its warts and deficiencies, the current NQF structure has been extensively advocated, in good faith, to a sceptical employer and consumer (of education products) market. The advocates include the professional bodies, the SETAs [Sector Education and Training Authorities], providers of tuition and education as well as training providers. This effort has been hugely demanding of resources, including money, human time, energy and ingenuity. It is inconceivable that these same vital stakeholders in the industry will have to go back to these convertees and tell them it has all changed - and for no conceivably good reason that we can fathom (ICSA, 2003).

SAUVCA (2003) raised the concern of how the proposed QCs would be able to 'promote communities of trust across very broad fields of learning'. For SAUVCA, it was obvious that 'such opportunities will have to be created on the basis of significant alignment between sectors, and *partnerships* between higher education, further education and the world of work'. NAPTOSA (2003) raised the concern that communities of trust would not be automatically created through establishment of the QCs:

Two fundamental assumptions are being made. The first is that Qualifications and Quality Assurance Councils will automatically result in new communities of trust. There is no evidence provided to convince NAPTOSA that this is anything more than an unfounded assumption (NAPTOSA, 2003).

The University of the Witwatersrand (2003) also suggested that 'there [must] be a concerted effort for trust amongst the different players to be developed'. They argued that replacing the "expert" focus of the NSB system with one that is *more focused on stakeholders*, would be a step in the right direction. For them, 'the level of scrutiny of standards in higher education is symptomatic of lack of trust in higher education providers':

The development of trust is a critical factor for the success of the system as a whole, and it can be assisted by prioritising good quality assurance practices at provider institutions; but since trust is reciprocal and has to be earned, the fostering of trust amongst all players in the system must be a priority (*Ibid.*).

The South African Board for Personnel Practitioners (SABPP) (in SAQA, 2005c) raised another important point: although institutions (and individuals) may want to trust one another, the "*basics*" *first have to be in place*. It would also be necessary to check for this on more than one occasion, before trust is gained:

... although you would want to be inclined to trust you would have to ensure through a relationship that there is, the basics are in place and they say the basics is in place and we have checked a few times that the basics are in place, the third time or fourth time we will say, okay well you have looked at this, you have looked at that...

The NSA (2003) gave some indication of what such "basics" may entail by calling for more formal linkages between roleplayers. The NSA (2003) argued that '[v]oluntary alliances have proven inefficient and insufficient to ensure broad based implementation of the envisaged partnerships'. In place of these unsuccessful voluntary arrangements, the NSA called for formal guidelines that should be 'governed by government regulations'.

Summary of unities associated with the Policy breadth object

The following unities associated with the policy breadth object can be identified:

Simplified and standardised processes are needed as unity

Numerous comments pertaining to the inconsistent application of guidelines across Education and Training Quality Assurance bodies (ETQAs), DoE, DoL and other bodies were noted.

Legislative inconsistencies are problematic as unity

The disregard for the current NQF legislation, particularly by the DoE and DoL, was of great concern.

Alignment between national policies is critical as unity

There was agreement that all national policies should be aligned. The NAP (DoE, 2001) and the SAQA Act (SA, 1995c) were singled out as important points of reference within such an alignment process.

The NQF is a major but not the only vehicle for transformation as unity

It was noted that the uniqueness of the NQF lies in the way it is embedded in institutions (SAQA, 2004c) and that this feature should be further developed. The NQF was seen as a catalyst that has a role to play in the transformation of the education and training system. It was agreed that other contributors, most notably institutional providers (with support from government and other agencies) through institutional initiatives (such as curriculum, learning and teaching) were the 'crucial levers of fundamental transformation' (CHE, 2003).

Lack of consultation is problematic as unity

The manner in which the review processes were conducted were criticised as being superficial, veiled as requests for comment and presented as *fait accompli*. The lack of direct involvement by key stakeholders such as professional bodies was viewed with extreme scepticism.

Communities of trust need to be understood and developed as unity

It was noted that developing communities of trust are more than creating consensus. The concept originates from the need to expose individuals to shared practical experience so that they would be able to make better judgements within a system that is limited by either a normative- or a criterion-referenced bias (Young, 2003).

Various suggestions were made as to how such communities of trust could be developed:

- communities of trust take time to develop and need a conducive environment to mature (CHE, 2003);
- "new" communities of trust are needed (NBFET, 2003);
- more changes will jeopardise the established communities of trust (ICSA, 2003);
- the proposed QCs will not necessarily create communities of trust – sector alignments and partnerships between higher education, further education and the world of work are rather needed (SAUVCA, 2003);
- too much scrutiny of standards (in higher education) shows a lack of trust and should be avoided (University of the Witwatersrand, 2003);
- the "basics" first have to be in place (SAQA, 2005c).

4.3.3.8 Unities associated with the Architecture object

The empirical data associated with the Architecture object are structured according to the following architectural components:

- Qualifications
- Outcomes-based education and training
- Credit requirements and accumulation
- Qualifications register
- Bands, levels and pathways
- Assessment
- Quality assurance
- Standards setting
- Organising fields.

Qualifications

Most of the evidence suggested either agreement or disagreement with architectural recommendations made in the discussion documents. An example of an area of agreement was the move towards more standardised nomenclature for qualifications:

The uniform approach to naming of qualifications is welcomed (RAU, 2004).

Importantly, it was noted that the SAQA definition of qualifications was ignored in the discussion documents. According to SAQA (2004), the policy definition of a qualification is:

...a planned combination of learning outcomes with a defined purpose or purposes, intended to provide qualifying learners with an applied competence and a basis for further learning.

The draft HEQF (DoE, 2004) posed an alternative definition for a qualification:

...formal recognition and certification of learning achievement awarded by an accredited institution.

In its response SAQA argued that the definition put forward in the draft HEQF (DoE, 2004:2) was fundamentally different: the SAQA definition focused on *learning and the learner*, while the draft HEQF focused on *institutional recognition*. In SAQA's view, this was a critical shift that 'reverts to the status of the institution, rather than the quality and status of the learning captured in the qualification' (SAQA, 2004).

Another area of agreement was the acceptance of the nested approach to qualification design (CTP, 2004; UOFS, 2004). The nested approach was also seen as part of the solution to the so-called "problem of [Outcomes-Based Education] OBE" (referring to the over-specification of competencies through detailed learning outcome formulation) in higher education:

We maintain that the nested approach to qualifications design is in part a solution to the problem of outcomes-based education (and the related debate of whole qualifications vs. unit standards), as it pre-empts the need to make explicit the specific learning outcomes and assessment criteria of individual qualifications, except for its community of practice and immediate users (SAUVCA, 2003).

Areas of disagreement (or at least areas where there was a lack of consensus) included the non-use of unit standards in higher education (SAUVCA, 2003) and the difficulties in applying common definitions of qualifications to three distinct pathways:

...it is unclear how far a common definition of a qualification will apply to all three pathways or whether they will be able to conceptualise their qualifications in their own terms and negotiate issues of credit transfer and progression (CHE, 2003).

The perceived increase in disparity between academic and vocational qualifications was also noted by many:

The CHE and HEQC [Higher Education Quality Committee] believe that far from improving access, mobility and progression, the recommendations of the Interdepartmental Task Team will lead to the perpetuation of inequalities, and impermeable boundaries between what will be perceived to be superior 'educational' institution based qualifications, and what will be perceived to be inferior 'training' workplace based qualifications (CHE, 2003).

Another recurring theme was the need to recognise and include professional qualifications in the current NQF, but also in the suggested changes:

The draft HEQF policy [DoE, 2004] is unclear on professional designations such as Attorney, Professional Engineer, Chartered Accountant and even Chartered Marketer. The NQF as an enabling framework must embrace these qualifications as well. The apparent disregard for professional qualifications and optional cooperation with professional bodies raises many questions (SAQA, 2004).

Outcomes-based education and training

Globalisation and historical imperatives were put forward as the reasons for adopting an outcomes-based philosophy in South Africa (SAQA, 2004c). Firstly, the increased demand for competitiveness and comparability compelled SAQA to move 'towards describing qualifications in terms of achieved learning outcomes' (*Ibid.*), a move that, as SAQA argued, would improve the articulation between South African and international qualifications. The second historical imperative originates from the historical misconception that it was more important 'where a qualification was obtained than what the students actually knew and could do' (*Ibid.*). In this regard, the NQF was seen as a tool to 'address the inappropriate social use of qualifications' (*Ibid.*).

It was noted that the South African "version" of OBE was 'different from the OBE that is practiced in other countries' (SAQA staff member in SAQA, 2004c). SACE (in SAQA 2004g) argued that this was in part due to the fact that OBE had been misunderstood: 'OBE is a misfit... Those people doing it do not understand what OBE is'. A university principal (in SAQA, 2004c) added that some disillusionment about OBE may have resulted due to the problems associated with the implementation of Curriculum 2005. He added that the NQF, on the other hand, 'is linked to a much-improved public perception of the outcomes-based approach' (*Ibid.*).

Credit requirements and accumulation

Although some cautionary measures were noted, the evidence suggested overwhelming support for the development of a Credit Accumulation and Transfer (CAT) system within the context of the NQF. Related comments argued for the inclusion of Higher Education in the development of a CAT system and general transparency and testing (CTP, 2004; Engineering Council of South Africa

[ECSA] and Engineering Standards Generating Body [ESGB], 2004). The impact of CAT on autonomy was however questioned:

While the concept of transferability of credits is supported, the question is what autonomy will individual departments have in determining the suitability of credits obtained at other institutions for the programme at their own institution (DENOSA, 2004).

A number of responses, though in support of a CAT system, expressed the caution that CAT was not a “silver bullet”, particularly when seen in the context of existing regulations such as ‘that at least 50% of a given degree curriculum must be followed at the institution that awards the degree’ (RAU, 2004). Likewise SAQA (2004) was concerned ‘as to how the CHE will manage articulation and portability in view of the 50% residency clause’.

Qualifications register

The underestimated value of the NLRD ‘in commenting on the state of education and training’ (INSETA, 2003) was mentioned in numerous instances. Some comments did however suggest that improvements were needed:

The NLRD gives a helicopter view of learners and more tracking is needed (SACE in SAQA, 2004g).

A huge frustration for the University of the Free State at the moment is the lack of alignment among the databases of the DoE, CHE and SAQA in terms of qualifications. The wonderful ideals of a NQF and a HEQF will not be realized if this is not resolved (UOFS, 2004).

Bands, levels and pathways

Numerous comments on this architectural component were found, but none on the NQF bands. This lack of engagement suggested general acceptance of the way in which the three bands (GET, FET and HET) had been implemented. The frequent exclusion of “training” when reference was made to the HET band, did however suggest a separation between education and training at these levels:

It is worth noting that the new six-level framework is called the HEQF and does not use the old NQF terminology of ‘Higher Education and Training (HET) band’. No mention is made of the influence of training, from the labour side, and how it relates to education (University of the Witwatersrand, 2004).

Overwhelming support for a ten-level NQF was found (CHE, 2003; NSA, 2003; RAU, 2004; SAICA, 2003 and SAQA, 2004). Some concerns were raised as to the amount of reworking that would be necessary:

NQF levels change from 8 to 10 levels. Thousands of qualifications and unit standards and hundreds of learnerships will need to be re-evaluated to fit into three grids with 10 levels as opposed to the current one grid with 8 levels (FASSET, 2003).

Isolated calls for more than ten levels were made:

Consideration must be given to the establishment of a further category, e.g. NQF Level 11, for the M.Med Vet degrees since the time and effort spent to obtain a M.Med Vet degree often exceeds those of PhD or doctoral degrees (Kruger, 2004).

Regarding level descriptors, comments ranged from calls for stability (INSETA, 2003) to more specific level descriptors (DENOSA, 2004, Lyceum College, 2003 and SACNASP, 2004).

Although some limited support for three pathways was found, an extensive range of negative comments were expressed. These included the fear that three pathways would lead to fragmentation:

The NQF will be disintegrated and more complex. Each pathway will be described by a separate set of level descriptors and 'managed' by three independent Quality Councils thus constructing walls between the three grids. In the interests of the learner, it will be difficult, if not impossible, to navigate his way through a learning pathway vertically and horizontally across the three grids (FASSET, 2003).

Concerns were also expressed that three pathways would result in competition between workplace-based professionals and university professionals:

If the structure proposed by the [*Consultative Document*] is accepted as it is, it will license SETAs within the new Trade Occupational and Professional pathway to create progression routes via workplace based learning and generate alternative workplace based engineers to compete with university educated engineers. Research and the experience of other countries demonstrate that this is an unworkable approach (CHE, 2003).

Very strong criticisms of the TOP and general vocational pathways were noted:

The CHE and HEQC unequivocally reject the extension of the TOP [Trade, Occupational and Professional] pathway into higher education and training (CHE, 2003).

The CHE's concerns were based on the perceived transfer of curriculum control 'of the majority of higher education and training qualifications' to the Minister of Labour (through the TOP QC) - while the Minister of Education would remain 'financially accountable for these learning programmes'. According to the CHE this would reduce the Higher Education and Training (HI-ED) QC's responsibility to 'undergraduate general "formative" qualifications and post-graduate discipline-based qualifications' (*Ibid.*).

McGrath (2003) noted that there were significant challenges in 'developing a new "general vocational" strand'. According to McGrath, similar attempts have failed elsewhere, as such qualifications 'have been seen by higher education, employers and society as being of neither academic nor vocational quality' (*Ibid.*).

Assessment

The limitation of assessor registration to the workplace was supported by the higher education sector:

[The CHE supports] the recommendations that assessor registration should apply only to workplace learning...(CHE, 2003).

The possibility of HE assessors registering with different SETAs, and being accountable to both the CHE and the SETAs, is undesirable (CTP, 2003).

The importance of Recognition of Prior Learning (RPL), even to the extent that complete qualifications could be obtained through RPL, was noted:

The draft HEQF policy seems to interpret RPL in a limited manner - providing access only and does not address the notion that qualifications can be attained wholly or in part through the process of the recognition of prior learning (SAQA, 2004).

It was also noted that assessment had become more formalised as a result of the NQF:

The assessment approaches are perhaps more formalised as a result of the NQF (SAQA, 2004d).

Quality assurance

Evidence focused mainly on the separation or combination of quality assurance and standards setting functions. Some evidence suggested that the two functions should be separated:

...by assuming responsibility for standards generation and quality assurance, the CHE takes on the role of both referee and player in higher education. ...the CHE will occupy an unnecessarily powerful position, directing the generation of standards in higher education whilst simultaneously accrediting higher education programmes and institutions (SAQA, 2004).

On the other hand, many comments supported the combination of quality assurance and standards setting functions. Examples include comment by the NSA (2003), SAUVCA (2003) and importantly, by both the CHE and UMALUSI:

[The CHE welcomes] the [*Consultative Document's*] understanding of standards-generation and quality assurance as only different moments of the same quality cycle with feedback mechanisms assuring quality and development...[The CHE supports] the bringing together under one body of the separate but related functions of standards setting and quality assurance...(CHE, 2003).

UMALUSI would appreciate the proposed greater freedom to decide on the design of qualifications and the setting of standards. One of the key difficulties with the present NQF is the separation of quality assurance from standards determination in curriculum and qualifications from curriculum (UMALUSI, 2003).

Standards setting

While cautioning that the expertise of SGBs and NSBs should not be lost (cf. SAUVCA, 2004), there was significant support for the disbanding of NSBs and SGBs (e.g. ECSA, 2003). Two key constituencies were most vocal. The first was professional bodies (see ECSA, 2003). The second was the higher education sector. RAU (2004) went as far as to support the notion that the NSBs and SGBs were becoming 'obsolete'. RAU argued that this would have a 'positive effect on the accreditation process as the lack of communication in this regard between SAQA and the CHE was extremely frustrating' (*Ibid.*). The UKZN (2004) maintained that '[t]here must be no going back to SAQA's SGB/NSB system' (*Ibid.*), and suggested that this function should rather be delegated to 'expert panels set up by academic provider and professional bodies, and not to general stakeholder groups' (*Ibid.*).

The continued involvement of stakeholders, particularly practitioners, in standards setting processes was emphasised:

An issue of particular importance is the possible change in standard setting, monitoring and evaluation arrangements. We recommend that HE practitioners be widely involved in standards generation, with the final standard setting, monitoring and evaluation located within the HI-ED QC (Committee of Technikon Principals [CTP], 2003).

Unit standard-based qualifications were supported as long as the standards did not dictate 'the modular structure of learning programmes' (CTP, 2003). It was further urged that 'the composition of learning programmes are left to the discretion of [higher education] institutions' (*Ibid.*) In this way, the CTP argued, institutions could 'maintain their autonomy as well as enrich learning programmes to address more than the required minimum standards' (*Ibid.*). Several comments on the proliferation of unit standards and qualifications were made. Some of these comments also referred to the role of SAQA in the higher education band:

The intention in SAQA had been to develop a simple framework, which would eliminate confusing proliferation of qualifications. In defending the right of universities to develop their own qualifications the CHE and the DoE have effectively stopped SAQA from doing its work in the higher education band (SADTU, 2004).

It was noted by SAQA (2004d) that the attempts by SETAs to develop their own standards and qualifications was problematic in that it contributed to proliferation:

One of the possible concerns or problems is that each SETA wants to develop its own standards and qualifications. The way it is going, I am afraid that we can end up with up to [ten] electrician qualifications and it becomes a problem with portability. We need strong generic standards that can be used for various qualifications (*Ibid.*).

A DoE respondent went as far as to say that the South African people had been *betrayed*. The statement was based on the opinion that provider development should have preceded qualification development:

If in 1997 we started by mapping qualifications, maybe later in 1999 we would have had qualifications in place, and we would be advertising qualifications, and maybe if we had done it the wrong way, we would only realise in 1999 that we do not have institutions to deliver qualifications. What we did was go the other way around. Now we have institutions

and we are suddenly saying, what are they offering? Again we have betrayed our people (DoE in SAQA, 2004f).

Many comments supported the need to accelerate and transfer the standards setting processes:

I think that the problem lies with the standards generation process, which is a little bit slow. It seems a very complex process. There seems to be a lot of to and fro movement between SGBs and NSBs. But again the inherent problems of some of the SGBs, such as financial constraints, could be the cause. There is also the thinking that SETAs are the ones that must run with the development of standards (DoL representative in SAQA, 2005f).

A suggestion for a collective approach to quality in the standards setting process was raised by SACE (in SAQA, 2004g):

I certainly endorse the notion of quality in a collective sense, meaning the benefit goes to the majority and not individuals...If you define quality as a collective quality instead of individual quality, the constituency that is going to be involved with standards setting and standards generation is going to be different...any collective standards setting process will take longer than an individual or academic kind of standards setting process. That is where the tension is.

Organising fields

Numerous comments related to the NQF Organising Fields were identified. These ranged from the need for the Organising Fields to be less constraining (ECSA, 2003) to considering alternatives, most notably the disciplinary divisions that characterise the formal education and training system. The Inter-NSB Committee (2003) explained that 'SAQA is presently confronted with three ways of categorising the knowledge that exists in our society'. According to them the three ways are:

- The twelve Organising Fields established at the outset of the NQF process. Each of these has roughly five sub-fields defined by each NSB, giving approximately sixty 'knowledge areas'.
- The 25 SETAs established to oversee/manage/define the education and training in their respective economic sectors. Each SETA has roughly the equivalent of six chambers, thus defining some 150 "knowledge domains".
- The normal disciplinary divisions that characterise the formal education and training system.

There was a definite rejection of the possibility of replacing the NQF Organising Fields with Standard Industrial Classification (SIC) codes (cf. INSETA, 2003 and University of the Witwatersrand, 2003):

The SIC code system, which is mentioned as a possible way for constructing generic "context" communities under the umbrella TOP QC for standards generation, is rejected in the strongest terms possible (SACSSP, 2003).

NAPTOSA (2003) suggested that the NQF Organising Fields presented a mechanism to accommodate different sectors and groupings:

The twelve [NQF Organising] fields have little (or nothing) to do with types of learning. They accommodate different sectors and groupings for the sole purpose of developing suitable, relevant qualifications and they provide for a way of organising the qualifications for registration.

Overarching comments on architecture

Although the NQF was not directly criticised for being agnostic (the lack of reference to related issues such as curriculum and modes of delivery), the recommendations contained in the discussion documents were seen as lacking such links:

The HEQF policy [DoE, 2004] is problematically silent on issues relating to pedagogical, curriculum, epistemological, mode of delivery and related kinds of issues. These areas are particularly critical for the successful participation of adult learners within the higher education system (CEPD, 2004).

The pressures of globalisation were noted:

"And what about those who have missed schooling? Must they be lined up against a wall and shot?" asked Zwelinzima Vavi, general secretary of the Congress of South African Trade Unions (COSATU), echoing the urgency expressed by Professor Roy du Pre, head of the Committee of Technikon Principals, on the need for an "immediate and fast-skilling of South Africa's workforce given the pressures of global competition" (*The Mail and Guardian*, 2 March 2001).

Numerous comments warned against a complete overhaul of the current system. The CHE (2003) proposed 'working with existing institutions, using incentives where necessary, rather than by changing the qualifications framework'.

As noted in previous instances, the importance of communities of trust were once again highlighted:

Although the concept of “communities of trust” is suggestive of the dangers of over-emphasising the specification of criteria or outcomes as a mechanism for achieving quality, there is much work to be done before it can be a prescription for policy or a clear basis for practice (CHE, 2003).

Summary of unities associated with the Architecture object

As noted on various previous occasions, a significant portion of the empirical evidence focused on the Architecture and Governance objects. Comments linked to architecture were organised according to a range of architectural components: qualifications; Outcomes-Based Education and Training (OBET); credits; qualifications register; bands, levels and pathways; assessment; quality assurance; standards setting; and organising fields. The following unities were identified:

Standardisation is necessary as unity

The inconsistency in qualification nomenclature was noted as being problematic, as it reflected a critical shift away from a learning focus to an institutional focus. The further exclusion of professional qualifications was viewed as equally problematic.

Increased disparity between academic and vocational qualifications must be avoided as unity

The recommendations emanating from the review documents were perceived to be “perpetuating” inequalities and “impermeable boundaries” between education and training.

OBET was adopted as a result of global and historical imperatives as unity

Reasons such as the demand for competitiveness, comparability, articulation and “intuitional blindness” (the value of the qualification is not dependent on the institution at which the qualification was obtained) were put forward as the reasons for adopting an outcomes-based approach.

OBET has been misinterpreted in South Africa as unity

Comments such as “OBE is a misfit” and South African OBE is “different from the OBE practiced in other countries” suggested substantial disagreement on the way in which outcomes-based education was implemented, but also more importantly interpreted, in the South African context.

Support for a CAT system as unity

Although stressing that CAT should not be seen as a “silver bullet” within the current system, there was overwhelming agreement that it should be developed.

Alignment between the National Learners' Records Database (NLRD) and other databases should be improved as unity

Frustrations, particularly from higher education providers, as to the incompatibility between their databases and the NLRD were noted.

Increased separation between education and training as unity

It was noted that recent developments, such as the HEQF (and proposed Further Education Qualifications Framework [FEQF]) were progressively excluding training, or at the very least, the articulation with more training-focused tracks. Other concerns included the comments that three pathways would “disintegrate” the NQF and make it more complex, and that the pathways would result in competition between workplace-based and university professionals. In addition McGrath (2003) argued that the development of a general vocational track had failed elsewhere, as these qualifications were seen to have neither an academic nor a vocational value.

Transfer of curriculum control is questioned as unity

The proposed establishment of a TOP pathway was queried. It was argued that this would result in the Minister of Labour gaining “curriculum control” of the majority of qualifications at the expense of the Minister of Education who would remain responsible for “financial control”.

Support for the limitation of assessor registration as unity

Comments from the higher education sector agreed that assessor registration should be limited to the workplace.

Combination of quality assurance and standards setting functions as unity

It was agreed that both quality assurance and standards setting functions could reside within a particular body, provided some measure of “fire walling” was erected to avoid difficulties. Only SAQA (2004) did not agree with this view.

Support for the disbanding of NSBs and SGBs as unity

It was stated, virtually without exception, that the current standards setting bodies had served their purpose and should be replaced by panels of experts in order to avoid the difficulties that had been experienced to date. Higher education practitioners were seen as one such grouping of experts that should be involved in standards setting.

The proliferation of unit standards and qualifications must be curbed as unity

It was agreed that SAQA had a role to eliminate the proliferation of qualifications – a role that SAQA could not perform as a result of the interventions by the CHE and the DoE (SADTU, 2004).

A collective approach to standards setting is more time consuming as unity

Compared to a standards setting system in which individuals (academics) have the sole responsibility for developing standards, a collective approach takes much longer – this leads to tensions (SAQA, 2004g).

The NQF Organising Fields are not the only way to categorise knowledge as unity

Several comments included suggested alternatives to the twelve NQF Organising Fields. Two alternatives were noted:

- The SIC code system, as currently applied by the SETAs.
- The “normal” disciplinary divisions of the formal education and training system.

No consensus was evident. It was, however, noted that due to the fact that the NQF Organising Fields did not have anything to do with “types of learning”, this more accommodating categorisation was useful (NAPTOSA, 2003).

4.3.3.9 Unities associated with the Governance object

A significant number of comments were identified for the Governance object. As before, these comments are categorised as in *Chapter 3*:

- Regional conventions, legislation and MoUs
- Implementing agencies
- Government departments
- International roleplayers
- Other NQF stakeholders
- Funding.

Regional conventions, legislation and MoUs

The empirical data offered no evidence related to regional conventions. This may be partly due to the fact that the NQF is a national system, as opposed to the Regional Qualifications Frameworks (RQFs), where regional conventions are of much greater importance.

Comments on legislation, during the various stages of NQF implementation, were numerous. Early comments included concerns that the NQF legislation aimed to divide powers:

Education bill targets division of powers (*The Argus*, 10 August 1995).

Other early comments questioned the extensive powers that would be given to the Education Minister through the NQF Bill:

The National Party has questioned the extent of power over policy which the Minister has given himself in the Education [NQF] Bill (*The Daily News*, 5 September 1995).

More recently, the comments on legislation focused mainly on the apparent disregard for current legislation in the discussion documents:

It appears as if the current legislative framework is disregarded in favour of a new emerging framework that is yet to be agreed, let alone promulgated. This apparent disregard for transparency, due process and seeming lack of uptake of comments from education and training stakeholders is concerning and does not bode well for future NQF implementation (APPETD, 2004).

The need for amendment of current NQF legislation, if the recommendations contained in the discussion documents were to be followed through, was noted by many:

...the changes proposed by the [*Consultative Document*], together with the changes proposed by this response, have major legal and financial implications. Various Acts will require amending, which is likely to be a complex, long-drawn out and contested process that will result in great uncertainty and anxiety for SAQA, quality assurance agencies and for education and training providers (CHE, 2003).

A related news article gave some indication of the ambition of the policymakers to draft a new NQF Bill:

A new NQF Bill is being drafted by the education and labour departments to remove "inconsistencies and duplication" in the laws relating to SA's education qualifications. The final policy, to be submitted to the cabinet for approval early next year, will force higher education institutions to produce skilled graduates for the labour market and companies to develop their existing human resource skills base (*Business Day*, 28 July 2003).

Regarding agreements and Memoranda of Understanding (MoUs) between NQF roleplayers, particularly the ETQAs, it was pointed out that in many cases MoUs were simply "agreements to agree":

What has happened with accredited SETAs is that a lot of promises have been made and the MoU actually is only an agreement to agree (ETQA representative in SAQA, 2005c).

Other related comments included the problematic resistance of the HEQC to sign MoUs:

The continuing resistance of the HEQC to sign Memoranda of Understanding with the SETA ETQAs should not be allowed to persist (NBFET, 2003).

The proposed standardisation of MoUs (generic MoUs) was welcomed, but it was cautioned that a joint effort would be needed:

Given the number of MoUs that are needed between professions and the CHE and between professions and SETAs, would standardisation of the form of these agreements by TOP be helpful? Such standardisation is desirable but would require a once-off effort followed by ongoing maintenance. A joint SAQA, SETA, CHE and profession initiative could deal with the initial development of MoUs. Thereafter the relatively light ongoing maintenance could be facilitated by SAQA (ECSA, 2003).

Some supported the possibility of replacing MoUs with generic *rules of engagement*:

Generic rules of engagement should be used as the basis for these interactions, and would replace the current practice of developing a multiplicity of Memoranda of Understanding (NSA, 2003).

SAICA (2003) argued that such rules of engagement between education and training QCs would 'simply perpetuate an existing systemic problem' (*Ibid.*). SAQA (2003) expressed similar reservations:

The suggestion then that the QCs should work co-operatively to resolve differences in accordance with the "rules of engagement" which will be agreed between the councils and then approved by SAQA seems somewhat naïve, given the experience to date (SAQA, 2003).

The NSA (2003), NAPTOSA (2004) and UMALUSI (2003) argued for increased regulation of roles and responsibilities, even beyond those available through the voluntary mechanisms contained in MoUs or even in the proposed rules of engagement:

[The] NSA strongly proposes that the linkages between the various role-players should be *governed by government regulations in order to ensure compliance*. Voluntary alliances have proven inefficient and insufficient to ensure broad based implementation of the envisaged partnerships. The NSA thus proposes that the linkages between the QCs should be formally set out and overseen by SAQA (NSA, 2003, emphasis added).

The State should, through the Intergovernmental Relations Bill, *provide for and monitor opportunities for co-governance* such as those that exist between DoE and DoL. The State cannot afford to abdicate this responsibility (NAPTOSA, 2004, emphasis added).

...on the issue of jurisdiction of the proposed QCs, we suggest that *stronger direction needs to be given*. It does not seem realistic to send these three bodies off to resolve between them which qualifications each will deal with, or be the "lead QC" for. This could easily lead us back to the "memoranda of agreement debacle", or even to a deadlock (UMALUSI, 2003, emphasis added).

Implementing agencies

Comments on the role of SAQA were extensive. They included serious concerns about the proposed new role of SAQA, as indicated in the discussion documents, but also the need for a "stronger" SAQA in some instances, whilst in others, a call for a "weaker" SAQA.

An early newspaper comment confirmed that SAQA was established as a reaction to the non-establishment of a single Ministry of Education and Training in 1994:

Need for uniform structure behind the birth of SAQA (*The Star*, 27 October 1997).

Regarding SAQA's proposed new role, numerous comments warned against the incapacitating effect that such proposals would have on SAQA. Examples include:

...[it] is unclear if SAQA's suggested "strategic leadership role" will make it possible for SAQA to intervene in disputes and appeals (APPETD, 2004).

...the [*Consultative Document*] provides insufficient details to understand the 'balance of power' that should exist between SAQA's oversight role and the necessary autonomy of the QCs (CHE, 2003).

The Inter-NSB Committee (2004) raised concerns are raised that SAQA's role would be reduced to an administrative function – a move that would effectively amplify the role of the CHE:

This locates SAQA as essentially an administrator of the NQF, with the CHE providing leadership and strategic direction in the HET [Higher Education and Training] band. We believe that this is inappropriate (Inter-NSB Committee, 2004).

SAUVCA (2003) commented that SAQA's relationship with the DoE and DoL (and the proposed inter-departmental committees and SAQA) needed clarifying:

The rejection of a tripartite NQF Strategic Partnership with SAQA...begs the question as to what exactly SAQA's (power) relationship will be to the two Ministries, and what its role and functions will actually be in practice. SAQA's role as envisaged in the *Consultative Document* is clearly as a "servant" of government rather than as a more independent structure. Yet SAQA is expected to oversee the three QCs which are also answerable to (and funded by) two separate Ministries (SAUVCA, 2003).

UMALUSI (2003) added another dimension to the discussion on SAQA's role. According to UMALUSI some existing bodies already had 'histories and legacies in the South African NQF environment', clearly referring to UMALUSI itself and probably also to the CHE as existing bodies with histories. The distinction is made between newly established bodies such as SAQA, and even more so, bodies proposed in the discussion documents.

The CHE (2003) argued that the proposed role of SAQA was too technicist:

The CHE and HEQC believe that the NQF needs a strong and effective Qualifications Authority to provide intellectual and strategic leadership for the implementation of the NQF. *Even though this particular SAQA has not provided such leadership* it is most unfortunate that the role of a Qualifications Authority is being reduced to an essentially technical one; and strongly oppose such a role for the Qualifications Authority (CHE, 2003, emphasis added).

In numerous instances calls were made for a stronger and more meaningful role for SAQA.

Examples included:

If SAQA is to continue then it should be allocated a clear and meaningful role. If it is to oversee and mediate between the three QCs, then it will need to be appropriately empowered to do so effectively (SAUVCA, 2003).

There is one key message from me: SAQA needs to take control...in a firmer way (General Education and Training [GET] provider in SAQA, 2005e).

Likewise, many comments supported the suspicion that SAQA had become distracted, spending too much time on administration and implementation (ETQA Manager in SAQA, 2004c), in effect becoming a bureaucracy, something that it was never intended to become, nor was it a role that SAQA would be able to sustain over an extended period of time:

The original role of SAQA was to develop the NQF, put the framework in place, propagate it and get the people on the ground to assist in making it work. That was SAQA in an overseeing role. Which in effect said, "This is the policy, this is the path we are going to move, you make the regulations". Now SAQA has moved from overseeing to implementing. It has made itself not a guiding body as much as an administrative body...[SAQA] has progressed from being a guiding organization/consultancy to being a bureaucracy. What it is now doing is feeding people answers and having so much control over what people do. It is taking the initiative from people and in fact reducing them to following a process... (Inter-Ministerial Working Group [IMWG] member in SAQA, 2004c).

A SAQA Manager (in SAQA, 2004c) argued that the need for SAQA leadership to have been 'chasing after resources' contributed to it (SAQA) being criticised for not taking up its role as an "apex organisation".

Numerous comments suggested that SAQA had been sidelined and even “scapegoated” during the review processes:

In defending the right of universities to develop their own qualifications the CHE and the DOE have effectively stopped SAQA from doing its work in the higher education band (SADTU, 2004).

The extent to which SAQA, as an organization, appears to have been “scapegoated” and sidelined is viewed with both alarm and disappointment. Indeed, the Inter-NSB is of the view that while there are undoubtedly imperfections and problems in the NQF architecture and its implementation, SAQA has done a remarkable job in relation to its mandate in the face of the most daunting constraints and obstacles (Inter-NSB Committee, 2003).

A university principal (in SAQA, 2004c) warned that ‘SAQA also has to resist power’ and indicated that SAQA had contributed to the development of trust:

SAQA is associated with quality and is seen as independent, which leads to trust and respect for its perceived objective... SAQA stands at the heart of this system and has the passion to make it work (in SAQA, 2004c).

As the proposed new role of SAQA was questioned, so too was the proposed role of the HEQC. Particular comments suggested that too much power was being given to the CHE/HEQC:

There is a perception that CHE is the authority and that they have more power and more relevance in the system than any other ETQA, and that’s a fact...And when I think of the way that they have been doing it it’s been very aggressive and very unprofessional...The CHE will do what the CHE wants to do (ETQA Manager in SAQA, 2005c).

Although some support for the establishment of QCs was identified (e.g. CHE, 2003), the majority of evidence suggested otherwise. Comments included concerns about a possible increase in the bureaucratic nature of the system (COSATU, 2003):

...creating the three QCs, with their functions, would serve to further complicate the NQF system itself. This would increase the bureaucratic nature of the system rather than simplifying it, by creating many centres responsible for implementation. The three QCs will be looking at their own sectoral interests, separating one from another. If this is the architecture envisaged in the *Consultative Document*, then the proposal only serves to further separate education and training.

Concerns about a possible return to pre-1994 suggestions that were 'rejected primarily because it was considered that it would create an unnecessary layer of bureaucracy, adding to the costs and complexity of the system' were also noted (SAQA, 2003).

The exacerbation of inequalities, fragmentation and the creation of silos were also indicated:

Whilst three pathways and three QCs are being recommended, they are not equal in respect of their areas of influence. TOP QC would clearly be the most influential even incorporating the NSA. NAPTOSA believes that, if there are contestations now, these will be exacerbated by this inequality (NAPTOSA, 2003).

NBFET believes that the governance model proposed in this report has the potential to finally result in the *complete and irrevocable fragmentation* of the Education and Training system (NBFET, 2003).

The current NQF arrangements include a lot of vertical structures that do not speak to each other. The proposed structure would create another three silos (SACP, 2003).

Other QC-related comments included the need for all QCs to report to the DoE (UMALUSI, 2003), and that QCs and ETQAs should not be in competition (De Wal, 2003; GDE, 2003 and Gibson, 2003).

The role of the proposed TOP QC was most vehemently criticised. Comments included the apparent paradox in its proposed role and the risk of further bureaucratisation:

We conclude that there is a paradox surrounding TOP: If TOP is to be effective, it should do very little. If it does little, are its functions essential or could a flexible and responsive SAQA serve the interests of the SETAs and the professions? (ECSA, 2003).

The proposed remit for the TOP QC is felt to be too broad and onerous for one body to adequately meet. The risk of creating a bureaucratic body which is out of touch with the realities of the workplace is great (Gibson, 2003).

UMALUSI (2003) agreed with its proposed new role as a QC with more credibility and a stronger voice that would be similar to that of the CHE:

UMALUSI welcomes its proposed advisory function. It creates more credibility for UMALUSI and gives it a stronger voice and the same status as that of the Council for

Higher Education. This will enable UMALUSI to rise above being merely a technical body that oversees quality and standard issues in education and training (UMALUSI, 2003).

Government departments

The lack of clarity regarding the proposed roles of both the DoE and DoL were mentioned on numerous occasions (cf. APPETD, 2004 and UMALUSI, 2003).

In a very strong statement an ETQA Manager (in SAQA, 2005c) suggested that the DoE had been “destroying” the NQF:

Everything that you [are] building up in the NQF is being destroyed by the DoE.

Another statement suggested that the DoE had become too powerful:

[The HEQF] seems to focus on increasing the power and influence of the DoE at the expense of other stakeholders and a unifying NQF (Reinecke, 2004).

The need for the DoE and DoL to assume political leadership of the NQF was noted:

The Departments of Education and Labour must assume political leadership of the NQF. However, this should avoid an absorption and centralization of policy and regulatory powers and functions that are rightfully the responsibilities of relatively autonomous yet publicly accountable national independent statutory agencies and institutions. Above all, independent statutory agencies should not be reduced to the technical implementation instruments of the Departments of Education and Labour (CHE, 2003).

Extensive evidence pointed towards the need for the DoE and DoL to set aside their differences, as these were impacting negatively on the system. Examples included comments by Education Deputy Minister Surty (*The Sowetan*, 16 September 2004) that the ‘department was also committed to working with other stakeholders, including the Labour Department’. Labour Minister Mdladlana said ‘he was frustrated at the lack of co-ordination between the ministries of education and labour. He said it was a nightmare to review the NQF [with the Department of] Education in order to restructure all training’ (*The Star*, 25 February 2004). Education Minister Pandor denied ‘that they had found it difficult to work with each other in the past’ (*The Mail and Guardian*, 18 February 2005).

A state of 'internecine warfare' (ICSA, 2003) between the Department of Labour and the Department of Education was noted with a radical solution to the problem being suggested - the combining of the two departments:

The opposing positions adopted by these two state departments (i.e. institutionalised education versus learning in the workplace) have been adopted for political and "turf" retention reasons...These opposite stances have developed into radically and significantly destructive positions...This NQF *Consultative Document* is merely an expression of the divisions between the two departments and thus represents a papering over of the cracks (a "band aid salve")....The DoE has gained the upper hand in the undeclared war with the DoL, and thus has taken control of two of the silos (HI-ED QC and General and Further Education and Training [GENFET] QC) - this opens up the possibilities of the DoE gaining access, somehow, to the skills development levies - at the expense of learnerships...The level of damage being caused by this warfare is intolerable and the relevant ministers must be held responsible for their actions - it is proposed that a fundamental resolution to this problem is the combining of the two state departments into one unified structure with one minister responsible for education and training (in the workplace) (*Ibid.*).

The idea of a single ministry was also raised by NBFET (2003), although it was conceded that a compromise may be needed. NBFET argued that such a compromise would be found 'in the Governance Structures that are implemented' (*Ibid.*). Importantly, NBFET argued that such a compromise would offer no guarantee 'that tensions resulting from this separation will not prompt periodic structural reviews as ways to overcome these tensions' (*Ibid.*).

The SACP (2004) proposed that the differences between the two departments should be resolved and 'dealt with openly':

There should be a serious attempt at rebuilding the national consensus on education and training that existed pre -1994, and which appears to have broken down during implementation (*Ibid.*).

In a news article the point was made that one of the reasons for tensions between the DoE and DoL may be in that ' the labour department feared the band ETQAs established by the education department, were seeking undue influence over SETAs, established by the labour department...'
(*The Financial Mail*, 2 August 2002).

International roleplayers

As was the case with regional agreements, no evidence related to the role or influence of international roleplayers in South Africa was identified from the empirical dataset.

Other NQF stakeholders

Comments about (and from) stakeholders (providers, learners, employers, employees and even unions) were numerous. An overwhelming number of comments affirmed the need for greater stakeholder input into NQF matters, particularly in the proposed changes to the NQF (e.g. FASSET, 2003). The SACP (2004) raised the concern that '[s]o far there has been no real open debate'. According to the SACP stakeholders were surprised by the draft HEQF (DoE, 2004). The fact that stakeholders had to 'respond without any of the other elements (FET and GET bands) spelt out, is a cause for concern' (*Ibid.*). The SACP added that it was 'essential that stakeholders have the complete picture and have a thorough debate, with time to consult and workshop' (*Ibid.*).

The exclusion of professional bodies was noted again:

No assurance is given about the input by or the role of professional bodies in the standards setting and/or quality assurance processes of relevant qualifications (SAQA, 2004).

The arguments for increased and continued stakeholder involvement also included reference to the need to preserve the representation achieved through the SAQA NSBs and SGBs:

The first major concern the SGB has is that the proposal is not clear on how the various stakeholders will in future be represented on, amongst others, the proposed QCs and Fit for Purpose bodies. The members feel very strongly that there must continue to be clear stakeholder representation from employers and employees on these and similar bodies. If this is not continued, the concern is that we go back to pre 1994 and a more academic focus on qualifications (Gibson, 2003).

Many comments were extremely critical of the way in which stakeholder inputs appeared to have been ignored and downplayed during the implementation of the NQF. Such comments were not limited to the more recent review period, but ranged from the early 1995 stage of implementation to the present day. Even prior to the promulgation of the SAQA Act (SA, 1995c) the government was criticised for not taking universities into its confidence:

At a time when democracy is a byword and lip service is continually paid to the need for transparency in all negotiations, the apparent failure of the government to take the country's

universities into its confidence on a matter, which directly affects their future, is almost inconceivable (*The Cape Times*, 28 June 1995).

The Minister of Education was accused of trying to 'railroad a Bill worked out in secrecy with unions, without the involvement of the academic community...' (*The Star*, 1 August 1995).

In response to the *Consultative Document* (DoE and DoL, 2003) NAPTOSA (2003) criticised the government for presenting changes as '*fait accompli*' (*Ibid.*) arguing that such a position 'begs the question whether any inputs received from various constituencies will even be considered - let alone taken into account' (*Ibid.*).

In responses to the draft HEQF (DoE, 2004) mention was made of the extent to which the draft HEQF policy failed to 'integrated the comments made on the previous two policy drafts' (The *Study Team Report* [DoE and DoL, 2002] and *Consultative Document* [DoE and DoL, 2003]) (Gibson, 2004). Reinecke (2004) agreed: 'It is evident that the proposals contained in the document ignore other stakeholders and role players'.

The waning involvement of organised labour in NQF matters was also mentioned:

The involvement of organised labour (and therefore of the workplace) from the early conceptualisation of the NQF up to the present day has been an important factor in the success of the NQF. The draft HEQF policy seems to suggest that this is not important (SAQA, 2004).

The early stage of implementation included attempts by the higher education sector to remain separate:

The NQF Bill has raised serious concerns about the role of tertiary education institutions...since the publication of the NQF Bill a state of antagonism has existed between some members of the education sector and the government (*The Argus*, 14 July 1995).

A single NQF has been adopted for the country although universities have opted to stay out of the framework (*The Sunday Independent*, 28 April 1996).

The unfair treatment of private providers was also mentioned:

The government plays a major role in funding public institutions and is therefore both player and referee in higher education. It seems to be using its regulatory powers to pursue a politically motivated agenda - that is to curtail private higher education radically in order to save the student market for public institutions (*The Mail and Guardian*, 19 January 2001).

SADTU (2004) argued that too much power would be given to higher education providers if they are able to determine their own entry requirements:

The [draft HEQF] continues to place too much power on the HE institutions themselves to determine entry requirements, even with learners who have successfully acquired an FETC [Further Education and Training Certificate]. The framework document states that, “while the framework is intended to facilitate articulation between further and higher education...the possession of a qualification does not guarantee a learner’s progression and admission to a program”...While this is a display of the autonomy of the Higher Education institutions, it could be problematic. Problematic in the sense nothing stops the institutions from engaging in practices that deny access unfairly to others. Our history has demonstrated that placing power of access on the institutions do not always have the desired effect; we are referring to the so-called “unintended consequences”. There is at times a tendency to use this power as an exclusion measure.

It was also noted that stakeholders had vested interests: ‘Stakeholders are your friends and they also have vested interests’ (SAQA Manager in SAQA, 2004c). A university principal (in SAQA, 2004c) even suggested that the SAQA stakeholder focus had gone a step too far, resulting in never-ending contestations:

I think that the SAQA process has been an incredible process with respect to stakeholders. In fact, it goes too far. The recommendation (in the NQF Review [DoE and DoL, 2002]) about leaving the democratic scrutiny to a stage when experts have already participated in the process is a wise one, because stakeholders by definition have different interests and so the battle is the battle of the primacy of these interests. If you haven’t upfront established what comes first, then everything is up for contestation and you get turned around in a million different ways as these different interests seek to satisfy their constituents.

Numerous comments suggested that a greater understanding of stakeholders' roles was needed:

We've come a long way in our understanding of stakeholders and the different level of commitment and participation in what that means. There are recommendations that could be thinned down and there could be a stakeholder representation that is also to some extent an expert representation to accelerate processes. That is a tension that needs to be maintained. Simple representation in terms of a stakeholder as being a body at a meeting but who doesn't participate or add any value to processes is not very helpful to the system. It also gives more weighting to those who do have the expertise and who then drive the system, because they can also say that it's a stakeholder driven process. It is quite complicated (SAQA Manager in SAQA, 2004c).

The suggestions for improved understanding of stakeholders' role went as far as to say that SAQA was a social construct, confusing the implementing agency with the NQF:

An important caveat that the Inter-NSB regards as central to all the considerations is the fact that SAQA is first a social construct that brings together all parties in our society who have an interest in the way that education and training standards are established and used. While inclusive processes are by their very nature often inefficient, when measured against quick delivery, in the long run they ensure adoption, use and refinement in ways not often associated with what are often viewed as elitist aspects of society (Inter-NSB Committee, 2003).

Other comments on stakeholders included private providers being caught in the crossfire between the DoL, SETAs and SAQA (Representative from a private FET provider in SAQA, 2004h).

Mention was also made that stakeholders should be empowered:

The NQF and its structures were founded on stakeholder participation and involvement - in standards and qualifications development and registration, in workplace implementation, in SETAs and in monitoring and evaluation. It is becoming clear that from the perspective of workers and the poor, there is involvement, but totally inadequate empowerment. Labour and community representatives do not have the time, the skills, the status or the resources to be effective in the structures. There is a need to review how people are selected, what resources and training they need, and the roles they are expected to play. Stakeholder participation and oversight must be strengthened within SAQA, DoL and SETA structures (SACP, 2003).

A broad understanding of 'the complex arguments that underpin education and training policy' (*This Day*, 7 July 2004) was also noted. In this news article it was argued that the 'historical struggles that informed our educational values and which have brought us to where we now are' (*Ibid.*) needed to be revisited.

Funding

It was noted on various occasions that the resourcing of the NQF had not been, and was also not being, taken into account. Examples included comments from the CHE (2003) and Gibson (2003). SAUVCA (2003) argued that access to funding was 'perhaps the single biggest challenge, in addition to effective partnerships'.

Isaacs (in *The Financial Mail*, 2 August 2002) was extremely critical of the lack of funding for the NQF from government: 'the risk of a funding crisis for SAQA is enormous'. The article, based on a reading of the *Study Team Report* (DoE and DoL, 2002), also gave a detailed overview of the financial pressures faced by SAQA:

...SAQA was a victim of benign neglect, denied adequate funding and support from the very departments charged with implementing this flagship project. SAQA's government grant has been virtually stable at R5.8m - R6m since its inception in 1996. The cost of SAQA's NQF operations is estimated at R42,5m/year. The balance has been made up by an EU [European Union] grant, but it ends in December 2003.

The continued dependence on donor funding was concerning to both the funders and SAQA. According to BSA (2003) the EU was even concerned that the 'NQF investigation exercise would result in negative changes to systems that it had funded and thus a waste of these investments':

It appears as if donor funding will be required to fund a major portion of SAQA and the NQF for a few years to come. The present anticipated extension of donor funding from the EU, the source of the largest proportion of donor funds, is due to end at the end of 2004.

Overarching aspects of governance

A SAQA Manager (in SAQA, 2004c) expressed the view that the NQF is owned by the people. SAQA was only the agency to implement the NQF:

The NQF is not created by SAQA. SAQA is the agency for the development and the oversight of the implementation of the NQF. The NQF is owned by the people of the country, and the range of participants that committed themselves to this.

As noted before, calls were also made for a single, accountable structure that would be responsible for integration:

It is essential that there is a single, accountable structure responsible for integration. If the three QCs are to manage quality assurance across the system, who will 'evaluate the evaluators' to ensure that the integration agenda across the three QCs is being driven?...It is not clear from the document whether SAQA will continue to have such a function (INSETA, 2003).

The extent to which NQF governance was participatory and consensus-based was questioned:

SAQA's absence from the discussions that led to the *Consultative Document* [DoE and DoL, 2003] and its limited involvement in the discussions of the Focus Study Team [DoE and DoL, 2002] has meant that some of the arguments put forward in the *Consultative Document* are based on the authors understanding of the "truth". The argument has then been presented together with the "facts" that would support the argument, even though they have little or no resonance with the reality experienced by SAQA and other stakeholders (INSETA, 2003).

A more co-ordinated effort was proposed, one in which relationships were 'defined and legislated in unambiguous terms thereby avoiding contestations over 'territory", delays due to overly bureaucratic structures and processes, and uncertainty amongst the QCs and institutional providers' (CHE, 2003). SAQA (2004) supported the position:

SAQA calls for a return to collaborative relationships between the agencies responsible for implementing the NQF. The current power struggles are having a negative impact on NQF implementation and may result in systemic changes that are not necessarily beneficial to South African learners - the very same learners for whom the system is ultimately designed (SAQA, 2004).

Overwhelming evidence of lack of clarity on roles and responsibilities was found (see APPETD, 2004; INSETA, 2003; ASDFSA, 2003; CEPD, 2004; CHE, 2003; COSATU, 2003; CTP, 2004; FASSET, 2003; NAPTOSA, 2004; SAQA, 2004; SADTU, 2004; Young, 2003).

Another aspect that received significant agreement was the disregard for the negative influence of power struggles on NQF implementation:

The *Consultative Document* does not deal adequately, with ... [the] power relationship contestations (INSETA, 2003).

INSETA (2003) suggested that a 'more realistic solution to the question of relationships' could be found in 'the democratic principle of broad consultation to determine appropriate and agreed power relationships between the potential contesting bodies' (*Ibid.*). According to INSETA it would be necessary to 'make these power relationships explicit, and provide the necessary legal, political and financial support to enable the respective bodies to function effectively in accordance with the decisions' (*Ibid.*).

A SAQA staff member (in SAQA, 2004c) agreed, stating that '[v]ested interests, historical manoeuvring and personality clashes' were all influencing the implementation process:

Another weakness that is exposed is the continual struggle for power and dominance between the various agencies that are tasked with NQF implementation.

According to SAQA (2004c) the NQF agencies were being criticised as 'being "power hungry", continually fighting for turf and more authoritative positioning within the NQF architecture'.

In an earlier response, SAQA (2003) explained that when it speaks of "power contestations", 'its remarks go beyond the lack of a single vision on the part of the Departments of Labour and Education'. According to SAQA its priority was to gain 'full government support to allow it to negotiate processes with relevant bodies and to take these processes forward' (*Ibid.*), something that was not being achieved through the review processes:

What we now face is an unravelling of the power to support our original operationalising of the NQF and the re-aligning of power by the Departments of Education and Labour around a new set of recommended innovations intended to resolve perceived problems of the present operationalisation (*Ibid.*).

The comments that the *Consultative Document* (DoE and DoL, 2003) was 'a compromised product of power struggles between the Departments of Education and Labour, rather than being about learners, or a national system of quality learning' (Inter-NSB Committee, 2003), were noted in many responses. NAPTOA (2003) went as far as to say that they regard it 'as a tragedy that contestations around power and areas of influence between two parties, that are on the same side, are in danger of disrupting and fragmenting a vision for transformation that was agreed upon - and which is legislated for'.

The protection of sectoral territories were noted:

Ever since the appearance of the interdepartmental Task Team's *Consultative Document*, the protection of sectoral territories has become more and more foregrounded - to the extent that the NQF is being held to ransom by those who wish to protect their own interests at the cost of what should be a common, national interest and commitment (NAPTOSA, 2004).

It was also noted that the NQF system was in continual flux:

...national quality assurance agencies, other related bodies and providers of education and training continue to be in flux and to face major challenges. The system, institutions and actors are at the limits of their capacities to cope with policy unpredictability and to continuously absorb policy changes, often in the face of inadequate resourcing. There is considerable stress, strain and anxiety within national quality assurance agencies and providers (CHE, 2003).

Comments about professional bodies focused on the desire to remain independent, but also not to be left out of the system:

By declaring CHE the "band ETQA" brings into question the position of other ETQAs and the associated professional bodies, for example the HPCSA [Health Professions Council of South Africa] and Allied Health Professions Council of South Africa (AHPSCSA). The roles between these different bodies should be clarified (Pretorius, 2004).

Numerous comments argued that the roles and function of the proposed *Interdepartmental Task Team* (CHE, 2003 and GDE, 2003), the proposed *NQF Forum* (COSATU, 2003 and De Wal, 2003) and the proposed *NQF Strategic Partnership* (GDE, 2003 and University of the Witwatersrand, 2003) needed to be clarified.

Summary of unities associated with the Governance object

Organised according to six categories (conventions and agreements, implementing agencies, government departments, international roleplayers, stakeholders, and funding) substantial empirical evidence related to the Governance object was obtained. The following unities were identified:

NQF legislation targets the division of powers as unity

As early as 1995 (even prior to the promulgation of the SAQA Act) concerns were raised that NQF legislation would impact on the powers of various roleplayers including the Minister of Education (*The Daily News*, 5 September 1995).

Amendments to legislation will be necessary as unity

It was agreed that the changes (as proposed in the review documents) would only be possible if a new NQF Bill was to be passed. The complexity and extended timeframe that would be required, were questioned.

Increased regulation of roles and responsibilities is necessary as unity

The increased regulation of roles and responsibilities, beyond the voluntary mechanisms in the MoUs, was supported. Comments related to MoUs suggested that they were only “agreements to agree” that were not particularly successful, notably between SETA ETQAs and the HEQC. The proposed standardisation of MoUs, to the extent that they would be replaced with “generic rules of engagement”, was cautiously supported.

Concerns about the role of SAQA as unity

The role of SAQA was questioned extensively. This ranged from the suspicion that SAQA was established in reaction to the establishment of separate Ministries of Education and Labour in 1994 (*The Star*, 27 October 1997) to concerns about SAQA’s overly administrative role as proposed in the review documents (Inter-NSB Committee, 2004). Additional comments questioned the proposed overly technician role of SAQA (CHE, 2003) and the extent to which SAQA had become too focused on administration and implementation at the expense of providing leadership (SAQA, 2004c). Concerns about SAQA being “scapegoated” and sidelined during the review processes (SADTU, 2004), and SAQA’s role in building trust (SAQA, 2004c), were also noted.

Concerns about the roles of the QCs as unity

In some cases the establishment of QCs were supported (CHE, 2003), although in many more instances concerns were raised. These included the increase in bureaucracy (COSATU, 2003), exacerbation of inequalities, fragmentation and the creation of silos. TOP QC was most vehemently criticised, while HI-ED QC (as the CHE) and GENFET QC (as UMALUSI) were less criticised. Notably the CHE and UMALUSI were in full agreement with their proposed transformations, while the NSA and NBFET were very critical of their transformation into the TOP QC.

DoE/DoL disagreements were problematic as unity

There was unanimous agreement that the differences between the DoE and DoL had been extremely harmful to NQF development and implementation. A comment such as 'the NQF is being destroyed by the DoE' (SAQA, 2005c), provides such evidence. Calls for the setting aside of differences, assuming collective political leadership and even a reconsideration of a single Ministry of Education and Training, were noted. Furthermore, requests were made that the differences between the Departments should be dealt with in a more transparent manner and that compromises should be made.

More stakeholder input needed as unity

As before, concerns about the lack of debate, transparency and trust were noted. Additional suggestions for the need to preserve the representation achieved through the NSB and SGB processes, were also made. Particular stakeholder groupings were singled out:

- exclusion of professional bodies (SAQA, 2004);
- waning involvement of organised labour (*Ibid.*);
- continued attempts by the higher education sector to remain separate (*The Argus*, 14 July 1995);
- unfair treatment of private providers (*The Mail and Guardian*, 19 January 2001);
- too much power to higher education providers (SADTU, 2004).

Caution was also expressed about the vested interests of stakeholders. Another important comment suggested that SAQA has "gone a step too far" with stakeholder involvement, resulting in never-ending contestations.

The NQF was under-resourced as unity

There was general consensus that the South African NQF had been severely under-funded by government.

Power relations need to be made more explicit as unity

INSETA (2003) argued that a more realistic solution to power relationships could be achieved by providing the respective bodies with the necessary legal, political and financial support.

4.3.3.10 Summary of unities in the NQF discourse

This section has presented empirical evidence obtained from the data sources and organised according to the eight identified objects in the NQF discourse. Statements that refer to the same object were grouped together and presented in a detailed and summative manner. A range of identified unities are summarised from the preceding presentation of the empirical findings, and presented in this section.

	Unities in the NQF discourse	Associated Object
1	Decline in trade union involvement as unity	Guiding philosophy object
2	Over-emphasis on economic needs as unity	
3	Rejection of technicism, vocationalism and standardisation by higher education as unity	
4	Lack of attention to epistemological differences as unity	
5	General acceptance of the influences of lifelong learning, Freireanism and globalisation as unity	
6	Need to build communities of trust as unity	
7	Support for the transformation, access and progression agendas of the NQF as unity	Purpose object
8	Loss of original vision as unity	
9	Unification is misunderstood as unity	Scope object
10	Aggregation towards a linked scope as unity	
11	Need for a single accountable structure as unity	Prescriptiveness object
12	Avoid a "one size fits all" approach as unity	
13	Tight prescriptiveness was necessary as unity	
14	NQF legislation is too restrictive as unity	
15	Universities have tried to maintain the status quo as unity	
16	The NQF is rooted in the equal acknowledgement of all groups as unity	
17	Changing an education system takes generations as unity	Incrementalism object
18	NQF implementation must be accelerated even further as unity	
19	Incremental approach is preferable as unity	
20	Concerns about limited stakeholder consultation as unity	
21	Significant progress has been made as unity	
22	Short-term pressures are a threat to long-term principles as unity	
23	Danger of NQF fatigue setting in as unity	Policy breadth object
24	Simplified and standardised process is needed as unity	
25	Legislative inconsistencies are problematic as unity	
26	Alignment between national policies is critical as unity	
27	The NQF is a major but not the only vehicle for transformation as unity	
28	Lack of consultation is problematic as unity	
29	Communities of trust need to be understood and developed as unity	Architecture object
30	Standardisation is necessary as unity	
31	Increased disparity between academic and vocational qualifications must be avoided as unity	
32	OBET was adopted as a result of global and historical imperatives as unity	
33	OBET has been misinterpreted in South Africa as unity	
34	Support for a CAT system as unity	
35	Alignment between the NLRD and other databases should be improved as unity	
36	Increased separation between education and training as unity	
37	Transfer of curriculum control is questioned as unity	
38	Support for the limitation of assessor registration as unity	
39	Combination of quality assurance and standards setting functions as unity	
40	Support for the disbanding of NSBs and SGBs as unity	
41	The proliferation of unit standards and qualifications must be curbed as unity	
42	A collective approach to standards setting is more time consuming as unity	
43	The NQF Organising Fields are not the only way to categorise knowledge as unity	
44	NQF legislation targets the division of powers as unity	Governance object
45	Amendments to legislation will be necessary as unity	
46	Increased regulation of roles and responsibilities is necessary as unity	
47	Concerns about the role of SAQA as unity	
48	Concerns about the roles of the QCs as unity	
49	DoE/DoL disagreements were problematic as unity	
50	More stakeholder input needed as unity	
51	The NQF was under-resourced as unity	
52	Power relations need to be made more explicit as unity	

Table 25: Unities in the NQF discourse

4.3.4 Description of the formation of *strategies* in the NQF discourse

4.3.4.1 Introduction

In the third and final stage of the systematic description of the NQF discourse through the application of archaeology, the formation of the strategies associated with the objects and unities that were identified in the first two stages, is described.

In the context of this study a strategy is interpreted as (based on Foucault, 1972):

Coherent, rigorous and stable statements that form themes and theories in the NQF discourse consisting of certain organisations of concepts and grouping of subjects.

Foucault (1972) suggests the following considerations when identifying strategies:

- *Points of diffraction of discourse* – these points are characterised as points of incompatibility, equivalence and systematisation.
- *Authorities that guide the choices that are made* – to account for the choices that were made out of all those that could have been made.
- *Determination of the theoretical choices that were made.*

Foucault (1972) suggests that the *points of diffraction* are characterised by points of incompatibility, equivalence and systematisation. When trying to identify strategies from the already identified objects and unities, it is useful to take note of this advice by looking for unities that are contradictory (incompatible), unities that are very similar (equivalent) and unities that affect the entire, or at least a significant part of the NQF discourse.

The second consideration when identifying strategies in the NQF discourse concerns the reasons why specific choices are made by authors (including interviewees and writers of response documents and news articles) out of all the choices that they could have made. This consideration requires *interrogation of the authorities that guide the choices* of the authors, for example, a SAQA employee may not feel at liberty to criticise NQF implementation, while a journalist may have no such limitations.

Thirdly, the identification of strategies is influenced by a *determination of the theoretical choices that are made*. Foucault (*Ibid.*) refers to the function of a discourse object, such as the NQF, 'in a field of non-discursive practices'. referring to statements and accounts that are *not* necessarily historically contextualised. Authors may make specific "out of context" statements that may appear

as fleeting thoughts or personal “hobbyhorses”. It is important in this final part of the archaeological critique that such statements are not ignored, but rather investigated to try and determine the specific choices that were made in order to identify coherent statements that form specific themes of theories (strategies) in the NQF discourse.

The following strategies were identified in the NQF discourse (the associated objects and unities are indicated in each case):

4.3.4.2 Disagreement on incrementalism as strategy

Associated objects

Incrementalism object

Architecture object

Associated unities

Changing an education system takes generations as unity; NQF implementation must be accelerated even further as unity; Incremental approach is preferable as unity; Short-term pressures are a threat to long-term principles as unity; Danger of NQF fatigue setting in as unity

A collective approach to standards setting is more time consuming as unity

The first strategy that is identified from the set of unities in the NQF discourse (summarised in the previous section) is a lack of agreement on incrementalism. Taken mainly from the unities associated with the Incrementalism object, this strategy is identified as a central theme in the NQF discourse.

Evidence from the empirical data suggests that there is an awareness that the transformation of the South African education and training system, as has been the case in other countries, may take generations to achieve (SACE in SAQA, 2004g). Largely incompatible with this awareness, a need for accelerated implementation of the NQF was also expressed (INSETA, 2003).

SAQA (2004c) notes that short-term pressures on political structures may be a threat to the longer-term principles of the NQF. Coming from SAQA, this statement is important in the context of this study. SAQA’s commitment to the NQF principles appears to be dominating the organisation’s own short-term needs, such as stability and increased funding.

A related point is the recognition that a credible and high quality standards setting process cannot be rushed, resulting in a tension between a collective approach to standards setting and a more academic approach (SACE in SAQA, 2004g).

A final point related to the Disagreement on incrementalism as strategy is the danger of NQF fatigue setting in. The fatigue is ascribed not to the rate or manner of NQF implementation, but the extensive and diverse review processes (SACSSP, 2003). The overwhelming consensus that a major overhaul of the current system was not needed (from at least seven different sources) further supports this position.

The distribution of Disagreement on incrementalism as strategy within the NQF discourse is summarised in the following diagram:

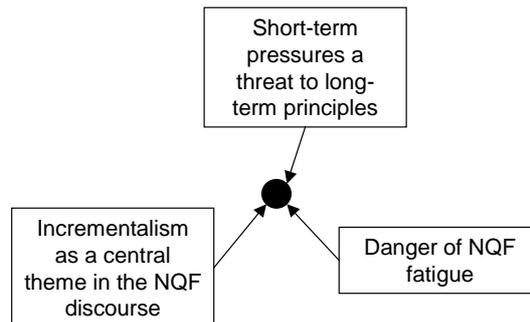


Diagram 15: Distribution of Disagreement on incrementalism as strategy

4.3.4.3 Inconsistent stakeholder involvement as strategy

<u>Associated objects</u>	<u>Associated unities</u>
Guiding philosophy object	Decline in trade union involvement as unity
Incrementalism object	Concerns about limited stakeholder consultation as unity
Policy breadth object	Lack of consultation is problematic as unity
Architecture object	Support for the disbanding of NSBs and SGBs as unity
Governance object	More stakeholder input needed as unity

Evident across many of the objects in the NQF discourse, were statements concerned with stakeholder involvement. A theme that ran across all these statements is the *inconsistent* involvement of stakeholders in NQF matters. In some cases stakeholders chose not to be involved (or at least noted a gradual withdrawal), such as the decline in trade union involvement (NUMSA in SAQA, 2004g), while in others, stakeholders felt they were purposely excluded through imposing unrealistic timeframes (ASDFSFA, 2003) or a lack of consultation (ICSA, 2003).

The strong support for the disbanding of the SAQA standards setting structures is also important. Except for statements by SAQA (2003) and NAPTOSA (2004), almost all other statements, even though recognising that the expertise should be retained (SAUVCA, 2004), suggested that the NSBs and SGBs should be disbanded. There was, however, agreement that the involvement of

stakeholders in standards setting processes should be continued, albeit in a different format and mainly with experts as opposed to individuals that were unable to contribute, but that participated for the sake of participating. The choice by authors to take this position is significant, in that it does not necessarily reflect awareness of a historical contextualisation, as it can be argued that the lack of stakeholder involvement in the pre-NQF system contributed significantly to the lack of parity of esteem between qualifications from different institutions.

Inconsistent stakeholder involvement as strategy within the NQF discourse is summarised in the following diagram:

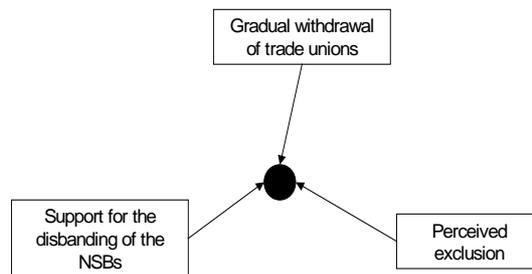


Diagram 16: Distribution of Inconsistent stakeholder involvement as strategy

4.3.4.4 Tight-loose prescriptiveness as strategy

Associated objects

Associated unities

Prescriptiveness object

Avoid a “one size fits all” approach as unity; Tight prescriptiveness was necessary as unity; NQF legislation is too restrictive as unity

Incrementalism object

Significant progress has been made as unity

Policy breadth object

Simplified and standardised process is needed as unity

Architecture object

Standardisation is necessary as unity; Alignment between the NLRD and other databases should be improved as unity; The proliferation of unit standards and qualifications must be curbed as unity; The NQF Organising Fields are not the only way to categorise knowledge as unity

Governance object

Amendments to legislation will be necessary as unity; Increased regulation of roles and responsibilities is necessary as unity

Another strategy identified in the NQF discourse is based on diverse statements that characterise a particular point of diffraction: simultaneous calls for both tighter and looser prescriptiveness.

The unities associated with the prescriptiveness object itself are a case in point. Calls to avoid a “one size fits all” approach (*The Mail and Guardian*, 19 January 2001) were accentuated by

concerns that the NQF legislation would be too prescriptive (*The Star*, 5 July 1995). Notably, many of the overarching concerns about tightness were from the early establishment period. Concerns in the later years focused more on the effect of the legislation on specific stakeholder groupings, such as private providers (APPETD, 2004). Most recently statements suggested agreement that NQF legislation would have to be amended to enable the proposed changes emanating from the review process.

A related point is the recognition that a certain amount of prescriptiveness was unavoidable in order for the South African NQF to achieve its goals of redress and transformation (DoE representative in SAQA, 2005d). The difficulties associated with inter-ETQA agreements (MoUs) and domination of sectoral interests were cited as support for increased prescriptiveness – a choice exercised by numerous authors, including the NSA (2003), NAPTOSA (2004) and UMALUSI (2003). ETQAs also expressed reservations about voluntary agreements such as MoUs, arguing that they were simply “agreements to agree” (ETQA representative in SAQA, 2005c).

Likewise, some unities included a call for greater standardisation, e.g. between different databases (UOFS, 2004), while others included criticism of too much standardisation, e.g. to consider alternatives to the twelve NQF Organising Fields (INSETA, 2003). In this case it was quite evident that specific authorities guided constituencies: SAQA and NAPTOSA (2003) questioned why alternatives were necessary, while some SETAs (e.g. INSETA, 2003) and professional bodies (e.g. SACSSP, 2003) were opposed to using the Standard Industrial Codes (SIC) as an alternative. It is important to note that the SETAs are established mainly according to the SIC codes and organising of the NQF according to this structure would probably be very useful. Despite this, INSETA argues against the possibility.

Tight-loose prescriptiveness as strategy within the NQF discourse is summarised in the following diagram:

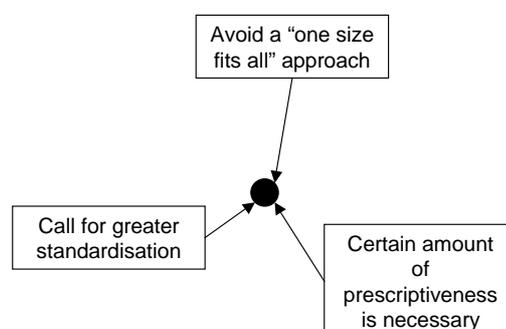


Diagram 17: Distribution of Tight-loose prescriptiveness as strategy

4.3.4.5 Building communities of trust as strategy

<u>Associated objects</u>	<u>Associated unities</u>
Guiding philosophy object	Need to build communities of trust as unity
Prescriptiveness object	The NQF is rooted in the equal acknowledgement of all groups as unity
Incrementalism object	Concerns about limited stakeholder consultation as unity; Significant progress has been made as unity; Short-term pressures are a threat to long-term principles as unity; Danger of NQF fatigue setting in as unity
Policy breadth object	Lack of consultation is problematic as unity; Communities of trust need to be understood and developed as unity
Governance object	DoE/DoL disagreements were problematic as unity; More stakeholder input needed as unity

Various objects were associated with the unities that suggested a need for building communities of trust. Closely related to the inconsistent stakeholder involvement strategy, this strategy includes statements that acknowledge the principle of meeting a 'wide range of needs without bowing to the specific demands of any group' (*The Mail and Guardian*, 19 April 1996).

A number of statements pointing towards the need for greater understanding of communities of trust were identified:

- Communities of trust are not the same as consensus (CHE, 2003);
- Communities with shared practical experience (e.g. expertise in a subject or occupational field) are important (Young, 2003);
- Shared experience and usage are important (*Ibid.*);
- Communities of trust take time to develop and need a conducive environment to mature (CHE, 2003);
- Expert focus should be replaced with more stakeholder involvement to encourage trust (University of the Witwatersrand, 2003);
- The "basics" first have to be in place (SABPP in SAQA, 2005c).

These comments point towards some of the points of diffraction in the NQF discourse, notably the tension between trust based on shared experience and excessive quality assurance practices. The choice of comment from the University of the Witwatersrand (2003), i.e. for more stakeholder involvement, is important, as it is inconsistent with what might be expected from the particular constituency.

Building communities of trust as strategy within the NQF discourse is summarised in the following diagram:

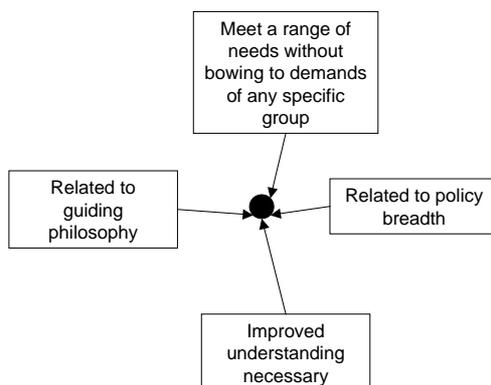


Diagram 18: Distribution of Building communities of trust as strategy

4.3.4.6 Strong leadership as strategy

Associated objects

Purpose object

Scope object

Incrementalism object

Architecture object

Governance object

Associated unities

Loss of original vision as unity

Need for a single accountable structure as unity

Short-term pressures are a threat to long-term principles as unity;
Danger of NQF fatigue setting in as unity

Increased separation between education and training as unity;
Transfer of curriculum control is questioned as unity

NQF legislation targets the division of powers as unity; Increased regulation of roles and responsibilities is necessary as unity; Concerns about the role of SAQA as unity; Concerns about the roles of the QCs as unity; DoE/DoL disagreements were problematic as unity; Power relations need to be made more explicit as unity

Another strategy identified from the unities in the NQF discourse is strong leadership. Underpinned by the perception that stronger leadership would resolve many of the contestations, authors called for a single accountable structure such as SAQA, that would be able to give strong and effective intellectual and strategic leadership (CHE, 2003).

The relationships between SAQA and the two Departments were noted as particularly problematic (e.g. SAUVCA, 2003) due to the fact that SAQA was unable to exert strong leadership. As an example, SAUVCA questioned SAQA's role as 'servant of government' (*Ibid.*) rather than being more independent. A related point is the extent to which the two Departments were able to give

overall leadership to the NQF project, especially since the differences between the two Departments were so evident.

Increased separation between education (academic) and training (vocational) thinking was obvious. In this regard, SAQA's role of integrating education and training was a common theme that cut across all the periods of NQF development.

There were also numerous and divergent opinions about the roles and functions of additional bodies recommended in the review documents. Examples include:

- The proposed Qualifications and Quality Assurance Councils (QCs) (NAPTOSA, 2003);
- Interdepartmental Task Team (CHE, 2003);
- NQF Forum (COSATU, 2003);
- NQF Strategic Partnership (GDE, 2003).

Strong leadership as strategy within the NQF discourse is summarised in the following diagram:

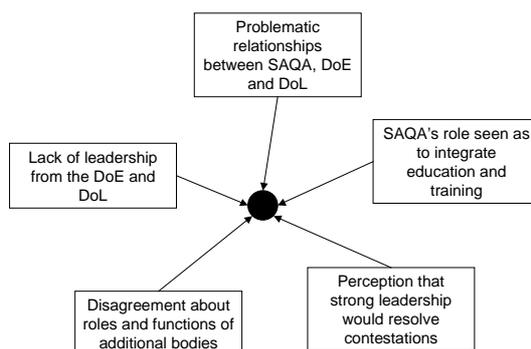


Diagram 19: Distribution of Strong leadership as strategy

4.3.4.7 Support for NQF objectives although interpretations vary as strategy

Associated objects

Guiding philosophy object

Purpose object

Scope object

Associated unities

Over-emphasis on economic needs as unity; Rejection of technicism, vocationalism and standardisation by higher education as unity; Lack of attention to epistemological differences as unity; General acceptance of the influences of lifelong learning, Freireanism and globalisation as unity

Support for the transformation, access and progression agendas of the NQF as unity; Loss of original vision as unity

Unification is misunderstood as unity; Aggregation towards a linked scope as unity

Prescriptiveness object	Universities have tried to maintain the status quo as unity
Incrementalism object	Significant progress has been made as unity; Short-term pressures are a threat to long-term principles as unity
Policy breadth object	Legislative inconsistencies are problematic as unity; The NQF is a major but not the only vehicle for transformation
Architecture object	OBET was adopted as a result of global and historical imperatives as unity; OBET has been misinterpreted in South Africa as unity; Increased separation between education and training as unity; The NQF Organising Fields are not the only way to categorise knowledge as unity

As is evident from the extensive list of associated unities, the strategy of Support for the NQF objectives although interpretations vary, is a central theme throughout most of the empirical data.

Support for the NQF objectives was significant, to the extent that the lack of criticism suggested that authors felt pressured not to make any negative statements, fearing that such criticism would be interpreted as unpatriotic and resistant to democratic change. This is an important authority that guided the choices of authors, as many of their other criticisms suggest that they did not necessarily agree with all the NQF objectives (e.g. Respondent from a private ABET provider in SAQA, 2004h).

The unities associated with the guiding philosophy object exemplify the different understandings, but also interpretations and positions of authors with respect to the NQF objectives, namely to:

1. create an integrated national framework for learning achievements;
2. facilitate access to and mobility and progression within education, training and career paths;
3. enhance the quality of education and training;
4. accelerate the redress of past unfair discrimination in education, training and employment opportunities; and
5. contribute to the full personal development of each learner and the social and economic development of the nation at large (SA, 1995c).

The first NQF objective on integration was singled out. The implementation thereof was even described as flawed (SACP, 2004). Incompatible comments on integration permeated the empirical dataset. Comments ranged from seeing the South African NQF as an achievement in bringing together all three levels of education and training (IMWG member in SAQA, 2004c) to criticism that 'the unhinging of education and training will lead to the "dumbing-down" of workplace learning' (CHE, 2003).

Support for NQF objectives although interpretations vary as strategy within the NQF discourse is summarised in the following diagram:

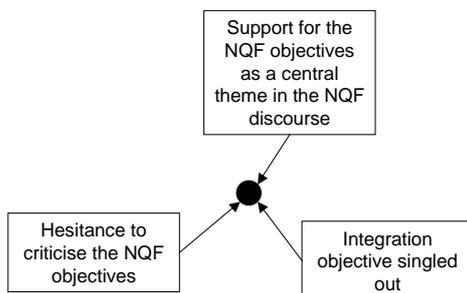


Diagram 20: Distribution of Support for NQF objectives although interpretations vary as strategy

4.3.4.8 High intrinsic and institutional logic as strategy

Associated objects

Policy breadth object

Architecture object

Governance object

Associated unities

Simplified and standardised process is needed as unity;
Legislative inconsistencies are problematic as unity; Alignment between national policies is critical as unity; The NQF is a major but not the only vehicle for transformation as unity

Alignment between the NLRD and other databases should be improved as unity

Amendments to legislation will be necessary as unity

Originating mainly from the policy breadth object, a number of unities focused on the need for high intrinsic logic for effective NQF implementation. Virtually without exception statements referred to the need for adequate design features, although these depended on the preferred architectural configuration. Some criticism was aimed at the lack of generic terminology, particularly qualifications nomenclature (GDE, 2003).

With regard to institutional logic, various statements referred to the need for policies and systems outside the NQF itself, to be aligned to those of the NQF. The apparent disregard for the current legislative framework (APPETD, 2004), particularly by the DoE and DoL (NAPTOSA, 2003), stood out as a point of diffraction.

High intrinsic and institutional logic as strategy within the NQF discourse is summarised in the following diagram:

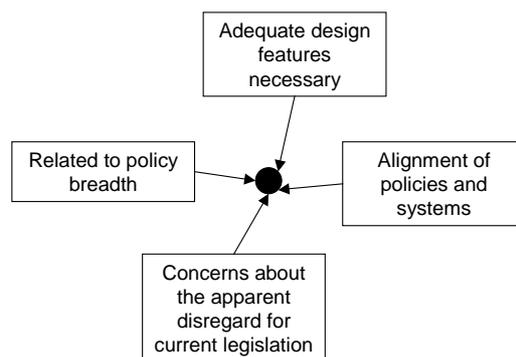


Diagram 21: Distribution of High intrinsic and institutional logic as strategy

4.3.4.9 Academic/vocational fault line as strategy

Associated objects

Guiding philosophy object

Purpose object

Prescriptiveness object

Incrementalism object

Architecture object

Governance object

Associated unities

Decline in trade union involvement as unity; Over-emphasis on economic needs as unity; Rejection of technicism, vocationalism and standardisation by higher education as unity; Lack of attention to epistemological differences as unity

Loss of original vision as unity

Avoid a “one size fits all” approach as unity; Universities have tried to maintain the status quo as unity; The NQF is rooted in the equal acknowledgement of all groups as unity

Short-term pressures are a threat to long-term principles as unity; Increased disparity between academic and vocational qualifications must be avoided as unity; Increased separation between education and training as unity; Support for the limitation of assessor registration as unity; Support for the disbanding of NSBs and SGBs as unity; The NQF Organising Fields are not the only way to categorise knowledge as unity

DoE/DoL disagreements were problematic as unity; Power relations need to be made more explicit as unity

Another central theme that seemed to underlie many of the other strategies is the fault line between the academic and vocational aspects of the NQF. Most of the unities associated with this strategy have also been associated with other strategies. This fault line strategy also starts to point towards the need to investigate the role and influence of power relations in the NQF discourse. Critiques of the *Consultative Document* (DoE and DoL, 2003) provide a fitting example (e.g. NAPTOSA, 2003 and SAQA, 2003) of the links between the academic differences and the power struggles within the NQF discourse.

The Academic/vocational fault line as strategy within the NQF discourse is summarised in the following diagram:

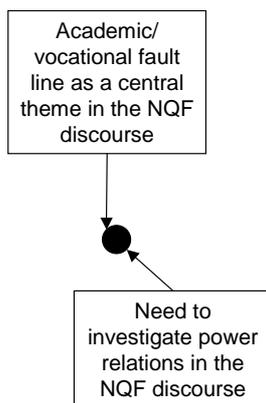


Diagram 22: Distribution of the Academic/vocational fault line as strategy

4.3.4.10 Summary of strategies in the NQF discourse

Based on the objects and unities in the NQF discourse, the following strategies have been described:

	Strategies in the NQF discourse	Diagrammatic summary of grouping of subjects
1	Disagreement on incrementalism as strategy	
2	Inconsistent stakeholder involvement as strategy	
3	Tight-loose prescriptiveness as strategy	

4	Building communities of trust as strategy	
5	Strong leadership as strategy	
6	Support for NQF objectives although interpretations vary as strategy	
7	High intrinsic and institutional logic as strategy	
8	Academic/vocational fault line as strategy	

Table 26: Strategies in the NQF discourse

A brief reflection on the number of associations between the identified eight strategies and the list of 52 unities provides some useful insights.

The unity with the highest frequency of inclusion was *Short-term pressures are a threat to long-term principles as unity*. Other unities with high frequencies of inclusion were:

- Over-emphasis on economic needs as unity
- Rejection of technicism, vocationalism and standardisation by higher education as unity
- Lack of attention to epistemological differences as unity
- Loss of original vision as unity
- Significant progress has been made as unity
- Danger of NQF fatigue setting in as unity
- Increased separation between education and training as unity
- The NQF Organising Fields are not the only way to categorise knowledge as unity.

Some unities were not associated with any strategies at all. These included:

- Support for a CAT system as unity
- Combination of quality assurance and standards setting functions as unity
- The NQF was under-resourced as unity.

Although not definitive, these frequencies do point towards a prioritisation of the most dominant unities in the NQF discourse.

This section concludes the archaeological critique of the NQF discourse. The purpose of the critique has been to *describe* the NQF discourse and nothing more. Through the detailed application of Foucault's archaeological method, eight objects, more than fifty unities and eight strategies have been identified. The diagram below illustrates the process that was followed (including examples of the associations between objects, unities and strategies) to describe the NQF discourse:

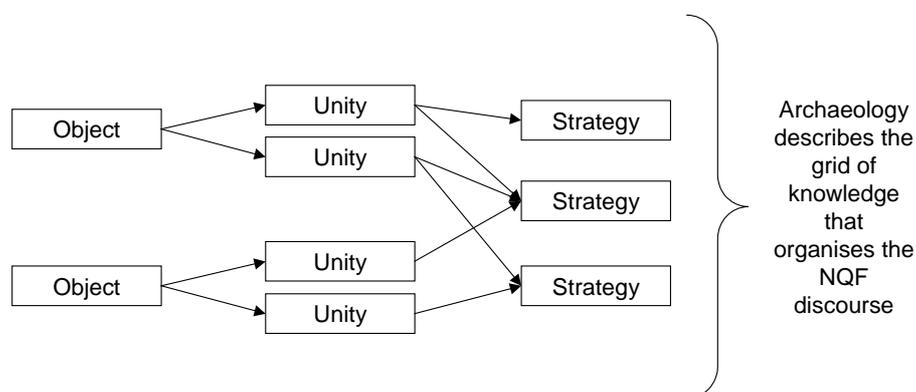


Diagram 23: Steps in the archaeological critique

4.4 GENEALOGY AS CRITIQUE

4.4.1 Introduction

The previous archaeological critique described the NQF discourse. It presented a “snapshot” of the discourse without necessarily focusing on the exercise of power. In comparison, the genealogical critique focuses explicitly on power as it presents a range of processual aspects of the NQF discourse as genealogy is used to reveal the NQF discourse as a system of constraint.

It is important to note that both Foucauldian methods are applied to the same empirical dataset. As a result, some of the evidence presented in this section may be similar to that presented in the archaeological section – clearly to support different findings in each case. An attempt has nonetheless been made to limit such duplications to avoid misinterpretations.

As noted before, the application of genealogy consists of three components:

- identification of *erudite knowledges* - the historical contents that have been buried and disguised in a functional or formal systematisation with an emphasis on power;
- identification of *local memories* – the set of knowledges that have been disqualified as inadequate to their task or insufficiently elaborated with an emphasis on power - those knowledges in the NQF discourse that are seen as inferior and non-scientific. The union of erudite knowledges and local memories makes it possible to know the historical knowledge of struggles within the NQF discourse; and
- identification and description of *knowledges opposed to power* - knowledges that “rebel” against centralising powers and are linked to the functioning of the NQF discourse. A greater emphasis is placed on power by identifying and describing the insurrection of knowledges that are opposed to power in the NQF discourse.

Based on Foucault’s argument that discourse can be revealed as a system of constraint by associating the two areas in the same category of subjugated or repressed knowledges (Foucault, 1980), a fourth section on *constraints* is included. In this section the results of the other three (i.e. the erudite knowledges, the local memories and the knowledges opposed to power) are grouped together (associated) in order to identify overarching processual aspects of the NQF discourse.

This section is therefore structured according to four themes:

- Identification of erudite knowledges
- Identification of local memories
- Identification and description of knowledges opposed to power
- Constraints in the NQF discourse.

As mentioned before the source documents contained in the empirical dataset have been kept separate from other source documents. References to documents in the empirical dataset do *not* include page numbers.

4.4.2 Identification of *erudite knowledges* in the NQF discourse

4.4.2.1 Introduction

As discussed in *Chapter 2*, erudite knowledges are interpreted in the context of this study as (from Foucault, 1980):

Historical contents within the NQF discourse that have been buried and disguised in a functional coherence or formal systematisation.

Importantly these erudite knowledges are seen as the products of meticulous erudite, exact historical knowledges that that have become part of formal and systematic discourses. These knowledges also include an emphasis on power.

The erudite knowledges identified from the empirical dataset are presented on the following pages.

4.4.2.2 Knowledges about divergence from the original conceptualisation

Contained within the empirical data were numerous and detailed critiques of the extent to which NQF implementation had diverted from the 'original vision' (Halendorff and Wood, 2004). These comments were in many cases linked to broader or overarching aspects, such as 'the transformation and development of South Africa's education and training system, including the NQF' (CHE, 2003), and 'how the [NQF] will provide for the recognition of the intellectually demanding, sophisticated bodies of knowledge emerging in the workplace, and provide for the delivery of relevant, focused learning resulting in required competence' (Halendorff and Wood, 2004).

The concerns were formulated in many ways, some of which included:

- need to 'maintain an adherence to principles, values, vision and goals [of the NQF]' (CHE, 2003);
- the 'guiding principles of the NQF' have been implemented in an uneven fashion (COSATU, 2003); and
- 'it is important to be reminded of the purpose of the NQF, and to decide whether the purpose has changed, and then only to resolve how the structures should be re-formed' (University of the Witwatersrand, 2003).

It was also noted that the proposed changes to the NQF (DoE and DoL, 2002; DoE and DoL, 2003 and DoE, 2004) were not as pragmatic as the original conceptualisation (Halendorff and Wood, 2004), and could never be an answer to all needs:

I think we must be careful that a qualification framework in my mind should never be an answer necessary to all needs. I think we can go hugely wrong because you will get it over regulated, very fragmented, very detailed, very timeous processes to keep that in place (Employer in SAQA, 2004d).

Related to the comment above, it was also noted that the post-1994 period included unrealistic expectations: 'I think we were too excited at first you know in the Mandela era and we wanted to change things drastically. These things take time' (Representative from a provider in SAQA, 2004h). A press article in 2001 captured some of the realisations that NQF implementation did not, and probably could not, meet all expectations:

...this initial support has been washed away by a tide of anger and disappointment. Private institutions are exasperated by the Department of Education's and South African Qualifications Authority's registration and accreditation processes, which are so flawed that they cannot possibly produce the results they were intended to achieve (*The Mail and Guardian*, 19 January 2001).

4.4.2.3 Knowledges of non-optional legislative compliance

Many of the comments contained in the empirical data focused on legislative aspects. Two common themes were identified. The first, more explicit theme, was the need for clear legislation that would avoid, or at least minimise, territory contestations:

Clear jurisdictions for, and responsibilities of, the different agencies must be defined and legislated in unambiguous terms thereby avoiding contestations over 'territory', delays due to overly bureaucratic structures and processes, and uncertainty amongst the QCs and institutional providers (CHE, 2003).

The second, more disguised theme, focused on the lack of compliance with the current NQF legislation. Importantly, the two Departments were criticised for not complying with their own legislation, in this way setting a dangerous precedent that would have a domino effect all the way down the system. The following comments from SAQA (2004) serve as an example:

What is concerning however is that even though the current legislative framework has placed some of this responsibility on SAQA, it now appears as if the Department of Education - with very limited consultation with SAQA - has deemed it appropriate to change the role of the CHE without the necessary legislative underpinning.

Linked to the above, the point was made that the two Departments, through their respective Ministers, developed legislation in consultation with each other – a process that should result in the Departments having a 'vested interest in the successful implementation of the NQF in terms of the legislation' (NAPTOSA, 2003).

Another related point focused on the extent to which conflicting legislation exists in post-apartheid South Africa. This is referred to by some as anomalies in legislation (FET Provider in SAQA, 2005e) and 'there are places where the different legislations do not talk to one another at all' (ETQA Manager in SAQA, 2005c). Three examples are listed below.

The Occupational Health and Safety (OHS) Regulations and the NQF:

The tension is created firstly by the Regulation that was created in 1992, and obviously pre-dated any NQF considerations. It appears to have been created without proper representation of the relevant stakeholders and contains considerable flaws apart from the inconsistencies with new training conditions. There are definite contradictions between the Regulation and NQF training requirements... (Shipston, 2003).

The (varied) responsibilities relating to standards setting:

The draft policy states that it makes a distinction between the act of generating standards for qualifications in terms of the SAQA Act, 1995 (Act No. 58 of 1995) and the Minister's responsibility for determining or setting standards for such qualifications in terms of the

Higher Education Act, 1997, (p2). It then goes on to say that the Council on Higher Education (CHE) will have a statutory responsibility for co-ordinating and generating standards for all higher education qualifications. This leads to confusion when in one instance it is stated that SAQA is the standards generating body and, in another, the CHE is tasked with generating standards (UP, 2004).

The lack of alignment with the *Norms and Standards for Educators* (DoE, 2000):

There is a concern that although the [HEQF] is designed to describe a future qualifications structure, insufficient attention has been given to the relationship between this framework and existing qualification structures and the legislation governing these. The education faculty offers the *Norms and Standards for Educators* as an example of this... (Woodward, 2004).

4.4.2.4 *Knowledges of continual shifts in power relationships*

Knowledges about the power relationships between potential contesting bodies were also identified. These knowledges were embedded in the NQF discourse and often linked to inter-ETQA agreements. In this regard, INSETA (2003) argued that new power relationships needed to be determined and agreed through consultation:

It is essential therefore for the authors of the *Consultative Document* to come to a more realistic solution to the question of relationships. It could employ the democratic principle of broad consultation to determine appropriate and agreed power relationships between the potential contesting bodies. Thereafter it would be necessary to make these power relationships explicit, and provide the necessary legal, political and financial support to enable the respective bodies to function effectively in accordance with the decisions.

Both SAQA (2003) and NAPTOSA (2003) concurred:

What we now face is an unravelling of the power to support our original operationalising of the NQF and the re-aligning of power by the Departments of Education and Labour around a new set of recommended innovations intended to resolve perceived problems of the present operationalisation (SAQA, 2003).

It is acknowledged by the task team that the “structure and scope of the TOP QC is unusual” and, NAPTOSA would add, is more complex and more powerful. The three QCs are clearly very unequal in this regard and NAPTOSA is concerned that this alone could be

the cause of further fragmentation and contestations, thus exacerbating the present tensions. For example, the fact that it is even suggested that the National Skills Authority (NSA) should be incorporated (or subverted) into the TOP QC is indicative of the powers that are being assigned to this QC (NAPTOSA, 2003).

More examples of power shifts included the proposal in the *Consultative Document* (DoE and DoL, 2003) to hand control of the 'curriculum of the majority of higher education and training qualifications' to the Minister of Labour, while the Minister of Education 'remains financially accountable for these learning programmes' (CHE, 2003). Likewise, the draft HEQF (DoE, 2004) was criticised for giving too much power to the Higher Education sector, placing the sector 'above everybody else' (SADTU, 2004). SADTU also noted the overlap of functions between SAQA and the CHE, citing the role of the CHE which, according to SADTU, was 'defending the right of universities to develop their own qualifications' and in this way 'the CHE and the DOE have effectively stopped SAQA from doing its work in the higher education band'.

SAQA (2003) also raised the concerns that SAQA itself was being excluded from the review processes, and even more importantly, perceived the reviews to be faultfinding exercises:

To date, SAQA has not been informed about the various submissions made by stakeholders and the general public in response to the Report of the Study Team [DoE and DoL, 2002] on the Implementation of the NQF. Not only was proper consultation with SAQA not forthcoming, we noted in our response to the Report of the Study Team on the Implementation of the NQF that the Report's basic approach was one of problem identification and problem solving.

4.4.2.5 *Knowledges of diversity*

Embedded within the empirical data was a general recognition of diversity, but more so, a wide range of comments suggesting that this diversity had not been recognised, nor did it appear as if the review suggestions were taking this into account. Examples included:

Private providers need special attention, particularly since they: do not receive state subsidization; are often much smaller than public providers; and have to adhere to additional registration requirements (APPETD, 2004). In some cases private providers even saw the 'SAQA accreditation system as being used as a weapon in a larger campaign against private education' (*The Mail and Guardian*, 19 January 2001). It was also noted that the public sector needed to recognise registered private sector qualifications (Carlsson, 2004).

The *FET sector* was described as complex, separate and different:

The FET level has always been the most complex part of the NQF model to get right, given the range of stakeholders, agenda and providers involved (McGrath, 2003).

A comment by a DoE official further illustrated the thinking that the FET sector had unique requirements:

We are hoping that by the end of maybe February again we will have a qualifications framework for further education and training that is linked to the NQF again... (DoE official in SAQA, 2005d).

Academic and vocational differences were recognised by many. Such comments included concerns that the 'academic stream is always the better endowed' (INSETA, 2003), the 'occupational/vocational qualification is deemed to be of a lesser value than the academic qualification' (Cape Town Wholesale and Retail Working Group, 2004), and that '[d]ifferent occupations require different kinds of knowledge, requiring different responses by the sites of learning' (CTP, 2003).

This last comment also illustrated the apparent paradox in recognising the diversity of the sector: while calling for recognition of diversity, stakeholders were also concerned that the proposed changes to the NQF would further 'entrench the dichotomy between workplace-based and institution-based learning' (COSATU, 2003). Comments indicating the entrenchment of 'previous incorrect perceptions related to the differences (and status) between vocational or career-focused and academic qualifications' (Pretorius, 2004), and the concern that 'many of the gains made over the past seven years to ensure parity of esteem between academic and vocational training will be lost to future generations' (SAQA, 2004), add further support. The rejection of vocational/academic differences by most NQF stakeholders was an important and unique exception to the more general call for recognition of diversity.

4.4.2.6 Knowledges that transformation requires power

It was noted that transformation, of the South African kind, required, amongst others, power to succeed:

The South African transformation agenda for education and training is one that seeks to advance a culture of lifelong learning for all, based on a human-rights culture where individuals develop to their full potential and the socio-economic fabric of our nation is

enhanced. This kind of transformation requires innovation as well as the technical, political, bureaucratic, and popular will *and power*, to succeed (INSETA, 2003, emphasis added).

SAQA (2003) concurred, and added that (from Fullan, 1999 in SAQA, 2003) in addition to power, moral purpose and ideas were also necessary conditions for changing the education and training system:

...moral purpose, ideas (innovations) and power are the three necessary conditions for education and training change and that “moral purpose and ideas without power means that the train never leaves the station” (SAQA, 2003).

The SACP (2003) made a related observation, stating that “consensus” might not be necessary as long as there was dialogue and interaction between stakeholders. This point is important – if power is necessary for transformation, consensus will most probably remain untenable; dialogue and interaction on the other hand, already exist:

The emphasis within stakeholder bodies has been on achieving consensus. Consensus over outcomes of qualifications, consensus over the best learning routes, consensus over assessment systems etc. It has been impossible to reach consensus and this should not be surprising, in a contested arena of struggle as important as education and training. *It is suggested that consensus may not be necessary, if there is dialogue and inter-action between the various parts of the system* (2003, emphasis added).

4.4.2.7 Knowledges about a single accountable structure

Comments suggested general agreement that SAQA’s future role needed to be clarified. Suggestions for responsibilities included ‘a single, accountable structure responsible for integration’ (INSETA, 2003), and intellectual and strategic leadership for the implementation of the NQF’ (CHE, 2003). Notably the CHE’s comments were followed by direct criticism of SAQA as not having provided such intellectual and strategic leadership to date:

Even though *this particular SAQA has not provided such leadership* it is most unfortunate that the role of a Qualifications Authority is being reduced to an essentially technical one...(CHE, 2003, emphasis added).

A respondent from a private provider (in SAQA, 2005e) seemed to be in support:

There is one key message from me [is that] SAQA needs to take control, more sort of in a firmer way...these “ouens” are running wild. I mean we’re trying for how long just to get to speak to one of our advisors and then you come there and they moved premises and they don’t even let us know, somewhere there is something drastically wrong.

A focused, representative decision-making structure (other than SAQA and without representation from the education sector) was also proposed:

...we propose a focused structure that represents government, business, labour and the community stakeholders to meet biannually to look at implementation issues with regards to the NQF. Furthermore the structure should have decision-making powers rather than being merely consultative (COSATU, 2003).

4.4.2.8 Knowledges that voluntary alliances are inefficient and insufficient

The NSA (2003) made the important observation that voluntary alliances had ‘proven inefficient and insufficient to ensure broad based implementation of the envisaged partnerships’. The NSA therefore suggested that more structured mechanisms, such as ‘rules of engagement’, were needed between NQF bodies. Particular reference was made to partnerships between SETA ETQAs and clusters of providers.

NAPTOSA (2003) supported the NSA position, arguing for more trust between ETQAs:

It is not the number of ETQAs (“plethora”) that is the problem. All of the legitimate ETQAs are accredited to quality assure specific qualifications. The contestations arise out of the “scope of responsibility” of each and this can only be resolved if ETQAs engage in the process of reaching the necessary agreement. A process/procedure has been established - and has been tested. The strength of the MoU concept is that it is flexible and that agreement is, indeed, reached on a “case-by-case” basis. The process becomes time consuming if the ETQAs involved are reluctant to share the responsibilities because of mistrust or “territoriality” (NAPTOSA, 2003).

4.4.2.9 Knowledges that entrance to higher education is tightly controlled

CEPD (2004) and SAQA (2004) agreed that entrance to higher education was tightly controlled. Particular reference was made to the fact that the minimum entrance requirement to higher education was stipulated as the Further Education and Training Certificate (FETC) (General). According to the CEPD this ‘potentially excludes students with vocational qualifications from the

college sector, and would hinder progression and articulation between different institutions at different levels within the education sector'. Furthermore, the CEPD continued, this narrow interpretation would 'undermine the more progressive elements of equity and access intended by the NQF'. SAQA agreed that the lack of reference to the other FETCs in the review documents was of concern:

The existence of various other FETC specialisations and the lack of reference to these is concerning and requires clarification (SAQA, 2004).

Another example of control of the HE/FET interface was the apparent move in the draft HEQF (DoE, 2004) by the DoE and CHE to limit learnerships at NQF Level 5 and above:

...the assumption might be drawn that the DoE and the CHE are planning to make the delivery of learnerships impossible at level 5 and above. Whilst this assumption may be wrong, many providers and SETA stakeholders have drawn that conclusion... (SACP, 2004).

4.4.2.10 Knowledges of DoE/DoL fissures

Viewed by many (e.g. NAPTOSA, 2003 and SAQA, 2003) as the primary cause of contestations in NQF implementation, the differences between the DoE and the DoL were discussed in many contexts. Some examples are discussed below.

The DoE and DoL should not usurp the powers of independent statutory agencies:

...this [political leadership] should avoid an absorption and centralization of policy and regulatory powers and functions that are rightfully the responsibilities of relatively autonomous yet publicly accountable national independent statutory agencies and institutions. Above all, independent statutory agencies should not be reduced to the technical implementation instruments of the Departments of Education and Labour (CHE, 2003).

The DoE and DoL's lack of leadership in NQF implementation is viewed as an indictment:

NAPTOSA acknowledges the statutory and constitutional responsibilities of the two departments but must point out that this is precisely why they (and no-one else) are in a position to provide the much needed strategic leadership that must guide SAQA in the fulfilment of its responsibilities regarding the implementation of the NQF. NAPTOSA views

this refusal by the departments as an indictment against their commitment to the implementation of the NQF (NAPTOSA, 2003).

The two Departments, being part of the initial conceptualisation of the NQF, had the responsibility to communicate the 'vision and the objectives of the NQF and to apply the law in order to begin achieving these objectives' (NAPTOSA, 2003). Their subsequent unequal commitment 'made the process more difficult than it needed to be' (*Ibid.*) and led to numerous problems and uncertainties that could have been avoided. NAPTOSA further explained that according to them, the *Consultative Document* (DoE and DoL, 2003) attempted to provide a rationale for the differences between DoE and DoL by making various distinctions. According to NAPTOSA the Task Team (DoE and DoL, 2003) used examples that would support their proposals, and although the categorisations were perfectly valid, their use reflected a particular bias:

...the Task Team has obviously elected to use only those which support the DoE/DoL separation in order to support their argument in favour of the three pathway NQF. NAPTOSA is not saying that these are invalid categorisations, only that they clearly reflect a particular bias and that the focus is exclusively on finding differences viz. "it is notoriously difficult to find a language to describe accurately the differences among...a wide spectrum of practices that serve different education and career purposes". Were any other possibilities considered? (NAPTOSA, 2003).

A further example of fissure was described as the problematic funding of the NQF, namely if the funding came from the DoL, but the political and administrative responsibility was located within the DoE:

There is no international precedent for funding of provision being located in one government department and the quality assurance of programmes and qualifications being located in an agency that reports to another government department (CHE, 2003).

4.4.2.11 Knowledges that the NQF is not the sole mechanism for transforming education and training

As was noted in the *Study Team Report* (DoE and DoL, 2002), the CHE concurred that the NQF should not be seen as the sole mechanism for transforming education and training, nor for the realisation of various social purposes and goals:

The creation of a qualifications framework cannot on its own bring about fundamental change in education and training provision and practices. Ultimately, it is the concerted and

deliberate building of the capabilities and capacities of institutional providers through the support of government and other agencies and through institutional initiatives in the areas of curriculum, learning, teaching and personnel expertise that are the crucial levers of fundamental transformation (CHE, 2003).

4.4.2.12 Knowledges that professional bodies have been excluded

Historically FET colleges were viewed as the “Cinderella” institutions of the education and training system due to the long-standing difficulties and lack of funding that they faced. From the various and detailed knowledges identified within the empirical data, it is not too drastic to also ascribe such Cinderella status to professional bodies in the NQF discourse. Despite the fact that a handful of professional bodies obtained ETQA status, the majority have remained outside the NQF, mostly not because of their own making. The review documents were criticised for being vague about the role of professional bodies, not to mention the inclusion of “professional qualifications”. Some examples are indicated below.

The CHE (2003) called for appropriate relationships between the proposed HI-ED QC, ‘other bodies and especially the professional bodies’. SAUVCA (2004), the Institute of Administration and Commerce of South Africa (IACSA) (2003) and NAPTOSA (2003) were in support.

Mention was made of the “impasse” between the non-statutory professional bodies and the CHE and DoE. Carlsson (2004) explained that professional bodies had ‘registered their qualifications and designations as qualifications on the NQF. This was another significant point of contestation as noted by SAICA (2003) and IACSA (2003):

We are disappointed that the [Consultative] document fails to address the debate of professional qualifications vs. professional designations. This is a major concern within the current system, and clarity on the issue must be provided (SAICA, 2003).

How is it possible that titles appear on the [NLRD] Registration list as Chartered Accountant, Associate General Accountant, Certified Accounting Technician, Chartered Management Accountant, etc., while other Professional Bodies are burdened with unheard of titles? (IACSA, 2003).

Carlsson (2004) also made the point that many of the professional bodies ‘have been operating since the early 1900’s and have and are contributing to the enhancement of skills in South Africa’.

RAU (2004) made the point that professional bodies were involved in determining admission requirements at higher education institutions:

Admission requirements to qualifications are also determined by professional bodies and not only by the higher education institution - flexibility in this regard is therefore supported (RAU, 2004).

SAUVCA (2003) suggested that professional bodies remain autonomous:

The sector proposes that professional bodies remain autonomous and independent, and work collaboratively with all three QCs with respect to the qualifications under their respective jurisdiction (SAUVCA, 2003).

A related point was made by UMALUSI (2003, emphasis added). It was suggested that the authority of professional bodies was “curbed” in the higher education sector, but strengthened in the FET sector:

The participation of the professional councils in the further education and training bands is not traditional and the report is not clear on the benefits of this. *Whilst it may be desirable to curb their role and authority in higher education, the reverse might be true for their role in the further education and training band.* Their involvement could help strengthen a weak sector that is currently led by industry interests outside the education sector. In other words, having a voice and input lower down in vocational qualifications (as well as higher education), could add much value in strengthening the quality of vocational education and promote the elusive vertical progression for learners in this sector (2003, emphasis added).

NAPTOSA (2003) regarded the non-recognition of non-statutory professional bodies as a serious omission:

The fact that non-statutory professional bodies (of which there are several - most of them function within the proposed domain of the TOP QC) are not recognised, not even mentioned, is likely to evolve into a highly contested area as some of these are already accredited ETQAs. This is a serious omission.

A final example of the exclusion of professional bodies in NQF discussions is taken from *The Financial Mail*:

Moreover, [Isaacs] warns that the fact that the new structure will make existing ETQAs subordinate to the SETAs and CHE in terms of standard setting is bound to be fiercely resisted by some professional bodies. These bodies, like the nursing and engineering councils, have taken the lead in establishing SGBs and in some cases been registered as ETQAs responsible for quality assurance in their respective fields. Those with ETQA status should be recognised as official standard-setting bodies (*The Financial Mail*, 2 August 2002).

4.4.2.13 Knowledges that the reconfigured standards setting system is supported

Although seen as a challenge, the empirical data suggested overwhelming support for the disbanding of the SAQA NSB and SGB structures and the transference of these functions to experts on Consultative/Fit-for-purpose Panels overseen by the CHE, UMALUSI and other partners:

There is confidence that a reconfigured HEQC, in close collaboration with SAUVCA, the CTP, APPETD, and other relevant bodies, would be able to form knowledge based 'fit-for-purpose' expert panels. However, developing a 'bottom' up process from these panels to the HI-ED QC will require strong leadership and management at the systemic level balanced by the growing capacities of institutional providers. To be effective, this approach will require effective planning and allocation of the necessary financial and human resources (CHE, 2003).

While the CHE's statutory responsibility for coordinating and generating standards for all higher education qualifications is acknowledged, the CHE must ensure that the generation of standards for generic qualifications is delegated to expert panels set up by academic provider and professional bodies, and not to general stakeholder groups. There must be no going back to SAQA's SGB/NSB system (University of KwaZulu-Natal [UKZN], 2004).

The SACP (2003) raised an important concern pertaining to the composition of such expert panels, mainly to avoid losing the stakeholder involvement on which the NQF was founded:

There is a need to review how people are selected, what resources and training they need, and the roles they are expected to play. Stakeholder participation and oversight must be strengthened within SAQA, DoL and SETA structures.

The combination of quality assurance and standards setting functions within particular institutions was also widely supported, though not by SAICA (2003):

As a professional body, SAICA has experienced significant problems with the functioning of the existing NSBs, particularly the way proposed qualifications have been evaluated and recommended for registration on the NQF. We remain to be convinced that the act of combining standards-setting and quality assurance functions in one body will fundamentally address this problem.

The nested approach to qualification design (cf. CHE, 2001) was viewed as a viable alternative:

The universities would strongly prefer to renew their interim registered qualifications via the nested approach under the proposed HI-ED QC, rather than under the SAQA NSB-SGB system (SAUVCA, 2003).

Importantly, SAUVCA (2003) and the CHE (2003) noted that the nested approach would need clarification to avoid uncertainties:

Essentially, the core issue is whether everybody in higher education will now, after reading the draft HEQC, know when *national* standards setting will be required and when it will not. The most simple and logical approach, directly aligned with the draft HEQF, is to restrict general, system-wide standards-setting to the three outer shells of the nested scheme: (1) Pegging of qualification types at a particular NQF level, requiring them to conform to the *level descriptors* at that level sufficiently to avoid being pegged at the level below; (2) Qualification descriptors as laid down in the HEQF policy; and (3) Generic standards set for the designated variants of the basic qualification types (SAUVCA, 2004).

...the NAP's recommendation that providers should have the autonomy to design the actual qualification and programme specialisations that are offered, and that these need not be registered on the NQF, but may be nested under a generic qualification standard for the purposes of registration, is important in this regard (CHE, 2003)

SAUVCA (2003) further suggested that the national system should be limited to operating on the perimeter of the classroom, suggesting three specific levels of control:

- *Teaching level* – direct control of the teaching-learning process should remain in the hands of those who teach.
- *Programme and qualification level* - external control of teaching and learning should involve setting the parameters for curriculum design and monitoring its progress and validating its results against national criteria at the programme and generic qualification

level only - and this should be done through the mediation of self-evaluation and Consultative Panels for peer review.

- *National level* - nationally set parameters and monitoring only occurring at the outer layers of the qualifications and programme “nest”.

4.4.2.14 Knowledges of the value of “partitioned” qualifications

Although an isolated comment, the recognition by the CHE that unit standards may be useful in specific cases, was important:

The CHE and HEQC, however, believe that the distinction between unit standards and whole qualifications will not disappear overnight and that, in the main, qualifications in the HET Band will be whole qualifications provided through courses that have fairly strict rules of combination, sequencing and duration. This is not to deny that unit standards, or the ‘parts’ represented by them, may have a role to play, especially in the FET Band and at levels 5 and 6 of the HET Band (CHE, 2003).

4.4.2.15 Knowledges that other databases need to link to the NLRD

The calls for (and opposition to) separate databases are an important observation that is indicative of the deeper, underlying power struggles. On the one hand it makes sense to develop independent and context-specific databases, whilst on the other it is necessary to ensure effective articulation between the various databases:

As SAQA already has a developed National Learners’ Records Database [NLRD], why does Higher Education need to develop their own database? It makes more sense to use an existing database and to make the relevant adjustments (Carlsson, 2004).

4.4.2.16 Knowledges that curriculum needs to be included in quality assurance

Notably a minority voice, but nonetheless important, UMALUSI (2003) made the call for the bringing together of institutional quality assurance with qualifications and learning programmes:

In our view any notion of quality outside quality of the curriculum, means very little. Bringing institutional quality assurance together with qualifications and learning programmes, makes more sense than the artificial separation we have at present.

4.4.2.17 Knowledges that an incremental approach is needed

Referring to the Scottish experience Young (2003) made the point that a more incremental approach that builds on existing structures was needed:

The implications which are brought out strongly in the experience of the Scottish SCQF (Raffe, 2003) are that incrementalism, building on the past and staying close to key providers/practitioners are crucial to successful implementation.

Young did however agree that in a country such as South Africa, ‘where there is no past to build on (or not a past that anyone wants to build on)’ caution must be taken not to ‘create new structures that have limited basis in practice’ (*Ibid.*).

Young’s view was supported by many, including the SACP (2003), who argued for a more incremental approach to the review processes, suggesting that ‘review must focus on what is going right and needs strengthening and what is going wrong and needs correcting’.

4.4.2.18 Summary of erudite knowledges in the NQF discourse

The erudite knowledges identified in this section are summarised in the table below.

Erudite knowledges in the NQF discourse	
1	Knowledges about divergence from the original conceptualisation
2	Knowledges of non-optional legislative compliance
3	Knowledges of continual shifts in power relationships
4	Knowledges of diversity
5	Knowledges that transformation requires power
6	Knowledges about a single accountable structure
7	Knowledges that voluntary alliances are inefficient and insufficient
8	Knowledges that entrance to higher education is tightly controlled
9	Knowledges of DoE/DoL fissures
10	Knowledges that the NQF is not the sole mechanism for transforming education and training
11	Knowledges that professional bodies have been excluded
12	Knowledges that the reconfigured standards setting system is supported
13	Knowledges of the value of “partitioned” qualifications
14	Knowledges that other databases need to link to the NLRD
15	Knowledges that curriculum needs to be included in quality assurance
16	Knowledges that an incremental approach is needed

Table 27: Erudite knowledges in the NQF discourse

4.4.3 Identification of *local memories* in the NQF discourse

4.4.3.1 Introduction

As discussed in *Chapter 2*, local memories are interpreted as follows in the context of this study (from Foucault, 1980):

A whole set of local and specific knowledges within the NQF discourse that have been disqualified as inadequate to their task or insufficiently elaborated – these are naïve knowledges, located low down on the hierarchy, beneath the required level of cognition or scientificity.

As was the case with the erudite knowledges, these local memories are described with a specific emphasis on power, in order to contribute to the genealogical focus on the exercise of power in the NQF discourse.

The following local memories have been identified from the empirical dataset:

4.4.3.2 Memories of the history of the NQF

A detailed article in *The Mail and Guardian* of 8 February 2001, one of many contained in the empirical dataset, provides a useful summary of the developments that led up the South African NQF. Because of its relevance, the complete article is included on the next page.

From the early 1970s, black trade union demands for a living wage were repeatedly rejected by employers on the grounds that workers were unskilled and so their demands were unjustified.

This in turn led to black workers seeing training as a means to achieving their demands for better wages. Here were the seeds of the NQF.

The struggle to persuade employers to accede to worker demands continued into the 1980s. In 1989 the National Union of Metalworkers of South Africa established a research group, comprising workers and union officials, to formulate recommendations on training.

On the assumption that skills development would lead to better wages, the group formulated a proposal based on a staged improvement in skills.

The proposal stressed the need not only for basic education, without which workers would not be able to access the proposed system, but also for portability and national recognition of training so that workers would not be at the mercy of a single employer. The Congress of South African Trade Unions (COSATU) formally adopted the proposal in July 1991.

The mid-1970s also witnessed a demand for change in education, spearheaded by the non-governmental education sector. The Soweto student uprising of 1976 was followed by nationwide student protest. By the 1980s the entire education system had been discredited and rejected.

Non-governmental education sector resistance resulted eventually in the formation of the National Education Policy Initiative (NEPI), which set about developing proposals for the restructuring of the formal education system. Drawing on discussions with a wide range of interested parties within the democratic alliance, the NEPI reports and framework, published in 1992, were premised upon the principles of non-racism, non-sexism, democracy and redress, and the need for a non-racial unitary system of education and training.

COSATU was closely involved with the NEPI process - an alliance that continued through to the democratic elections of 1994.

Despite repeated resistance to worker and student demands for change, the government of the day came increasingly to appreciate the inappropriateness, and ultimately the unsustainability, of its rejection of such demands. Then president FW de Klerk's announcement in 1990 of the government's intention to dismantle apartheid gave added impetus to, and was symptomatic of, the change of policy towards worker and student demands.

The then department of manpower, through the National Training Board, had embarked from the 1980s upon a number of initiatives, notably the restructuring of the apprenticeship system into a competency-based modular training system run by autonomous industry training boards. However, unions viewed the process as flawed, not only because it excluded workers but also because the proposals emanating from the initiatives were narrowly focused on apprenticeship to the exclusion of basic education, which unions saw as a point of access to skills training.

After years of conflict the department of manpower and the trade union federations reconvened in 1992. The then department of education simultaneously initiated its own process of policy discussion, which culminated in the Education Renewal Strategy (ERS). The democratic alliance within the education sector was invited to participate in the process, but declined the invitation on the grounds that the initiative lacked legitimacy. The ERS advocated three streams - academic, vocational and vocationally orientated - a system the democratic alliance found unpalatable. The education employer sector did, however, participate in the process, advocating a seamless framework similar to that adopted by Scotland and New Zealand.

The 1992 meeting of the department of manpower and the trade union federations resulted in the formation of a task team, which established eight working groups charged with developing a new national training strategy. The working groups had representation from trade unions, employers, the state, providers of education and training, the African National Congress education department and the democratic alliance.

1994 saw the publication of three documents that laid the foundation for the SAQA Act (1995): the ANC Policy Framework for Education and Training (1994); the Discussion Document on a National Training Strategy Initiative (1994); and the Implementation Plan for Education and Training (1994). White papers on Education and Training (1995) and on Reconstruction and Development (1994) followed, both of which underscored the need for the development and implementation of the NQF.

An Inter-Ministerial Working Group drafted the NQF Bill, which was passed into law as the South African Qualifications Authority Act in October 1995.

Source: The South African Qualifications Authority

Published in *The Mail and Guardian*, 8 February 2001

This article contains a range of local and specific knowledges important to this study. Some of these are listed below:

The earliest "seeds" of the South African NQF germinated within the rebellion to the racist behaviour of white employers and managers that refused to pay black workers living wages. Black workers expected that improving their skills would force employers to pay better wages. More than

twenty years later, in 2005, SAQA's NQF Impact Study (SAQA, 2005b) concluded that the links between qualifications and salaries were still difficult to identify, even more difficult to quantify.

Another local memory is located in the 1991 COSATU proposal that focused on ABET, portability and national recognition of training. From the article it is evident that the underlying purpose was to protect employees from the abuse of a single employer. National recognition and portability would force employers to recognise improvement in the skills of black workers. Turning again to the NQF Impact Study (SAQA, 2005b), it was found that portability was still lacking by 2005.

The gradual but relentless discrediting of the apartheid education and training system, spearheaded by NGOs with support from COSATU, represents another local memory. Culminating in the publication of a range of National Education Policy Initiative (NEPI) reports (e.g. on *Human Resources and Development* and *Governance and Administration* in 1992, and *Adult Education* in 1993), the Non-Governmental Organisation (NGO)-trade union alliance was a major contributor to the eventual change of policy towards worker and student demands - ideals that were only to realise much later, as noted in a press article in 2004:

Perhaps this is because so many are benefiting from the work of the NQF and SAQA. For people who have been deprived by a political system of the opportunities to obtain the certificates that symbolise educational achievements, the changes in education and training do not amount to a paper chase, but to dignity and opportunities (*This Day*, 17 August 2004).

Juxtaposed with the trade union developments, a government process took place to transform the apprenticeship system. The attempts were discredited by the unions, mainly because ABET was largely excluded. By 1992 some agreement was reached and eight working groups were established to develop a new national training strategy. Working Group 2 was tasked to investigate a national qualifications framework. Underlying their recommendations was a strong emphasis on the NQF as 'a vehicle for an integrated approach' (National Training Board [NTB], 1994:92). A recent comment by Van der Merwe (2004) summarises the developments well:

The NQF was established to assist and legitimise the workplace as a representing the opportunity of vocational qualifications. Under the previous dispensation, apprenticeships were primarily opportunities for workplace experience, on the basis of educational qualifications and summatively assessed via a Trade Test. Even here, the education and workplace experiences were seen as of different value and driven by different departments. Given the recent focus by government, via the Skills Development Acts, and SAQA Act,

and supported by the Growth and Development Summit, the trend has been to move to legitimatising vocational qualifications.

A third parallel development was steered by the Department of National Education (DNE). Resulting in the Education Renewal Strategy (ERS) that advocated three streams: *academic, vocational and vocationally orientated*. The proposal for three streams was not unanimously accepted, although participation continued in an attempt to influence the DNE towards the “seamless” frameworks that were developing in Scotland and New Zealand. COSATU (2003) described the process as follows:

...the product of hard, serious and difficult negotiations amongst the strong positioned nationalists and democrats. It further emanated from the alliance’s strong engagements with the opposition of change at the time...

In summary, the following local memories have been identified in this section:

- black workers expected that improving their skills would force employers to pay better wages;
- black workers expected that national recognition would protect them from the abuse of particular employers;
- the discrediting of the apartheid education and training system was spearheaded by the NGO-trade union alliances;
- the transformation of the apprenticeship system, although initially opposed by the unions, eventually resulted in the recommendation for an NQF as a vehicle for an integrated approach; and
- even during the early NQF discussions, the DNE favoured a three stream approach, despite the fact that stakeholders disagreed.

4.4.3.3 Memories of the NQF being inextricably linked to power

Moving beyond the events that led up to the development of the draft NQF Bill and the eventual SAQA Act in 1995, empirical evidence dated directly after the passing of the SAQA Act and thereafter, explicitly mentioned the local perception that the NQF was inextricably linked to power. The following are some examples:

Education [NQF] bill targets division of powers (*The Argus*, 10 August 1995).

Bhengu's bid to close the books on apartheid education - through two Bills he tabled in Parliament yesterday - could be set for a stormy passage because of the powers he has given himself in the process (*The Daily News*, 5 September 1995).

Other more general concerns focused on the affordability of 'ivory tower degrees' (*The Argus*, 14 July 1995) and fears of a 'loss of autonomy and of being forced to tow the Government party line - or risk losing funding' (*The Daily News*, 3 June 1997). More recent evidence also points to a link between the NQF and the exercise of power:

There were two different conceptual understandings of what the framework was all about. We had for years the experience of Higher Education not even wanting to move towards that. They wanted to cling to qualification and they do not want to change because it is convenient...The NQF has shaken HE institutions and encourages a focus on skills development (Representative from SACE in SAQA, 2004g).

Whatever reasons are given, and however they try to disguise what they are doing by changing titles of qualifications and by rewriting the descriptions of their qualifications in "SAQAnese", traditional universities and technikons are trying to maintain the status quo as far as their learning programmes are concerned. That means they are striving to maintain parallel higher educational qualifications (Dixie, 2004).

NAPTOSA (2003) made the point that in holistic models, such as the NQF, there will always be contestation, adding that such contestations could be resolved:

In a holistic model, such as the integrated NQF, there will be more pieces, more debates and more contestations but also more benefits. We need to work through these in order to resolve the contestations through the unifying vision and transformational agenda of the NQF policy itself.

Another example is provided by Lyceum College (2003), explaining that vocationalists welcomed the NQF, while public institutions remained unaware:

The workplace and vocational providers have with the SETAs very much taken the opportunity to develop the workforce with great zeal. It is interesting that the change was met by vocational educationalists with open arms, and yet the public institutions have until recently remained unaware of the new environment and legislative impact of the National Qualifications Framework (Lyceum College, 2003).

Another example of power in the NQF discourse is the perception that SAQA's power was being taken away through the review processes:

We were very saddened by the changes which were suggested [in the draft HEQF], particularly: (1) Eliminating Unit Standards; (2) *Reducing of SAQA to an organisation with no real power*; (3) Ignoring RPL; (4) Ignoring life-long learning... We ask that you consider very carefully what changes are made by DoE and the Council for Higher Education and that you take care not to "throw that baby away with the bathwater". The current system is not without flaws, but it should be reworked sensitively and carefully (Heartlight, 2004, emphasis added).

More examples that focused on sectoral territoriality and power struggles included the following:

...the greatest weakness of the NQF is in my opinion inflexibility of certain stakeholders. I refer to higher education, flexibility of higher education to acknowledging that there are other forces which are credible and which deliver quality education (Representative from a private provider in SAQA, 2004c).

In 1994 all parties participated in and bought into a vision of transformation that included the development and implementation of an integrated NQF as well as the intended outcomes of that process. It was clear that, as SAQA became fully operational, there was the necessary political will to ensure that it happened. It would however appear that, over time, sectoral interests have again become more dominant and that political will has all but disappeared in some sectors. As evidenced earlier in this submission: the vision has not changed; the transformation agenda has not changed; support for the NQF persists but, because of sectoral territoriality and power struggles, there is now a divide between the two lead departments and the sectors which fall within each of them (NAPTOSA, 2004).

The first weakness that is noted is that of instabilities and lack of coherence with the higher education sector. The reluctance to engage with the NQF, the considerable opposition and the attempts to force a power shift are all examples of the incoherence between the NQF and higher education. The often-mooted disjuncture between unit standards and qualifications based on exit level outcomes is another example of the deeper underlying challenges facing the higher education sector (SAQA, 2004c).

...they [the Departments] don't want to give up the whole power to such a statutory body (SAQA staff member in SAQA, 2004c).

...the ideology behind the gate-keeping is about the vested interests in terms of the power block... (SAQA Manager in SAQA, 2004c)

Underlying a comment from the SACP (2004) was an acceptance that complete consensus may never be obtainable in a contested area such as the NQF, suggesting that the notion of "consensus" should rather be replaced by "dialogue":

There is a need to discuss whether the concept of *consensus* should be replaced by *dialogue* as a key principle underlying delivery, as consensus building is taking long and may not be achievable always (SACP, 2004, emphasis in original).

Public differences (and subsequent resolutions) between the DoE and DoL offer more local memories of the existence of power struggles:

In a first for South African politics, a government minister has publicly attacked a cabinet colleague. Labour Minister Membathisi Mdladlana yesterday flayed the education system for what he termed "cosmetic transformation and a lack of co-ordination", particularly with his ministry... Mdladlana said he was frustrated at the lack of co-ordination between the ministries of education and labour... (*The Star*, 2 September 2004).

Minister of Labour Membathisi Mdladlana's blistering attack on the national Department of Education this week has blown the lid off tensions simmering between the two departments since 2001... "I am very frustrated as Minister of Labour" *The Star* quoted the Minister as saying: "We have to link education with training - what is frustrating is when you can't help because you train people and they don't know what to do after that... Mdladlana said it was a nightmare to review the NQF with the Department of Education to ensure a seamless link between training and education. "All we are doing is fighting for turf. There is a need to have education and training under one roof" (*The Mail and Guardian*, 3 September 2004).

The Department of Education is committed to the development and implementation of the National Qualifications Framework, Deputy Education Minister Enver Surty said in Johannesburg yesterday. Surty told delegates from South Africa and other countries at the Q-Africa 2004 conference that his department was also committed to working with other stakeholders, including the Labour Department, to achieve this goal (*The Sowetan*, 16 September 2004).

The following statement by UMALUSI (2003) is another important example:

In some respects UMALUSI probably enters the debate on the NQF with an advantage. As a new ETQA, UMALUSI has not significantly invested in the current NQF regime. This is not only because the Council is new, but also because it has experienced difficulties with the current framework. It is perhaps easier for UMALUSI to align itself with the new proposals than for the “older” ETQAs.

A number of observations can be made from UMALUSI’s statement. The most notable is that UMALUSI seems to be aligning itself to the recommendations emanating from the reviews, rather than showing a commitment to the current structures – a reference such as “not having invested in the current *regime*”, supports this point.

4.4.3.4 Memories that South Africa has a history of non-participation in government structures

As was also noted in the first section on the history of the NQF, and in particular the discrediting of the apartheid education and training system and the opposition to the DNE’s Education Renewal Strategy, South Africa has had a legacy of non-participation in government structures. SAQA (2003) described it as follows:

Coming from a history of non-participation in governance structures, it has taken time for our nation to appreciate the importance of the principle of transparency of operation. However there is a growing appreciation for the stakeholder principle and the significance of public participation, albeit that process delays are attributed to the need for multilevel consultation.

4.4.3.5 Memories that the NQF was not adequately marketed

Another local memory suggests that the “product” of the many consultations and processes that led up to the passing of the SAQA Act in 1995 was not adequately marketed. Plagued by a lack of resources and most probably a severe underestimation of the task at hand, SAQA and the DoE were facing an uphill battle as exemplified from comments by a reporter that attended a 1997 briefing. The following is an extract from an article entitled “Marketing creates confusion” – ironically the reporter’s misinterpretation of the NQF as a “new curriculum” provides support for her own argument:

There was an exodus to the car park after tea, as many in the congregation saw no point in staying for the official panel discussion scheduled for the late afternoon. The department had missed a golden opportunity to clear up misconceptions and allay fears of the NQF amongst the flock. Instead, it had alienated both cynics and supporters by preaching a gospel and forgetting communion. If the new curriculum is to be effectively 'implemented, without delay, then this kind of oversight must not be repeated...The department must revisit its marketing strategy for the NQF and ensure that the platitudes of the system gone before are not repeated when trying to sell the system of the future (*The Teacher*, April 1997).

4.4.3.6 Memories that SAQA was established as a substitute for a Ministry of Education and Training

The non-establishment of the combined Ministry for Education and Training in 1994 dealt a severe blow to the NTB's vision for the NQF as a vehicle for an integrated approach (NTB, 1994). Viewed as contributing to mistrust and a detriment to the system, it was agreed that the separate Ministries would be balanced with a statutory body located between the two. The following comments support this local memory:

...these Departments continue to operate in isolation, often to the detriment of the system and the Learners it must serve. This in turn has led to a perpetuation of the separation of Workplace Learning and Discipline-based Learning...any mistrust that might have emerged has been between the Departments of Education and Labour due to their separate administration of the Education and Training systems respectively (Business South Africa [BSA], 2003).

Need for uniform structure behind the birth of SAQA (*The Star*, 27 October 1997).

4.4.3.7 Memories that there was a mixed reaction to the SAQA Act

Related to most of the previously mentioned points, the empirical data also contained various examples of resistance to the passing of the SAQA Act. These included concerns that universities would lose control over who they admit and what they teach:

...changes like these will undoubtedly be perceived as radical and shocking in institutions where resistance to tampering with academic tradition is strong. It is not so much that universities are opposed to flexible entrance requirements; it is the perceived loss of control over who they admit and what they teach. The Committee of University Principals (CUP)

moved to get higher education institutions excluded from the new education legislation passed in November, since not enough research had been conducted on the issue (*The Mail and Guardian*, 26 April 1996).

The Minister of Education was accused of trying to rush (*The Citizen*, 13 September 1995) and “railroad” legislation that was ‘worked out in secrecy with the unions’ (*The Star*, 1 August 1995), without consulting the academic community – accusations that were refuted by the Minister:

The allegations levelled in the media against the Bill seem to depart from the truth. The Minister of Education has been accused of trying to railroad a Bill worked out in secrecy with unions, without the involvement of the academic community (*Ibid.*).

The NQF legislation was seen as complex and hierarchical:

Labour analyst...says that the whole act is a very complex piece of legislation. It's a hierarchical, not a flat structure, she says. "Once you think you've come to grips with it, then you go on to the next level and it's even more complicated. It is also administratively difficult to implement but, at the end of the day, you will have workers with portable skills" (*The Mail and Guardian*, 26 May 2000).

During the review period it was noted that new NQF legislation was needed to remove the inconsistencies and duplications, implying that the existing legislation was inadequate:

A new NQF Bill is being drafted by the education and labour departments to remove "inconsistencies and duplication" in the laws relating to SA's education qualifications. The final policy, to be submitted to the cabinet for approval early next year, will force higher education institutions to produce skilled graduates for the labour market and companies to develop their existing human resource skills base... Ultimately, the new qualifications framework should recognise the distinct labour market and education and training system interests, says Molapo (*Business Day*, 28 July 2003).

4.4.3.8 Memories of previous ideas

Extensive evidence pointed towards agreement that the recommendations emanating from the review documents, particularly the *Consultative Document* (DoE and DoL, 2003), were not new ideas, but rather a return to ideas that were previously debated. Examples are discussed below.

The most obvious return to previous ideas is found in the *Consultative Document* recommendation that three Qualifications and Quality Assurance Councils (QCs) be established. Originally put forward in 1995 (HSRC, 1995), the QCs were not included in the Inter-Ministerial Working Group's (IMWG) draft NQF Bill, and therefore also not in the SAQA Act (SA, 1995c):

The creation of three quality assurance councils is not a new idea. It was considered in the early debates on the NQF and was rejected primarily because it was considered that it would create an unnecessary layer of bureaucracy, adding to the costs and complexity of the system (INSETA, 2003).

The view of the SACP was that the creation of three overarching ETQAs would divide education and training and take us back to pre-1994. We therefore opposed this specific proposal (SACP, 2004).

Another example is a return to the debate on integration. As was noted earlier in this section on local memories, the education constituency always had reservations about the integration of vocational and academic qualifications. Although these concerns were downplayed in the period leading up to the SAQA Act, they were never dealt with adequately, and emerged again, albeit in different forms during the review period:

More importantly is the issues of access, redress, equity and quality has been compromised. When the NQF was designed the major arguments that were raised was that we want to get the majority of our people that were marginalized by the system, and are outside of the formal education system, out of fault not of their own, who have accumulated skills and experience in the workplaces and in the communities (Representative from the DoE in SAQA, 2004f).

The Inter-NSB Committee (2003) and NBFET (2003) agreed:

The *Consultative Document* does not propose a "new perspective on the NQF" - it proposes a pre-1994 system that fragments and systematically disempowers stakeholders, other than the two Departments, who have invested considerably in the process of transforming education and training in South Africa (Inter-NSB Committee, 2003).

The three-stream model proposed in the Discussion Document closely resembles the CUMSA model (Curriculum Model for SA) that was introduced in 1991 and published as CUMSA 2 in 1994. The return to a model that was rejected at that time cannot be supported by the NBFET (NBFET, 2003).

4.4.3.9 Memories of commitment to the NQF

This local memory is based on various comments that NQF stakeholders were becoming fatigued with the continual changes proposed in the review documents:

I think there was great support but we are fast approaching a stage when that support is waning. We should do something about this (Representative from the DoE in SAQA, 2004f).

Importantly many education and training providers, more so the private and small-, medium- and micro enterprise (SMME) providers, raised concerns that the substantial investments incurred as part of NQF compliance had not brought about any substantial benefits. Of even more concern to this constituency was the fact that the providers that had opted to stay out of the NQF were still operating without the restrictions imposed by the NQF. These “rogue” operators were in direct competition with the “aligned” providers:

APPETD is concerned at the way in which the draft HEQF policy document seemingly throws out concepts and principles which were embraced and agreed on by all stakeholders in the run-up to the establishment of the NQF in terms of the SAQA Act (Act 58 of 1995). It took providers a long time to familiarise themselves with the new system. The changes that needed to be made in the organisations were fundamental and costly (APPETD, 2004).

According to the Association for Skills Development Facilitators of South Africa (ASDFSA) (2003) employers were still more positive, although it can be assumed that their support is of a more overarching nature, focusing on human resource and skills development:

Employers indicated that the implementation of an integrated NQF is starting to make a positive impact on the workplace. It seems premature to change the philosophy of the NQF that employers have eventually bought into. It is rather advisable to resolve the current operational issues that are affecting a more efficient and effective implementation of the NQF (FASSET, 2003).

4.4.3.10 Memories of disqualified constituencies

The empirical data contained numerous statements from, and about, specific constituencies within the NQF discourse that were being disqualified and seen as inadequate. A number of such examples are discussed below.

Private providers were viewed by the CHE (2003) as unable to meet the country's needs:

We do not believe that private providers have the expertise or resources to meet the country's needs for higher education and training.

The standards setting bodies, the NSBs and SGBs, were severely criticised for contributing to anarchy and chaos:

Standards setting has been chaotic and difficult (Representative from the DoE in SAQA, 2004f).

The universities also welcome the emphasis on qualifications and the ideas of qualification mapping and design whose 'planning thrust' tends to contrast sharply with the current anarchy and free-for-all which reigns in the twelve SAQA NSBs (SAUVCA, 2003).

According to Masango (2004) and others the role of the SETAs were downplayed in some of the consultation documents, most notably *The HEQF* (DoE, 2004):

The role of the SETAs seems to be underplayed or totally ignored.

In a similar manner, various concerns were raised about the previous technikon qualifications being relegated to lower levels on the NQF and are being left to "float" somewhere between secondary and university education:

The second interpretation is that the HEQF [DoE, 2004] favours traditional university type qualifications and that the CTP's current qualifications are relegated to lower levels on the NQF (CTP, 2004).

Technikon qualifications by contrast have struggled to gain recognition. They "float" vaguely in the public perception somewhere between secondary education and university education (Dixie, 2004).

Dixie (2004) ascribed this “disqualifying” of the technikon qualifications to the long-standing competition between universities and technikons:

At present there is much competition between traditional universities and technikons for funding both at the undergraduate level and at the research level...We really need to move away from this parochialism. For decades technikons have been trying to prove that their qualifications are as good as, or better than those of traditional universities. This is unhealthy competition (*Ibid.*).

A related point was the perception that comments on discussion documents were being ignored, especially when they came from less important constituencies:

It is unfortunate that the perception in the tourist guide training fraternity in the Cape is that for the sake of political correctness public comment is called for and then ignored (De Wal, 2003).

The [draft HEQF] policy fails to demonstrate that the Department of Education has integrated the comments made on the previous two policy drafts. Should these previous draft policies not be first agreed and implemented before adding further confusion and uncertainty into what is already an area of education under review? (Gibson, 2004).

Not all evidence was negative. According to a representative from the DoL in the Western Cape (in SAQA, 2005d) the NQF had resulted in improved recognition of qualifications from colleges that were previously viewed as stigmatic and inferior:

...we're coming from a history where it was regarded as inferior if you had a qualification from a FET College. Now, all of a sudden, it is recognised by the DoE and it has recognition throughout the world of work, it is no longer seen as inferior. At one stage people were not keen to go to Technical Colleges because of the whole stigma of having a college qualification.

4.4.3.11 Memories that the value of stakeholder involvement was questioned

A recurring theme, although more evident during some periods, focused on the value of stakeholder representation in NQF structures. The following comment by a SAQA Manager (in SAQA, 2004c) captures some of the underlying thinking:

We've come a long way in our understanding of stakeholders and the different level of commitment and participation in what that means. There are recommendations that could be thinned down and there could be a stakeholder representation that is also to some extent an expert representation to accelerate processes. That is a tension that needs to be maintained. Simple representation in terms of a stakeholder as being a body at a meeting but who doesn't participate or add any value to processes is not very helpful to the system. It also gives more weighting to those who do have the expertise and who then drive the system, because they can also say that it's a stakeholder driven process. It is quite complicated.

According to the Inter-NSB Committee (2003) SAQA ' may have erred on the side of conflating the stakeholder and technical roles'.

4.4.3.12 Memories of SAQA's role in NQF development and implementation

As mentioned on numerous previous occasions, the governance of the NQF became an important focus of many NQF discussions during the review period and even earlier. These discussions on governance in general, and SAQA in particular, are probably also the most obvious evidence of the underlying power struggles that are influencing NQF development and implementation. Importantly though, the NQF governance debates only represent the obvious symptoms resulting from the hidden causes.

In this section a number of local and specific knowledges referring to the role of SAQA are presented.

Starting with SAQA's own comments, the observation is made, based on a number of interviews with NQF stakeholders, that SAQA needed to fulfil a number of distinct roles:

- function independently as a dedicated body;
- give non-bureaucratic guidance, expertise and leadership;
- promote and maintain stakeholder involvement;
- promote advocacy and awareness; and
- develop and maintain the National Learners' Records Database (NLRD) (SAQA, 2004c).

SAQA itself raised a number of concerns about being sidelined and excluded in other national projects, most importantly the NQF review process itself:

SAQA's attempt to put in place a joint implementation plan with the Department of Education (23 June 1999) fell on deaf ears. This too was the response to consistent requests to the Department of Education for participation in NSB structures. SAQA's unrelenting efforts to work with two key higher education structures i.e. the Department of Education – Higher Education branch and the CHE, on various matters met with little or no response (SAQA, 2003).

The Department of Education's communication strategy including Tirisano, did not include any notable communication of SAQA's role in relation to its activities. In fact in terms of communication, there is a significant absence of the role of SAQA and the NQF, in communications from the Department of Education and the Council on Higher Education. In other words, rather than pooling resources to create a holistic picture of the education and training system, SAQA has found that some stakeholders have included the NQF and SAQA incidentally in communications while others appear to have been almost purposeful in omitting the contribution of SAQA and the NQF (*Ibid.*).

A SAQA staff member suggested that SAQA should find ways and means of interacting directly with NQF stakeholders:

...we don't deal with these providers. We deal with ETQAs, the ETQAs have to deal with providers, you know that kind of link with your stakeholders which is not a direct link sometimes, it's an indirect link, as a result SAQA can never actually be sure that this is our failure we have failed because there is that indirect link that we are having... We should be having some ways to interact directly... (SAQA staff member in SAQA, 2004c).

A member of the Inter-Ministerial Working Group (IMWG) (involved in the development of the SAQA Act), made a number of critical comments, arguing that SAQA had grown into a controlling bureaucracy:

[SAQA] has progressed from being a guiding organization/consultancy to being a bureaucracy. What [SAQA] is now doing is feeding people answers and having so much control over what people do. It is taking the initiative from people and in fact reducing them to following a process... (IMWG member in SAQA, 2004c)

Isaacs (in *This Day*, 17 August 2004) made the point that '[o]ne of the difficulties for SAQA includes being wedged between the departments of education and labour'.

4.4.3.13 Memories that schooling is ring-fenced

As noted in *The Teacher* of 23 October 1998, schooling (and probably also Higher Education) represents a unique constituency that does not react to radical transformations, such as the NQF:

Schools, in particular, serve a distinctive constituency and play a particular educational and socialising role with respect to young people. They provide a foundation of general education, as well as more specific knowledge and skills to pre-employed youth. They also tend to occupy a distinctive place in the minds of parents, young learners and educators, which reflect deep-rooted cultural roles. For these and other reasons, changes in schooling worldwide tends to be gradual and incremental.

NAPTOSA (2003) offered a practical example of how the schooling sector had remained “outside” or “alongside” the NQF:

...to date, there are no GETC [General Education and Training Certificate] or FETC [Further Education and Training Certificate] qualifications (for schools) registered on the NQF. It is as if the DoE regards qualifications for schools as being “outside” or “alongside” the NQF - but not within the Framework. The GETC and FETC schools’ qualifications are crucial within the Framework and their absence leaves a “vacuum” on the NQF. This is possibly a reason why the NQF implementation has been perceived as being “too slow”. Schools are a very large and significant constituency and concerns are repeatedly expressed that, whilst the NQF is becoming populated with other qualifications, these important qualifications are still “missing”!

Schooling and higher education also tend to be kept closely within the ambit of the responsible Minister. One reason for doing this may be purely political, as changes to historically entrenched traditions and values in schools and universities that are too radical, may not bode well for such a Minister’s future (cf. SAQA, 2005e).

4.4.3.14 Summary of local memories

The local memories identified in this section are summarised in the table below.

Local memories in the NQF discourse	
1	Memories of the history of the NQF
2	Memories of the NQF being inextricably linked to power
3	Memories that South Africa has a history of non-participation in government structures
4	Memories that the NQF was not adequately marketed
5	Memories that SAQA was established as a substitute for a Ministry of Education and Training
6	Memories that there was a mixed reaction to the SAQA Act
7	Memories of previous ideas
8	Memories of commitment to the NQF
9	Memories of disqualified constituencies
10	Memories that the value of stakeholder involvement was questioned
11	Memories of SAQA's role in NQF development and implementation
12	Memories that schooling is ring-fenced

Table 28: Local memories in the NQF discourse

4.4.4 Identification of *knowledges opposed to power* in the NQF discourse

4.4.4.1 Introduction

In the third stage of the genealogical critique knowledges opposed to power are interpreted as follows (see *Chapter 2* for a more detailed discussion) (from Foucault, 1980):

Knowledges that are opposed not primarily to the contents, methods or concepts of a science, but to the effects of the centralising powers that are linked to the institution and functioning of the NQF discourse.

4.4.4.2 Knowledges opposed to bureaucratisation and loss of autonomy

Some of the earliest knowledges that opposed power in the NQF discourse were concerned with the centralising effect of the NQF, specifically the increased bureaucratisation and loss of autonomy.

The first evidence is found in an article in the *Eastern Province Herald* of 27 June 1995. Entitled "Thought police feared", the article describes the initial reaction of the university sector to the draft NQF Bill. According to the article, the universities were unaware of the developments that

preceded the draft NQF Bill and really were only in a position to react to it as it was already passing through parliament:

Unaware until recently that the draft Bill was about to slip through Parliament, the Committee of University Principals [CUP] called a hurried meeting earlier this month to inform members of the looming crisis. Last Friday, virtually every university in the country, handed submissions opposing the move to the Education Ministry in a last-ditch effort to get themselves excluded from the legislation.

An article a day later, entitled “Academic freedom under threat” in the *Cape Times* of 28 June 1995 highlighted some of the universities’ concerns, notably also interpreting the NQF as having an influence on “what could be taught” at the universities:

The concern in South African universities about draft legislation which might be used to impose on them set curricula with uniform qualifications should be sufficient to deter the government from any such ill-considered step. Proposed legislation aims at bringing all educational institutions under a single administration to be known as the [South African] Qualifications Authority. University spokesmen fear it might enable the state to prescribe what could be taught, and how, failing which universities would risk losing their government subsidies. If this is the effect of the legislation, nothing could be more calculated to downgrade the international standing of South Africa’s best universities and devalue their degrees. Universities cannot be run like schools, with syllabuses applied by rote.

The article went as far as to compare the threat of the NQF to their autonomy with the “apartheid government at its most autocratic”:

They [universities] should be the sole arbiters of the courses offered, not bureaucrats with measuring tapes and compartmentalized minds. The fear is that the threat to university autonomy can be compared with the one launched many years ago, but for different reasons, by the apartheid government at its most autocratic (*Ibid.*).

Subsequent to the two articles discussed above, the then Minister of Education, Sibusiso Bengu, attempted to allay the fears with comments such as the following:

To even imagine that a Government committed to democracy, transparency and public accountability could contemplate the creation of “thought police” is utter nonsense (*The Star*, 3 July 1995).

Two days later *The Star* (5 July 1995) went to print with an article entitled “Consult the universities – the NQF Bill has merits but it needs the input of the universities”. Clearly recognising the “oversight” from government, it now became important to make sure that the promulgation of the NQF Bill was not derailed. The debate continued in subsequent articles: *The Argus* (14 July 1995) ran a story entitled “Can we afford luxury of ivory tower degrees?”, while *The Star* of 1 August 1995 went with “No malice in spirit of Bill”, addressing the allegations that the NQF Bill was ‘seriously flawed’ (*Ibid.*).

An important article followed on 10 August 1995 in *The Argus*. This time entitled “Education bill targets division of powers”, the article discussed the extent to which the NQF Bill and the National Education Policy Bill would ‘regulate the division of powers between [the Education] Ministry and provincial education authorities’ (*Ibid.*). Two subsequent articles questioned the extent of the power that the Education Minister had given himself (*The Daily News*, 5 September, 1995 and *The Citizen*, 7 September 1995). In an important development the CUP was denied a hearing in Parliament to discuss the powers of the proposed qualifications authority (*The Citizen*, 7 September 1995), due to concerns that this hearing would lead to a delay in the passing of the Bill (*The Daily News*, 8 September 1995).

More articles followed:

- “Opposition objects to rushing of Bill” (*The Citizen*, 13 September 1995).
- “Radical proposals for higher learning” (*The Mail and Guardian*, 19 April 1996).
- “Visions of a dizzy new highway” (*The Mail and Guardian*, 26 April, 1996):

No wonder the engineering academics embrace the new concepts with such enthusiasm: visions of a dizzy highway of teaching and learning pose yet more challenges for complicated sums around structures and balance. The same can't be said of the philosophers and theoreticians who can think of nothing worse than imposing a shape - a framework of evaluation, of exit and entry levels - on their lectures about the infinity of meaning.

- “One system needed to embrace all institutions” (*The Sunday Independent*, 28 April 1996).
- “[Member of Parliament] rejects higher education sector’s opposition to a new qualifications framework” (*Business Day*, 11 October 1996).
- “New criteria will affect colleges” (*The Citizen*, 14 October 1996).
- “Very process of learning is set to change” (*Business Day*, 18 October 1996).

4.4.4.3 *Knowledges opposed to the proposed changes to the NQF*

The empirical data also contained extensive references to disagreements about the manner in which changes to the NQF were being proposed. Ranging from calls that the NQF should be scrapped to accusations of purely political purposes, disagreement was substantial:

The NQF should be scrapped and replaced by a national campaign which had literacy as a central feature, rather than a neglected side show (Democratic Alliance spokesperson in African National Congress [ANC], 2000).

Just about all the problems that are purportedly resolved by turning the current NQF on its head, could and should be resolved within the current structures. The changes are not being introduced to resolve these problems in the structure and operation of the NQF, but are being introduced *for other political reasons* - and this reason for introducing the changes is unacceptable (The South Africa Institute of Chartered Secretaries and Administrators [ICSA], 2003).

4.4.4.4 *Knowledges opposed to giving the CHE too much power*

On various fronts the increased authority and power of the CHE was noted. In most cases the comments were concerned with the diminishing power of SAQA that would be associated with the increase of power of the CHE.

The first evidence is taken from a news article in the *Business Day* of 6 March 1998:

An industry source said the new [CHE] council was trying to exclude outside role players and seeking to take over responsibilities from SAQA.

APPETD (2004) raised concerns about the CHE assuming responsibility for standards generation and quality assurance, arguing that this would allow the CHE to take on 'the role of both referee and player in higher education'. APPETD also asked whether SAQA would then have the authority to intervene in disputes and appeals. APPETD also questioned the draft HEQF's (DoE, 2004) recommendation that the HEQC would have the option to collaborate with relevant statutory and non-statutory professional bodies and agencies:

The use of the word "may" in this section suggests that collaboration will take place only at the discretion of the HEQC (APPETD, 2004).

The CHE itself (CHE, 2003) was critical of the proposals in the *Consultative Document* (DoE and DoL, 2003) for the “demotion” of SAQA to a “toothless” organisation ‘unable to carry out its statutory role of overseeing the implementation of the NQF’. According to the CHE:

This removal of “powers” from SAQA to the Interdepartmental Task Team, on the one hand, and to the QCs, on the other hand, will lead to confusion over areas of responsibility and a serious blurring of line-management functions (*Ibid.*).

Education and Training Quality Assurance body (ETQA) Managers were most vocal in their criticism of the CHE’s powers:

There is a perception that CHE is the authority and that they have more power and more relevance in the system than any other ETQA, and that’s a fact...And when I think of the way that they have been doing it it’s been very aggressive and very unprofessional (ETQA Manager in SAQA, 2005c).

The CHE will do what the CHE wants to do. In any case we can either participate or we can leave. It’s just being horrible (*Ibid.*).

...the CHE is all powerful and that they had the power to close institutions down if they felt like it.... (*Ibid.*).

A provider had a similar message:

I also learned that the recent policy imperative which is going to be probably taken into law early next year will give the CHE a lot of power...I’m told our existence as an institute will be threatened by that (Representative from a higher education provider in SAQA, 2005e).

SAQA did not directly challenge the CHE, but raised concerns about the “delegation model of operation” that the CHE was proposing in place of the SAQA supported co-operative Memoranda of Understanding (MoUs) between ETQAs:

The MoU was identified as the mechanism through which the contesting ETQAs would express their co-operation in dealing with overlaps in qualifications and standards, duplication, qualification articulation and dispute resolution. This approach has consistently been resisted by the band ETQAs, notably the CHE, which has been holding out for a delegation model of operation and not a co-operative partnership between equals (SAQA, 2003).

4.4.4.5 Knowledges opposed to giving the DoE too much power

Just as was the case with the CHE, the empirical evidence included concerns that the DoE was trying to increase its influence at the expense of other stakeholders, while also disregarding the objectives of the NQF:

[The draft HEQF] seems to focus on increasing the power and influence of the DoE at the expense of other stakeholders and a unifying NQF (Reinecke, 2004).

...what has become increasingly clear is that DoE has no understanding of anything that happens outside the formal academic environment and are not willing to learn and not willing to concede that what the academy of financial markets is doing it's making contributions...Everything that you build up in the NQF is being destroyed by the DoE...One wonders about the agenda of the DoE sometimes (ETQA Manager in SAQA, 2005c) .

4.4.4.6 Knowledges opposed to giving higher education institutions too much power

SADTU (2004) warned that institutions with too much power had the tendency to use it as an exclusionary measure:

Our history has demonstrated that placing power of access on the institutions do not always have the desired effect; we are referring the so-called "unintended consequences". There is at times a tendency to use this power as an exclusion measure.

4.4.4.7 Knowledges opposed to power imbalances

Related to the previously mentioned knowledges opposed to power, the review of the NQF was criticised for not taking power imbalances into account. In fact, the recommendations emanating from the review process were seen as contributing to the power struggles that were having a detrimental effect on the development and implementation of the NQF. A selection of examples is discussed below.

INSETA (2003) argued that the *Consultative Document* (DoE and DoL, 2003) did not deal adequately with three issues: (1) The integrated approach to education and training; (2) The loss, damage and disadvantage to the transformation agenda of South Africa and (3) The power relationship contestations.

The CHE (2003) argued that the *Consultative Document* (DoE and DoL, 2003) ‘provides insufficient details to understand the “balance of power” that should exist between SAQA’s oversight role and the necessary autonomy of the QCs [Qualifications and Quality Assurance Councils]’, suggesting further that the lack of clarity ‘increases the possibility of bureaucratic “turf-wars” and jurisdictional ambiguities that will undermine implementation of the objectives of the NQF and HRD [Human Resource Development] strategies’ (*Ibid.*).

The Inter-NSB Committee (2003) was critical of the *Consultative Document*, as it was perceived to be:

...a compromised product of power struggles between the Departments of Education and Labour, rather than being about learners, or a national system of quality learning.

To add fuel to the fire, various stakeholders made the point that they were being excluded from the proposed NQF structures. Such examples include professional bodies that argued that their powers were being transferred to the QCs:

The functions and powers of the QCs mirror the powers and functions of professional bodies (SACSSP, 2003).

Another body that was excluded, was the newly established Higher Education South Africa (HESA):

We believe it is a major deficiency in the *Consultative Document* [DoE and DoL, 2003] that no role whatsoever is allocated to the organised [higher education] sector (the new body [HESA] emerging from SAUVCA and the CTP [Committee of Technikon Principals]) (University of Stellenbosch, 2003).

It was also noted that the role of employers should not be disregarded:

...it would be an oversimplification of the diversity and complexity of the world of work to claim that insights into trends and expectations can be comprehensively obtained from SETAs and that direct interaction with employers is no longer necessary (University of Stellenbosch, 2003).

Other examples of the existence of power imbalances included:

- perceptions that the new system, particularly the recommendations contained in the *Consultative Document*, is labour dominated (Oosthuizen, 2003 and University of Stellenbosch, 2003);
- perceptions that the recommendations contained in the draft HEQF (DoE, 2004) are education dominated: 'The Education bias is a retroactive step and destructive in the extreme' (Van der Merwe, 2004; also Halendorff and Wood, 2004 and SAUVCA, 2004);
- competition between NQF bodies should be avoided (De Wal, 2003 and Gibson, 2003);
- the three QCs demarcate the NQF into three silos that would lead to increased contestations (FASSET, 2003; NAPTOSA, 2003 and ICOSA, 2003);
- the distribution of qualifications across the QCs is based on the premise that institutions provide discipline-based learning and the workplace provides skills development - it is this very premise that the NQF challenges (INSETA, 2003);
- frequent use of the word "tension" in the *Consultative Document* is questioned: '...if the "tensions" were detailed by incompetent bureaucrats, then it is doubtful if they are valid tensions' (Thomas, 2003);
- mention that the bands are very different – similar QCs, modelled on the CHE, may be unsuitable (UMALUSI, 2003);
- various unsubstantiated generalisations that bring into question the mandate of the Departments (Inter-NSB Committee, 2003);
- sectoral territoriality and power struggles can sabotage the NQF (Dixie, 2004 and NAPTOSA, 2004); and
- omission of the word "training" from the description of bands, e.g. *The HEQF* document consistently makes reference to only Higher Education – this undermines the core NQF principle relating to the integration of education and training (Inter-NSB Committee, 2004).

4.4.4.8 *Knowledges that SAQA has to resist power*

As was discussed for the CHE and DoE (notably not for the DoL), SAQA's power relationships also come under scrutiny in the empirical data. Questions about greater clarity on SAQA's role in relation to the DoE and DoL were asked:

However, the basic relationships between the Ministries (and the inter-departmental NQF Strategic Team) and SAQA need clarifying. The rejection of a tripartite NQF Strategic Partnership with SAQA...begs the question as to what exactly SAQA's (power) relationship will be to the two Ministries, and what its role and functions will actually be in practice... (SAUVCA, 2003).

Important advice was given by a university principal (in SAQA, 2004c):

SAQA also has to resist power.

SAQA (2003) argued that its concerns about power contestations went beyond a lack of a single vision between the DoE and DoL, and it called for a prioritisation of the NQF project through funding and partnerships:

When SAQA speaks of “power contestations”, its remarks go beyond the lack of a single vision on the part of the Departments of Labour and Education, observed by the NQF Study [DoE and DoL, 2002]... This priority determination on the part of SAQA recognises government’s avowed responsibility to work in a clearly documented and resourced partnership with, and in support of SAQA’s NQF implementation leadership responsibilities.

In its comments, the National Board for Further Education and Training (NBFET) (2003) returned to the earlier, much debated development of two Ministries instead of one. NBFET suggested that the compromise was to be found in the implemented governance structures, i.e. SAQA and other NQF bodies. NBFET made a further very important point, stating that ‘there is no guarantee that tensions resulting from this separation will *not* prompt periodic structural reviews as ways to overcome these tensions’ (2003, emphasis added).

The Inter-NSB Committee (2003) made the point that SAQA initially concentrated almost exclusively on the disciplinary areas of knowledge-production – a move that produced conflict between SAQA, the DoE and the higher education sector:

In the first years of its existence, SAQA concentrated almost exclusively on the disciplinary areas of knowledge-production. This is hardly surprising since it was the environment familiar to everybody at the outset. Not surprisingly, in retrospect, it also produced significant conflict between SAQA and the DoE and the Higher Education sector which viewed the work of the NSBs as an intrusion on their 'turf'. It is only recently that the nature of knowledge-production in society has begun to be understood more fully. In particular, the advent of the SETAs has measurably contributed to this (Inter-NSB Committee, 2003).

4.4.4.9 Knowledges opposed to the internecine warfare between the DoE and DoL

Although implied in some of the previous points, it is necessary to discuss the mutually destructive power struggles between the DoE and DoL in particular. Taking into account that it may be overly

simplistic to generalise the position of the Departments, some of the main aspects of this “warfare” are identified from the empirical data, and discussed below.

The evidence suggests that the DoE (previously the DNE) had always favoured a tracked NQF, one in which the academic (later referred to as general), vocational (later general vocational) and vocationally orientated (trade, occupational and professional) pathways could coexist, albeit with limited articulation between them. The DoL (previously represented in the thinking of the NTB), on the other hand, favoured an integrated approach that rejected the rigid division between academic/theory and application/practice that was historically associated with, amongst other things, power (DoE and DoL, 2002 in Heyns and Needham, 2004). Clearly the battle lines were already drawn during the early conceptualisation period of the NQF:

It cannot be desirable for the country as a developing economy to have two Government Departments promoting conflicting qualification routes. One Government Department promotes qualifications where applied competence is demonstrated in a context (the Department of Labour and its focus on skills and knowledge in the workplace via learnerships) and a second Government Department promotes the achievement of qualifications or programmes of learning which do not require demonstration of applied competence in a context. This causes uncertainty and confusion and could result in certain stigma being developed on one or the other type of qualification i.e. one is “better” than the other - one is “more highly regarded” than the other (Gibson, 2004).

The battle has waged ever since. At the time of the promulgation of the SAQA Act (SA, 1995c) the DoL camp appeared to have the upper hand, finding support for a unified single pathway NQF. During the review period the recommendations moved towards the DoE’s favoured position, i.e. to two pathways, with an additional articulation pathway and even to three pathways with two articulation columns. The three pathways also formed the basis for the establishment of the three QCs (current consideration point towards only two QCs) that would be managed by the two Departments (once again, current considerations suggest that only the DoE will have this responsibility):

The DoE has gained the upper hand in the undeclared war with the DoL, and thus has taken control of two of the silos (HI-ED QC and GENFET QC) - this opens up the possibilities of the DoE gaining access, somehow, to the skills development levies - at the expense of learnerships...The level of damage being caused by this warfare is intolerable and the relevant ministers must be held responsible for their actions...(ICSA, 2003).

Despite being downplayed by the Ministers, the DoE/DoL “differences” were noticed by most stakeholders:

This NQF *Consultative Document* is merely an expression of the divisions between the two departments and thus represents a papering over of the cracks (a “band aid salve”) (ICSA, 2003).

It would seem that while pace-setters in Europe are embarking on a process of developing an integrated qualifications framework, South Africa (because of inter-departmental differences and absence of a political will to drive the process) is preparing to make a 180° turn - and head back to where we emerged from in 1994 (NAPTOSA, 2004).

...that the apparent turf-warfare between the DoE and DoL was unhelpful and that the proposed new framework must make clear that both the DoE and DoL work from the basis of a shared vision, and understanding of the national strategy for education and training. The SACP proposed that the two departments should move away from attempting to resolve their issues behind closed doors and open the debates to stakeholders. Whilst it is important that decisions are made, and debates should not go on for years, it is important that the issues are dealt with openly. There should be a serious attempt at rebuilding the national consensus on education and training that existed pre -1994, and which appears to have broken down during implementation (SACP, 2004).

The tensions that exist in the system between training as administered under the Department of Labour and education administered under the Department of Education are self-evident. These tensions have militated against successful achievement of an integrated system. The independent actions referred to regarding qualifications design clearly illustrate this fact (BSA, 2003).

Importantly, the DoE/DoL differences were starting to spill over into other ministries. The DoE and Ministry of Health were facing a similar dispute as noted by RAU (2004):

We recommend a final dispute resolution between the Ministry of Education and the Ministry of Health to incorporate nursing colleges into the mainstream of higher education in the interest of learners' qualifications progression.

In view of the inter-departmental differences, NAPTOSA (2003) asks two important questions, and calls for an investigation into the causes of the contestations around power and areas of influence:

- (1) What, exactly, is the cause of the tensions/differences between the Departments of Education and Labour?
- (2) How can these differences be successfully resolved in order to prevent the fragmentation of the coherent and integrated NQF?

It is hoped that this study, which aims to support the development and implementation of the NQF, will go some way towards at least starting to answer the difficult questions posed by NAPTOSA. The empirical data provide some keys that may be useful to unlock the answers to the NAPTOSA questions. These are discussed below.

A news article in *The Financial Mail* of 2 August 2002 provides the first key. The article highlights inconsistent legislation and incoherent policy development as undermining the NQF's implementation, but also notes that one of the reasons for tension between the Departments was that:

...the labour department feared [that] the band ETQAs established by the education department, were seeking undue influence over career-focused training.

...the education department feared that the SETAs, established by the labour department, were unduly influencing providers in the direction of unit standards-based qualifications without regard to the policies of the education ministry.

Another two articles from *The Mail and Guardian*, one published on 18 February 2005, the other on 4 March 2005, provide some further insight into the possible causes for the DoE/DoL tensions, and also the more recent attempts to try and address these differences

The NQF delay was allegedly caused by a power struggle between the departments of education and labour...Mdladlana and Minister of Education Naledi Pandor this week denied that they had found it difficult to work with each other in the past. Mdladlana reportedly blamed interdepartmental friction on the "attitude of some officials". A recent Business Report quoted him as saying: "The officials in question had been advised to get out if they could not cooperate". Senior departmental officials this week told the *Mail and Guardian* the tension between Mdladlana and Bird had long been brewing. "They had differences on the content of the NQF" said an official, who asked to remain anonymous (*The Mail and Guardian*, 18 February 2005).

...instead of working together to address the skills backlog that hampers the economy, the two departments spend much time fighting for turf. "The problem was not with the ministers.

It was their departments and their officials that had problems. Philosophically the tension seems to pit the educationalists against the vocationalists,” said Ken Hall chairperson of the education and training committee of the South African Chamber of Commerce (*The Mail and Guardian*, 2 March 2005).

The CHE (2003) advised that the NQF funding department and overseeing department should be one and the same:

The portfolio division of responsibilities should not lead to situations where the funding of provision is located in one government department and the quality assurance of programmes and qualifications is located in an agency that reports to another government department. This will severely undermine the capacity of the Department of Education to steer and transform higher education through planning, funding and quality assurance.

Equally importantly, the CHE (*Ibid.*) warned that the NQF should not ignore the power of different types of learning:

The power of different types of learning is a reality that any NQF has to start from. If it does not, it will be a barrier to progression - not a way of overcoming barriers.

Another key may be found from comments by the CHE (2003) that the recommendations contained in the *Consultative Document* (DoE and DoL, 2003) would effectively hand control of the ‘curriculum of the majority of higher education and training qualifications’ to the Minister of Labour, while the Minister of Education ‘remains financially accountable for these learning programmes’ (*Ibid.*).

NAPTOSA (2003), responding to its own earlier questions, was extremely critical of the suggestion that the DoE and DoL would not have any representation on the SAQA Board:

It is extremely worrying, and very revealing that the two departments are suggesting that they should not have members on the board. Since SAQA is tasked with overseeing the implementation of the NQF, it is extremely strange that the two departments wish to remain outside of SAQA...

In summary, the following possible causes of the DoE/DoL tensions have been identified from the empirical data:

- Inconsistent legislation and incoherent policy development

- DoL “fears” the influence of the band ETQAs
- DoE “fears” the influence of the SETAs
- “Attitudes of some officials”, pitting the educationalists against the vocationalists
- NQF funding department and overseeing department could be different
- Ignoring the power of different types of learning
- Concerns that the “curriculum control” of education would be handed to the DoL
- Proposed withdrawal of the DoE and DoL from the SAQA (Board).

4.4.4.10 Knowledges that stakeholder engagement is better than reconstructing the NQF

In their comments stakeholders expressed concerns about the radical reconstructions that were being proposed in the review documents, suggesting that increased consultation and stakeholder engagement would be preferred:

At this moment however, we do not believe in total reconstruction as the document seems to be intending. It is our view that stakeholder engagement is the way to go as this process is political. Political in that it is a transformation process of the apartheid geared education and training system characterised by social strata silos (COSATU, 2003).

SAQA has come a long way and is slowly finding its feet. It must however be stated that more consultation with providers should take place instead of these bodies adopting a threatening attitude (De Wal, 2003).

Gibson agreed, and added that failure to include stakeholders would take the system back to the pre-1994 academic focus on qualifications:

The first major concern the SGB has is that the proposal is not clear on how the various stakeholders will in future be represented on, amongst others, the proposed QCs and Fit for Purpose bodies. The members feel very strongly that there must continue to be clear stakeholder representation from employers and employees on these and similar bodies. If this is not continued, the concern is that we go back to pre-1994 and a more academic focus on qualifications (Gibson, 2003).

In an important comment, a university principal (in SAQA, 2004c) provided a counter-balance to the call for increased stakeholder involvement. He warned that the SAQA process may have gone too far by inviting stakeholder involvement before experts had been involved. According to him this premature involvement of stakeholders contributed significantly to contestations:

I think that the SAQA process has been an incredible process with respect to stakeholders. In fact, it goes too far. The recommendation (in the NQF Review [DoE and DoL, 2002]) about leaving the democratic scrutiny to a stage when experts have already participated in the process is a wise one, because stakeholders by definition have different interests and so the battle is the battle of the primacy of these interests. If you haven't upfront established what comes first, then everything is up for contestation and you get turned around in a million different ways as these different interests seek to satisfy their constituents.

The CHE (2003) made a related observation. According to the CHE a tension exists between the need for "communities of trust" (based on partnerships, integrity and mutual trust) and the recommendations for "rules of engagement" (based on written agreements, contractual obligations and regulations):

To talk of "Rules of Engagement" is to acknowledge there has been and will continue to be, at least in the short-term, contestation and conflict over jurisdictional and other issues. "Communities of trust", however, implies long-standing partnerships based on integrity and earned mutual respect.

Referring to the HSRC's "Ways of seeing the NQF" (HSRC, 1995), SAQA (2003) concurred that power contestations about certain concepts and structures (such as an integrated approach) would be minimised if the different positions of stakeholders were understood:

Some stakeholders often decide to "sit on the fence" for a while; some continue to push for interpretations or meanings that are congruent with their needs and interests; others withdraw and move to negotiation forums which better serve their purposes. The point is that a major transformation such as the proposed NQF has, and should have, both proponents and critics.

4.4.4.11 Knowledges that professional bodies also have power relations

Throughout the empirical data reference is made to the powers of professional bodies, but also to the relationships between the professional bodies and other roleplayers. Some examples are indicated below.

ECSA and ESGB (2004) emphasise the point that relationships between professional bodies, the CHE and SAQA should be co-operative:

Professions have statutory empowerment to set standards and to accredit higher education qualifications. Those professions are required by their respective Acts to co-operate with SAQA and the CHE. The relationship between the CHE, SAQA and the statutory professions must therefore be a co-operative one...

Mention is also made of non-statutory professional bodies, suggesting that such bodies should be allowed to undertake quality assurance functions, but only under delegated authority:

...professional bodies not established by statute should continue to undertake quality assurance under delegated authority (GDE, 2003).

In this regard, SAQA (2003) suggested that as many as possible of the professional bodies should be recognised as ETQAs to avoid power contestations:

Given the nature and history of power contestations in this regard, we still believe that recognising the professional bodies as separate ETQAs, where appropriate and justified, offers the NQF system the best way forward.

According to the University of Stellenbosch (2003) professional bodies would have to negotiate their way between the labour and education constituencies:

In the new site of struggle (between the labour and education constituencies) the professional bodies will play a crucial role. The professional bodies will have to negotiate their way between the different QCs.

4.4.4.12 Summary of knowledges opposed to power in the NQF discourse

The knowledges opposed to power identified in this section are summarised in the table below.

Knowledges opposed to power in the NQF discourse	
1	Knowledges opposed to bureaucratisation and loss of autonomy
2	Knowledges opposed to the proposed changes to the NQF
3	Knowledges opposed to giving the CHE too much power
4	Knowledges opposed to giving the DoE too much power
5	Knowledges opposed to giving higher education institutions too much power
6	Knowledges opposed to power imbalances
7	Knowledges that SAQA has to resist power
8	Knowledges opposed to the internecine warfare between the DoE and DoL
9	Knowledges that stakeholder engagement is better than reconstructing the NQF
10	Knowledges that professional bodies also have power relations

Table 29: Knowledges opposed to power in the NQF discourse

4.4.5 Description of constraints in the NQF discourse

4.4.5.1 Introduction

In this final genealogical section the identified erudite knowledges, local memories and knowledges opposed to power are grouped together as subjugated knowledges. These are then used to describe a number of *constraints* within the NQF discourse.

As discussed in *Chapter 2*, constraints are interpreted in the context of this study as (based on Foucault, 1980):

Lineages of historical knowledge within the NQF discourse which were present but disguised within the body of functionalist and systematising theory and which criticism has been able to reveal.

In each case, the erudite knowledges, local memories and knowledges opposed to power associated with the particular constraint are listed.

4.4.5.2 Limited common understanding of the original conceptualisation of the NQF as constraint

<u>Associated erudite knowledges</u>	<u>Associated local memories</u>	<u>Associated knowledges opposed to power</u>
Knowledges about divergence from the original conceptualisation	Memories of the history of the NQF; Memories that the NQF was not adequately marketed; Memories that there was a mixed reaction to the SAQA Act; Memories of previous ideas	Knowledges opposed to the proposed changes to the NQF

The first constraint identified from the grouping of the erudite knowledges, local memories and knowledges opposed to power is a limited common understanding of the original conceptualisation of the NQF. Through this genealogical critique, a number of knowledges related to the original conceptualisation of the NQF have been identified.

Partially revealed through the debates that have taken place during the review period, it is acknowledged that during the late 1970s/early 1980s, black workers expected that improving their skills would force employers to pay better wages. They also expected that national recognition would protect them from the abuse of particular employers (Van der Merwe, 2004).

Initial NQF conceptualisation can be broadly categorised into three parallel developments:

- Labour - the transformation of the apprenticeship system, although initially opposed by the unions, eventually resulted in the recommendation for an NQF as a vehicle for an integrated approach.
- Education - even during the early NQF discussions, the DNE favoured a three stream approach, despite the fact that many of its stakeholders disagreed.
- NGO – the work of the CEPD and the subsequent Implementation Plan for Education and Training (IPET) (*The Mail and Guardian*, 8 February 2001).

According to *The Citizen* (of 13 September 1995) the SAQA Act (SA, 1995c) was “railroaded” through parliament at a time when the new government was under severe pressure to replace apartheid legislation. The then Minister of Education was further accused of working in ‘secrecy with unions without the involvement of the academic community’ (*Ibid.*). This resulted in some initial reservations being expressed by the higher education community, most notably the Committee of University Principals (CUP). The CUP requested a parliamentary audience to

discuss the concerns, but was denied a hearing, as this would have led to a delay in the passing of the legislation (*The Daily News*, 8 September 1995).

More recently, the recommendations contained in the review documents, particularly the *Consultative Document* (DoE and DoL, 2003) and to a lesser extent *The HEQF* (DoE, 2004), were accused of being a return to ideas discussed during the conceptualisation period (INSETA, 2003) – many of which were rejected at that time. Examples include:

- Qualifications and Quality Assurance Councils (QCs) – resembling the proposed Qualifications Councils that would have been responsible to recommend qualifications and determine the rules of combination (HSRC, 1995);
- Consultative Panels – resembling the proposed Standards Review Bodies which would evolve from the temporary NSBs (*Ibid.*); and
- three tracks resembling the three-stream model introduced through the CUMSA model (NBFET, 2003).

Another historical knowledge revealed through critique is the perception amongst NQF stakeholders that the attempts to turn ‘the current NQF on its head, could and should be resolved within the current structures’ (ICSA, 2003). According to ICSA and others the changes to the NQF are not being introduced to resolve problems but for ‘other political reasons’ (*Ibid.*).

The lineage of Limited common understanding of the original conceptualisation of the NQF is summarised in the following diagram:

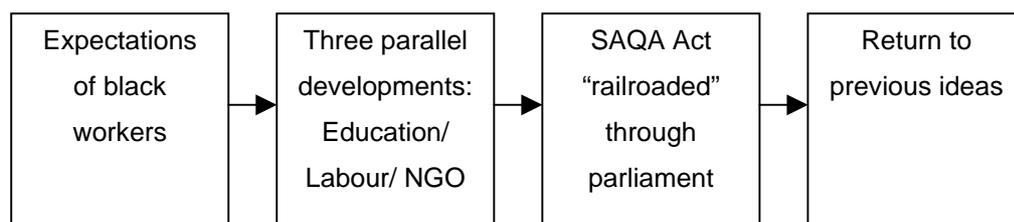


Diagram 24: Lineage of Limited common understanding of the original conceptualisation of the NQF

4.4.5.3 Lack of awareness that transformation requires power as constraint

Associated erudite knowledges

Knowledges of continual shifts in power relationships; Knowledges that transformation requires power; Knowledges of DoE/DoL fissures

Associated local memories

Memories of the NQF being inextricably linked to power; Memories that SAQA was established as a substitute for a Ministry of Education and Training; Memories that there was a mixed reaction to the SAQA Act; Memories of disqualified constituencies; Memories that schooling is ring-fenced

Associated knowledges opposed to power

Knowledges opposed to bureaucratisation and loss of autonomy; Knowledges opposed to giving the CHE too much power; Knowledges opposed to giving the DoE too much power; Knowledges opposed to giving higher education institutions too much power; Knowledges opposed to power imbalances; Knowledges that SAQA has to resist power; Knowledges opposed to the internecine warfare between the DoE and DoL; Knowledges that professional bodies also have power relations

This constraint is based on the subjugation of a variety of erudite knowledges, local memories and knowledges opposed to power. This constraint has an explicit focus on power and its lineage is indicated below.

As early as 1995, even before the promulgation of the SAQA Act, the draft NQF Bill was associated with power:

Education [NQF] Bill targets division of powers (*The Argus*, 10 August 1995).

During this time, the Education Minister was also accused of giving himself too many powers (*The Daily News*, 5 September 1995). The response from the government at that time was that the powers were necessary to prepare the way for the other education and training acts that would pass through parliament in the following years.

SAQA's establishment through the SAQA Act (SA, 1995c) as a fallback position when the utopian idea of a *single* Ministry of Education and Training did not materialise, led to numerous difficulties

(BSA, 2003). A number of additional responsibilities were imposed on the newly established agency, many of which were unrealistic, if not impossible to achieve. Despite these odds, SAQA battled through the obstacles, embodying the Freirean philosophy of “making the road by walking it” (cf. Isaacs, 2001). By 2005 SAQA emerged battle fatigued as the recommendations from the review processes pointed towards a new role with arguably more realistic responsibilities.

Power struggles have also been evident in the disqualification of particular constituencies at specific times. Examples include:

- private providers viewed as inadequate to meet the country’s higher education needs (CHE, 2003);
- NSBs and SGBs viewed as anarchic and a free-for-all (SAUVCA, 2003);
- SETAs downplayed in the draft HEQF (Masango, 2004);
- Technikon qualifications being relegated to the lower levels of the NQF (CTP, 2004); and
- perception that stakeholders’ comments on discussion documents were being ignored (De Wal, 2003).

The ring-fenced schooling system has consistently stayed just outside the NQF (NAPTOSA, 2003). Seen as a constituency that does not react to radical transformations, most schooling qualifications were not registered on the NQF. Most recent developments on the FETCs do however point towards some movement in this regard.

In the more recent review documents and responses authors have recognised the presence of power in the NQF discourse, while some have even acknowledged that power was necessary for transformation (cf. SAQA, 2003). SAQA (2003) even stated that it was facing the ‘unravelling of the power to support the original conceptualisation of the NQF’, adding that a *re-aligning of power* by the DoE and DoL was taking place around a new set of innovations.

Most recently the public differences between the Ministers of Education and Labour provide further evidence of the power struggles within the NQF discourse. Importantly, it is recognised that these struggles are not about individuals such as the Ministers, but rather about the deeper, underlying philosophical differences that have historically existed between the two Ministries.

Additional knowledges disguised within the NQF discourse include awareness amongst stakeholders that specific organisations should not have too much power (three specific examples that were mentioned were the CHE, the DoE and higher education institutions). It is important to note that these organisations all represent higher education. It is just as important to note that the DoL (or any other labour organisations) was not accused of being power hungry. It was

furthermore noted that SAQA (University principal in SAQA, 2004c) and professional bodies (University of Stellenbosch, 2003) were also involved in power relations. In all, the common knowledge was that power imbalances had to be avoided.

The lineage of Lack of awareness that transformation requires power as constraint is summarised in the following diagram:

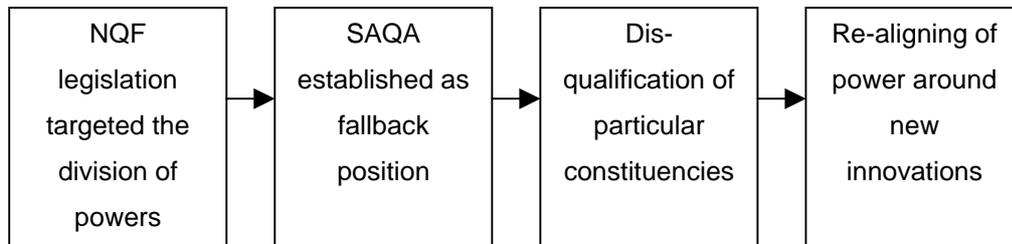


Diagram 25: Lineage of Lack of awareness that transformation requires power as constraint

4.4.5.4 Varying stakeholder involvement as constraint

Associated erudite knowledges

Knowledges of continual shifts in power relationships; Knowledges of diversity; Knowledges that voluntary alliances are inefficient and insufficient; Knowledges that professional bodies have been excluded; Knowledges that the reconfigured standards setting system is supported

Associated local memories

Memories that South Africa has a history of non-participation in government structures; Memories that the NQF was not adequately marketed; Memories that there was a mixed reaction to the SAQA Act; Memories of commitment to the NQF; Memories of disqualified constituencies; Memories that the value of stakeholder involvement was questioned

Associated knowledges opposed to power

Knowledges that stakeholder engagement is better than reconstructing the NQF

Varying stakeholder involvement was identified as another important lineage that, at least to some extent, has been disguised within the NQF discourse. The following are some key points within this lineage:

The pre-1994 government did not encourage participation from stakeholders in the education and training system. Where it did, the participation was segregated and limited. Together with the transition to the new democratic system, the education and training system was set on a path of radical transformation that included the implementation of an outcomes-based approach, initially in

schools, but later throughout the system. The NQF was seen as an important tool that government could use to achieve its transformative goals. Education and training stakeholders were not accustomed to being included in such processes (SAQA, 2003). Furthermore, the initial development of the draft NQF Bill, and even the passing of the SAQA Act, were perceived as exclusionary (i.e. included the labour constituency, but excluded others, such as the higher education sector). Despite these initial barriers, stakeholders did become more involved in NQF processes, most notably in the composition of the standards setting bodies. With very limited experience of such participation, the NSBs and SGBs faced severe challenges. Even so, their contributions were significant, leading to the development of numerous unit standards and qualifications, but more importantly, empowering stakeholders to take part in national processes.

The effect on stakeholder involvement of the more recent decision to disband the NSBs and replace them with Consultative Panels, remains to be seen. Although the move was widely supported (e.g. CHE, 2003 and SAICA, 2003), concerns have been raised about retaining the expertise that was built up through the NSBs and SGBs, resourcing, leadership and also the challenge of developing a “bottom-up” process (CHE, 2003).

A number of additional factors militated against sustained stakeholder involvement, including the disqualification of some constituencies (e.g. private providers [CHE, 2003] and professional bodies [University of Stellenbosch, 2003]), and the questioning of the value of stakeholder involvement. Concerns about delays and unnecessary contestations caused by stakeholder involvement were a recurring theme, even from the time of the passing of the SAQA Act (SA, 1995c) when the CUP was denied a public hearing, as this would have delayed the passing of the Act (*The Daily News*, 8 September 1995). Another factor apparent in the empirical dataset was the concern that stakeholders were becoming fatigued with the continual (proposed) changes to the NQF system (FASSET, 2003). In this case the advice was given that further stakeholder engagement would be more beneficial than “reconstructing” the NQF (De Wal, 2003).

Another significant factor that had an important influence on stakeholder involvement was the lack of adequate marketing of the NQF. The importance of marketing was probably underestimated in the early days (*The Teacher*, April 1997); in the subsequent years marketing may have been limited due to funding difficulties. Despite such a valid reason for not effectively marketing the NQF, it cannot be disputed that this oversight contributed significantly to varying stakeholder involvement, and even more so to contestations based on lack of understanding.

Knowledges of continual shifts in power relationships (INSETA, 2003), partly manifested in the difficulties associated with voluntary alliances and to some extent in the disregard for the diversity of stakeholders, also impacted on stakeholder involvement.

The lineage of Varying stakeholder involvement as constraint is summarised in the following diagram:

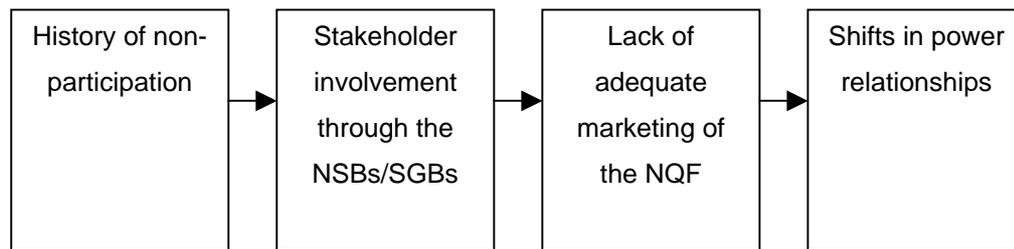


Diagram 26: Lineage of Varying stakeholder involvement as constraint

4.4.5.5 Unrealistic expectations of the NQF as constraint

Associated erudite knowledges

Knowledges about divergence from the original conceptualisation; Knowledges that the NQF is not the sole mechanism for transforming education and training; Knowledges that an incremental approach is needed

Associated local memories

Memories that the NQF was not adequately marketed; Memories of SAQA's role in NQF development and implementation

Associated knowledges opposed to power

Knowledges opposed to the proposed changes to the NQF

From the results of the genealogical critique the expectations of the NQF presented another significant point of diffraction in the NQF discourse. Various influences and characteristics are noted.

As mentioned before, marketing of the NQF proved to be wholly inadequate, impacting on effective and sustainable stakeholder involvement, but also failing to effectively communicate that which the NQF could realistically achieve in the short and long term, as the early warnings that '[t]he Department must revisit its marketing strategy of the NQF' (*The Teacher*, April 1997) fell on deaf ears.

A knowledge related to this point is the contestations around the perceived/real divergence from the original conceptualisation of the NQF (e.g. COSATU, 2003). From the comments contained in the empirical dataset some of these "unrealistic" expectations included:

- the NQF would be the answer to all needs (cf. Employer in SAQA, 2004d);

- the system would be changed in a short period of time (cf. Representative from a provider in SAQA, 2004h);
- less bureaucratic and regulated processes than those in the previous system (cf. *The Mail and Guardian*, 19 January 2001);
- the NQF on its own would bring about fundamental change in education and training practices (cf. CHE, 2003); and
- the NQF could be implemented in a much shorter period of time than was needed in other countries (cf. Young, 2003).

A further related point is evident in the disagreements about the proposed changes to the NQF. The diverse range of positions with regard to the recommendations flowing from the *Study Team Report* (DoE and DoL, 2002), the *Consultative Document* (DoE and DoL, 2003) and even the draft HEQF (DoE, 2004) suggest that even more recently, the expectations of what the NQF can achieve, are still to be agreed.

In part, SAQA was to be “blamed” for the NQF not meeting the expectations of stakeholders. Being a more accessible target of criticism than the NQF as a social construct, SAQA faced a barrage of criticisms:

- SAQA has become a bureaucracy that has too much control over what people do (IMWG member in SAQA, 2004c);
- unclear and problematic power relationships between SAQA, the DoE and the DoL (SAUVCA, 2003);
- SAQA concentrated almost exclusively on the disciplinary areas of knowledge production which led to conflicts with the DoE and CHE (Inter-NSB Committee, 2003);
- SAQA took stakeholder involvement “too far” resulting in significant (and avoidable) contestations (University principal in SAQA, 2004c);
- SAQA did not provide effective leadership (CHE, 2003);
- SAQA should have taken more control (Respondent from a private provider in SAQA, 2005e); and
- SAQA was trying to “disguise” what it was doing by changing qualification titles and rewriting them in “SAQAnese” (Dixie, 2004).

In summary, the lineage of Unrealistic expectations of the NQF as constraint is summarised in the following diagram:

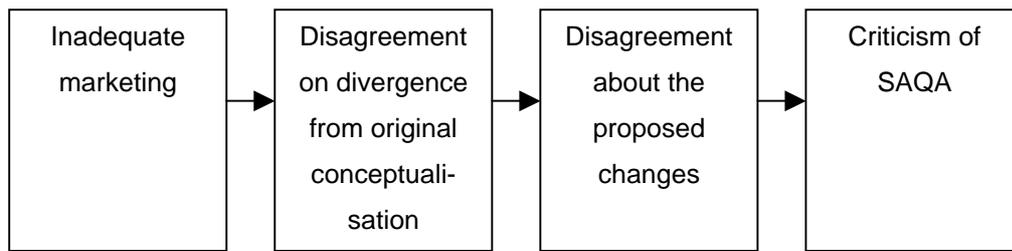


Diagram 27: Lineage of Unrealistic expectations of the NQF as constraint

4.4.5.6 Disagreement on the role of a single accountable structure as constraint

Associated erudite knowledges

Knowledges about a single accountable structure; Knowledges of DoE/DoL fissures; Knowledges that the reconfigured standards setting system is supported

Associated local memories

Memories of the NQF being inextricably linked to power; Memories that SAQA was established as a substitute for a Ministry of Education and Training; Memories that there was a mixed reaction to the SAQA Act; Memories of SAQA's role in NQF development and implementation

Associated knowledges opposed to power

Knowledges opposed to bureaucratisation and loss of autonomy; Knowledges opposed to power imbalances; Knowledges that SAQA has to resist power; Knowledges opposed to the internecine warfare between the DoE and DoL

Mixed reaction to the SAQA Act (SA, 1995c) was one of the first signs that the role of the organisation that would oversee NQF development and implementation would be contested. As an example the higher education sector in particular, mainly through the CUP, was concerned that 'bringing all educational institutions under a single administration to be known as SAQA' (*The Cape Times*, 28 June 1995) would enable the state to prescribe what would be taught.

Another historical knowledge related to the role of a single accountable structure was the establishment of SAQA as a "substitute" for the envisaged single Ministry of Education and Training (*The Star*, 27 October 1997). As mentioned before, this shifted several additional and unrealistic responsibilities to SAQA, and to a large extent, set SAQA up for failure.

The divergent views on the role of SAQA, as identified in the empirical dataset, are summarised as follows:

- independence, leadership, promotion and maintenance of stakeholder involvement, advocacy and awareness of the NQF and maintenance of the NLRD (summarised from a range of stakeholders in SAQA, 2004c);
- responsible for integration (INSETA, 2003);
- intellectual and strategic leadership of the NQF (CHE, 2003);
- interacting directly with education and training providers (SAQA staff member in SAQA, 2004c); and
- in co-operative relationships with the CHE and statutory professions (ECSA and ESGB, 2004).

SAQA itself raised concerns that it had been “sidelined” and that some stakeholders were ‘purposeful in omitting the contribution of SAQA and the NQF’ (SAQA, 2003).

On a related point, stakeholders raised concerns that power imbalances existed (cf. CHE, 2003) and that SAQA, as the overseeing body had, to resist power (University principal in SAQA, 2004c). The identification of local memories of the NQF being inextricably linked to power further emphasises the point. Power relations between the NQF overseeing body and other bodies and stakeholders were unavoidable.

The transformation of the SAQA standards setting structures to Consultative Panels most probably represented one of the most serious challenges to SAQA in its current role. Virtually without exception all NQF stakeholders opposed SAQA and agreed that the NSBs and SGBs should be disbanded and replaced by the Consultative /Fit-for-purpose Panels. As a result, in 2005, SAQA disbanded the NSBs, without being forced to do so, without the review process being concluded, and therefore also without a clear and well-communicated plan of how the Consultative Panels would be established or function. Importantly though, SAQA did not disband the SGBs.

A final knowledge that has a direct bearing on the role of the accountable overseeing structure, is the internecine warfare between the DoE and the DoL. At least two consequences of the DoE/DoL differences can be identified from the empirical data: according to the CHE (2003) this political leadership should avoid usurping the powers of independent statutory agencies (most probably referring to the CHE and SAQA); and inadequate funding arrangements for the NQF and SAQA exist (*Ibid.*).

The lineage of Disagreement on the role of a single accountable structure as constraint is summarised in the following diagram:

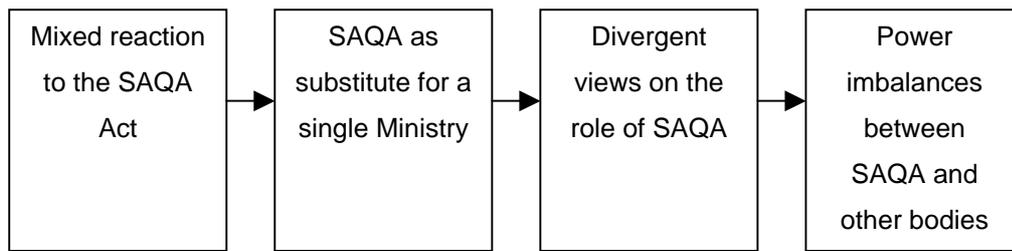


Diagram 28: Lineage of Disagreement on the role of a single accountable structure as constraint

4.4.5.7 Misalignment between the educationalists and vocationalists as constraint

Associated erudite knowledges

Knowledges about divergence from the original conceptualisation;
 Knowledges of continual shifts in power relationships;
 Knowledges of diversity;
 Knowledges that entrance to higher education is tightly controlled; Knowledges of DoE/DoL fissures;
 Knowledges of the value of “partitioned” qualifications;
 Knowledges that curriculum needs to be included in quality assurance

Associated local memories

Memories that SAQA was established as a substitute for a Ministry of Education and Training; Memories that there was a mixed reaction to the SAQA Act; Memories of disqualified constituencies;
 Memories that schooling is ring-fenced

Associated knowledges opposed to power

Knowledges opposed to giving the CHE too much power; Knowledges opposed to giving the DoE too much power; Knowledges opposed to giving higher education institutions too much power;
 Knowledges opposed to the internecine warfare between the DoE and DoL

The differences between educational/academic and vocational/labour constituencies permeate the genealogical critique. Clear points of diffraction are observed with numerous non-contextualised statements occurring. The misalignment between the two constituencies probably represents the most significant constraint identified through genealogy. It is, however, important to note that the revelation of this constraint has not been entirely dependent on the genealogical method, as the recent criticisms of particular stakeholder groupings such as NAPTOA (2003 and 2004) and SACCP (2004), had already started to expose the differences.

The following related knowledges are taken from the grouping of subjugated knowledges:

The differences between the DoE and DoL, also referred to as “internecine warfare” (ICSA, 2003), present the most public manifestation of the differences between the education and vocational constituencies. Other characteristics of the differences between the two Departments include:

- DoE and DoL are promoting conflicting qualification routes (Gibson, 2004);
- DoE has gained the upper hand in the undeclared war with the DoL (ICSA, 2003);
- level of damage being caused by the warfare is intolerable (*Ibid.*);
- apparent turf-warfare between the DoE and the DoL was unhelpful (SACP, 2004);
- DoL fears the band ETQAS, DoE fears the SETAs (*The Financial Mail*, 2 August 2002);
- NQF delay allegedly caused by a power struggle between the DoE and DoL (*The Mail and Guardian*, 18 February 2005);
- two Departments spend much time fighting for turf (*The Mail and Guardian*, 2 March 2005); and
- refusal by the Departments to take leadership of the NQF is an indictment against their commitment (NAPTOSA, 2003).

An important point to note is that although the DoE, CHE and higher education institutions (mainly through trying to control entrance to higher education [CEPD, 2004]) were criticised for trying to gain too much power, the DoL was not. Knowledges of continual shifts in power relations and the re-alignment of power around new innovations (SAQA, 2003) suggest that DoL may have been losing ground as the DoE’s position strengthened. This point will be discussed again in *Chapter 5*.

As noted before, and also preceding the aforementioned differences, evidence suggested that SAQA was established as a conduit for integration as a result of the establishment of two separate Ministries, one for Education, the other for Labour in 1994. Viewed together with the mixed reaction to the SAQA Act (SA, 1995c), the “fallback” establishment of SAQA signified that the differences between the educational and vocational sectors had not been resolved before NQF implementation commenced – differences that clearly were also not resolved during the implementation, as the knowledges of divergence from the original conceptualisation indicate.

Despite strong support for acknowledging diversity in the NQF discourse, the disqualification and downplaying of particular constituencies, notably along the educational/vocational divide, provides further evidence in support of this constraint. Examples of disqualified constituencies included private providers (many of whom operate in the vocational sector) (CHE, 2003), standards setting bodies (SAUVCA, 2003), SETAs (cf. Masango, 2004) and technikons (now universities of technology) (Dixie, 2004).

A related point is the apparent ring-fencing of the schooling and higher education sectors by the DoE (*The Teacher*, 23 October 1998).

Qualification types present a further example of differences, but to some extent also convergence, between education and training. The initial compromise made it possible for both unit standard-based qualifications (used mainly in the vocational sector) and non-unit standard-based qualifications (used mainly in the educational sector) to be registered on the NQF. The empirical evidence does however suggest that the educational sector may be moving towards a more partitioned (or credit-based, modularised) approach that would enable learners to transfer credits between institutions (CHE, 2003).

The call for the inclusion of curriculum in quality assurance (UMALUSI, 2003) is also important, as it would represent a move towards the more traditional educational approach that resisted the separation of qualifications from curricula – something the NQF purposely attempted.

The lineage of Misalignment between the educationalists and vocationalists as constraint is summarised in the following diagram:

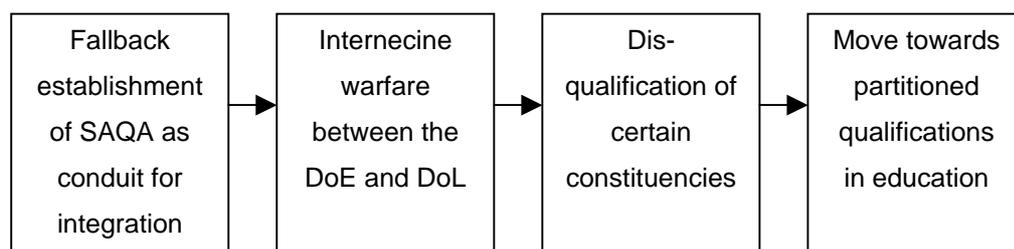


Diagram 29: Lineage of Misalignment between the educationalists and vocationalists as constraint

4.4.5.8 Taking advantage of the lack of clear legislative alignment as constraint

Associated erudite knowledges

Knowledges of non-optional legislative compliance; Knowledges that voluntary alliances are inefficient and insufficient; Knowledges of DoE/DoL fissures; Knowledges that the NQF is not the sole mechanism for transforming education and training

Associated local memories

Memories that South Africa has a history of non-participation in government structures; Memories that the NQF was not adequately marketed; Memories that there was a mixed reaction to the SAQA Act

Associated knowledges opposed to power

Knowledges opposed to the proposed changes to the NQF; Knowledges opposed to giving the CHE too much power; Knowledges opposed to giving the DoE too much power; Knowledges opposed to the interneccine warfare between the DoE and DoL

This constraint is probably also the most serious. According to the empirical evidence it seems as if the long-standing resistance to apartheid legislation has resulted in a *laissez fair* attitude towards post-apartheid legislation, most notably and of most concern, by the very Departments that have the responsibility to implement it (NAPTOSA, 2003). The initial reaction to the draft NQF Bill in 1995 (*The Mail and Guardian*, 26 April 1996) as well as the more recent comments about new NQF legislation (*Business Day*, 28 July 2003) appears to be very similar in that the concerns by specific stakeholder groupings are downplayed as they may “delay the process”, and also in that the political agenda may be dominating the real needs (e.g. ECSA, 2003).

Perceptions that many of the new education and training acts were in contradiction to each other, or at the very least were vague about commonalities, further contributed to the problem (SAQA Manager in SAQA, 2005c). It was evident from the data that more than one constituency were taking advantage of the apparent anomalies in the legislation to strengthen their own positions (e.g. by strengthening the positions of either the DoE or DoL). Examples of perceived contradictions in the legislation are:

- Occupational Health and Safety (OHS) Regulations (Shipston, 2003);
- SAQA having responsibility for standards generation and the CHE being tasked to generate standards (UP, 2004); and
- insufficient attention to the *Norms and Standards for Educators* (Woodward, 2004).

The acknowledgement that voluntary alliances had to be replaced with more structured “Rules of Engagement” (NSA, 2003) provides further evidence that the lack of clear legislative alignment has been causing problems.

A final point, that has been made before, is that the inadequate marketing of the NQF, which is linked to a lack of understanding that the NQF is not the sole mechanism for transforming education and training, may have contributed to the exploitation of unclear legislative alignment.

The lineage of Taking advantage of the lack of clear legislative alignment as constraint is summarised in the following diagram:

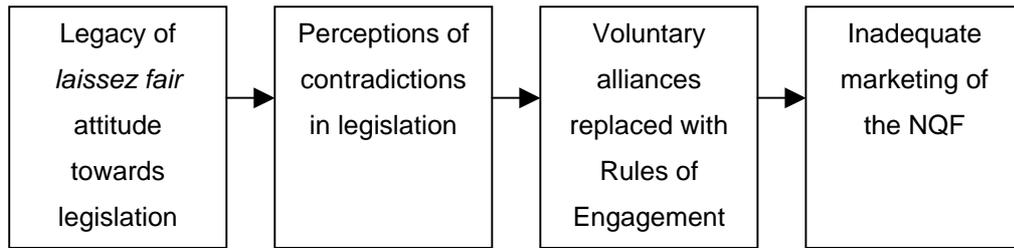


Diagram 30: Lineage of Taking advantage of the lack of clear legislative alignment as constraint

4.4.5.9 Summary of constraints in the NQF discourse

Based on the erudite knowledges, local memories and knowledges opposed to power in the NQF discourse, the following constraints have been identified and described:

	Constraints in the NQF discourse	Diagrammatic summary of lineage
1	Limited common understanding of the original conceptualisation of the NQF as constraint	<pre> graph LR A[Expectations of black workers] --> B[Three parallel developments: Education/ Labour/ NGO] B --> C[SAQA Act "railroaded" through parliament] C --> D[Return to previous ideas] </pre>
2	Lack of awareness that transformation requires power as constraint	<pre> graph LR A[NQF legislation targeted the division of powers] --> B[SAQA established as fallback position] B --> C[Dis-qualification of particular constituencies] C --> D[Re-aligning of power around new innovations] </pre>
3	Varying stakeholder involvement as constraint	<pre> graph LR A[History of non-participation] --> B[Stakeholder involvement through the NSBs/SGBs] B --> C[Lack of adequate marketing of the NQF] C --> D[Shifts in power relationships] </pre>
4	Unrealistic expectations of the NQF as constraint	<pre> graph LR A[Inadequate marketing] --> B[Disagreement on divergence from original conceptualisation] B --> C[Disagreement about the proposed changes] C --> D[Criticism of SAQA] </pre>
5	Disagreement on the role of a single accountable structure as constraint	<pre> graph LR A[Mixed reaction to the SAQA Act] --> B[SAQA as substitute for a single Ministry] B --> C[Divergent views on the role of SAQA] C --> D[Power imbalances between SAQA and other bodies] </pre>
6	Misalignment between the educationalists and vocationalists as constraint	<pre> graph LR A[Fallback establishment of SAQA as conduit for integration] --> B[Intermecine warfare between the DoE and DoL] B --> C[Dis-qualification of certain constituencies] C --> D[Move towards partitioned qualifications in education] </pre>
7	Taking advantage of the lack of clear legislative alignment as constraint	<pre> graph LR A[Legacy of laissez-fair attitude towards legislation] --> B[Perceptions of contradictions in legislation] B --> C[Voluntary alliances replaced with Rules of Engagement] C --> D[Inadequate marketing of the NQF] </pre>

Table 30: Constraints in the NQF discourse

As before, a brief reflection on the number of associations between the identified seven constraints and the 16 erudite knowledges, 12 local memories and 10 knowledges opposed to power, is useful.

Those with the highest number of associations were *Memories that there was a mixed reaction to the SAQA Act*; *Knowledges of DoE/DoL fissures*; *Knowledges opposed to the internecine warfare between the DoE and DoL*; and *Memories that the NQF was not adequately marketed*.

Other high frequencies included:

- Memories that SAQA was established as a substitute for a Ministry of Education and Training;
- Knowledges about divergence from the original conceptualisation;
- Knowledges of continual shifts in power relationships;
- Memories of disqualified constituencies;
- Knowledges opposed to the proposed changes to the NQF;
- Knowledges opposed to giving the CHE too much power; and
- Knowledges opposed to giving the DoE too much power.

An exception was *Knowledges that other databases need to link to the NLRD*, which was not associated with any constraints. As was the case with the strategies identified through the archaeological critique, the frequencies point towards some prioritisation or order of dominance.

This section concludes the genealogical critique of the NQF discourse in which genealogy was used as a qualitative tool in order to reveal the NQF discourse as a system of constraint. This process included the identification of erudite knowledges (historical contents that have been buried or disguised), local memories (knowledges that have been disqualified as inadequate) and knowledges opposed to power. An important difference between the archaeological critique and the genealogical critique is the emphasis on power in the latter. Power is introduced through a “history of the present” and is concerned with “disreputable origins and unpalatable functions” by pointing out things about the origins and functions that remain hidden.

Other key characteristics of the genealogical critique have been an attempt to remain non-judgemental and to describe statements as an ongoing process, rather than as a snapshot of the NQF discourse. The genealogical method was applied to the same empirical dataset. Importantly, the genealogical method did not try to exclude the understanding gained from the archaeological method, but rather concentrated on the strategic use of archaeology to answer problems about the present.

The diagram below illustrates the process that was followed in revealing the NQF discourse as a system of constraint:

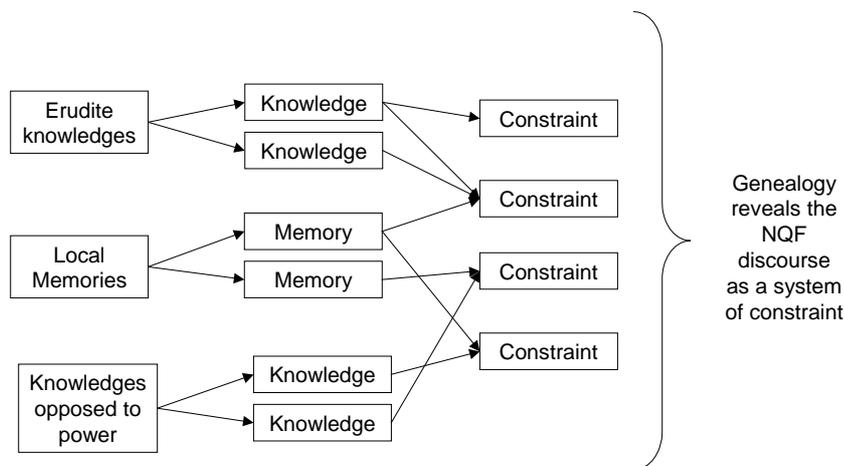


Diagram 31: Steps in the genealogical critique

4.5 SUMMARY

Foucault’s archaeology and genealogy proved suitable to the analysis of the NQF discourse. Applied sequentially to the same empirical dataset that consisted of 300 interviews (including focus groups), 90 responses to discussion documents and 72 news articles, the two methods revealed a diverse set of strategies and constraints embedded within the NQF discourse. The list coding within the ATLAS.ti hermeneutic unit facilitated the application of archaeology and genealogy and also made it possible to include a much larger empirical dataset than would otherwise have been possible.

Some of the “hidden knowledges” revealed through the critiques were what might have been expected, as they had already been revealed by critiques other than those employed in this study; even so, their positioning in relation to other similar knowledges within the NQF discourse was invaluable. In short, the chapter aimed to make strategic use of the historical struggles within the NQF discourse to inform future developments, hopefully following the advice given by Jewison in 2004:

We need to revisit some of the historical struggles that informed our educational values and which have brought us to where we now are (Jewison, 2004:14).

This chapter forms the core of this study that intends to support improved future development and implementation of the South African NQF. Preceding chapters provided the context and tools with

which the NQF discourse could be analysed (mainly *Chapter 1*), established the framework within which the analysis could be undertaken (*Chapter 2*), and identified the objects within the NQF discourse (*Chapter 3*). Premised on these prior developments, it was possible to perform a qualitative analysis of the NQF discourse, as represented through the empirical dataset in *Chapter 4*. The findings of this analysis are further utilised in the next (final) chapter (*Chapter 5*) to describe power in the NQF discourse which, in turn, is utilised to make recommendations on how the negative effects of power struggles in the NQF discourse can be minimised.

CHAPTER 5: FINDINGS AND RECOMMENDATIONS

5.1 INTRODUCTION

5.1.1 Purpose of this chapter

The purpose of the final chapter of this thesis is to develop and present the findings and recommendations that follow from the Foucauldian analysis of the empirical data summarised in *Chapter 4*, but also from the two literature reviews, one on Foucauldian theory presented in *Chapter 2*, the other on NQF development and implementation presented in *Chapter 3*.

In effect, the purpose of this chapter mirrors the overall purpose of the study, namely to improve future development and implementation of the South African NQF by making recommendations on how the negative effects of power struggles can be minimised.

5.1.2 Structure of this chapter

This chapter is structured as follows:

- *Findings* – a detailed description of power in the NQF discourse.
- *Recommendations* – suggestions on how the negative effects of power struggles in the NQF discourse can be minimised.

The description of power in the NQF discourse is based on the results of the application of archaeology and genealogy to the NQF discourse (as identified from the empirical dataset and presented in *Chapter 4*). The observations from the literature review as well as the findings from the positioning of the NQF (also from *Chapter 3*) are used to support the results of the Foucauldian critique. The description of power in the NQF discourse is structured according to the six guises of power identified in *Chapter 2*.

The recommendations on how power struggles can be minimised in the NQF discourse are based on the preceding description of power, but also draw on various central themes that emerge from the preceding chapters. Importantly, a Foucauldian understanding of power underlies the recommendations in that it is accepted that the NQF discourse cannot be power-free, i.e. the recommendations do not try to rid the NQF discourse of power struggles, but rather attempt to minimise those struggles that may have a detrimental effect on NQF development and implementation.

A third and final section discusses the limitations of this study and also includes some suggestions for further study.

As was noted in *Chapter 4* the empirical dataset (as contained within the ATLAS.ti hermeneutic unit) has been kept separate from other source documents. References to documents in the empirical dataset do *not* include page numbers, even when extracts are used as supporting evidence. References to other source documents include page numbers when cited.

5.1.3 Summary of preceding findings and observations

5.1.3.1 Overview of the preceding chapters

This study is a critique of the development and implementation of the South African NQF. Its development and implementation has been discussed in detail over the course of the preceding chapters, which have dealt with:

- *Chapter 1* (Thematically and methodological orientation) – a background description of NQF implementation over three periods, the key concepts employed in the study and the research design
- *Chapter 2* (Periodic and thematic review of Foucauldian theory) – a literature review leading to a description of the Foucauldian theoretical framework and the two Foucauldian research methods, archaeology and genealogy, used in this study
- *Chapter 3* (Explication and identification of objects in the NQF discourse) – a review of NQF literature leading to the identification of eight objects in the NQF discourse, a list of typological observations, as well as the typological positioning of the NQF over the three initial periods as well as some most recent considerations
- *Chapter 4* (Archaeological and genealogical critiques of the NQF discourse) – the qualitative analysis of the empirical data using archaeology and genealogy.

5.1.3.2 Summary of key concepts

Three key concepts have been developed and consistently applied throughout this thesis:

- NQF, particularly the South African NQF;
- NQF discourse; and
- Power in the NQF discourse.

Firstly, the *South African NQF* is interpreted as follows within the context of this study:

A complex social construct with specific overt and/or covert purposes implemented and overseen by the South African government.

Furthermore, the South African NQF is characterised by a particular typological configuration that includes components such as: guiding philosophy, purpose, scope, prescriptiveness, incrementalism, policy breadth, architecture and governance (each of which was described in detail in *Chapters 3 and 4*).

The *NQF discourse* is interpreted as follows within the context of this study:

A dominant, influential and coherent amalgamation of divergent and even contradictory views, which support the development of an NQF that replaces all existing differentiated and divisive education and training structures.

For the purposes of this study the NQF discourse is represented by a wide range of NQF literature as well as an extensive empirical dataset consisting of:

- 300 interviews (including focus groups) conducted between 2002 and 2004
- 90 responses to discussion documents released between 2002 and 2004
- 72 news articles published between 1995 and 2005.

Thirdly, the particular choice of theoretical framework and research methods requires an understanding of Foucauldian power within the NQF discourse. From a literature review (presented in Chapter 2) of approximately 100 sources, including 20 primary texts, the Foucauldian theoretical framework is developed to provide the logical structure and boundaries within which the data collection and data analysis took place (see Jansen, 2001). The main characteristics of the Foucauldian framework include the following:

- Recognition that serious speakers within the NQF discourse know exactly what they mean (i.e. that there is no hidden truth that causes misinterpretation of their statements), while also ignoring individuals and their histories.
- Acknowledgement that speech acts within the NQF discourse cannot be studied in isolation from one another, but sets of such statements can be studied in isolation from their background.
- Recognition that all statements that refer to the NQF form a group that can be used to cluster objects that are linked to the NQF – in this case the eight objects (based on the typological components) identified in *Chapter 3*.
- No attempt is made to seek another underlying discourse – the NQF discourse is defined in terms of its own specificity.
- As far as possible, an attempt is made to remain non-judgemental and non-nihilistic – it is accepted that power in the NQF discourse is inescapable and that even the research process itself cannot avoid being drawn into it; even so, it is important to avoid confronting, judging or rejecting authorities and institutions and in so doing, try to rid the NQF discourse of power, as this would be a futile exercise.
- The general history of the NQF is used to explain the present - this history focuses on divisions and transitions and avoids period-based generalisations.
- Interrogation of *savoir* knowledge – the general knowledge that underlies disciplines within the NQF discourse.

This broader understanding of the Foucauldian theoretical framework employed in this study led to a particular interpretation of power within the NQF discourse:

Power exists in the NQF discourse in that different NQF stakeholders continually and consistently exercise power - this power represses the voices of some stakeholders in order to make others more dominant. This power exists in complex strategic relationships with reality, is linked to knowledge and is studied at the point where it is completely invested in its real and effective practices.

Power is also characterised by six guises: its effects, forms, manifestations, origins, relations and techniques.

5.1.3.3 Problem and purpose statements

The *Background* section in *Chapter 1* focused on three periods of NQF development and implementation:

- Conceptualisation period (early 1980s to 1994)
- Establishment period (1995 to 1998)
- Review period (1999 to 2005).

Three problems were identified within the South African NQF discourse. Firstly, that the NQF is rooted in contestations, i.e. contestations have been associated with NQF development and implementation since its conceptualisation in the early 1980s. It was also found that many NQF stakeholders have unrealistic expectations of the NQF, most probably because they do not fully understand the purpose of the NQF. A third finding from this section suggested that power struggles within the broader NQF discourse were having a negative effect on implementation. The identification of the problems resulted in the formulation of the *research problem* addressed throughout this study:

Power struggles are having a negative effect on the development and implementation of the South African NQF.

In an attempt to address this problem, the study has *purposed* to:

Support improved future development and implementation of the South African NQF.

Finally, in order to achieve the purpose of the study, the following actions have been taken thus far:

- *Description of the NQF discourse* – this description was partly presented in *Chapter 3*, mainly through the identification of objects in the NQF discourse, and continued in *Chapter 4*, with the application of archaeology to the empirical dataset.
- *Revelation of the NQF discourse as a system of constraint* – the revelation was presented in *Chapter 4* with the application of Foucault's genealogical method to the same empirical dataset.

5.1.3.4 Summary of observations from the review of NQF literature

The literature review, presented in *Chapter 3*, covered approximately 200 source documents that included published and presented papers and reports from recognised authors as well as formal

publications concerned with NQF development and implementation from South Africa, the SADC region, the United Kingdom, the European Union (EU), Australia, New Zealand, France and the Caribbean Community (CARICOM).

The literature review was structured according to eight NQF typological components that were identified and explicated as objects in the NQF discourse and then used during the archaeological critique. In addition to the identification of the eight objects, a list of 30 observations were also made (see *Table 18* in *Chapter 3*). These observations included the following:

- A tension exists between the underlying philosophy that influences the South African NQF and its more overt purposes such as addressing social justice and redress – importantly the South African NQF formed part of a new *unifying discourse* that was emerging from the reconciliatory process that characterised the 1994 period and that was characterised by hegemonic struggles (Deacon and Parker, 1999).
- Due to globalisation and other influences, there are pressures to pursue unification within the South African NQF – paradoxically, such attempts to pursue unification led to greater diversification.
- The tight prescriptiveness of the South African NQF has been contentious, but has also been necessary in order to achieve its purpose.
- Gradual and phased implementation was not an option for the NQF in South Africa, despite the fact that rapid and comprehensive implementation has not worked elsewhere in the world.
- The low institutional logic that accompanied initial NQF implementation in South Africa contributed to unrealistic expectations of what the NQF would be able to achieve.
- Stakeholder involvement in the South African NQF has remained contentious but also necessary - the need to build communities of trust was observed.
- Both the architecture and governance of the South African NQF have remained contested on a variety of fronts.

5.1.3.5 Summary of findings from the typological positioning of the NQF

Twelve findings (see *Table 22* in *Chapter 3*), related to the typological components, were subsequently made. These findings were based on literature that covered the four periods of the development and implementation of the South African NQF (the three initial periods that were also described in *Chapter 1* with an additional discussion on current [2005] considerations).

The findings, also organised according to the eight typological categories, included the following:

- The objectives of the South African NQF have remained largely unchallenged.
- The scope of the South African NQF has evolved from unified to tracked.
- The prescriptiveness of the South African NQF has remained tight.
- The incrementalism of the South African NQF has remained rapid and comprehensive.
- The policy breadth of the South African NQF has evolved to high intrinsic with high institutional logic.
- Architecture- and governance-related disagreements have skewed the South African NQF debate to the extent that many other more fundamental and deep-rooted causes of power struggles have been ignored.

5.1.3.6 Summary of results from the archaeological critique

After the identification of objects in the NQF discourse (as the eight NQF typological components, namely: underlying philosophy, purpose, scope, prescriptiveness, incrementalism, policy breadth, architecture and governance) in *Chapter 3*, more than fifty unities were identified from the empirical data. As a result, eight *strategies* in the NQF discourse were identified, each of which was interpreted as (also see Foucault, 1972):

Coherent, rigorous and stable statements that form themes and theories in the NQF discourse consisting of certain organisations of concepts and grouping of subjects.

The eight strategies identified in the NQF discourse are:

1. Disagreement on incrementalism as strategy
2. Inconsistent stakeholder involvement as strategy
3. Tight-loose prescriptiveness as strategy
4. Building communities of trust as strategy
5. Strong leadership as strategy
6. Support for NQF objectives although interpretations vary as strategy
7. High intrinsic and institutional logic as strategy
8. Academic/vocational fault line as strategy.

5.1.3.7 Summary of results from the genealogical critique

The genealogical critique included the identification of sixteen erudite knowledges, twelve local memories, and ten knowledges opposed to power. The knowledges and local memories were then

combined into the same group of subjugated knowledges and used to identify seven *constraints* within the NQF discourse, interpreted as follows within the Foucauldian theoretical framework:

Lineages of historical knowledge within the NQF discourse which were present but disguised within the body of functionalist and systematising theory and which criticism has been able to reveal.

The seven constraints identified in the NQF discourse are:

1. Limited common understanding of the original conceptualisation of the NQF as constraint
2. Lack of awareness that transformation requires power as constraint
3. Varying stakeholder involvement as constraint
4. Unrealistic expectations of the NQF as constraint
5. Disagreement on the role of a single accountable structure as constraint
6. Misalignment between the educationalists and vocationalists as constraint
7. Taking advantage of the lack of clear legislative alignment as constraint.

5.2 POWER IN THE NQF DISCOURSE

5.2.1 Introduction

This section presents the findings of the study as a description of power in the NQF discourse. The findings are based on the research results, i.e. from the analysis of the empirical dataset described in the preceding chapters, namely the:

- archaeological critique (as represented by the eight identified strategies);
- the genealogical critique (as represented by the seven identified constraints); and
- observations and findings from the review of NQF literature.

The strategies describe the NQF discourse (a snapshot), while the constraints reveal the NQF discourse as a system of constraint through lineages (or processual aspects) within the discourse. In this section the strategies and constraints are viewed together to describe power in the NQF discourse. The observations and findings from the literature review are used to support the description.

The description of power in the NQF discourse, as presented in this section, is structured according to three stages covering the six identified guises of power (see *Chapter 2* for a detailed discussion):

Stage 1

- *Forms of power* - the characterisable and unique modes in which power appears within the NQF discourse. Identified categories of forms of power include: Bio-power, Busno-power, Disciplinary power, Governmentality, Legal power, Negative power, Pastoral power, Police, Political power, Positive power and Royal power.
- *Techniques of power* - the methods or systems by which power is exercised in the NQF discourse. Identified categories of techniques of power include: Archivisation, Bureaucratisation, Centralisation, Classification, Colonialisation, Control, Distribution, Economisation, Exclusion, Individualisation, Normalisation, Regulation, Spatialisation, Surveillance, Totalisation and Verbalisation.
- *Power relations* - the web of overt and covert interactions and associations between and amongst NQF stakeholders. Identified categories of power relations include those of the: NQF overseeing agency, NQF principals, NQF partners, quality assurance bodies, standards setting bodies and education and training providers.

The sequence of the description is chosen so as to allow for a more coherent and logical progression. The *forms* of power, *techniques* of power and *power relations* in the NQF discourse are described by using the empirical evidence and the results of the literature review. As each of these three guises are largely made up of pre-identified categories, the empirical evidence and the literature review were interrogated to find evidence for each of the categories that made up the three guises. Where none was found, it was reported as such.

Subsequently, three *origins* of power in the NQF discourse are suggested - also identified from the empirical evidence and the literature review:

Stage 2

- *Origins of power* - the primary sources, starting points and/or catalysts that are directly linked to the noticeable way in which power appears at the point of its direct relationship with the NQF.

The particular choices of origins are supported by discussing specific *manifestations* (or appearances) and *effects* (results) of power that are associated with each.

Stage 3

- *Manifestations of power* - the noticeable and observable appearance of power at the point where it is in direct and immediate relationship with objects within the NQF discourse.
- *Effects of power* - the outcomes or results of the manifestation of power in the NQF discourse.

The sequence of description using the guises of power is illustrated below:

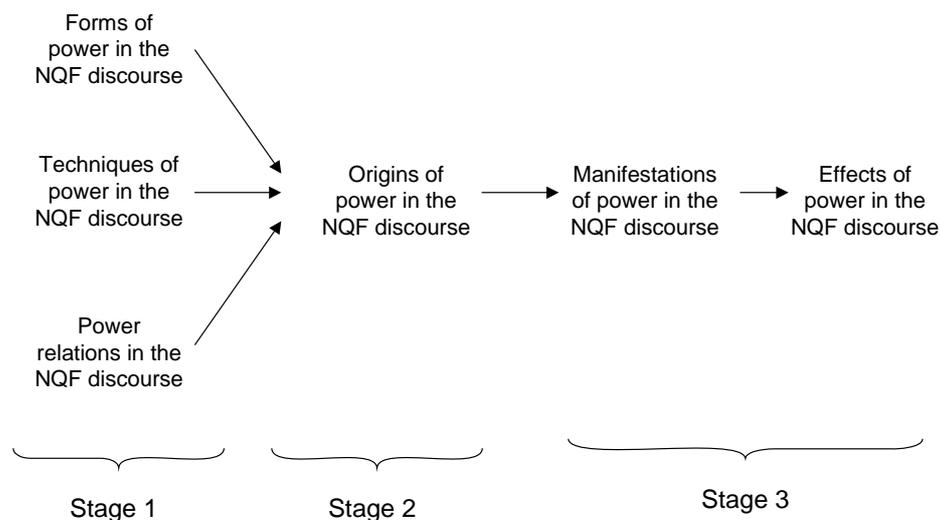


Diagram 32: Sequence of the description of power in the NQF discourse

5.2.2 Forms of power in the NQF discourse

In the context of this study on the development and implementation of the NQF, *forms of power* are interpreted as the:

...characterisable and unique modes in which power appears within the NQF discourse.

Forms of power include: Bio-power, Busno-power, Disciplinary power, Governmentality, Legal power, Negative power, Pastoral power, Police, Political power, Positive power and Royal power.

5.2.2.1 Identified forms of power

The following forms of power are identified from the archaeological and genealogical critiques:

1. Bio-power as form
2. Busno-power as form
3. Governmentality as form
4. Legal power as form
5. Political power as form
6. Positive power as form.

The following forms of power were *not* explicitly identified (this is not to say that they do not exist in the NQF discourse, rather just that they were not explicitly identifiable from the empirical dataset):

- Disciplinary power – the internalised disciplinary power that produces a person who is docile (Dreyfus and Rabinow in Shawver, 1999).
- Negative power - says that something cannot be done (Foucault, 1980).
- Pastoral power - looking after the community, implies knowledge of conscience and ability to direct it (cf. Foucault in Dreyfus and Rabinow, 1983).
- Police - a system of regulation that seeks to control everything and everyone (cf. Foucault in Leach, 1997).
- Royal power – a monarch’s absolute power (Foucault, 1980).

The examples used to illustrate the various forms of power are not intended to be inclusive of all those that are possible, but have been carefully selected to explain the specific form of power. As before, supporting evidence is obtained from the archaeological and genealogical critiques as well as from the literature review – these are listed at the beginning of each description.

5.2.2.2 Bio-power as form

Associated strategies

Academic/vocational fault line as strategy

Associated constraints

Varying stakeholder involvement as constraint;
Disagreement on the role of a single accountable structure as constraint; Misalignment between the educationalists and vocationalists as constraint

Marshall (1996:2) describes bio-power as being ‘...exercised over members of a population so that their sexuality and individuality are constituted in certain ways that are connected with issues of

national policy, including the machinery of production'. Following from this description, *bio-power* in the context of the NQF discourse is recognised as:

...the extent to which the NQF and related policies influence the individuality of the South African population.

Examples from the empirical dataset are discussed below.

The SAQA Act stands out as an important example of how NQF “policy” influenced individuality as exemplified in the initial fears of the higher education sector that the establishment of SAQA would enable the state to prescribe what would be taught (*The Cape Times*, 28 June 1995). Although the extensive involvement of stakeholders in the standards setting structures must have allayed some of these fears, the NSBs and SGBs continued to develop qualifications and unit standards for the next ten years, arguably influencing what was taught, even if indirectly, as providers were still able to develop their own curricula and programmes based on the registered qualifications and unit standards.

Another comment, identified through the genealogical critique, shows how SAQA’s overseeing role placed SAQA in a position to exercise power in order to ensure the involvement of the population in the NQF:

The original role of SAQA was to develop the NQF, put the framework in place, propagate it and get the people on the ground to assist in making [the NQF] work. That was SAQA in an overseeing role, which in effect said, “This is the policy, this is the path we are going to move – you make the regulations” (IMWG member in SAQA, 2004c).

Even though many, including the IMWG member above, argued that SAQA did not fully take on this overseeing role, it was always called for and as such is an important example of bio-power.

Also from the genealogical critique, the misalignment between educational and vocational constituencies includes reference to the disqualification of particular constituencies (e.g. private providers and technikons). Such disqualification would undoubtedly be linked to the manifestation of bio-power in the NQF discourse.

The observation from the literature review that communities of trust are needed is also an important example of how individuality can be influenced by the NQF and related policies as emphasised in the empirical dataset:

Research has shown that it is never possible to develop criteria that are universally applicable to all situations - assessors cannot avoid invoking “norms” in making their judgements. Hence, the importance of “communities” with shared practical experience (which is often expertise in a subject or occupational field), which provides people with the basis for making judgements. In other words, criteria alone are never enough. In relation to qualifications, the idea of “communities of trust” stresses the importance of shared experience and usage (CHE, 2003).

5.2.2.3 *Busno-power as form*

Associated strategies

Inconsistent stakeholder involvement as strategy;
Building communities of trust as strategy;
Academic/vocational fault line as strategy

Associated constraints

Misalignment between the educationalists and vocationalists as constraint

Busno-power is defined as:

...directed at the subjectivity of the person, not through the body but through the mind, through forms of educational practice and pedagogy which, through choices in education, shape the subjectivities of autonomous choosers...in the exercise of busno-power there is a merger of the economic, the social and the activity of the government (Marshall, 1996:4).

Following from Marshall’s definition, *busno-power* in the NQF discourse is recognised in two appearances:

- In NQF-influenced *educational practice and pedagogy* that shape the subjectivities of autonomous choosers, such as learners and other stakeholders;
- As a *merger of actions of the government with economic and social goals* – i.e. when the NQF is used by the government to transform society and simultaneously to achieve specific economic goals.

Examples are discussed below.

Through the archaeological critique, evidence relating to all five main purposes of NQFs was identified from the empirical sources. The five purposes were:

1. addressing issues of social justice;
2. improving access to the qualifications system and progression within it;

3. establishing standards, achieving comparability and benchmarking;
4. qualifications as instruments of communication; and
5. qualifications as instruments of regulation.

The purposes clearly merge social goals (*Purpose 1*) with regulatory actions of the government (*Purpose 5*) and economic goals embodied in increased comparability and benchmarking. It is, however, important to note that there is continual tension between these purposes and the more covert underlying purposes or philosophies:

...the explicit purposes of NQFs are not their “real” purposes or at least that there is a tension between the democratic ideals of NQFs and the neo-liberal economic objectives of governments (Tuck, personal correspondence, 18 February 2005).

The merger indicated above is so obvious, that some authors expressed grave concern that the NQF was emphasising economic needs at the expense of social and political developmental needs:

...we have observed that systems put in place tend to over-emphasise economic needs at the expense of social and political developmental needs...[this] does not in any way facilitate the attainment of transformation in the education and training architecture as entrenched by the apartheid government (COSATU, 2003).

Trade union involvement in the development of the NQF, albeit inconsistent (NUMSA in SAQA, 2004g), further signifies merger of the social purposes of the NQF with the actions of government.

The proposed increased alignment between the NQF, the National Skills Development Strategy (NSDS) and various educational initiatives, also indicate a merger of the activities of the government and social and economic goals. Comments from the CTP (2003) also emphasise the need for more alignment between national policies:

We found the lack of alignment of national policy regarding education and training an obstacle. Discussion of the NQF cannot be divorced from policy that relates to its structure...

It can also be argued that the power of “what is knowledge” was transferred to the bureaucrats when it became the responsibility of SAQA and its substructures to approve and register all national qualifications. The call for the disbanding of the NSBs and SGBs support this point (e.g. SAUVCA, 2004).

Here again, the differences between vocationalism and educationalism seem to have an important influence. The continual struggle for dominance between the two constituencies as well as the increased pressures for more unity, exposes individuals from each sector to various forms of educational practice and pedagogy that, in turn, can shape their subjectivity.

As with bio-power, the need for communities of trust also signifies the extent to which the choices of individuals and communities can be shaped through educational practices associated with the NQF.

5.2.2.4 Governmentality as form

Associated strategies

Inconsistent stakeholder involvement as strategy;
Tight-loose prescriptiveness as strategy

Associated constraints

Lack of awareness that transformation requires power as constraint; Varying stakeholder involvement as constraint; Disagreement on the role of a single accountable structure as constraint

Shawver (1999:1) describes governmentality as follows:

A centralisation and increased government power. This power is not negative. In fact, it produces reality through "rituals of truth" and it creates a particular style of subjectivity which one conforms to or resists. Because the individuals are taken into this subjectivity they become part of the normalizing force.

Governmentality in the NQF discourse is interpreted as follows:

...the extent to which the NQF is associated with the increased centralisation of government power and the subjectivity of individuals within the NQF discourse.

Examples are discussed below.

In the following example governmentality is recognised, in that the NQF discourse is described as too specialised and technocratic:

Discussions around the NQF have been restricted to a few, and the implications of the new system have not been fully explored. This is partly due to the specialised and technocratic language which surrounds the NQF as well as the complexity of the proposed bureaucracy which will put it into place (Samson and Vally, 1996:7).

Similar examples are sourced from the archaeological critique where the NQF is associated with unnecessarily complex language, or 'SAQAnese' (Dixie, 2004), and a 'minefield of jargon, acronyms and bureaucracy' (*The Mail and Guardian*, 26 May 2000).

Likewise, from the literature review, Parker (1999:4) described the initial period of NQF implementation as one in which governmental discourse 'employs a language of bureaucracy rather than democracy or reflection'. In an even earlier document, the HSRC concurred:

Developing and exploring aspects of the NQF has meant using and defining words and terms in a particular way, a way that many readers may find confusing, or even mystifying (HSRC, 1995:1).

Increased state control was questioned from the very release of the draft NQF Bill (*The Daily News*, 5 September 1995). It does, however, appear that with time, most stakeholders have conformed to the increased centralisation, even to the extent that calls for more standardisation were being made (e.g. for qualification nomenclature and quality assurance processes [GDE, 2003]). In this regard it can be argued that the NQF has created a "style of subjectivity" which stakeholders have chosen to conform to or resist. Importantly, both the archaeological and genealogical critiques identified *varying/inconsistent stakeholder involvement*, which may point to different stages of conformation and resistance by stakeholders. The initial resistance from the higher education sector is one such example. The gradual decline in trade union involvement (NUMSA in SAQA, 2004g) is another.

Shawver (1999) also notes that individuals that are taken into this subjectivity become part of the normalising force. Following from the example above, this appears to be the case in the NQF discourse. Some of the most ardent critics of the NQF have over time become very supportive (others that have been very supportive, have become critical). The following are two such examples, one from the higher education sector, the other from the Human Sciences Research Council (HSRC):

In 1999 Jansen made his doubts about the NQF well known:

Predicting that neither the NQF nor OBE would work, Prof. Jansen said policies had to "resonate with the ideas of practitioners" thinking in order of work. "People have to make sense of [them] in the daily grind of their work" (NRF, 1999:47).

By 2004, after supporting various NQF-related initiatives, Jansen showed much more optimism in his comments on the results of the NQF Impact Study (SAQA, 2004):

The first reason the NQF has had minimal impact in the South African education and training system is quite simply that the NQF promised what it could never deliver in practice. This in part has to do with the nature and complexity of practice, but it has a lot to do with the idealism and euphoria of policymaking in the years immediately preceding and following the formal installation of a democratic government in 1994. Put bluntly, we got carried away (Jansen, 2004b: 95).

Kraak, on the other hand, was closely involved during the conceptualisation period, but seemed to withdraw as implementation continued. *Ways of seeing the NQF* was published by the HSRC in 1995 and made a positive contribution to the development of an integrated NQF. In 1998 Kraak was arguing for a systemic rather than unit standards framework (Kraak, 1998); a year later he was arguing for Mode 2 knowledge (problem solving) rather than Mode 1 (traditional disciplinary knowledge) (Kraak, 1999). In 1999 the HSRC investigated restructuring in higher education (in NRF, 1999). This included a focus on SAQA, but was eventually discredited by Jansen (2000). *Education in retrospect* followed in 2001 (Kraak and Young, 2001).

The examples have not been used to discredit Jansen or Kraak, as both academics are well respected and acknowledged in the local and international research community, and by the author of this thesis. The intention has rather been to show how individuals have been taken into the subjectivity associated with the NQF discourse and have become part of its normalising force – governmentality in practice.

A related point is raised by French (2004). He compares the NQF process to a famous limerick when he warns that the NQF Impact Study (SAQA, 2004), just as the NQF itself, seems to be ‘aiming at using the power of a dangerous tiger, but remaining the rider’ (French, 2004:109):

There was a young lady from Riga
Who smiled as she rode a tiger
They returned from the ride
With the lady inside
And the smile on the face of the tiger.

One interpretation of French’s warning is that the execution of the NQF Impact Study is also a form of governmentality.

Another example of governmentality is to be found from the genealogical critique in the lack of awareness that transformation requires power to succeed. In this constraint the positive power of

governmentality is noticeable. The centralisation and increased government power associated with the NQF are not questioned; what is concerning to stakeholders is rather the disqualification of certain constituencies (De Wal, 2003) and the power struggles between the DoE and DoL (NAPTOSA, 2004).

Likewise, in the disagreement on the role of a single accountable structure constraint, it is only the initial concerns from the higher education sector, through the CUP, that SAQA would be too prescriptive. Other comments focused on power imbalances and once again, the “warfare” between the DoE and DoL.

5.2.2.5 Legal power as form

Associated strategies

Disagreement on incrementalism as strategy; Tight-loose prescriptiveness as strategy; Support for NQF objectives although interpretations vary as strategy

Associated constraints

Limited common understanding of the original conceptualisation of the NQF as constraint; Unrealistic expectations of the NQF as constraint; Taking advantage of the lack of clear legislative alignment as constraint

Elders (<http://dusan.satori.sk>, accessed 5 July 2004) suggests that it is important to act against legal power:

...against those areas of laws which simply ratifies some system of power.

Keeping Elders’ advice in mind, *legal power* in the context of the NQF discourse is interpreted as:

...the extent to which NQF legislation and related legal actions are used to exercise power in the NQF discourse.

Extensive evidence of legal power in the NQF discourse was found from the empirical dataset. Some examples are indicated below.

The “railroading” of the SAQA Act through parliament in 1995 is an important example of how the legal mode of power was used to ratify a system of power. Together with other education and training legislation at that time, the Minister of Education was given considerable powers that were questioned by many:

The National Party has questioned the extent of power over policy which the Minister has given himself in the Education [NQF] Bill (*The Daily News*, 5 September 1995).

The Minister was in a unique situation – apartheid legislation had to be replaced and the NQF needed to be implemented. In such ideal conditions, the SAQA Act (SA, 1995c) was not going to be stopped, even if some sections of the higher education sector were excluded (cf. *The Star*, 5 July 1995) during the initial conceptualisation. The SAQA Act was therefore also the first piece of education and training legislation to be passed by the ANC government.

A further example of legal power is the perceived *laissez faire* attitude towards the SAQA Act (SA, 1995c) and subsequent legislation (referred to above). According to APPETD (2004) and others the two Departments in particular appear to be prematurely disregarding ‘the current legislative framework...in favour of a new emerging framework that is yet to be agreed, let alone promulgated’. SAQA (2004) concurred:

What is concerning however is that even though the current legislative framework has placed some of this responsibility on SAQA, it now appears as if the Department of Education - with very limited consultation with SAQA - has deemed it appropriate to change the role of the CHE without the necessary legislative underpinning.

Another way in which legal power is exercised is reflected in the intentions that new NQF legislation would be developed and passed in an unrealistically short time (ASDFSFA, 2003). Yet another, is the way in which specific stakeholder groupings are affected by legislation. Two examples that stand out are mentioned:

- Private providers facing difficulties regarding registration and accreditation processes:

Private institutions are exasperated by the Department of Education's and South African Qualifications Authority's registration and accreditation processes, which are so flawed that they cannot possibly produce the results they were intended to achieve (*The Mail and Guardian*, 19 January 2001).

- Exclusion of professional bodies (both statutory and non-statutory) in quality assurance processes:

Professions have statutory empowerment to set standards and to accredit higher education qualifications. Those professions are required by their respective Acts to co-operate with SAQA and the CHE. The relationship between the CHE, SAQA and the statutory professions must therefore be a co-operative one... (ECSA and ESGB, 2004).

From the tight-loose prescriptiveness strategy follows another example of legal power, in this case not necessarily negative. A certain amount of prescriptiveness was unavoidable in order for the South African NQF to achieve its goals of redress and transformation (DoE representative in SAQA, 2005d). As found in the literature review, this is the main reason why the prescriptiveness of the South African NQF has remained tight, despite evidence of other NQFs becoming looser, and despite the fact that such “tightness” leads to contestations:

The implementation of tight frameworks has generally been associated with controversy and contestation, largely arising from resistance in the university and school sectors to what may be perceived as the imposition of alien and inappropriate ideas and processes imported from VET [Vocational Education and Training] (Tuck *et al*, 2004:7).

Another observation from the literature review suggests that a range of policies and systems are needed to achieve the NQF’s overt purposes. Worded differently, NQFs require legislative undergirding in order to achieve the purposes set out by the government that oversees them; in short, laws are needed to ratify the system of power associated with the NQF.

5.2.2.6 Political power as form

Associated strategies

Disagreement on incrementalism as strategy; Tight-loose prescriptiveness as strategy; Building communities of trust as strategy; Strong leadership as strategy; Academic/vocational fault line as strategy

Associated constraints

Lack of awareness that transformation requires power as constraint; Misalignment between the educationalists and vocationalists as constraint

Foucault (1980:88) describes political power as:

Power is that concrete power which every individual holds, and whose partial or total cession enables political power or sovereignty to be established. This theoretical construction is essentially based on the idea that the construction of political power obeys the model of a legal transaction involving a contractual type of exchange...

For Foucault political power is also linked to the economy: ‘...we have a political power whose formal model is discoverable in the process of exchange, the economic circulation of commodities’ (*Ibid.*). An important feature that can be deduced from Foucault’s explanation is that political power is a *type of exchange* similar to a legal (contract) or economic (buy-and-sell) transaction.

In the context of the NQF discourse, *political power* is interpreted as:

...the exchange and circulation of commodities within the NQF discourse that occurs when NQF stakeholders partially or completely concede specific positions.

Examples from the Foucauldian critique as well as the literature review are discussed below.

From the disagreement on incrementalism strategy, evidence of the tensions between the short-term pressures on political structures and the threat to the longer-term principles of the NQF is identified:

My sense is that the NQF, at this stage of development, does provide a means to reflect the principles that were embedded in the NQF in its conceptualisation. I think some of those principles are under threat, partly for the reasons mentioned earlier - the tension about the short term pressure on political structures to demonstrate quick fixes is a major threat to some of the longer term principles of the NQF (SAQA Manager in SAQA, 2004c).

Tight-loose prescriptiveness is another example of an exchange process. As mentioned before, a certain amount of prescriptiveness has been necessary in order for the NQF to achieve its transformative goals. A complete lack of prescriptiveness would have rendered the NQF ineffective. A too strong framework, on the other hand, would lead to considerable opposition:

...the stronger the framework the harder it is likely to be to achieve agreement and for the framework to be able to include a wide diversity of learning needs (Young, 2005:14).

Another example of political power is found in the need for the building of communities of trust. On the one hand stakeholder involvement is an integral part of a social construct (Inter-NSB Committee, 2003), while on the other, too much stakeholder involvement leads to delays and contestations:

I think that the SAQA process has been an incredible process with respect to stakeholders. In fact, it goes too far. The recommendation (in the NQF Review) about leaving the democratic scrutiny to a stage when experts have already participated in the process is a wise one, because stakeholders by definition have different interests and so the battle is the battle of the primacy of these interests. If you haven't upfront established what comes first, then everything is up for contestation and you get turned around in a million different ways as these different interests seek to satisfy their constituents (University principal in SAQA, 2004c).

Yet another, and probably more extreme example of political power, is evident in the misalignment between the academic and vocational constituencies. Described as internecine warfare, the differences between the DoE and DoL have manifested in the public domain:

...instead of working together to address the skills backlog that hampers the economy, the two departments spend much time fighting for turf. "The problem was not with the ministers. It was their departments and their officials that had problems. Philosophically the tension seems to pit the educationalists against the vocationalists," said Ken Hall chairperson of the education and training committee of the South African Chamber of Commerce (*The Mail and Guardian*, 2 March 2005).

An example from the literature review is the tension between the overt and covert purposes of the NQF. As also mentioned before, NQFs are influenced by both sets of purposes; therefore this tension can lead to increased contestations and power struggles.

A related example is taken from Isaacs (2000:4) and refers to the tension between the overt and covert agendas of NQF stakeholders, particularly those within SAQA and the principals of the NQF:

The most critical threat to the successful implementation of the NQF are the overt and covert agendas of the SAQA members [referring to the SAQA Board], SAQA staff, government departments, professional councils and bodies, consultants, providers, industrial sectors and other stakeholders.

Yet another example may be taken from the funding of NQFs. With extensive support from donors such as the European Union, SAQA was able to become more autonomous and proceed with the development and implementation of the NQF at a much greater pace than would have been possible. This led to tensions between SAQA and the DoE:

SAQA was a victim of benign neglect, denied adequate funding and support from the very departments charged with implementing this flagship project... (Isaacs in *The Financial Mail*, 2 August 2002).

5.2.2.7 Positive power as form

Associated strategies

Tight-loose prescriptiveness as strategy; Building communities of trust as strategy; High intrinsic and institutional logic as strategy

Associated constraints

Lack of awareness that transformation requires power as constraint

Shawver (1999) defines positive power as follows:

Positive power inspires and solves certain problems, enables, serves use to someone.

In the NQF discourse, *positive power* is interpreted as:

...the complex relations within the NQF discourse that contribute to the more effective development and implementation of the NQF.

Examples of positive power in the NQF discourse are discussed below.

In the first example SAQA acknowledges that power is necessary for transformation:

...moral purpose, ideas (innovations) and power are the three necessary conditions for education and training change and that “moral purpose and ideas without power means that the train never leaves the station” (Fullan, 1999 in SAQA, 2003).

Another related example is recognition that a certain amount of prescriptiveness is necessary to achieve the goals of the NQF (DoE representative in SAQA, 2005c).

The need to increase institutional and intrinsic logics also represents a mode of power that can be characterised as enabling and beneficial as long as social and educational goals are not ignored, as suggested by Tuck *et al* (2004:10):

...combine intrinsic and institutional logics while not subordinating social and educational goals to the needs of specific institutional interest groups.

Recognition of the need for improved parity of esteem between vocational training and academic education is another example of positive power (SAQA, 2004).

5.2.2.8 Concluding comments on forms of power in the NQF discourse

Six different (but not exclusive) forms of power have been identified in the NQF discourse. In each case a number of examples of manifestations of power that can be characterised within a specific mode or form have been presented.

5.2.3 Techniques of power in the NQF discourse

In the context of this study, *techniques of power* are:

...the methods or systems by which power is exercised in the NQF discourse.

Techniques of power include: Archivisation, Bureaucratisation, Centralisation, Classification, Colonialisation, Control, Distribution, Economisation, Exclusion, Individualisation, Normalisation, Regulation, Spatialisation, Surveillance, Totalisation and Verbalisation.

5.2.3.1 Identified techniques of power

The following techniques of power have been identified from the archaeological and genealogical critiques:

- Archivisation as technique
- Bureaucratisation as technique
- Centralisation as technique
- Classification as technique
- Colonialisation as technique
- Control as technique
- Distribution as technique
- Economisation as technique
- Individualisation as technique
- Normalisation as technique
- Regulation as technique
- Spatialisation as technique
- Surveillance as technique
- Totalisation as technique
- Verbalisation as technique.

The examples used in this section are not intended to be inclusive of all those that are possible, but have been carefully selected to explain the specific technique of power. The interpretations of each technique have been taken mainly from Foucault (1972), Gore (in Popkewitz and Brennan, 1998) and Rajchman (in Smart, 1994). Furthermore, the techniques of power discussed in this section cannot be seen as discrete methods or systems, as significant overlaps are possible between each.

5.2.3.2 Archivisation as technique

Associated strategies

Support for NQF objectives although interpretations vary as strategy

Associated constraints

Limited common understanding of the original conceptualisation of the NQF as constraint;
Unrealistic expectations of the NQF as constraint;
Taking advantage of the lack of clear legislative alignment as constraint

The first method by which power is exercised in the NQF discourse is *archivisation*, which is interpreted as:

...the formation and transformation of statements in the NQF discourse.

Examples identified from the empirical evidence and literature review are indicated below.

From the archaeological critique it was noted that the significant support for the NQF objectives camouflaged the fact that interpretations of the objectives varied, even to the extent that such interpretations may be contradictory. From this evidence archivisation is associated with this appearance of power in the NQF discourse. As noted in the previous chapter, authors felt pressured not to make negative statements about NQF objectives, fearing that such criticism would be interpreted as support for the “evil” pre-1994 system. Allias (2003) and Young (2003) suggest that this is due to a tendency for the distinction between *means* (the NQF and its outcomes basis) and *goals* (purpose or objectives, e.g. redress, access etc.) to be collapsed. One consequence of this distortion is that:

... any criticism of the NQF approach is dismissed as a critique of the broader transformational goals that the NQF is seen as a vehicle for (Allias, 2003, in Young, 2003).

Another example of the formation of statements is found in the various media releases that coincided with the promulgation of the SAQA Act (SA, 1995c). Some examples are listed below:

- “Thought police feared” (*Eastern Province Herald*, 27 June 1995)
- “Academic freedom under threat” (*The Cape Times*, 28 June 1995)
- “Education bill targets division of powers” (*The Argus*, 10 August 1995).

The transformation of statements, or at least the accusation that statements had been transformed, was also evident in the press, as the following example shows:

To even imagine that a Government committed to democracy, transparency and public accountability could contemplate the creation of “thought police” is utter nonsense (Bhengu in *The Star*, 3 July 1995).

Archivisation as technique of power is very evident in the 90 responses to the review documents that were included in the qualitative analysis. Numerous statements from the Departments and the Study Team (DoE and DoL, 2002) were critiqued and transformed to support the positions of various constituencies. In many cases, the very accusations of power struggles, such as those between the Departments, were in fact examples of the exercise of power in themselves. *Chapter 4* is saturated with examples similar to the following:

The [NQF] has a role to play in redress but not a major role as expected. I think it is a misplaced kind of expectation, which is why I suppose part of the *Study Team* [DoE and DoL, 2002] comment was that the NQF is but one [mechanism] for the transformation of this country. Maybe that is more an indication of the ambition we had (DoE in SAQA, 2004f, emphasis added).

We are disappointed that the [*Consultative*] document fails to address the debate of professional qualifications vs. professional designations. This is a major concern within the current system, and clarity on the issue must be provided (SAICA, 2003, emphasis added).

The role of the SETAs seems to be underplayed or totally ignored [in the *draft HEQF* (DoE, 2004)] (Masango, 2004).

A final example of archivisation is statements of the perceived contradictions between various pieces of legislation. From the genealogical critique it was shown that some constituencies might have been taking advantage of the apparent anomalies in the legislation to strengthen their own. One such example is the questioning by the University of Pretoria of the role of SAQA with respect to standards generation when the CHE is also being tasked to generate standards (UP, 2004).

5.2.3.3 Bureaucratisation as technique

Associated strategies

Tight-loose prescriptiveness as strategy; Strong leadership as strategy

Associated constraints

Lack of awareness that transformation requires power as constraint; Disagreement on the role of a single accountable structure as constraint; Taking advantage of the lack of clear legislative alignment as constraint

Bureaucratisation is interpreted as:

...making the NQF a system of government that is based on unnecessary official procedures, divisions and hierarchy of authority.

A number of examples have been identified.

Concerns about bureaucratisation were most evident when the SAQA Act (SA, 1995c) was drafted and promulgated. These concerns decreased during the establishment period (1995-1998), but seemed to resurface during the review period. The following are examples from the two periods:

The fear is that the [NQF's] threat to university autonomy can be compared with the one launched many years ago, but for different reasons, by the apartheid government at its most autocratic (*The Cape Times*, 28 June 1995).

The government's legislation is a minefield of jargon, acronyms and bureaucracy (*The Mail and Guardian*, 26 May 2000).

Related to leadership of the NQF, the “plethora” (NAPTOSA, 2003) of quality assurance bodies constitute another example of increased official procedures and hierarchies. Comments about the roles and functions of additional bodies recommended in the review documents also provide supporting evidence (e.g. CHE, 2003; COSATU, 2003 and GDE, 2003).

From the genealogical critique it was seen that the “fallback” establishment of SAQA resulted in various additional responsibilities being placed on SAQA, requiring SAQA to become more administrative and bureaucratic:

SAQA has moved from overseeing to implementing. It has made itself not a guiding body as much as an administrative body...[SAQA] has progressed from being a guiding organization/consultancy to being a bureaucracy (IMWG member in SAQA, 2004c).

Also evident from the genealogical critique is the recurring theme of inadequate marketing and the influence that it had on the expectations of stakeholders and the unclear position of the NQF within the broader national strategy. Likewise, the inadequate marketing contributed to the perception of stakeholders that the NQF is an overly bureaucratic governmental intrusion on their practices.

The literature review has provided more examples: the definition of an NQF (as used in this study), namely as a complex social construct with specific overt and/or covert purposes implemented and *overseen by government bureaucracies*; and the characteristics of an NQF which includes an organisation of bureaucracy, as noted by Kraak and Young (2001). It is apparent that just as the NQF as a social construct is inextricably linked to power (see the section on the origins of power in the NQF discourse), the NQF as bureaucratic instrument is necessarily linked to bureaucratisation as a method by which the power is exercised.

5.2.3.4 Centralisation as technique

Associated strategies

Tight-loose prescriptiveness as strategy; Strong leadership as strategy

Associated constraints

Disagreement on the role of a single accountable structure as constraint

Closely related to bureaucratisation, *centralisation* is understood as

...an attempt to unify, consolidate, integrate and bring everything in the NQF discourse under central control.

Various examples of centralisation have been identified.

The NQF discourse is interpreted as:

...a dominant, influential and coherent amalgamation of divergent and even contradictory views, which support the development of an NQF that replaces all existing differentiated and divisive education and training structures.

From this description it can be seen that the NQF discourse is inherently centralising, and integrating, associated with the attempt to replace differentiated and diverse structures.

Some of the earliest knowledges that opposed power in the NQF discourse were concerned with the centralising effect of the NQF, specifically the increased bureaucratisation and loss of autonomy:

Proposed [NQF] legislation aims at bringing all educational institutions under a single administration to be known as the [South African] Qualifications Authority (*The Cape Times*, 28 June 1995).

The exercise of power through centralisation was also evident in the many concerns raised by stakeholders in their responses to the review documents. The following is an example:

The draft HEQF policy implicitly suggests that all providers, public or private, are similar and need to be treated in a similar manner. SAQA is of the opinion that this is a fatal error (SAQA, 2004).

From the archaeological critique the calls for strong leadership, and a single accountable structure such as SAQA, provides more examples of centralisation:

The CHE and HEQC believe that the NQF needs a strong and effective Qualifications Authority to provide intellectual and strategic leadership for the implementation of the NQF (CHE, 2003).

Another example is from an early comment in a news article that discussed the proposals of the National Commission on Higher Education (NCHE) related to the NQF. In the article it was noted that no specific groupings were recognised above others when the initial NQF development took place:

...the commission appears to have met a wide range of needs without bowing to the specific demands of any group. It embraces a vision for an integrated and highly co-ordinated higher education system which guarantees academic freedom (*The Mail and Guardian*, 19 April 1996).

From the literature review, the scope of the South African NQF stood out as one of the most contested typological components. Compared to the other typological components scope, and to some extent governance and architecture, appeared to evolve the most. For example, the SAQA Act (SA, 1995c) provided for the integration of all levels, sectors and types of qualifications into a single unified framework, whereas the *Consultative Document* (DoE and DoL, 2003) suggested three interdependent pathways. Despite the aggregation towards a less unified scope, the centralising effect of the NQF was still recognised:

The greatest achievement of the NQF initially was in bringing together all three levels of education and training...that was a major shift because you could not find it anywhere else in the world (IMWG member in SAQA, 2004c).

5.2.3.5 Classification as technique

Associated strategies

Building communities of trust as strategy;
Academic/vocational fault line as strategy

Associated constraints

Disagreement on the role of a single accountable structure as constraint; Misalignment between the educationalists and vocationalists as constraint

Classification is interpreted as:

...differentiating groups or individuals from one another in the NQF discourse.

Again the NQF discourse is saturated with examples of this technique of power, which include two types: one is a classification of knowledge domains and qualifications, the other a classification of groups. Examples of both types are discussed below.

The South African NQF has been implemented with twelve Organising Fields with a range of sub-fields (SAQA, 2000c). Both the literature reviews and the empirical evidence pointed towards some areas of disagreement as well as suggestions for alternatives, such as the Standard Industrial Classification (SIC) codes. Ensor (2003) in particular indicated that the classification of fields by means of the NQF Organising Fields was problematic:

The classification of fields which cut across academic disciplines and occupational fields and which underpins the standards setting processes in South Africa is essentially arbitrary. The result is that the standards-based qualifications give priority to procedures and cross-sectoral level descriptors, not knowledge content (in Young, 2003:233).

Importantly, though, these alternatives were strongly opposed by stakeholders (e.g. INSETA, 2003 and University of the Witwatersrand, 2003). NAPTOSA (2003) even went as far as to argue that the Organising Fields had nothing to do with types of learning, suggesting that the contestations were misplaced:

The twelve [NQF Organising] fields have little (or nothing) to do with types of learning. They accommodate different sectors and groupings for the sole purpose of developing

suitable, relevant qualifications and they provide for a way of organising the qualifications for registration (NAPTOSA, 2003).

The Inter-NSB Committee (2003) made the point that SAQA initially concentrated almost exclusively on the disciplinary areas of knowledge-production – a move that led to conflict between SAQA, the DoE and the higher education sector:

In the first years of its existence, SAQA concentrated almost exclusively on the disciplinary areas of knowledge-production. This is hardly surprising since it was the environment familiar to everybody at the outset. Not surprisingly, in retrospect, it also produced significant conflict between SAQA and the DoE and the Higher Education sector which viewed the work of the NSBs as an intrusion on their “turf”.

The NQF has also led to the classification of groups, to the extent that some groups have expressed concerns about being excluded (e.g. professional bodies). The varied stakeholder groupings used in this study bear testimony to the extent to which the NQF has led to classification:

- NQF overseeing agency (SAQA)
- NQF principals (DoE and DoL)
- NQF partners (CHE and UMALUSI)
- NQF quality assurance bodies (ETQAs)
- NQF standards setting bodies (Consultative Panels [formerly NSBs] and SGBs)
- NQF education and training providers (private, public and at various levels)
- Other NQF stakeholders (such as employers, organised labour and NGOs).

Even communities of trust suggest some form of classification, as groups and sectors with shared practical experience are recognised and encouraged (Young, 2003).

The very existence of the academic/vocational fault line points towards deeply entrenched differences that are accentuated by classification. Examples of such “over the fence” references that explicitly refer to differences in order to exert power, were observed in many cases. One such example is the reference to the different types of learning as noted by Young (2003):

The DoE/DoL [Consultative] Document explicitly breaks with the SAQA approach by recognising that the NQF must be based on a recognition of the differences between two broad types of learning, which they refer to as institution-based and work-based.

5.2.3.6 Colonialisation as technique

Associated strategies

Academic/vocational fault line as strategy

Associated constraints

Varying stakeholder involvement as constraint;
Lack of awareness that transformation requires power as constraint

Colonialisation is also evident in the NQF discourse and is understood as:

...to take possession of and lay claim over that which is weaker.

In a discussion on the SADCQF, Samuels and Keevy (2005b:3) note the influence of colonialisation:

The origins of national qualifications frameworks as we know them today can be found within the confines of our former colonial powers...

Less conventional notions of colonialisation are also evident in the examples from the genealogical critique, such as the disqualification of certain constituencies, including private providers, standards setting bodies and even technikons:

At present there is much competition between traditional universities and technikons for funding both at the undergraduate level and at the research level...We really need to move away from this parochialism. For decades technikons have been trying to prove that their qualifications are as good as, or better than those of traditional universities. This is unhealthy competition (Dixie, 2004).

The power struggles between the DoE and DoL can also be seen as a method of colonialisation, although the power shifts seem to be dynamic. Supporting evidence includes unquestioned acceptance of the nested approach by DoL, despite evidence that it constituted a dramatic move away from their earlier position (SAUVCA, 2003).

The *Consultative Document* (DoE and DoL, 2003) was viewed as skewed towards the DoE's position:

The DoE has gained the upper hand in the undeclared war with the DoL, and thus has taken control of two of the silos (HI-ED QC and GENFET QC) - this opens up the possibilities of the DoE gaining access, somehow, to the skills development levies - at the

expense of learnerships...The level of damage being caused by this warfare is intolerable and the relevant ministers must be held responsible for their actions...(ICSA, 2003).

5.2.3.7 Control as technique

Associated strategies

Tight-loose prescriptiveness as strategy; Strong leadership as strategy

Associated constraints

Lack of awareness that transformation requires power as constraint; Disagreement on the role of a single accountable structure as constraint

Control is interpreted as:

...to command, limit, restrain, regulate and direct processes and structures in the NQF discourse.

Examples from the NQF discourse are indicated below.

SAQA's role as overseeing body includes controlling specific aspects within the education and training sector – in essence SAQA was established to control. Despite having such a legislative mandate to exert control, SAQA was criticised for becoming too administrative and controlling:

What [SAQA] is now doing is feeding people answers and having so much control over what people do. It is taking the initiative from people and in fact reducing them to following a process... (IMWG member in SAQA, 2004c).

In direct contradiction to the concerns above, SAQA was also criticised for not taking enough control. The common position was that strong leadership would resolve the contestations. The following is an example:

There is one key message from me SAQA needs to take control, more sort of in a firmer way...these "ouens" are running wild...(Respondent from a private provider in SAQA, 2005e).

Another example of control in the NQF discourse is located in the role of the standards setting bodies. Some professional bodies, but also other stakeholders, experienced significant problems with the functioning of the NSBs. For example, a particular concern about the 'way proposed qualifications have been evaluated and recommended for registration on the NQF' was noted by SAICA (2003).

The recommendation in the *Consultative Document* (DoE and DoL, 2003) for three pathways, including a Trade, Occupational and Professional (TOP) pathway, is also an example of how power could be exercised through control. According to some authors the TOP pathway would result in the Minister of Labour gaining “curriculum control” of the majority of qualifications at the expense of the Minister of Education who would remain responsible for “financial control” (CHE, 2003).

From the archaeological critique evidence suggested that there was a lack of awareness that power was needed for transformation. Despite this, the DoE, CHE and higher education institutions were criticised for being too controlling and powerful:

[The draft HEQF] seems to focus on increasing the power and influence of the DoE at the expense of other stakeholders and a unifying NQF (Reinecke, 2004).

An industry source said the new [CHE] council was trying to exclude outside role players and seeking to take over responsibilities from SAQA (*Business Day*, 6 March 1998).

Our history has demonstrated that placing power of access on the institutions do not always have the desired effect...There is at times a tendency to use this power as an exclusion measure (SADTU, 2004).

Related evidence from the literature review suggested that too much control (i.e. being too prescriptive) would lead to considerable contestations. It was also noted that the South African NQF was the most prescriptive NQF when compared with other NQFs. The only NQF with similar controlling features was in New Zealand where more recent policy decisions were also moving to making the NQF less prescriptive.

Also from the literature review, Stephenson (2003:333) argues that the control and steering inherent to quality assurance systems, such as those associated with NQFs, will always be contested:

No wonder that academics are wary: the control and steering inherent in quality assurance systems is irresistibly tempting for administrators and policy makers.

A final point to take note of is that NQFs in general have their roots in controlling techniques of power. According to Young (2005) early NQF developments first surfaced as National Vocational Qualifications (NVQs) with a very particular political function, namely to transfer ‘the control of vocational education from providers to employers’ (2005:6).

5.2.3.8 *Distribution as technique*

Associated strategies

Academic/vocational fault line as strategy

Associated constraints

Lack of awareness that transformation requires power as constraint; Varying stakeholder involvement as constraint; Disagreement on the role of a single accountable structure as constraint; Misalignment between the educationalists and vocationalists as constraint

Distribution is understood to be:

...the arranging, isolating, separating and ranking of bodies in the NQF discourse.

Distribution is similar to classification, but includes a focus on isolation and ranking. Examples from the NQF discourse are listed below.

Cases of isolation are distinctly recognisable in the empirical evidence flowing from both the archaeological and genealogical critiques. One such example is the following comment by NAPTOSA (2004), in which it is argued that power struggles may lead to sectors retreating into isolation:

...sectoral territoriality and power struggles have provided the impetus and momentum for sectors to retreat back into comfortable semi-isolation.

The DoE and DoL are also accused of isolating practices:

...these Departments continue to operate in isolation, often to the detriment of the system and the Learners it must serve (Business South Africa [BSA], 2003).

In another example, though nearly ten years earlier, the DoE was accused of sidelining the higher education community when the draft NQF Bill was *en route* to parliament. Ironically the higher education community responded with similar threats of exclusion:

The Committee of University Principals (CUP) moved to get higher education institutions excluded from the new education legislation passed in November, since not enough research had been conducted on the issue (*The Mail and Guardian*, 26 April 1996).

Yet another example, linked to the DoE, were accusations of sidelining and isolating SAQA during the review process:

The extent to which SAQA, as an organization, appears to have been “scapegoated” and sidelined is viewed with both alarm and disappointment (Inter-NSB Committee, 2003).

The draft HEQF (DoE, 2004) suggests the establishment of a separate framework for higher education, albeit in the context of the national framework. Recent developments suggest that the further education sector is following with a Further Education Qualifications Framework (FEQF). Although such “sub-frameworks” (see *Chapter 1*) may not be uncommon, these initiatives are symptomatic of the power struggles within the NQF discourse. The explicit focus on education without training further illustrates the way in which exclusion is practised.

Ranking is just as commonplace in the NQF discourse. Overseen by a government bureaucracy the governance of the NQF is necessarily bureaucratic and hierarchical. The chain of command may be contested, but it exists and where it is found to be inadequate, it is replaced with another. Ranking is also observed with regard to education and training providers: those that comply with minimum criteria obtain accreditation status, those that do not, remain excluded and of a lower stature. ETQAs follow a similar route, while some ETQAs are even recognised as band ETQAs with additional responsibilities and authority. The recent suggestion for Qualification and Quality Assurance Councils (QCs), which is not such a new idea at all, continues the practice. The disqualification of certain constituencies is a related example of distribution within the NQF discourse.

From the literature review the agnosticism of the NQF stands out as a strong example of distribution, particularly through the isolation of specific bodies. Oberholzer (1994b) explains that the NQF is institution-free. This means that qualifications are viewed as equivalent, independent from the education and training provider that offers them, as long as the provider meets the minimum accreditation requirements.

5.2.3.9 Economisation as technique

Associated strategies

Academic/vocational fault line as strategy

Associated constraints

Disagreement on the role of a single accountable structure as constraint; Taking advantage of the lack of clear legislative alignment as constraint

Economisation refers to the:

...overt or covert differentiation between specific groups in the NQF discourse to limit financial support or expenditure that leads to economic disparities.

Examples are listed below.

SAQA's funding difficulties are extensively debated in the empirical evidence (e.g. CHE, 2003, and Gibson, 2003). The point is clearly made that SAQA was severely under-funded by government:

*...SAQA was a victim of benign neglect, denied adequate funding and support from the very departments charged with implementing this flagship project (Isaacs in *The Financial Mail*, 2 August 2002).*

Being victim to economisation, SAQA opted to elicit funding elsewhere. Donor funding, mainly from the European Union (EU) was forthcoming, and carried the NQF project through its early turbulent years. The funding from the EU enabled SAQA to become more autonomous and independent from the DoE and DoL – this, in turn, led to increased alienation and further funding difficulties.

As identified in the literature review, according to recent agreements, SAQA's 2005/6 budget shortfall would be covered by the National Skills Fund (NSF), and in the long term, by the DoE. As discussed in the section on the positioning of the NQF (*Chapter 3*) this move by the DoE to provide funding, clearly on its own terms and within its own time, points towards a significant move to regain direct control of NQF development and implementation.

The CHE (2003) mentions another point related to economic differentiation. According to the CHE, funding from the DoL and political and administrative responsibility from the DoE, would be problematic:

There is no international precedent for funding of provision being located in one government department and the quality assurance of programmes and qualifications being located in an agency that reports to another government department (CHE, 2003).

Another example of economisation was apparent as early as 1997 when the public higher education sector expressed concerns that the NQF would lead to loss of autonomy and risk of losing funding, unless they were prepared to 'tow the Government party line' (*The Daily News*, 3 June 1997).

Funding of higher education remained contentious. In 2004 NAPTOSA and others accused the DoE of constructing the draft HEQF (DoE, 2004) 'around the funding model for higher education', in this way skewing the proposal towards an economic agenda.

The creation of purposeful economic disparities are also noted in the unfair treatment of private providers, mentioned in *The Mail and Guardian* of 19 January 2001:

The government plays a major role in funding public institutions and is therefore both player and referee in higher education. It seems to be using its regulatory powers to pursue a politically motivated agenda - that is to curtail private higher education radically in order to save the student market for public institutions.

5.2.3.10 Normalisation as technique

Associated strategies

Building communities of trust as strategy; Strong leadership as strategy

Associated constraints

Limited common understanding of the original conceptualisation of the NQF as constraint

Normalisation is interpreted as:

...invoking, requiring, setting or confronting a standard - i.e. defining the normal in the NQF discourse.

Examples in the NQF discourse are described below.

The NQF discourse is in itself normalising - consider the interpretation used in this study:

The NQF discourse is a dominant, influential and coherent amalgamation of divergent and even contradictory views, which support the development of an NQF that replaces all existing differentiated and divisive education and training structures.

According to Kraak (1998) such a discourse is of a systemic nature and represents a 'highly persuasive, influential and coherent view which emerged in the education and training policy formulation process which began in earnest after the unbanning of the ANC in February 1990'. This understanding of discourse is also associated with four tendencies (see *Chapter 1* for a more detailed discussion and a comparison with other interpretations). These are listed below, as each links the NQF discourse to power, particularly normalising power, in a very direct manner:

- concerned with the distribution of power between state, market and education and training institutions;
- interested in social relations which underpin the forms of differentiation, articulation and certification which emerge within the education and training system and between it and other structures such as the economy and the labour market;
- has a political dereliction towards the creation of a unified education and training system; and
- argues that each education and training system is held together by a distinctive regulatory framework over all others.

Another unequivocal example of normalisation is the very fact that the NQF is also a framework for planned combinations 'of learning outcomes with a defined purpose or purposes, including applied competence and a basis for further learning' (SAQA, 2000c:8), in other words, a normalising system of qualifications and standards, which requires conformation.

This normalising force is contested, as the following comment from SAUVCA (2003) on the unit standard methodology suggests:

...the unit standard methodology of qualification design is not appropriate to the knowledge structure and pedagogy of higher education, and especially not to discipline-based knowledge. The key issue is that small units of learning (modules or courses) and their specific learning outcomes must not be required to be registered and standardised on the NQF for this will stifle innovation, creativity and academic freedom.

In other areas, normalisation was welcomed:

The uniform approach to naming of qualifications is welcomed (RAU, 2004).

Quality assurance structures are also standardised. All ETQAs have to meet the same requirements for accreditation, although slightly more leeway is given to ETQAs to contextualise NQF policies within their sectors. The proposed standardisation of MoUs (so-called generic MoUs) is another example of normalisation in the NQF discourse (cf. ECSA, 2003). Building communities of trust based on shared experience, could also be interpreted as normalisation.

The literature review suggests that the NQF requires high institutional logic as well as high intrinsic logic, meaning the NQF needs to be directly and explicitly linked with other measures that influence how the framework is used. In most cases this leads to standardisation of systems and procedures to ensure increased compatibility, which is another example of normalisation.

5.2.3.11 Regulation as technique

Associated strategies

Tight-loose prescriptiveness as strategy; High intrinsic and institutional logic as strategy

Associated constraints

None

Regulation is understood to be:

...controlling by rule, to subject to restrictions, invoking a rule, including sanction, reward and/or punishment in the NQF discourse.

Examples are given below.

As was discussed in the earlier section on legal power, the NQF is based on legislation and enforced through regulation. The SAQA Act (SA, 1995c) established the NQF after which two sets of regulations were gazetted, one for standards setting, the other for quality assurance:

- *NSB Regulations* (SAQA, 1998a)
- *ETQA Regulations* (SAQA, 1998b).

The NQF is also associated with a hierarchical structure of accreditation, monitoring and auditing. SAQA accredits ETQAs and then also monitors and audits them. The ETQAs, in turn, do the same with education and training providers. These roles are delineated by the SAQA Act (SA, 1995c) and the *ETQA Regulations* (SA, 1998b).

Through the *NSB Regulations* (SA, 1998a) SAQA prescribes the structure of the standards setting system (mainly stakeholder driven) and defines qualifications – this includes specific criteria that need to be complied with in order for a qualification to be registered on the NQF.

Another example of the exercise of power through regulation is the “threat “ of a new NQF Bill as proposed in the *Consultative Document* (DoE and DoL, 2003):

A new NQF Bill is being drafted by the education and labour departments to remove "inconsistencies and duplication" in the laws relating to SA's education qualifications. The final policy, to be submitted to the cabinet for approval early next year, will *force* higher education institutions to produce skilled graduates for the labour market and companies to develop their existing human resource skills base (*Business Day*, 28 July 2003, emphasis added).

From the archaeological critique it was apparent that stakeholders were of the opinion that this move was unrealistic and even unnecessary, as they questioned the extended period of time that would be required for such an overhaul.

The calls for Memoranda of Understanding (MoUs) to be replaced with more stringent and non-voluntary rules of engagement are also an example of regulation. Some stakeholders even commented that the MoUs were simply “agreements to agree” (ETQA representative in SAQA, 2005c) with limited effect; therefore more stringent requirements were called for:

[The] NSA strongly proposes that the linkages between the various role-players should be *governed by government regulations in order to ensure compliance*. Voluntary alliances have proven inefficient and insufficient to ensure broad based implementation of the envisaged partnerships (NSA, 2003, emphasis added).

A related development was the resistance from the CHE to sign MoUs with other ETQAs (NBFET, 2003). As a result, the CHE developed its own MoU model that was based on delegation and quality assurance of other ETQAs:

- *Delegation* – if the ETQA/professional council has an effective quality management system, has aligned itself to the HEQC’s programme accreditation criteria (see CHE, 2004c) and uses peer evaluation, etc.
- *Partial delegation* - if the HEQC is not sure/confident about the quality management systems of the ETQA/professional council.
- *Partnership* – if the ETQA/professional council has no quality management system (CHE, 2004).

This CHE model for MoUs is another example of an attempt to control by rule.

5.2.3.12 Spatialisation as technique

Associated strategies

Disagreement on incrementalism as strategy; Building communities of trust as strategy; Support for NQF objectives although interpretations vary as strategy

Associated constraints

Lack of awareness that transformation requires power as constraint

Spatialisation is interpreted as:

...the way power is given to be seen in the NQF discourse.

This means that power's workings become acceptable because one sees of it only what it lets one see, only what makes it visible. Examples from the NQF discourse follow.

The NQF as social construct is inextricably linked to power (see the later discussion on the origins of power in the NQF discourse). This recognition of power within the discourse already signifies an acceptance of its presence. As mentioned on various previous occasions, the empirical evidence is saturated with many such examples.

Another example of spatialisation is in NQF stakeholders' "blindness" towards the NQF objectives, i.e. the NQF objectives are supported despite the fact that there may be disagreements on their interpretation.

The recognition that power is needed for transformation is also an example of the acceptance of power within the NQF discourse (cf. SAQA, 2003). The re-aligning of power around new innovations, as was also noted by SAQA (2003) is a related example:

What we now face is an unravelling of the power to support our original operationalising of the NQF and the re-aligning of power by the Departments of Education and Labour around a new set of recommended innovations intended to resolve perceived problems of the present operationalisation.

5.2.3.13 Surveillance as technique

Associated strategies

Tight-loose prescriptiveness as strategy

Associated constraints

Lack of awareness that transformation requires power as constraint

Surveillance is interpreted as:

...supervising, closely observing, watching, threatening to watch stakeholders and processes within the NQF discourse.

Examples from the NQF discourse are indicated below.

Despite the early concerns that the DoE Minister was giving himself too much power (*The Daily News*, 5 September 1995), the initial NQF legislation set the stage for the numerous layers and forms of surveillance that would be associated with the NQF.

The auditing and monitoring functions of SAQA and the ETQAs are one example of surveillance. Despite the intention for these processes to be “developmental” and non-threatening, they are supervisory.

SAQA’s new role, as recommended in the review documents, appears to suggest that SAQA would become more subservient to the Departments which, in turn, may lead to tensions and the inability to effectively oversee (i.e. a form of surveillance) the QCs:

SAQA’s role as envisaged in the *Consultative Document* is clearly as a “servant” of government rather than as a more independent structure. Yet SAQA is expected to oversee the three QCs which are also answerable to (and funded by) two separate Ministries (SAUVCA, 2003).

From the literature review, the different models of NQF implementing agencies also suggest different extents to which they would be able to exercise surveillance:

- *Strong Authority* that oversees all other bodies.
- *Central Authority* that has responsibility for quality assurance and accreditation but separate awarding bodies exist for particular sectors and/or levels, such as for Schooling, VET and Higher Education.

- *Co-ordinating Authority* that has mainly administrative and co-ordinating powers and is influenced by powerful partners.

5.2.3.14 Totalisation as technique

Associated strategies

Building communities of trust as strategy; Strong leadership as strategy; Support for NQF objectives although interpretations vary as strategy; Academic/vocational fault line as strategy

Associated constraints

Limited common understanding of the original conceptualisation of the NQF as constraint; Unrealistic expectations of the NQF as constraint; Disagreement on the role of a single accountable structure as constraint; Misalignment between the educationalists and vocationalists as constraint

Totalisation is:

...the giving of collective character to systems, processes, institutions and stakeholders within the NQF discourse.

Some examples from the NQF discourse are described below.

The specification of NQF stakeholder groupings is an example of totalisation. Communities of trust can also be seen as the specification of new “collectives” within the NQF discourse:

To talk of “rules of engagement” is to acknowledge there has been and will continue to be, at least in the short-term, contestation and conflict over jurisdictional and other issues. “Communities of trust”, however, implies long-standing partnerships based on integrity and earned mutual respect (CHE, 2003).

Another example of specifying collectivities is found in standards setting. SACE (in SAQA, 2004g) proposes that a collective approach to standards setting is necessary:

I certainly endorse the notion of quality in a collective sense, meaning the benefit goes to the majority and not individuals...If you define quality as a collective quality instead of individual quality, the constituency that is going to be involved with standards setting and standards generation is going to be different...

Leadership of the NQF as a collective is another example, as noted in the archaeological critique (see *Chapter 4*):

Calls for the setting aside of differences, assuming collective political leadership and even a reconsideration of a single Ministry of Education and Training were noted. Furthermore, requests were made that the differences between the departments should be dealt with in a more transparent manner and that compromises should be made.

The characterisation of education and vocation as identified in both the archaeological and genealogical critiques is also an example of totalisation.

5.2.3.15 Verbalisation as technique

Associated strategies

Support for NQF objectives although interpretations vary as strategy

Associated constraints

Limited common understanding of the original conceptualisation of the NQF as constraint;
Unrealistic expectations of the NQF as constraint

Verbalisation is interpreted as:

...the effects of the spoken word within the NQF discourse.

Verbalisation includes the voicing or articulation of something that may or may not exist in reality.

Examples from the NQF discourse follow.

The first example of verbalisation is the support for NQF objectives, even if interpretations differ. Also seen as a form of spatialisation, individuals claimed to support the NQF objectives, although that which they claimed to support, differed. Stated differently, individuals supported different things, even though they said they supported the same thing. Observations from the literature review were similar, in that it was observed that the objectives of the NQF had remained largely unchallenged.

Taken from the genealogical critique, the return to previous ideas is another example of verbalisation. Using this technique, the authors of the *Consultative Document* (DoE and DoL, 2003) articulated “new” ideas as if they were different from what had been proposed before. Various comments from the empirical evidence noted this discrepancy, as the following example shows:

The creation of three quality assurance councils is not a new idea. It was considered in the early debates on the NQF and was rejected primarily because it was considered that it

would create an unnecessary layer of bureaucracy, adding to the costs and complexity of the system (INSETA, 2003).

Other examples of verbalisation include the articulation of unrealistic expectations of what the NQF could achieve, in this way placing undue pressure on the system and the implementers of the NQF. A related example from the literature review is the observation that some stakeholders saw the NQF, outcomes-based education and training (OBET), and even the recognition of prior learning (RPL), as a panacea for the ills that the apartheid legacy had left behind. Another related example is the unrealistically short time in which it was expected that the NQF would bring about change. Even another is the articulated expectation that the NQF on its own could bring about change.

5.2.3.16 Concluding comments on techniques of power in the NQF discourse

Fifteen techniques of power have been identified and supported with evidence from the Foucauldian critiques as well as from the literature review. Although the various techniques have been presented separately, they are not discrete and substantial overlaps are possible. Furthermore, the “evidence” used to support each choice may be similar in some cases, i.e. the same manifestations and/or effects of power have been used to support the selection of different techniques.

Techniques of power that were not explicitly identified in the NQF discourse are:

- Exclusion: the defining of the pathological in the NQF discourse – the power of arousing pity or sadness.
- Individualisation: giving individual character to oneself or another.

5.2.4 Power relations in the NQF discourse

In the context of this study power relations are interpreted as:

...the web of overt and covert interactions and associations between and amongst NQF stakeholders.

An important point to revisit before proceeding with the identification of power relations is that it is *not* important to ask who has the power, but rather to analyse the power at the point of its intention:

...it should not attempt to consider power from its internal point of view and that it should refrain from posing the labyrinthine and unanswerable question: “who then has power and what has he in mind? What is the aim of someone who possesses power?” Instead, it is a case of studying power at the point where its intention, if it has one, is completely invested in its real and effective practices (Foucault, 1980:97).

Relating this understanding to the NQF discourse means that it would be futile to investigate power by only considering which organisations, individuals and other stakeholders exercise power and how they exercise this power. Power should rather be investigated in the “micro practices” of the NQF, i.e. in the daily practices that take place within the NQF discourse (Berkhout, 2005).

In line with this reasoning the NQF itself is supposed to be institution-free:

Although in theory a NQF is institution-free, in reality I believe it is not possible to separate a qualification from the providing institution and more specifically from the philosophy that governs the provider. If the NQF ignores this, the market place will make its own assumptions of the value of the qualification and the integrity of the NQF is lost! (Oberholzer, 1994b:22).

As explained in *Chapter 2*, Foucault (in Dreyfus and Rabinow, 1983:210) also suggests that we need ‘a new economy of power relations’, emphasising the need to use an indirect and more empirical method to analyse power relations that ‘consists of taking the forms of resistance against different forms of power as a starting point’ (*Ibid.*).

As a final point to support a Foucauldian understanding of power relations, it is important to note that the ‘exercise of power is not simply a relationship between “partners”, individuals or collective’ (Foucault, 1982 in Faubion, 1994:340), but rather a way in which some act on others. In essence, power struggles cannot exist if there are no power relationships wherein human beings, individually and/or collectively, deliberately, and purposefully engage in. The mere existence of relationships, between individuals and/or groups, does not imply that power is exercised: only when human beings engage in action, power struggles become possible.

Keeping these points in mind it is possible to proceed with the identification of power relations.

5.2.4.1 Identified power relations

Premised on the NQF stakeholders identified in *Chapter 1*, the following six overarching categories of power relations in the NQF discourse have been identified:

- Power relations of the NQF overseeing agency
- Power relations of the NQF principals
- Power relations of NQF partners
- Power relations of quality assurance bodies
- Power relations of standards setting bodies
- Power relations of education and training providers.

The following results from the archaeological and genealogical critiques, supported by the observations from the literature review, are associated with the identified power relations. These results are used to substantiate and describe the identified power relations (as suggested above).

Associated strategies

Disagreement on incrementalism as strategy; Building communities of trust as strategy; Strong leadership as strategy; Support for NQF objectives although interpretations vary as strategy; Academic/vocational fault line as strategy

Associated constraints

Limited common understanding of the original conceptualisation of the NQF as constraint; Lack of awareness that transformation requires power as constraint; Disagreement on the role of a single accountable structure as constraint; Misalignment between the educationalists and vocationalists as constraint; Taking advantage of the lack of clear legislative alignment as constraint

In addition to the results from the archaeological and genealogical critiques (as listed above), the forms of power identified earlier in this chapter are also used to further support the identified power relations. This approach is also in line with Foucault's advice to use an indirect and more empirical method to analyse power relations that is premised on taking the forms of resistance against different forms of power as a starting point (Foucault, in Dreyfus and Rabinow, 1983).

5.2.4.2 Power relations of the NQF overseeing agency

The power relations between SAQA, as the body tasked to oversee the development and implementation of the NQF, and other NQF stakeholders are characterised as indicated below.

As discussed in the previous sections of this chapter as well as in *Chapter 3*, SAQA was established to fulfil some of the functions that a joint Ministry of Education and Training might have fulfilled. In addition, SAQA was answerable to both the Ministers of Education and Labour, although the Minister of Education had the oversight function. Funding, although limited, also came from the DoE. Although SAQA was conceptualised as a *central authority* that would work with separate awarding bodies, SAQA was established as a *strong authority* that was to oversee all

other related bodies. After securing considerable funding from the EU and smaller strategic grants from CIDA, GTZ, DANIDA, USAID, British Council, NUFFIC, HEDCO-Ireland and the Ford Foundation (cf. DoE and DoL, 2002), SAQA was in a position to continue, and even accelerate NQF implementation without the DoE's financial assistance.

Although SAQA's financial independence may have been useful to the DoE in the early stages, a gradual difference in position became apparent as NQF implementation proceeded and often infringed on territories that may be described as ring-fenced by the DoE (e.g. schooling and higher education), as the following comment illustrates:

The GETC and FETC schools' qualifications are crucial within the Framework and their absence leaves a "vacuum" on the NQF (NAPTOSA, 2003).

SAQA's relationship with the DoL seemed to remain constructive, even to the extent that the DoL, through the NSF, came to SAQA's rescue when donor funding was depleted and the DoE was not ready to supplement the budget.

Inter-departmental structures, committees and partnerships were often debated in the review period, mainly to facilitate the interaction between the two Departments and SAQA, but more apparently, to develop joint positions on NQF matters by the two Departments themselves, as it is evident from the empirical evidence that there were significant differences between the two (e.g. NAPTOSA, 2004). The subsequent rejection of the inter-departmental structures led to increased concerns about the power relations between SAQA, the DoE and the DoL:

The rejection of a tripartite NQF Strategic Partnership with SAQA...begs the question as to what exactly SAQA's (power) relationship will be to the two Ministries, and what its role and functions will actually be in practice... (SAUVCA, 2003).

SAQA's relationship with the NQF partners (UMALUSI and the HEQC) were characterised by a struggle for hegemony. To some extent, SAQA was seen as lacking the authority to oversee the partners, which were also established through legislation, importantly, through different legislation: the HEQC through the Higher Education Act (SA, 1997) and UMALUSI through the GENFETQA Act (SA, 2001). The HEQC's position was more explicit, and included criticism of SAQA for not providing the strong and effective intellectual and strategic leadership that was required for successful NQF implementation (CHE, 2003). The HEQC was also seen as attempting to take over SAQA's overseeing role in the higher education sector. This was most evident in the SETA ETQA resistance to the CHE's proposed delegation model for MoUs (CHE, 2004):

There is a perception that CHE is the authority and that they have more power and more relevance in the system than any other ETQA, and that's a fact... And when I think of the way that they have been doing it it's been very aggressive and very unprofessional...The CHE will do what the CHE wants to do... (ETQA Manager in SAQA, 2005c).

UMALUSI's relationship with SAQA remained cordial, and like the HEQC, UMALUSI resisted SAQA's directive to sign MoUs with other ETQAs. In addition, UMALUSI was also slow to implement quality assurance and other NQF-related policies within the Adult Basic Education and Training (ABET), GET and FET sectors. The following comment from UMALUSI (2003) illustrates UMALUSI's attempt to achieve the same (more powerful) status as that of the CHE:

UMALUSI welcomes its proposed advisory function. It creates more credibility for UMALUSI and gives it a stronger voice and the same status as that of the Council for Higher Education. This will enable UMALUSI to rise above being merely a technical body that oversees quality and standards issues in education and training. The accumulated experience and its engagements in the field, makes UMALUSI a useful point of reference for finding out what works and what does not.

In general, the ETQAs accepted SAQA's guidance, although they appeared to be inconsistent in their application of the SAQA guidelines as was identified through the SAQA monitoring and auditing processes (SAQA, 2004j and 2005).

Standards setting bodies were tightly controlled by SAQA since the start of NQF implementation. Managed by SAQA staff (twelve NSB Co-ordinators), the NSBs and SGBs became closely aligned to the SAQA position, as was evident in their submissions to the review documents (e.g. Inter-NSB Committee, 2003). As mentioned previously, the SAQA standards setting processes were also severely criticised by stakeholders, to the point that they would be phased out and replaced by Consultative/Fit-for-purpose Panels that would be "outside" SAQA's control.

Education and training providers initially expected SAQA to be bureaucratic and regulatory, but this concern seemed to recede and was replaced by frustrations that compliance was not beneficial. In various instances providers commented that SAQA needed to be "stronger" and "have more teeth" so that the non-compliant providers could be dealt with:

There is one key message from me: SAQA needs to take control...in a firmer way (General Education and Training provider in SAQA, 2005e).

5.2.4.3 Power relations of and between the NQF principals

As discussed in great detail in the previous sections, the Departments of Education and Labour appeared to be involved in an extremely damaging internecine power relationship that was having a negative effect on NQF development and implementation (NAPTOSA, 2003).

Both the DoE and the DoL seemed to be concerned by the powerful positions of quality assurance bodies: the DoL of the CHE and UMALUSI, and the DoE of the SETAs (*The Financial Mail*, 2 August 2002). The close proximity of the CHE and UMALUSI to the DoE and the SETAs to the DoL, provides further evidence of the identified academic/vocational fault line.

The DoE seemed to disregard the standards setting bodies, opting for the “separate” development of schooling qualifications:

It is as if the DoE regards qualifications for schools as being “outside” or “alongside” the NQF - but not within the Framework (NAPTOSA, 2003).

In comparison, the DoL remained largely silent on standards setting issues, even to the point that the DoL seemed to be “overrun” by the DoE, accepting recommendations such as the nested approach to qualification design without questioning.

In various instances the empirical evidence suggested that private providers were being sidelined, or at the very least not adequately considered, by the DoE. The requirement for registration applicable only to private providers of education and training was noted as a particular stumbling block for private providers (cf. *The Mail and Guardian*, 19 January 2001).

The DoL, on the other hand, was faced by employers that were concerned that they were not benefiting enough from compliance with skills legislation and NQF aligned training:

With all its warts and deficiencies, the current NQF structure has been extensively advocated, in good faith, to a sceptical employer and consumer (of education products) market. The advocates include the professional bodies, the SETAs, providers of tuition and education as well as training providers. This effort has been hugely demanding of resources, including money, human time, energy and ingenuity. It is inconceivable that these same vital stakeholders in the industry will have to go back to these convertees and tell them it has all changed... (ICSA, 2003).

International agencies were very active in both the DoE and DoL (e.g. EU and the GTZ) and enabled the Departments to accelerate delivery on a wide front. Importantly, these were the same agencies that were funding NQF development and implementation through SAQA.

5.2.4.4 Power relations of and between NQF partners

As mentioned earlier, both the CHE/HEQC and UMALUSI tried to exert dominance over SETA ETQAs by refusing to sign MoUs. To complicate matters further, UMALUSI was impeded by limited capacity to effectively execute its responsibilities in the areas where the SETA ETQAs were most eager to become involved, leading to considerable difficulties and contestations:

As a new ETQA, UMALUSI has not significantly invested in the current NQF regime. This is not only because the Council is new, but also because it has experienced difficulties with the current framework... (UMALUSI, 2003).

With regard to standards setting, both the HEQC and UMALUSI rejected the restrictions imposed by the NSB/SGB model, particularly the use of unit standards, preferring modularisation as a more acceptable alternative, and the separation of quality assurance from standards setting:

UMALUSI would appreciate the proposed greater freedom to decide on the design of qualifications and the setting of standards. One of the key difficulties with the present NQF is the separation of quality assurance from standards determination in curriculum and qualifications from curriculum (UMALUSI, 2003).

The CHE, in particular, was accused of adopting a threatening approach to education and training providers:

The harm that the CHE has done and in one of our meetings with our institutions threatened institutions with closure knowing full well that the legislation is in conflict since the Higher Education Act and the SAQA Act, still threatening providers, making them go through a dual accreditation system where we now sitting with a mess (ETQA Manager in SAQA, 2005c).

5.2.4.5 Power relations of and between quality assurance bodies

Various examples of competition and turf wars between ETQAs have been identified in the empirical evidence. As an example, NAPTOA (2003) argues that it is not the number of ETQAs that is the problem, but the overlapping responsibilities of each:

It is not the number of ETQAs (“plethora”) that is the problem. All of the legitimate ETQAs are accredited to quality assure specific qualifications. The contestations arise out of the “scope of responsibility” of each and this can only be resolved if ETQAs engage in the process of reaching the necessary agreement.

As another example of inter-ETQA contestations, SAQA notes that SETAs should not be allowed to randomly develop qualifications, as they would like to do, as this would lead to unnecessary duplications:

One of the possible concerns or problems is that each SETA wants to develop its own standards and qualifications. The way it is going, I am afraid that we can end up with up to ten electrician qualifications and it becomes a problem with portability...(SAQA, 2004d).

The tensions between SETA ETQAs and professional bodies (ETQA and non-ETQA) were also noted. In some cases SETA ETQAs opted to delegate some of their functions to such professional bodies (e.g. FASSET), but in most cases the non-ETQA professional bodies were excluded.

In another example some ETQAs rejected the dominance of other ETQAs (e.g. SABPP’s comments suggesting that the SERVICES SETA was encroaching on its qualifications).

The relationships between ETQAs and education and training providers appeared to be reasonably good although there were some exceptions, notably pertaining to the certification of learners through RPL (see SAQA, 2004).

Most ETQAs, particularly the SETA ETQAs, supported standards setting through the NSB/SGB structures. to the extent that many SGBs were directly or indirectly funded by the ETQAs. In turn, this led to some difficulties regarding the mandate of the ETQAs, i.e. being responsible to quality assure education and training provisioning whilst also being involved in qualification development.

Various donors were also involved in a range of ETQA projects, including RPL (e.g. CETA).

As might be expected, the SETA ETQAs were more closely aligned to the DoL, to the extent that some ETQA Managers were severely critical of the damaging role of the DoE:

Everything that you building up in the NQF is being destroyed by the DoE (ETQA Manager in SAQA, 2005c).

5.2.4.6 Power relations of and between standards setting bodies

The NSBs and SGBs were set up as temporary bodies, but remained active for nearly ten years. As previously mentioned, the NSBs and SGBs were opposed by many institutions, despite the fact that in many cases most of these institutions had representatives serving on the standards setting bodies. As a result, the NSBs and SGBs included a wide range of stakeholders and were criticised for not having enough expert representation:

There is a need to review how people are selected, what resources and training they need, and the roles they are expected to play...(SACP, 2003).

The inclusion of historical (pre-NQF) qualifications on the NQF set an important benchmark for the operation of the standards setting bodies – *all* new qualifications would have to be approved by the NSBs, effectively subordinating all education and training providers. As NQF implementation proceeded, this arrangement remained contentious, eventually leading to the “voluntary” disbanding of the NSBs in 2005 by SAQA. The proposed Consultative/Fit-for-purpose Panels were seen as a solution to the problems experienced with the NSBs and SGBs, as these would return the *function* of qualification development to the experts, and the *responsibility* to NQF agents and stakeholder groupings:

There is confidence that a reconfigured HEQC, in close collaboration with SAUVCA, the CTP, APPETD, and other relevant bodies, would be able to form knowledge based ‘fit-for-purpose’ expert panels (CHE, 2003).

5.2.4.7 Power relations of and between education and training providers

Education and training providers, mostly those from the higher education sector, were initially threatened by SAQA and the quality assurance and standards setting bodies. As NQF implementation continued, reluctant compliance was gradually replaced by acceptance and even buy-in. There were, however, a number of issues that remained of concern to providers. These included:

- confusion regarding inconsistent application of NQF regulations and policies by ETQAs;
- accusations that providers were trying to promote their own agendas while serving on the standards setting bodies;
- exclusion and alienation of private providers; and
- possible lack of autonomy of higher education providers.

The relationships between providers are characterised by the public/private divide mentioned above. In many cases private providers raised concerns that they were being treated unfairly while their public sector competitors were being advantaged through funding, and more importantly, through the fact that the public providers did not have to comply with the DoE's registration requirements (cf. *The Mail and Guardian*, 19 January 2001).

5.2.4.8 Concluding comments on power relations in the NQF discourse

Six categories of power relations between NQF stakeholders have been discussed in this section. In each case the examples have been based on the results of the preceding archaeological and genealogical critiques as well as the literature review. In summary, the characteristics of power relations indicated below, have been discussed:

SAQA, as the overseeing agency, with:

- DoE – strained with concerns of overstepping mandate
- DoL – constructive although limited
- HEQC and UMALUSI – struggle for hegemony
- Quality assurance bodies - acceptance, but inconsistencies in application
- Standards setting bodies – tightly controlled
- Education and training providers – frustrations due to lack of action
- International agencies – financial and technical support.

The DoE and DoL, as NQF principals, with:

- Each other – damaging (internecine)
- SETA ETQAs – DoE concerned about powerful positions
- HEQC and UMALUSI – DoL concerned about powerful positions
- Standards setting bodies – disregarded by the DoE, ambivalence from the DoL
- Private providers – sidelined, lack of consideration by the DoE
- Employers - fatigued
- International agencies – targeted financial and technical support in specific areas.

The HEQC and UMALUSI, as NQF partners, with:

- SETA ETQAs – limited, refusal to sign MoUs
- Standards setting bodies – rejected

- Providers – threatening
- International agencies – targeted financial and technical support in specific areas.

Quality assurance bodies with:

- DoL and DoE – SETA ETQAs aligned to DoL, critical of DoE
- Each other – turf wars and overlapping responsibilities
- Standards setting bodies – mostly supported
- Professional bodies – collaboration as well as exclusion
- Providers – good, with some occurrences of “insubordination”
- International agencies – targeted financial and technical support in specific areas.

Standards setting bodies with:

- HEQC, UMALUSI and providers – mostly opposed.

Education and training providers with:

- DoE – accusations of exclusion of private providers
- Quality assurance bodies – confusion as a result of inconsistencies
- Standards setting bodies – influenced by provider agendas.

This section on *power relations*, together with the preceding discussions on the *forms* of power and *techniques* of power, represents the initial stage of the description of power in the NQF discourse. As mentioned earlier, these three guises consisted of pre-identified categories within which empirical evidence and observations from the literature review could be placed. With a few exceptions, evidence for most of the categories was obtained.

In the next stage the findings from the archaeological and genealogical critiques of the NQF discourse, supported by the observations from the literature review, are used to identify three origins of power in the NQF discourse.

5.2.5 Origins of power in the NQF discourse

Within the context of this study, *origins of power* are interpreted as:

...the primary sources, starting points and/or catalysts that are directly linked to the noticeable way in which power appears at the point of its direct relationship with the NQF.

The origins of power are directly linked to specific manifestations of power (as will be shown in the next section).

5.2.5.1 Identified origins of power

Three origins of power in the NQF discourse are identified:

1. The NQF as social construct is by default inextricably linked to power as origin
2. Differences between educationalism and vocationalism as origin
3. The NQF is implemented in a historically contested terrain as origin.

Evidence in support of these origins of power is based on the results of the archaeological and genealogical critiques. In each case the associated strategies and constraints are indicated. Further support is sourced from the observations from the literature review and the findings from the typological positioning of the NQF.

The manifestations and effects of power used to support the identified origins of power are not intended to be inclusive of all those that are possible, but have been carefully selected to support the particular choice. Both the manifestations and effects of power are discussed in more detail in subsequent sections.

5.2.5.2 The NQF as social construct is by default inextricably linked to power as origin

Associated strategies

Building communities of trust as strategy

Associated constraints

Limited common understanding of the original conceptualisation of the NQF as constraint; Lack of awareness that transformation requires power as constraint

The NQF is inextricably linked to power because it is a social construct. Power is an intricate part of society (Smart in Hoy, 1986) and thus also part of the NQF discourse, which represents an

amalgamation of views that are all related to the same object, the NQF which, in turn, is a social construct (Cosser, 2001).

A constraint from the genealogical critique, the lack of awareness that transformation requires power, provides more supporting evidence that the NQF discourse cannot be “power-less”. From the very beginning the NQF legislation was linked to power:

Education [NQF] Bill targets division of powers (*The Argus*, 10 August 1995).

The subsequent “railroading” of the legislation through parliament (*The Star*, 1 August 1995), without making time for debate as this would “delay the process” (*The Daily News*, 8 September 1995), provides further evidence. Many other examples throughout NQF development and implementation were identified in *Chapter 4*. The following are two such examples:

- The exercise of power over certain constituencies by disqualifying them as inadequate for the task that they needed to perform (CHE, 2003 and SUAVCA, 2003).
- Recognition that the re-aligning of power around new innovations was taking place during the review period (SAQA, 2003).

More support for this choice of origin is found in statements by Isaacs (2004). In addressing the concerns about the ability of SAQA to implement the NQF, Isaacs suggests three sources of underlying power contestations: (1) the integrated approach to education and training; (2) the lack of a NQF strategic partnership between the Department of Education, the Department of Labour and SAQA; and (3) the lack of communities of trust, the vested interests, inconsistencies in legislation, incoherent policy development and implementation, and lack of leadership authority recognised both by office and competence. The empirical evidence from the Foucauldian critique provided support for Isaacs’ suggestions, but also pointed towards additional deeper, underlying origins of power, suggesting that Isaacs’ three sources should be revisited. As a result, the following two additional origins of power in the NQF discourse are suggested:

- *The differences between educationalism and vocationalism* – seen as a deeper, underlying origin, but closely related to contestations around integration as well as DoE/DoL contestations.
- *The NQF is implemented in a historically contested terrain* – the legacy of apartheid, more so, the entrenched resistance to the government of the day is recognised. It is suggested that various manifestations and effects of power, such as vested interests and the lack of communities of trust, can be linked to this origin.

These two origins are discussed in more detail below.

5.2.5.3 Implementation of the NQF in a historically contested terrain as origin

Associated strategies

Inconsistent stakeholder participation as strategy

Associated constraints

Varying stakeholder involvement as constraint

The oppressive apartheid policies led to a culture of non-participation in government structures (SAQA, 2003). It would be unrealistic to expect that this culture would suddenly be replaced in 1994 with one of constructive co-operation. It is therefore argued that the historical nature of the South African education and training landscape has contributed significantly to the power struggles within the NQF discourse.

Ironically, the radical purpose of the NQF, and therefore also the five NQF objectives, are not contested, as the case may have been in another country. Here again, the influence of the historicity of the terrain is exemplified.

5.2.5.4 Differences between educationalism and vocationalism as origin

Associated strategies

Academic/vocational fault line as strategy

Associated constraints

Misalignment between the educationalists and vocationalists as constraint

Also a central theme through the NQF discourse, this origin links directly to the way in which power appears in the discourse. Described in various manners, such as academic/vocational or education/training differences, the divide is commonly acknowledged as problematic and can only be addressed through a political process that will inevitably conflict with the goals and interests of stakeholders:

...unification is not simply a technical matter of designing and implementing a better system; it is above all a political process. The goals of unification may conflict with the interests of stakeholders who have the power to block, neutralise or modify them (Raffe, 2002:7).

Strong examples are found in stakeholders' responses to the review documents, particularly the *Consultative Document* (DoE and DoL, 2003) and *The HEQF* (DoE, 2004):

[The HEQF] seems to focus on increasing the power and influence of the DoE at the expense of other stakeholders and a unifying NQF (Reinecke, 2004).

This NQF *Consultative Document* is merely an expression of the divisions between the two departments and thus represents a papering over of the cracks (a “band aid salve”)...The DoE has gained the upper hand in the undeclared war with the DoL... (ICSA, 2003).

In the genealogical critique, the misalignment between the educational and vocational constituencies was identified as one of the most significant constraints in the NQF discourse. The differences between the DoE and DoL represented the noticeable way in which power appeared. The differences could however be related back to much deeper and entrenched differences between their constituencies in general. Examples of the DoE/DoL differences included accusations from stakeholders of:

- promotion of conflicting qualification routes (Gibson, 2004);
- turf-warfare (SACP, 2004 and *The Mail and Guardian*, 18 February); and
- lack of leadership (NAPTOSA, 2003).

The establishment of SAQA as a “fallback”, after the single Ministry of Education and Training did not materialise, was also noted as an important example of the deeply entrenched differences between the educational and vocational sectors (BSA, 2003).

Further support for the identification of this origin is found in the review of NQF literature. An important observation associated with the guiding philosophy object was the point that NQFs are influenced and even covertly guided by the underlying philosophies from which they emerge. In the case of the South African NQF it was shown that a clear fault line existed between “formal education” and the NQF. Explained along the lines of the forced integration of the *epistemologically different modes of learning*, Ensor (2003:341) explained the differences as follows:

Formal education and the NQF thus rest on two fundamentally different assumptions about knowledge, knowing and identity. Formal education and training aim to specialise academic and or professional identities through induction into largely disciplinary-based forms of knowledge, whereas the NQF wishes to background knowledge and emphasise a generic capacity to learn.

Luckett (1999:1) agrees:

Operating within the requirements of the NQF demands a shift to a more technical paradigm, in which vocational/human capital discourse is overlaid with radical humanist discourses...

From the preceding discussion it is clear that the empirical evidence as well as the literature tends to conflate power struggles with epistemological concerns. Heyns and Needham (2004) argue that observers are more likely to recognise power struggles, even though it is really the epistemological differences that limit common understanding of an integrated NQF. This leads to another point: unification, including its various permutations (such as an integrated approach, a linked system, etc.) is recognised as a major area of contestation in the NQF discourse. Suggestions for unifying measures (such as those from Raffe, 2002) ultimately attempt to bring the academic and the vocational more closely together. In turn, as it has been shown in international literature, these attempts inevitably lead to conflict with powerful stakeholders. Despite the pressures to pursue unification, such as globalisation and the need for greater parity of esteem between educational and vocational qualifications, it appears as if attempts at unification have been unsuccessful – the South African NQF being a case in point.

5.2.5.5 Concluding comments on origins of power in the NQF discourse

It is not proposed that the three origins of power identified in this section are mutually exclusive or that there is any hierarchical arrangement between them. The proposed origins do however present identifiable starting points of power that can be directly linked to the noticeable way in which power appears at the point of its direct relationship with the NQF, i.e. the origins of power can be directly linked to specific manifestations of power. These are discussed in *Stage 3* of the description of power in the NQF discourse, which is presented in the next section.

5.2.6 Manifestations and effects of power in the NQF discourse

In the context of this study, *manifestations of power* are interpreted as:

...the noticeable and observable appearances of power at the point where they are in direct and immediate relationship with objects within the NQF discourse.

The *effects of power* are interpreted as:

...the outcomes or results of the manifestation of power in the NQF discourse.

Foucault (1980:99) suggests an *ascending* approach to the analysis of power, starting with the ‘infinitesimal mechanisms’ of power and then seeing how they have been ‘invested, colonised, utilised, involuted, transformed, displaced, extended, etc.’. He repeats this idea on various occasions, e.g.:

...it is a case of studying power at the point where its intention, if it has one, is completely invested in its real and effective practices. What is needed is a study of power in its external visage, at the point where it is in direct and immediate relationship with that which we can provisionally call its object, its target, its field of application, there – that is to say – where it installs itself and produces its real effects (Foucault, 1980:97).

Faced with the challenge to focus on the “infinitesimal mechanisms of power”, a turn towards the manifestations of power was suggested. It was argued that it is at the point of manifestation that the techniques of power occur at their most basic levels, i.e. where the most direct and immediate relationship between power and its target exists.

Following Foucault’s advice, the effects and manifestations of power have been separated from each other and then related to a specific origin of power.

5.2.6.1 Identified manifestations and effects of power

The manifestations and effects of power in the NQF discourse that have been identified from the evidence are directly linked to the three origins of power discussed in the previous section, namely: (1) The NQF as social construct is by default inextricably linked to power; (2) The NQF is implemented in a historically contested terrain; and (3) Entrenched differences between educationalism and vocationalism.

Manifestations that relate to a specific effect of power have been grouped together and are presented below. As noted before, these examples have been drawn from the preceding discussion and are presented only as examples, as many additional permutations are also possible. The effects and manifestations are also not described in detail, as this has already been done in the description of power in the NQF discourse.

5.2.6.2 Manifestations and effects related to the first origin

Linked to the first origin of power in the NQF discourse, namely that *the NQF as a social construct is by default inextricably linked to power*, the following examples of manifestations and effects of power have been identified:

Inconsistencies in legislation as effect

Various inconsistencies in education and training legislation are noted in the empirical evidence. Examples include: the targeting of the division of powers through the initial NQF legislation (*The Argus*, 10 August 1995); the “railroading” of the NQF legislation through parliament (*The Star*, 1 August 1995), including concerns that too much debate and stakeholder involvement would delay the process and lead to continual contestations; promulgation of laws to ratify the NQF’s system of power (see the discussion on legal power); and using the new NQF Bill as a threat (DoE and DoL, 2003).

Lack of recognition of the contribution of the NQF as effect

Linked to manifestations such as the contested merger of the actions of the government with economic and social goals (COSATU, 2003), and the tensions between the overt and covert purposes of the NQF (identified in the literature review), it appears as if the contribution of the NQF towards transforming the education and training system is under-valued and less than explicit (Surty, 2004).

SAQA’s role disputed as effect

Identified as a constraint from the genealogical critique, a significant effect of various manifestations of power in the NQF discourse is the disagreement on SAQA’s role as overseeing and accountable structure. Such manifestations included: SAQA being targeted and criticised for being too controlling, administrative and bureaucratic (IMWG member in SAQA, 2004c), but also for not taking enough control (Respondent from a private provider in SAQA, 2005e); and implied suggestions that SAQA should be a “servant” of government (SAUVCA, 2003).

Stakeholders’ unrealistic expectations of what the NQF is supposed to achieve as effect

Similarly, the unrealistic expectations of the NQF were identified as a constraint in the genealogical critique. Manifestations that could have resulted in this effect include: disagreement on incrementalism (identified in the archaeological critique); specialised, technocratic and restricted discussions perceived as a “minefield of jargon, acronyms and bureaucracy” (*The Mail and Guardian*, 26 May 2000); inadequate marketing (cf. *The Teacher*, April 1997); varying and inconsistent stakeholder involvement (e.g. NUMSA in SAQA, 2004g); and the return to previously rejected ideas (NBFET, 2003). This effect is also related to the tensions between the democratic

ideals of the NQF and the possible neo-liberal economic objectives of the government (discussed in *Chapter 3*).

Limited collaboration between SAQA, the NQF principals and partners as effect

As also noted during the archaeological critique, the governance of the South African NQF has been severely contested – this also included the erratic involvement of the DoE and DoL in NQF development and implementation. Related manifestations of power include: inadequate funding of the NQF and SAQA (Isaacs in *The Financial Mail*, 2 August 2002); re-alignment of power around new innovations during the review period as well as dissension about the proposed changes to the NQF (e.g. NAPTOSA, 2004); skewing of the draft HEQF (DoE and DoL, 2003) towards the higher education funding formula; attempts by the DoE to regain control of the NQF by providing “delayed” funding on its own terms (see the discussion on economisation); struggle for hegemony between SAQA, the HEQC and UMALUSI (e.g. ETQA Manager in SAQA, 2005c).

Instabilities related to quality assurance and standards setting bodies as effect

The following manifestations of power can all be linked to this effect: the purposeful centralisation of the development of qualifications and unit standards (see the discussion on centralisation); establishment of a “plethora” of ETQAs (NAPTOSA, 2003); disagreement on the “one size fits all” approach (SAQA, 2004); wide ranging standardisation of systems and procedures (e.g. GDE, 2003); resistance from the CHE and UMALUSI to sign MoUs with ETQAs (NBFET, 2003); disqualification of NSBs and SGBs by the DoE, CHE and UMALUSI (e.g. CHE, 2003).

Alienation and fatiguing of NQF stakeholders as effect

Another example of an effect of power that is related to the first origin of power in the NQF discourse is the gradual alienation and fatiguing of stakeholders. Related manifestations of power include: the adoption of a threatening approach towards education and training providers by the CHE (ETQA Manager in SAQA, 2005c); the perceived use of regulatory powers to curtail private higher education in order to save the student market for public institutions (*The Mail and Guardian* of 19 January 2001); limited tangible benefits to employers (ICSA, 2003).

Lack of attention to learners as effect

This is probably the most important effect of power. It appears as if the central focus on the needs of learners was usurped by the continual power manifestations. Most of the examples mentioned above can be included in such a list.

5.2.6.3 Manifestations and effects related to the second origin

The following effects are linked to the second origin of power in the NQF discourse, namely that *the NQF is implemented in a historically contested terrain*:

Lack of communities of trust as effect

The lack of trust between sectors, constituencies and groups of stakeholders, is a critically important effect of power in the NQF discourse. This effect is also directly linked to the two previously mentioned origins of power. Related manifestations include: disbanding of the NSBs and SGBs (e.g. SAUVCA, 2004); private providers facing difficulties with registration and accreditation (*The Mail and Guardian*, 19 January 2001); overt and covert agendas of NQF stakeholders seen as a threat to successful NQF implementation (Isaacs, 2000); exclusion of professional bodies (ECSA and ESGB, 2004); criticism that the NSBs and SGBs did not have enough expert representation (SACP, 2003); initial threats of withdrawal from the higher education sector (*The Mail and Guardian*, 26 April 1996); fears from the higher education sector that the establishment of SAQA would allow the state to prescribe what would be taught (*The Cape Times*, 28 June 1995); suggestions that MoUs should be replaced with more stringent and non-voluntary Rules of Engagement (see the section on regulation).

Untouchable NQF objectives as effect

Manifestations include: support for the NQF objectives despite varying interpretations (identified as a strategy in the archaeological critique); passing of the SAQA Act (SA, 1995c) at a time when apartheid legislation had to be replaced made it virtually “unstoppable” (see the discussion on legal power); intentions to develop and pass new NQF legislation in an unrealistically short period of time (ASDFSA, 2003).

Struggle to overcome the apartheid legacy as effect

Manifestations include: struggle to achieve a significant shift away from the apartheid system (COSATU, 2003).

Culture of opposition and disregard as effect

Manifestations include: history of non-participation in government structures (SAQA, 2003); apparent disregard for the current legislative framework (APPETD, 2004); entrenched resistance to government (e.g. *The Mail and Guardian*, 8 February 2001).

NQF becoming skewed towards education as effect

Manifestations include: inconsistent trade union involvement (identified as a strategy in the archaeological critique); and the DoE and DoL operating in isolation (in the discussion on distribution).

Reluctance to take note of the voices of stakeholders as effect

Manifestations include: *Consultative Document* (DoE and DoL, 2003) viewed as an expression of the DoE/DoL differences (NAPTOSA, 2003); draft HEQF (DoE, 2004) viewed as an attempt to increase the power and influence of the DoE at the expense of other stakeholders and a unifying NQF (Reinecke, 2004).

Unrealistic ambition of the NQF as effect

Manifestations include: Realisation that the NQF is but one mechanism to transform the country (CHE, 2003); re-alignment of power around new innovations during the review period as well as dissension about the proposed changes to the NQF (e.g. NAPTOSA, 2004).

5.2.6.4 Manifestations and effects related to the third origin

Using the *entrenched differences between educationalism and vocationalism* as one of the primary sources of the manifestations of power in the NQF discourse, the following effects can be identified:

Contested integration as effect

Contestations, disagreements and misinterpretations of integration are noticeable appearances of power in the NQF discourse. Other examples of manifestations include: recognition of institution-based learning as different to work-based learning (Young, 2003); promotion of conflicting qualification routes (Gibson, 2004); classification of stakeholder groupings (see the discussion on classification); the establishment of SAQA as “fallback” position (BSA, 2003); concerns about the attempted forced integration of epistemologically different modes of learning (discussed in *Chapter 3*); NQF viewed as a threat to university autonomy (*The Cape Times*, 28 June 1995).

Academic/vocational fault line as effect

Closely related to contested integration is the appearance of a fault line between the academic and vocational sectors, which was also identified as a strategy during the archaeological critique.

Related manifestations include: differences, the struggle for dominance and internecine “turf warfare” between the DoE and DoL (cf. *The Mail and Guardian*, 2 March 2005); the role of SETAs underplayed or ignored by the DoE (Masango, 2004); perception that the Minister of Labour was gaining “curriculum control” of the majority of qualifications at the expense of the Minister of

Education who would remain responsible for “financial control” (CHE, 2003); ETQAs critical of the DoE (ETQA Manager in SAQA, 2005c); rejection of the unit standards-based approach by the DoE, HEQC and UMALUSI (cf. SAUVCA, 2003); formal education is seen as something different from the NQF (Ensor, 2003); *Consultative Document* (DoE and DoL, 2003) viewed as an expression of the DoE/DoL differences (NAPTOSA, 2003); draft HEQF (DoE, 2004) viewed as an attempt to increase the power and influence of the DoE at the expense of other stakeholders and a unifying NQF (Reinecke, 2004).

Fragmentation of the NQF as effect

Manifestations include: terminology excludes training, education is used as sole reference, e.g. reference is made to the Higher Education Band in stead of to the Higher Education *and Training* Band (e.g. in DoE and DoL, 2003); proposed establishment of sub-frameworks for higher and further education (e.g. DoE, 2004); incoherent policy development and implementation (cf. Isaacs, 2004); disqualification of certain constituencies (see the discussion on bio-power); retreat of some sectors into “comfortable semi-isolation” (NAPTOSA, 2004); DoE and CHE (not the DoE and SETAs) criticised for being too controlling (*Business Day*, 6 March 1998); political function to transfer the control of vocational education from providers to employers (discussed in *Chapter 3*); disagreement about the NQF Organising Fields (see the discussion on classification); evolving scope of the NQF (also discussed in *Chapter 3*).

Discrediting of the NQF

Manifestations include: perception that a shift towards a more technical paradigm is needed to operate within the requirements of the NQF (Lockett, 1999); work of NSBs viewed as intrusion into the higher education sector (see the discussion on bureaucratisation); conflict with the DoE and the higher education sector as a result of SAQA’s focus on disciplinary areas of knowledge production (Inter-NSB Committee, 2003).

Lack of leadership of the NQF as effect

Manifestations include: no specific grouping recognised more than another during initial NQF development (discussed in *Chapter 3*); DoE and DoL operating in isolation (see the discussion on distribution); DoL concerned about the influence of the HEQC and UMALUSI, while the DoE is concerned about the SETAs (*The Financial Mail*, 2 August 2002); interim funding from the DoL while the DoE retained political and administrative control (see the discussion on economisation); SAQA “scapegoated” and sidelined (Inter-NSB Committee, 2003).

5.2.6.5 Concluding comments on the manifestations and effects of power

In this third and final stage of the description of power in the NQF discourse twenty effects of power and numerous manifestations of power have been identified. It is important to note that these effects of power have not been judged as being positive or negative. Such an attempt has been resisted, as it would require a particular bias towards a specific constituency. For example, the lack of recognition of the contribution of the NQF would be viewed as an extremely negative effect by the implementers of the NQF, but as a positive effect by those who are critical of the NQF. Similarly, the “untouchable” NQF objectives would be viewed differently by different groupings. The point to be made is that power struggles can have a negative or positive effect on the development and implementation of the South African NQF. The focus in this thesis has however consistently been on the minimisation of the negative effects. The list above is therefore not universally negative (as the examples have shown).

5.2.7 Summary of the description of power in the NQF discourse

This section has presented the findings of the study in the form of a description of power in the NQF discourse, structured over three stages, and using the six Foucauldian guises of power. The description was based on the preceding results of the archaeological critique (predominantly the eight strategies) and the genealogical critique (predominantly the seven constraints).

The table below presents an overview of these findings:

	Origin of power	Related effect of power
1	NQF as a social construct is inextricably linked to power as origin	Inconsistencies in legislation as effect
		Lack of recognition of the contribution of the NQF as effect
		SAQA's role disputed as effect
		Stakeholders' unrealistic expectations of what the NQF is supposed to achieve as effect
		Limited collaboration between SAQA, the NQF principals and partners as effect
		Lack of attention to learners as effect
		Alienation and fatiguing of NQF stakeholders as effect
		Instabilities related to quality assurance and standards setting as effect
2	NQF is implemented in a historically contested terrain as origin	Lack of communities of trust as effect
		Untouchable NQF objectives as effect
		Struggle to overcome the apartheid legacy as effect
		Culture of opposition and disregard as effect
		NQF becoming skewed towards education as effect
		Reluctance to take note of the voices of stakeholders as effect
3	Entrenched differences between educationalism and vocationalism as origin	Unrealistic ambition of the NQF as effect
		Contested integration as effect
		Academic/vocational fault line as effect
		Fragmentation of the NQF as effect
		Discrediting of the NQF as effect
		Lack of leadership of the NQF as effect

Table 31: Description of power in the NQF discourse

5.3 MINIMISING THE NEGATIVE EFFECTS OF POWER STRUGGLES

5.3.1 Introduction

This section presents the recommendations of the study based on the findings as summarised in the previous section. The recommendations on how to minimise the negative effects of power struggles in the NQF discourse aim to:

Support improved future development and implementation of the South African NQF.

The recommendations are based on the results of the Foucauldian critique of the historical development and implementation of the NQF – in effect, using the “history” of the NQF to explain the present situation and also to make recommendations for the future.

This section is structured as follows:

- Revisiting the researcher's social location
- Revisiting the problem being investigated
- Negative effects of power struggles in the NQF discourse
- Considerations emanating from the findings
- Three recommendations for the minimisation of the negative effects of power struggles.

5.3.2 Revisiting the researcher's social location

In order to make recommendations for minimising the negative effects of power struggles on NQF development and implementation, it is necessary to revisit the researcher's social location. Two aspects stand out:

Commitment to the objectives of the South African NQF

As discussed at various points in this thesis, one of the effects of power in the NQF discourse is that stakeholders support the NQF objectives despite differing, often conflicting, interpretations (also seen as spatialisation or verbalisation – see the discussion on the techniques of power). As stated explicitly at the outset of this thesis, the researcher cannot claim to be unaffected by the very same power that is being described in the research. In a sense this apparent conflicting influence actually supports the Foucauldian interpretation of power employed in the research, in that different NQF stakeholders are continually and consistently exercising power. The research project places the researcher within the NQF discourse, making it impossible to remain completely objective.

In the employ of the South African Qualifications Authority

The fact that the researcher is employed by SAQA is important, as it covertly results in a bias that remains an influence, although it can be minimised through increased awareness. This is discussed again in the section on the limitations of the study.

In summary, the researcher's social location continues to have a significant influence on the process and outcome of the research project. Importantly though, this social location does not imply that the researcher is unable to critique NQF development and implementation (Dey in Smit, 1993).

5.3.3 Revisiting the problem being investigated

The following problem has been addressed in this study:

Power struggles are having a negative effect on the development and implementation of the South African NQF.

From the outset of this study it was also noted that two additional, but related problems required attention:

- Stakeholders have unrealistic expectations of what the NQF is supposed to achieve; and
- The NQF is rooted in contestation.

Reflecting on the findings of the study and the problem statement above, the following four observations are important:

1. The findings of the study show, without question, that the NQF discourse is inextricably linked to power, to the extent that this is the first origin of power within the NQF discourse: *The NQF as social construct is inextricably linked to power.*
2. The findings of the study also show that the exercise of power in the NQF discourse results in both negative and positive effects, depending on the social location of the observer.
3. First identified as a constraint in the NQF discourse through the genealogical critique, but also later as an effect of power linked to the first origin of power in the NQF discourse (see the first observation above), the unrealistic expectations by stakeholders (and also implementers) of what the NQF could achieve, were observed throughout the study.
4. Lastly, the “suspicion” that the NQF is rooted in contestation was confirmed by the findings, most notably in the identification of the second and third origins of power in the NQF discourse: *The NQF is implemented in a historically contested terrain and Entrenched differences between educationalism and vocationalism.*

These four observations show that the problem identified at the outset of this study was not unfounded, but more importantly that the ultimate purpose of the study - to support future development and implementation of the South African NQF - could be achieved by systematically addressing the initially identified problem within the confines of the Foucauldian theoretical framework.

5.3.4 Negative effects of power struggles in the NQF discourse

Earlier in this chapter, *positive power* as form of power within the NQF discourse was interpreted as *the complex relations within the NQF discourse that contribute to the more effective development and implementation of the NQF*.

The following manifestations of power in the NQF discourse were associated with positive power:

- acknowledgement that power is necessary for transformation, i.e. ‘moral purpose and ideas without power means that the train never leaves the station’ (Fullan, 1999 in SAQA, 2003);
- recognition that a certain amount of prescriptiveness is necessary to achieve the goals of the NQF (DoE representative in SAQA, 2005c);
- recognition that high institutional and high intrinsic logics are necessary as long as social and educational goals are not ignored (Tuck *et al*, 2004); and
- recognition that there is a need for improved parity of esteem between vocational training and academic education (SAQA, 2004).

On the other hand, negative power was interpreted as ‘the power that says that something cannot be done and that acts to enforce this law’ (Foucault, 1980:139). Importantly, even paradoxically, no negative forms of power were explicitly identified from the empirical dataset or from the literature review. Does this mean that there are no negative effects of power in the NQF discourse? Surely not. Consequently, another attempt was made to identify negative forms of power. Although some manifestations could possibly have been categorised as negative forms of power, the result was still very similar to the initial attempt: no manifestations could explicitly be categorised as negative forms of power. The conclusion was that the negative *effect* of power and negative power as *form*, should not be confused. All forms of power, whether they are positive, negative, bio-power or governmentality, can result in a negative effect of power. This meant that the effects of power had to be categorised as positive or negative, regardless of their links with the other guises of power.

As mentioned earlier, this required the researcher’s social location to be explicitly stated. His location is: (1) affected by verbalisation as technique of power - to the extent that the researcher remains committed to the objectives of the NQF; (2) affected by the normalising force of governmentality as form of power – to the extent that the researcher is taken into the subjectivity associated with the NQF discourse, and, although an awareness of this effect allows him to be critical to some extent, it does influence his perception of what a negative effect of power would, or would not be.

Continuing with a focus on the effects of power in the NQF discourse, it is useful to revisit the earlier “generic” definition:

The effects of power are the outcomes or results of the manifestation of power in the NQF discourse.

The extrapolation of this interpretation to cater for positive and negative effects, results in the following suggestion:

A positive/negative effect of power is the outcome or result of the manifestation of power in the NQF discourse that does/does not contribute to the more effective development and implementation of the NQF as viewed by a specific observer from a specific social location.

As explained above, different observers would have different social locations and could therefore also have divergent opinions of what constitutes a positive or a negative effect of power. Applying this interpretation to the list of effects of power identified earlier in this chapter, and considering the social location of the author of this thesis, *all* the effects are categorised as being negative. Does this mean that there are only negative effects of power in the NQF discourse? Again the answer is: surely not.

It became apparent that a totally different tack was required. Revisiting the interpretation of the NQF discourse proved to be useful:

The NQF discourse is a dominant, influential and coherent amalgamation of divergent and even contradictory views, which support the development of an NQF that replaces all existing differentiated and divisive education and training structures.

Embedded within the NQF discourse is support for the development of an NQF, *that is not restricted to a particular typological configuration*, that would replace existing divisive education and training structures. Using this “support for the development of an NQF” as the criterion for categorising the effects of power, provided a means that would not require the problematic emphasis on the social location of the observer – although this could not be negated in totality. Keeping this in mind, the following alternative interpretation for positive and negative effects of power was suggested:

A positive/negative effect of power is the outcome or result of the manifestation of power in the NQF discourse that does/does not support the development of an NQF.

As before, the interpretation was applied to the list of effects of power identified earlier in this chapter, resulting in the identification of the following *negative* effects of power in the NQF discourse:

- Stakeholders' unrealistic expectations of what the NQF is supposed to achieve as effect
- Alienation and fatiguing of NQF stakeholders as effect
- Fragmentation of the NQF as effect
- Discrediting of the NQF as effect
- Lack of leadership of the NQF as effect
- Unrealistic ambition of the NQF as effect.

These effects were considered *not* to be supportive of the development of an NQF, independent of a particular typological configuration, and as far as possible, also independent of the observer's social location. The list is not intended to be inclusive of all possible negative effects. It does, however, provide critical evidence of the existence of negative effects of power in the NQF discourse. In summary, the answers to both the earlier questions are important. There are negative effects of power in the NQF discourse, but there are also positive effects. Importantly, it has been demonstrated, in an accountable and substantiated manner, through the Foucauldian critique of the development and implementation of the South African NQF, that power struggles are in fact having a negative effect on the development and implementation of the South African NQF. As important, the findings of the study provide the basis for recommendations that will support improved future development and implementation of the South African NQF.

5.3.5 Considerations emanating from the findings

At this stage it is important to indicate the correlation of the characteristics of Foucault's power (as discussed in *Chapter 2*) as they are reflected within the findings of this study:

Firstly, for Foucault (cf. Smart in Hoy, 1986) there is no power-free society. The NQF as social construct can therefore not be power-free. Inclusion of this characteristic is reflected in the first origin of power in the NQF discourse, namely that *the NQF as a social construct is by default inextricably linked to power*. A related point by Smart (*Ibid.*) is important and will be taken up in the next section on the recommendations that emanate from this study: Smart argues that the objective is *not* to develop strategies through which the relations of power may finally be undermined, but rather to critically analyse how power is exercised.

Secondly, power exists only in action. According to Foucault (1980) power should be analysed in how individuals and groups act upon each other. This is reflected in the extent to which the manifestations of power (i.e. the noticeable and observable appearances of power) in the NQF discourse were used to support the identification of, not only, the forms, techniques, origins and effects of power, but also power relations. As it was shown in the earlier section on power relations in the NQF discourse, power struggles in the NQF discourse can only exist if human beings deliberately and purposefully exercise power – the existence of relationships between human beings (and groups of human beings) does not in itself imply that power is exercised. This approach is also supported by Berkhout (2005) who argues for an analysis of power based on everyday practices that are shaped by current discourses, such as the NQF discourse.

Thirdly, power represses, but power also has positive effects. Power should therefore not be studied solely as a form of repression; its positive effects must also be considered. The earlier comment regarding an awareness of the bias of the author of this thesis is a related point. The twenty effects of power identified in this study have purposely not been categorised as positive or negative, as they could be either, depending on the position of the judicator. Attempting to make recommendations on how to minimise the *negative* effects of power struggles does, however, require the researcher to take an explicit position.

Fourthly, power is exercised only over free subjects (Foucault in Dreyfus and Rabinow, 1983). This is a fundamental assumption that underpins the description of power as presented in this thesis. Individual NQF stakeholders, as represented in the various stakeholder groupings are recognised as autonomous and free subjects that are able to exercise their freedom of choice within the democratic South African society. The range and diversity of statements contained in the empirical dataset bear testimony to this fact.

Fifthly, power is extra-institutional. As discussed in the earlier section on power relations in the NQF discourse, it is *not* important to ask who has the power, but rather to analyse the power at the point of its intention (Foucault, 1980). An awareness of this potential pitfall underpinned the description of power as presented in this thesis.

In the sixth place, power should be described in terms of its own specificity. As argued by Davidson (in Hoy, 1986:226), power in the NQF discourse could not be reduced to a consequence of legislation and social structure only. As it was shown in the discussion on legal power, legislation is also used to exercise power.

In the seventh place, power exists in a complex relationship with knowledge. The very fact that the NQF is inherently concerned with qualifications and the classification of knowledge is evidence that this characteristic of power has been included in the description.

In the eighth place, it was noted that power appears in a variety of guises. The use of the six guises of power provides such evidence. Importantly, this point emphasises Foucault's caution (in Dreyfus and Rabinow, 1983) that asking questions about "how" power is exercised would limit the analysis to only describing power's effects without relating the effects to causes (or origins). The direct relationships between the origins and effects of power in the NQF discourse provide an important point of reference that can be used to make recommendations on how to minimise the negative effect of power struggles.

Lastly, power can only be established within discourse (Foucault, 1980). This is another fundamental assumption made in this thesis and reflected in the emphasis on an analysis of the NQF discourse as a whole, and not only on specific NQF architectural or governmental aspects.

In summary, the following aspects stand out as important considerations when making recommendations on how to minimise negative power struggles and therefore also to restore the balance of power in the NQF discourse:

- The objective is *not* to develop strategies through which the relations of power in the NQF discourse can be undermined.
- The formulation of recommendations requires the researcher to take an explicit position, albeit temporarily.
- It is *not* important to ask who has the power, but rather to focus on power at the point of its intention.
- Power in the NQF discourse cannot be reduced to a consequence of legislation and social structure only.
- The identified direct relationships between origins and effects of power in the NQF discourse can be used as points of reference.

5.3.6 Recommendations for the minimisation of the negative effects of power struggles

The recommendations presented in this section are based on the findings of this research project as exemplified in the description of the NQF discourse within the Foucauldian theoretical framework, and the revelation of the NQF discourse as a system in which power is exercised,

using the Foucauldian research methods. Most importantly, the resulting identification of the three origins of power in the South African NQF discourse is used as the fundamental point of reference:

1. The NQF as social construct is by default inextricably linked to power.
2. The NQF is implemented in a historically contested terrain.
3. Entrenched differences between educationalism and vocationalism.

Following from the three identified origins of power in the NQF discourse, and based on the understanding that the NQF discourse cannot be power-free, but also that power in the NQF discourse will have both positive and negative effects, a range of effects of power were identified. The identification of these effects of power confirmed the initial suspicion and showed that, even when viewed from outside of a particular typological preference and the social location of a particular observer, a range of negative effects of power in the NQF discourse could be identified. Examples included: alienation and fatiguing of NQF stakeholders, fragmentation of the NQF, and discrediting of the NQF.

Importantly, it was virtually impossible to identify any positive effects of power in the South African NQF discourse without compromising the “typological” and “social location” principles. This meant that in the period of NQF implementation that this study has covered (from the late 1970s to 2005, although focusing mainly on the 2002-2005 period) the balance of power was skewed towards the negative. This in turn, as has been shown in this study, had a negative effect on the development and implementation of the South African NQF.

In order to counter these negative effects of power struggles and therefore also to “restore the balance of power” in the NQF discourse, the following three recommendations are made to support improved future development and implementation of the South African NQF:

- Inculcate an understanding of the NQF as a social construct.
- Improve the compatibility between the NQF and the South African context.
- Bridge the entrenched differences between educationalism and vocationalism.

Each of the recommendations is discussed in more detail in the following sections and followed by a brief discussion on their international applicability.

5.3.6.1 Inculcate an understanding of the NQF as a social construct

The following three actions are recommended to inculcate an understanding of the NQF as a social construct:

- Improve the understanding of the NQF as a social construct.
- Create an awareness of the affinity of the NQF, as social construct, to power struggles.
- Develop strategies that make the NQF, as a social construct, more effective.

Improve understanding of the NQF as a social construct

The first, and also most critical action that is needed to restore the balance of power, is an inculcation of an understanding that the NQF is more than a map of qualifications that are included on a ladder-like construction, but the negotiated product of the South African society:

[The NQF is a] social construct whose meaning has been, and will continue to be, negotiated for the people, by the people (SAQA in Kraak and Young, 2001:30).

Adding dimensions such as an organisation of bureaucracy, and practices and agreements between users, providers and assessors (cf. Kraak and Young, 2001), do not adequately capture the NQF as a social construct, requiring an additional understanding that the NQF results in an 'overlay of a further system of classification onto reality' (*Ibid.*).

CONOCER (1999:8) further includes the social location of the individuals that make up the society in the social construct principle:

[The NQF as a social construct] represents the synthesis of the experience, thinking and practice...of individuals from a variety of socio-economic backgrounds representing a variety of worldviews.

As discussed earlier, it is this unavoidable recognition of the social location of individual observers that further contributes to contestations. Using more examples, it would be possible to further elaborate and develop the "NQF as social construct". This is not the place to do so, however. Suffice it to say that through the literature review and analysis of the empirical evidence presented in this study, it is already possible to identify various characteristics of the NQF as a social construct.

A more detailed and accurate understanding of the NQF as social construct lies outside the scope of this research project and is limited to the following suggested actions to be taken by NQF stakeholders, particularly the overseeing agency and the NQF partners:

- Collaborative research on NQFs as social constructs.

- Informed discussions amongst NQF stakeholders about the consequences of the NQF being a social construct.

Create an awareness of the affinity of the NQF, as social construct, to power struggles

Secondly, it is necessary to create awareness that social constructs, such as the NQF, are prone to power struggles. NQF stakeholders need to identify the positive and negative effects of power, the manifestations of power and even more importantly, the origins of power within the NQF discourse. As is evident from the findings of this study, the lack of awareness of power within the NQF discourse resulted in wide-ranging implications for NQF development and implementation, even to the extent that the NQF was compromised from the beginning (see Jansen, 2004b).

Just as importantly, NQF stakeholders, in particular the NQF principals, overseeing agency and partners, need to understand that an NQF with a transformative purpose, such as that of South Africa, requires power to succeed, to the extent that such power needs to be embraced rather than resisted:

...the challenge to all higher education and training providers is how you embrace this new power for real change to give South Africa an education and training system for the 21st century. Embracing this new power entails owning the NQF as yours as much as it is all South Africans (Nkomo, 2000 in Isaacs, 2000:10).

Furthermore, stakeholders should understand that although contestations are inevitable, they could have positive effects, such as finding common ground between sectors and traditions, which is in effect a vital component of building communities of trust:

Contestation is an inevitable (and in many respects healthy) feature of complex reform programmes. It does not necessarily mean that a programme is going off the rails. In particular, struggles between sectors in defence of particular learning traditions may be essential to find the appropriate common ground and achieve acceptance and willing support (DoE and DoL, 2002:57).

In summary, the negative effects of power struggles in the NQF discourse can be minimised (at least in part) by recognising the affinity of the NQF to power struggles; in particular the potential contribution of NQF stakeholders (including stakeholder groupings and individuals) when power is enacted within power relations. Taking this point even further, it will remain critically important to recognise the potential positive contribution of deliberative relationships, within power relations, in order to restore the balance of power in the NQF discourse.

Develop strategies that make the NQF, as a social construct, more effective

Moving from an understanding that the NQF is a social construct, and that this social construct is inextricably linked to power struggles, a third action is also required: the development of strategies that will make the NQF more effective.

The findings of this thesis indicate that such a plan of action was not adequately developed during the initial development and implementation of the NQF, as noted by Jansen (2004b:2): 'The NQF lacked a credible theory of action'.

This is not to say that no attempts were made to facilitate the development of the NQF as social construct. Isaacs (2001), in particular, made considerable efforts, but his ideas were not sufficiently supported to allow for their development and advocacy. Isaacs suggested three criteria necessary for a successful social construct:

- democratic participation of stakeholders;
- intellectual scrutiny; and
- adequate resourcing.

With the benefit of hindsight, Isaacs' suggestion is a step in the right direction, but should be further developed to reflect an improved understanding of the NQF as a social construct, particularly in the:

- synthesis of the experience, thinking and practice of individuals (also related to the notion of "communities of practice" [see CHE, 2003]) within the NQF discourse;
- understanding of the way in which power is exercised in the NQF discourse, including the affinity of the NQF to power struggles, the manner in which individuals (and groups) deliberately and purposefully enact power, and the extent to which such an understanding can potentially reduce power struggles in the NQF discourse; and
- identification and recognition of the knowledges, memories and unities that constitute the NQF as a social construct.

Although each of the three points mentioned above are important, it is the last point that is of particular significance to this study. In effect, this statement puts forward the argument that the NQF is a social construct, at least in part, on the basis that it (the NQF) consists of identified knowledges (including erudite knowledges and knowledges opposed to power), memories (local memories to be more precise) and unities (statements that refer to the same object) as were identified during the archaeological and genealogical critiques. This argument is taken up again when recommendations are made for specific areas that require further study.

5.3.6.2 Improve the compatibility between the NQF and the South African context

The second recommendation that follows from the findings of this study, is the need to improve the compatibility between the particular typological configuration of the South African NQF and the particular context in which the NQF is implemented. Importantly, it is argued that neither the NQF typology nor the South African context is static, and although it is critical to consider the historical context, it is just as important to continually know the current context in order to allow the NQF to evolve accordingly.

The following actions are recommended to improve the compatibility between the South African NQF and the South African context:

- Consider historical contestations and influences.
- Investigate the changing South African context.
- Actively communicate the purpose of the NQF.
- Allow for the evolution of the NQF.

Consider historical contestations and influences

The findings of this study have highlighted the legacy of apartheid within the South African education and training system, and in the South African society as a whole. In brief, the historical contestations and influences indicated below, were noted.

Entrenched differences between educationalism and vocationalism were most observable in, but not limited to, the contestations between the DoE and the DoL (this point is discussed in more detail in the next section as well).

Demise of authority and the subsequent attempts to re-establish educational authority through the NQF resulted in the invasion of the sphere of learning by those with political power:

In South Africa the justifiable rejection of the “authorities” and traditions of apartheid “education” has all too readily led to the rejection of educational authority and the tradition of learning as such (Morrow, 1993 in Oberholzer, 1994:10).

Apparent apathy and entrenched resistance to government initiatives were noted. Although the 1994 transition was accompanied by significant stakeholder involvement, it is possible that historical practices negated continued involvement.

The first NQFs, particularly that of England, were introduced for lower level vocational education and training (VET). This is an important influence on the South African NQF and can be associated with two negative effects:

- Limited debate on the NQF in policy and research literature, as VET is not a topic that has the ‘...highest profile for either academic researchers or policy makers, whose major concerns have tended to be with the more politically sensitive (and high status) issues of schools and universities’ (Young, 2003:224).
- The NQF is seen as inferior, vocationally biased and unable to accommodate the epistemological differences between different types of knowledge.

Replication of historical fractures was also noted. Lugg (2002:149) argues that ‘the emerging picture suggests a fragmentation of approaches to the NQF across different policy communities, with lines of fracture, perhaps not surprisingly running along race and class, and along sectors of education and training’. She classifies the policy players into three generations:

- Those that took positions crudely either for or against the NQF (1990-1994) – mainly from labour, few from schooling and higher education.
- Fracturing of 1st generation which drew in politically marginal, mainly white players that carried the NQF through the Inter-Ministerial Working Group (IMWG) into Law.
- Universities and DoE gained louder voices with the passing of the SAQA Act, also resulting in the development of bureaucracy and improved racial representivity.

The historical establishment of forums to bypass authorities, for example, the Convention for a Democratic South Africa (CODESA), replaced the pre-1994 apartheid government during the transition period:

In essence, such forums bypassed authorities that were still established in terms of apartheid legislation and functioned as transitional bodies while new legislation...was framed (CHE, 2002:37).

In a similar manner the suggested NQF Forum and Inter-Departmental Task Team would be able to bypass the currently established overseeing body (SAQA) (cf. DoE and DoL, 2003).

These are a few of the historical contestations and influences that have been identified through the Foucauldian critique. It is recommended that these be considered, but also further developed, to improve the compatibility between the NQF and the context in which it is implemented.

Investigate the changing South African context

As important as it is to consider the historical influences within South Africa, it is just as important to investigate the changing context. South Africa immediately after 1994 is very different from South Africa in 2005. Therefore the original typological configuration of the NQF, particularly its purpose, which was developed in the 1994 context, may no longer be compatible with the 2005 context.

On the other hand, it is also important to realise that large scale systemic changes, such as the one envisaged with the South African NQF, take many years and that frequent and premature changes may result in no purpose being achieved at all. There are, however, indicators of when such changes may be appropriate, and of which aspects of the NQF may require change:

- embedded NQF language (Raffe, 2003);
- organisational, economic and societal benefits (SAQA, 2005b);
- contribution by the NQF to other national strategies (*Ibid.*); and
- quality of learning and teaching (*Ibid.*).

Badat (2004:4) makes an important point in relation to the South African context. He argues that the post-apartheid South African social order is not yet indelibly defined, resulting in significant contestations:

In reality there is neither an entirely neo-liberal inspired reform process and pervasive and hegemonic neo-liberalism, nor a wholly revolutionary sweeping displacement of old social structures and arrangements and dawn of an entirely new social order. Instead, there is a mixed picture and fluid situation characterised by contesting social forces with competing goals, strategies and policy agendas, by attempts to resolve profound economic and social paradoxes in differing ways, by continuities and breaks and contradictions and ambiguities in policy and practice, and by differing trajectories and trends.

More considerations can be added, and would have to be added, to continually improve the compatibility between the NQF and the context in which it is implemented.

Actively communicate the purpose of the NQF

Another recommended action to improve NQF development and implementation is the active and effective communication of the purpose of the NQF. Reflected in various forms, such as the NQF objectives, NQF stakeholders often contest, or at the very least become apathetic towards the NQF, simply because they do not know or understand what it is meant to achieve. Even more problematic are the unrealistic expectations of the NQF that develop. This seeing of the NQF as a

“panacea” for all ills in the South African education and training system was identified and discussed in various instances in this thesis. Examples included the NQF promising what it could never achieve and the NQF objectives being viewed as “intractable” (Heyns, 2005 and Samuels *et al*, 2005).

Jansen (2004b:4) provides a fitting summary:

The first reason the NQF has had minimal impact in the South African education and training system is quite simply that the NQF promised what it could never deliver in practice. This in part has to do with the nature and complexity of practice, but it has a lot to do with the idealism and euphoria of policymaking in the years immediately preceding and following the formal installation of a democratic government in 1994. Put bluntly, we got carried away. This is not the place to repeat what some of us have called the over-investment in policy symbolism or others have observed as the tremendous moral imperatives that underwrote the education and training policies of the first post-apartheid government. The NQF was to address ‘employment opportunities’ as well as ‘economic development’ as well as ‘career paths’ and of course ‘redress past unfair discrimination.’ I know of no policy in the world that can address all of these things in the ways envisaged, let alone all at the same time. Yet we believed in the redemptive power of policy, and we are paying the price.

Although it is acknowledged that marketing of the NQF is important, it is recommended that communication is more important, the difference being that marketing would “sell” the NQF in its current form and purpose, while communication would focus more on empowering, increased understanding and even intellectual scrutiny, allowing for at least some discussion on changes and improvements.

Communication of the purpose of the NQF should also include awareness that there are competing overt and covert purposes (see *Chapter 3*) and a very explicit explanation of the unique purpose of the South African NQF and the resulting contestations:

The feature of the NQF that most distinguishes it from other systems is its location in the political and social transformation of South Africa. At first glance, the five objectives of the NQF read more or less like those of other systems; the underpinning concept of lifelong learning and the emphasis on transparency, flexibility and mobility echo the concerns of other frameworks...Except that is for Objective Four. In it the inclusion of “redress” as an objective moves the framework from the technical realm of education and training to a socio-political realm. In doing so, the real meaning of the other objectives, and especially

Objective Five, becomes transformed from technical and vaguely platitudinous aspirations into live and contestable political issues (Granville, 2004:4).

In summary, the government must 'make explicit what the NQF is expected to achieve and the purposes for which it will be used' (Surty, 2004:2).

Allow for the evolution of the NQF

Another recommended action to improve the compatibility between the NQF and the South African context is located in the tension between a "revolutionary" and an "evolutionary" NQF (see Lolwana, 2005 and Young, 2005). Internationally, a more evolutionary and incremental approach to NQF implementation seems to be the most successful (e.g. in Scotland). NQFs that have elements of tightness *and looseness* also seem more effective and definitely less prone to the contestations that the South African NQF has experienced.

This recommendation is not limited to purpose, prescriptiveness and incrementalism as discussed in the previous paragraph. Scope, policy breadth, architecture and governance are equally important.

The point is that the NQF, in its particular typological configuration, should not be seen as so revolutionary that there is no room for it to evolve, resulting in very dogmatic or even zealous approaches:

Because NQFs are so new and have experienced such a rapid and chequered evolution, there has not been time for an orthodoxy to develop. This has not prevented some NQF activists here and abroad from espousing fixed positions. Dogmatism is particularly inappropriate when applied to a subject as new and dynamic as an NQF... (DoE and DoL, 2002:57).

...enthusiastic advocates taking ideas, whether reasonable or otherwise, to unreasonable extremes, and insisting that there is only one right way (*Ibid.*).

For example, the scope of the South African NQF has consistently been contested (see *Chapter 3* for a detailed discussion). Initially, changes to the scope of the NQF may have been viewed with extreme scepticism, although in retrospect, such changes may have been necessary at the time and would have avoided the suggestions for more drastic changes that followed in later years. Admittedly, this is speculative and only time will tell if this is indeed the case.

A related point is SAQA's continual search for closure in the review process. This may be misplaced, as education and training systems often, if not always, include change and contestation, implying that full closure may never be obtained, and SAQA's efforts could be better spent on aspects other than bringing the review process to a close (cf. Smart in Hoy, 1986).

5.3.6.3 Bridge the entrenched differences between educationalism and vocationalism

The third recommendation to improve the development and implementation of the NQF is based on the third identified origin of power in the NQF discourse, namely the entrenched differences between educationalism and vocationalism. This discussion is related to the consideration of historical contestations and influences mentioned earlier, but is addressed separately, due to its significant influence in the South African context in particular.

The following actions are recommended to bridge the entrenched differences between educationalism and vocationalism:

- Recognise the differences between education and training.
- Build communities of trust.
- Create a greater local awareness of international trends in NQF development and implementation by increased cross-border co-operation with other countries and regions.

Recognise the differences between education and training

It is recommended that rather, than ignoring the differences between education and training (or educationalism and vocationalism), these differences need to be acknowledged and addressed. The findings show without any doubt that such differences exist in the South African context and despite the unifying approach of the NQF, still remain.

The differences manifested in a variety of ways, including:

- DoE and DoL disagreements and attempts to consolidate positions (see the extensive evidence presented in *Chapter 4*, particularly the concerns raised by NAPTOA, 2004).
- Disagreement on integration and an integrated approach (discussed in *Chapter 3*, also see French, 2005).
- Competing education and training policy discourses as found in the systemic vs. unit standards framework (Kraak, 1998).
- A "quick-fix" approach by the DoL by excessive funding but with short-term effectiveness – an approach that was very dominant in the early years of NQF implementation (Personal notes from a meeting between Badat, Raffae, Hart, Blom and Keevy, 13 June 2005).

- A long-term systemic approach followed mainly by the DoE – an approach that has become more dominant in recent years (*Ibid.*).

To emphasise the extent of the evidence, the fault line is summarised in the following table and organised according to the eight identified objects in the NQF discourse (also referred to as the NQF typological categories):

Object in the NQF discourse	Education/academic position	Training/vocational position
Guiding philosophy	Opposition to Neo-liberalism and the forced integration of epistemologically different modes of learning	Post-Fordism, Vocationalism, Unitisation and the Competence approach
Purpose	Aims to facilitate access to lifelong education and training opportunities, which will in turn contribute towards improving the quality of life and building a peaceful, prosperous and democratic society	Aims to grow the economy, investment and employment creation, and improve skills, equity, labour relations, respect for employment standards and worker rights
Scope	Separate pathways (tracked)	Single (unified) pathway (at least an integrated approach)
Prescriptiveness	Loose with some tightness	Tight with some looseness
Incrementalism	Long term, focused on systemic partnerships and internal capacity building	Fast, focused on short term needs
Policy breadth	High intrinsic and high institutional logic	High intrinsic and low institutional logic
Architecture	Non-unit standard-based (whole) qualifications, discipline-based programmes	Unit standard-based qualifications, occupational context-based programmes
Governance	Institutional provisioning, understand the nature of institutions	Workplace-based and/or institutional provisioning, over-bureaucratised

Table 32: Educational/vocational fault line

It is further acknowledged that attempts to unify such epistemological differences are overlaid by politics and struggles and are more than likely to be unsuccessful, leading to three likely divergent outcomes (Raffe, 2002):

- The role of academic and vocational tracks as basic organising mechanisms are reinforced (academic education remains largely unreformed, vocational track may be strengthened but maintains its distinct identity).
- Unification affects both tracks and vocational education loses its identity.
- Unification neither transforms nor replaces the academic and vocational tracks but creates a new intermediate track between them.

In summary, the recommendation is that unification is not a viable manner to bridge the differences between educationalism and vocationalism in the NQF discourse. It is rather suggested that these

differences be recognised and bridged through alternative means, such as the building of communities of trust discussed in the next section.

Build communities of trust

It was earlier noted that one probable positive effect of power struggles in the NQF discourse is the establishment of communities of trust (DoE and DoL, 2002). It is therefore recommended that a concerted effort is made to understand the dynamics of “communities of trust”, including how they can be built within the NQF discourse, and to aggressively implement measures to encourage the process.

Findings from this research project suggest that communities of trust have the following characteristics (cf. CHE, 2003), but also that more research is needed in this area:

- communities of trust are not the same as consensus;
- communities of trust are not the same as “communities of practice” that emphasise the fundamental social basis of learning; and
- communities of trust are about “communities” with shared practical experience (which is often expertise in a subject or occupational field), which provides people with the basis for making judgements.

Research in the European Union confirms that power has a key role in the understanding of communities of trust (referred to as Zones of Mutual Trust [ZMTs] in this context):

“Power” thus has a key role in understanding ZMTs – both in terms of how, where and why they are set up, as well as how they operate. Power relations thus not only enter into the relationship between an individual and the selector(s) in employment in education/training – the gatekeepers to progression and mobility – but also in respect of the differential power held by different social groups (Coles and Oates, 2004:28).

It is also recognised that despite the overwhelming negative effects of power struggles identified from the empirical evidence, it cannot be disputed that a number of communities of trust have indeed resulted from the implementation of the South African NQF. Examples include:

- NSBs and SGBs, and also the Consultative Panels;
- Joint Implementation Plans (JIPs) between various NQF stakeholders, especially the overseeing body and the partners and ETQAs;
- attempts to include professional qualifications on the NQF (cf. Keevy, 2005);

- MoUs between ETQAs – although mostly severely contested, there were some success stories;
- regular meetings of the SAQA, UMALUSI and CHE CEOs;
- strengthened co-ordination between some key institutions; and
- strategic engagements between NQF stakeholders, such as FETC General with DoE, SETA support team with DoL, Level Descriptors with CHE.

Create awareness of international trends

Another recommended action to bridge the differences between education and training, but also to contribute to the overall restoration of the balance of power in the NQF discourse, is creating awareness of international trends in NQF development and implementation. While it is acknowledged that NQFs in different countries are uniquely suited to the contexts in those countries, it was also found that there are generic typological categories that allow for comparability between NQFs. It is recommended that the eight typological categories (see *Chapter 3*) be used to follow international trends and also to facilitate communication of these trends to NQF stakeholders.

As examples, the following trends were identified from this study:

- Guiding philosophy - NQFs are influenced by underlying philosophies.
- Purpose - tensions exist between the overt and covert purposes of NQFs.
- Scope - unification leads to diversification.
- Prescriptiveness - there is a migration towards tight and linked NQFs.
- Incrementalism - gradual and phased implementation is least prone to power struggles.
- Policy breadth - combination of high intrinsic logic and high institutional logic is preferable.
- Architecture - the NQF is influenced by external pressures.
- Governance - participatory and consensus-based NQF governance is difficult to manage.

Another important way in which differences can be bridged, is through increased co-operation with other countries and regions. Such examples include:

- involvement in the development of the proposed SADC regional qualifications framework (TCCA, 2005);
- a request from the International Labour Organisation (ILO) that SAQA develop a discussion document on the Recognition of Prior Learning (RPL) (SAQA, 2005); and
- UNESCO support to assist Angola with the development of an NQF (UNISA, 2005).

5.3.7 Summary

In this section the recommendations for the minimisation of the negative effects of power struggles in the NQF discourse have been discussed. It was noted that the researcher's social location, in particular the commitment to the NQF objectives, has influenced the development of the recommendations, but not to the extent that critique of NQF development and implementation was impeded. It was also noted that the findings of the study have largely addressed the problem identified at the outset of the study, including the identification of *negative* effects of power struggles, without compromising the research design. Finally, based on a number of important considerations for balancing power in the NQF discourse, three recommendations were proposed. The recommendations, including the recommended actions and related findings (origins of power) are summarised in the three diagrams below.

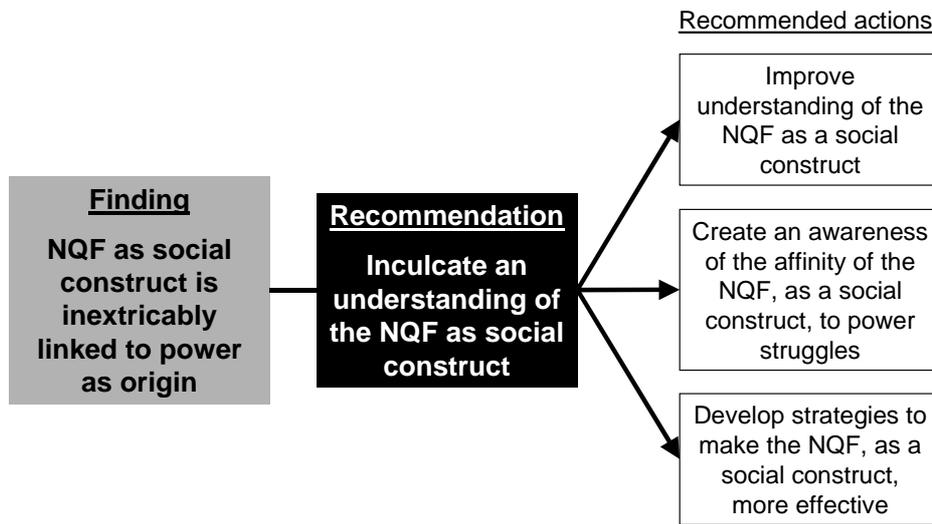


Diagram 33: First recommendation for the minimisation of the negative effects of power struggles

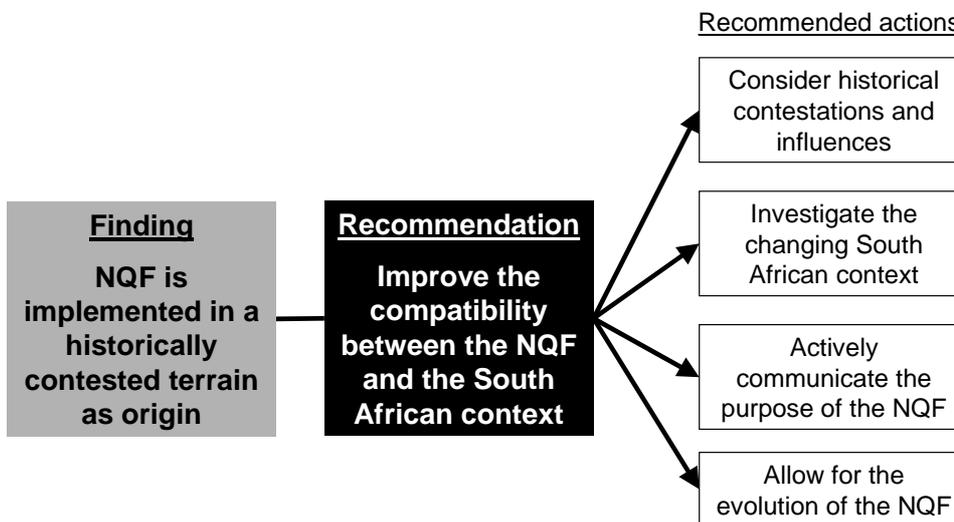


Diagram 34: Second recommendation for the minimisation of the negative effects of power struggles

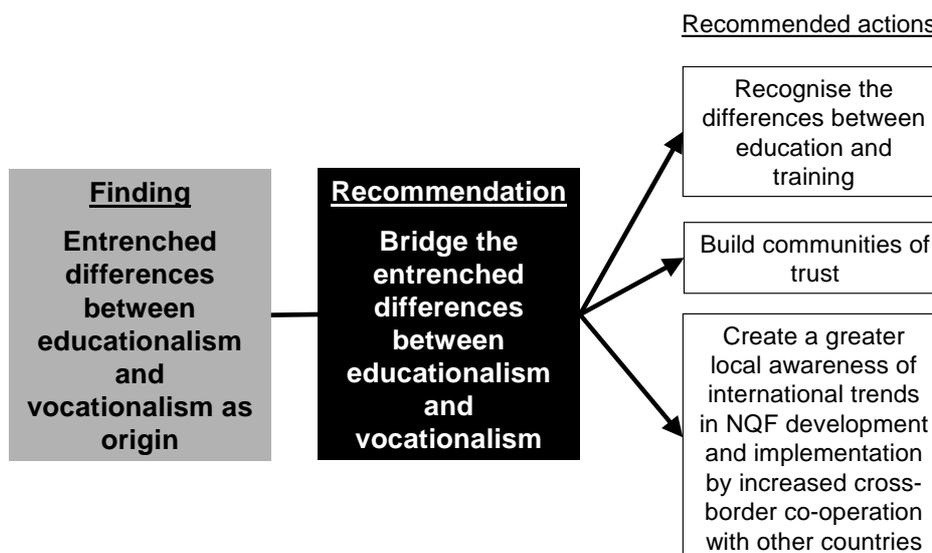


Diagram 35: Third recommendation for the minimisation of the negative effects of power struggles

5.4 REFLECTION ON THE RESEARCH DESIGN AND SUGGESTIONS FOR FURTHER RESEARCH

5.4.1 Introduction

What remains to be discussed is a reflection on the weaknesses and strengths of the research design that comprised two core components: a Foucauldian theoretical framework, and Foucauldian research methods (archaeology and genealogy). This section also includes a brief discussion of additional research that may further support NQF development and implementation in South Africa.

The section is structured as follows:

- *Assumptions* – both implicit and explicit.
- *Methodological considerations* – related to the research design, including the applicability of the research methods, sampling and analysis.

5.4.2 Assumptions

Two research assumptions that underlie the Foucauldian critique of the development and implementation of the South African NQF were already mentioned in *Chapter 1*. These are listed below. A third assumption that became evident in the course of the study is also added:

- The researcher has the legitimacy to speak about power in the NQF discourse.
- The Foucauldian theoretical framework and methods were best suited to the study.
- The study did not attempt to question the “validity” of the NQF.

5.4.2.1 The researcher has the legitimacy to speak about the subject

It has been assumed in this study that the researcher has the legitimacy to speak about power in the NQF discourse. The assumption has not been haphazardly employed in the study, but has been made possible by the particular research design. By selecting a Foucauldian theoretical framework, the researcher has submitted to the principles and thinking that it embraces. In the case of legitimacy, Foucault (see Prior, 1997:65) requires an author to take specific actions in order to be able to ‘claim legitimacy to speak, write and authoritatively pronounce’ on the topic. Such actions include examining the discursive rules through which knowledge is produced in the

specific discourse. This is an action that underpinned most of the discussions contained in this thesis, most notably as part of the archaeological and genealogical critiques. Importantly, it is not the researcher's social location (working in the NQF environment) that allows legitimacy. Quite on the contrary, this social location impedes the researcher to a large extent, in that he becomes embattled in the very power struggles that are being described and analysed. Although this social location allows the researcher the benefit of knowledge and experience related to the topic, personal experiences can lead to bias and lack of objectivity. It is for this very reason that the researcher's legitimacy to speak about the subject may seem somewhat paradoxically embedded in the use of the third person in the writing of the thesis. This was however done on purpose: by employing the third person the researcher foregrounds the action that is taken in order to be able to speak about power in the NQF discourse. Stated differently, the use of the third person in this thesis was deliberately chosen to emphasise the fact that the researcher does not have the legitimacy to speak about power in the NQF discourse as a result of his "insider status" and that this "insider status" was rather an impediment. The legitimacy to speak about power in the NQF discourse was made possible through the selection and application of the Foucauldian theoretical framework and the necessary boundaries that this framework placed on the research.

5.4.2.2 The research design was the most appropriate

Following from the previous discussion, the choice of the research design poses a second assumption. Although carefully selected and based on extensive review of literature and even trial applications, it still remained the researcher's assumption that the research design was the most appropriate for the task at hand. In retrospect, the researcher is confident that the initial assumption was correct and that the Foucauldian theoretical framework limited the number of perspectives from which the problem could have been interpreted to the one that was most pragmatic, but also effective.

5.4.2.3 The study did not attempt to question the "validity" of an NQF

As noted earlier in this chapter, the almost dogmatic and zealous commitment to the NQF as the panacea to a fragmented education and training system has inadvertently influenced many NQF stakeholders, the author of this thesis included. And, although an awareness of this effect of power has been important, the effects could not be completely avoided. As a result, the study did not explore alternatives to NQFs, such as have been successfully developed in countries like the United States and Germany (cf. Young, 2005, Blackmur, 2004 and Young, 2003). In retrospect, it can be argued that such exploration falls outside the scope of the study that already covered an extensive range of aspects, but this would be avoiding the real issue. In brief, in this study it was assumed that an NQF was the most appropriate solution to the challenges faced in the South

African context, even if the particular typological configuration of the NQF was not necessarily supported.

5.4.3 Methodological considerations

As discussed above, the choice of the research design was not made without considerable effort to understand the Foucauldian approach, and included an extended investigation that comprised a review of both primary and secondary Foucauldian literature in order to find an appropriate match with the task at hand (cf. Keevy, 2004, 2004b, 2004c).

The author's own background in the natural sciences acted both as an impediment and useful tool. By considering the similarities and differences between the natural and social sciences, the author was able to better select, understand and even develop the research methods that were most appropriate to the research. On the other hand, this lack of grounding in the social sciences made movement and comparison between different philosophical disciplines very difficult, restricting the author to the Foucauldian.

In order to "evaluate" the suitability of the Foucauldian framework (and methods), it is important to ask what advantages and disadvantages may accrue as a result of using it (see *Chapter 1*), as the particular theoretical framework should be able to maximise those advantages that are most salient for the investigation, but also to minimise those disadvantages that are most inimical to it. Some of these advantages and disadvantages are discussed below.

5.4.3.1 Funnelling effect of the research design

The research design led to a gradual shift from the large empirical dataset and literature, to the development of strategies (through the archaeological method) and constraints (through the genealogical method), to a description of power in the NQF discourse (mainly the three identified origins of power) and finally, three recommendations.

The advantage of this funnelling effect was that a considerable amount of empirical data (300 interviews [including focus groups], 90 responses to discussion documents and 72 news articles) and literature could be included in the qualitative analysis. In turn, this ensured that a comprehensive image of NQF development and implementation could be obtained. As a secondary effect, particular sections of the thesis could be used as valuable resources in local and international initiatives. For example, significant sections of *Chapters 1* and *3* were translated into

Portuguese and used to support the Angolan government with NQF development and implementation.

The disadvantage was that the study became cumbersome both in execution and reporting. A considerable amount of time was needed to complete the study and the thesis became much longer than originally anticipated. As a result, the readability is more limited than it was meant to be.

5.4.3.2 Duplicating effect of the research methods

The Foucauldian research methods, archaeology and genealogy, were applied to the same (and also large) empirical dataset. This also had advantages and disadvantages. The repetitive nature of the research design required the researcher to painstakingly work through the dataset not once, but twice. Although this led to duplication in the evidence and findings, it ensured that important findings were not missed. The differences in the two research methods resulted in the foci of the applications being very different:

- The archaeological method focused on the systematic description (snapshot) of the NQF discourse, resulting in the identification of eight objects, 52 unities and eight strategies.
- The genealogical method focused on the processual aspects of the NQF discourse, resulting in the identification of 16 erudite knowledges, 12 local memories, ten knowledges opposed to power and seven constraints.

The duplicating effect of the research methods resulted in a more extensive and in-depth description of power in the NQF discourse than would have been possible with the application of only one of the two. More importantly, the two methods complemented each other and in the opinion of this author and others (e.g. Kendall and Wickham, 1999), the research findings would have been very limited if only one method had been applied.

5.4.3.3 ATLAS coding process

The coding process that preceded the archaeological and genealogical critiques proved to be useful and manageable. The following related points should be noted:

The inclusion of the 300 interviews (including focus groups) from the NQF Impact Study (SAQA, 2004 and 2005b) contributed to the range of stakeholders and periods that could be covered, but also had disadvantages. The interviews were coded twice, the first time during the SAQA analysis

captured in eleven annexures (SAQA, 2004b-g and 2005c-h). The annexures therefore represented secondary data that had been gathered for a different purpose.

In this subsequent Foucauldian critique the same empirical data were coded again, using different codes. As a result, the original transcripts were not accessed. Arguably, the sheer volume of the transcripts presented a significant challenge, even with the ATLAS software, and the decision is at least defensible within the constraints of this thesis. As an alternative, fewer interviews could have been used and coded in greater detail. This would not necessarily have added value to the findings and more likely than not, would have skewed the findings towards the constituencies involved.

The coding process also required that responses to discussion documents, individual comments (from the interviews) and press articles had to be treated in a similar manner, in effect placing them all on the same level. Although this may have had some negative influence on the findings, it is argued that it is precisely this “placing on the same level” of erudite knowledges and local memories that made the Foucauldian critique so effective.

Although the use of secondary data can be seen as a critical self-imposed limitation, the outcome of the study showed the contrary: despite the fact that the interviews were conducted for a different (although related) purpose, the evidence of power struggles was still overwhelming. In effect, the limitation became a strength that led to a credible and substantiated confirmation of the identified research problem.

5.4.3.4 Choice of the empirical dataset

The sampling followed in the composition of the empirical dataset allowed for the inclusion of as many stakeholders as possible. Even so, stratification was intentional and had the following advantages and disadvantages:

- Fewer responses to the *Study Team Report* (DoE and DoL, 2002) were included than responses to the *Consultative Document* (DoE and DoL, 2003) and *The HEQF* (DoE, 2004).
- Not all stakeholders were included in the dataset, for example, NGOs and international agencies were excluded. Most responses to discussion documents also came from non-ETQA professional bodies and associations, with few from education and training providers, particularly from SMMEs.
- Some INSETA and SAQA responses were very similar, even identical. Although this problem was identified during the qualitative analysis, the coding had already been completed and may have resulted in some skewing of the evidence presented in *Chapter 4*.

- The inclusion of pre-1995 news articles could have added value to the findings, but was not done, as the key word search offered very limited results. This was mainly due to the fact that the term “NQF” was not used during this period.

5.4.3.5 Limited comparability

Although various attempts were made to find comparative studies on power in NQF development and implementation, very few were found, and even these were limited to a paper (e.g. Tobias, 1999) or passing comments (e.g. Young, 2005). A few isolated publications considered Foucauldian influences on the transformation of the South African education and training system as related to the NQF (e.g. Malherbe and Berkout, 2001).

As noted before, research on NQF development and implementation in general was found to be very limited, and will require significant attention in the years to come as societies grapple with their potential benefits and effects.

5.4.3.6 Remaining within the Foucauldian framework

A last point on the methodological considerations is the extent to which the author had to consciously refrain from “inventing” additional terminology within the Foucauldian critique. Despite the awareness to remain within the confines of the chosen theoretical framework, some new terms and “steps” in the research methods inadvertently developed during the course of the study. Two examples stand out:

- “Constraints” as a new concept in genealogy.
- “Guises of power” as a way to describe and categorise the various characteristics of power.

The advantage of the “new” terminology is that the author was able to better understand and apply the Foucauldian methods. The disadvantages are that it removed some of the discussion from the accepted Foucauldian terminology and that it can result in confusion.

5.4.4 Recommended further study

The limited research on NQF development and implementation that is currently available suggests that a wide range of further research is needed urgently (cf. Raffe, 2005). Based on the findings of this Foucauldian critique of the development and implementation of the South African NQF, the following research agenda is suggested for NQF stakeholders, in particular SAQA and the NQF

partners (CHE and UMALUSI) in collaboration with higher education institutions and research agencies:

- NQFs as social constructs
- South African context
- External influences on NQF development and implementation
- Communities of trust
- International trends.

5.4.4.1 NQFs as social constructs

As noted throughout this thesis, and in particular in the findings and recommendations, an improved understanding of the NQF as a social construct is fundamental to improved future NQF development and implementation. Although some aspects were covered in this thesis, there is a need for a more detailed and focused study on NQFs as social constructs. In this regard a constructivist theoretical framework may be more appropriate, and doctoral students should be encouraged to undertake such studies.

A useful point of departure for further study of the NQF as a social construct may be found in the findings of this study on power in the NQF discourse. The identification of unities in the NQF discourse (through the application of archaeology), erudite knowledges, local memories and knowledges opposed to power (through the application of genealogy) presents a radical, yet plausible route towards describing the NQF as a social construct based on its key analytical features. Of course it would not be possible to make such an argument solely on statements made by key roleplayers in the NQF discourse. In this regard, recent work by Jansen (2002b) and others on the sustainability of education reforms (focusing on conceptual adequacy, resource commitments and strategic actions), Berger and Luckmann in their seminal work, *The Social Construction of Reality* (Berger and Luckmann, 1966), and Hacking (1999) may offer considerable support (see Keevy [2005d] for an initial exploration).

In agreement with this recommendation, it was noted at the recent *First Annual NQF Colloquium* that the social purposes of the NQF had to be revisited, and that in this regard, it may be time to reconsider the original evolutionary and transformative purpose of the NQF (Keevy, 2005c).

5.4.4.2 The South African context

As also noted earlier, consideration of historical contestations and influences in South Africa will contribute to improved compatibility between the NQF and the South African context. Of equal

importance is the need to continually investigate the changing South African context to ensure that the NQF can evolve in tandem with the needs of society. Here again, many of the contestations and influences have been identified through this study, but these need to be complemented by focused and continued research. It is recommended that the results from research such as the NQF Impact Study (SAQA, 2004 and 2005b) are utilised. In order for this to happen, it is suggested that the results are communicated extensively at local, regional and national forums.

5.4.4.3 External influences on NQF development and implementation

The review of NQF literature, presented in *Chapter 3*, covered many aspects of NQF development and implementation as reflected in the eight components of the suggested NQF typology. Particular external factors, such as globalisation (cf. Raffe, 2002) and an increased focus on human resource development in education (cf. Wolf, 2002), were not explicitly addressed, although they were taken up in the discussion. It is suggested that more focused research is undertaken to identify the full extent of such external influences on NQF development and implementation. A useful framework for such research may be the three broad pressures identified by Raffe (2005), that influence unification, namely: economic (mainly the economic challenge of globalisation); democratic (here he notes South Africa's history of apartheid and redress); systemic (different sectors of education and training are becoming interdependent parts of a complex system that requires stronger measures of co-ordination and coherence). Related to this point is the need to carefully investigate the differences and similarities between unification and integration.

5.4.4.4 Communities of trust

In this study it was found that the building of communities of trust is an essential component of successful NQF development and implementation. As before, the study identified a number of important aspects of communities of trust, but more is needed. It is recommended that the work done in the context of VET in the proposed European Qualifications Framework (EQF) on zones of mutual trust (ZMTs) be further developed to suit the South African and SADC contexts (cf. European Commission, 2005 and Coles and Oates, 2004, 2004b, 2004c, 2004d and 2004e).

This recommendation is also supported by Hart (2005) and Samuels (2005:5), as recorded in the proceedings of the *First Annual NQF Colloquium*:

It seems to me that this [zones of mutual trust] is one of the single most important issues that we have to tackle within the South African context.

5.4.4.5 International trends

Lastly, there is a critical need for increased collaboration between countries that have implemented NQFs, countries that are in the process of implementing NQFs, and countries (and regions) that are considering implementing NQFs. Such international collaboration will minimise the negative effects of the inevitable power struggles by contributing to the growing body of knowledge contained in the NQF discourse. This recommendation is also supported by the research agenda outcomes of the *First Annual NQF Colloquium* (Keevy, 2005c).

5.5 CONCLUDING COMMENTS

This study has described the development and implementation of the South African NQF since the early 1980s to 2005 within a Foucauldian theoretical framework. It has been found that power struggles are having a significant effect, both positive and negative, on the development and implementation of the NQF. It has also been found that the NQF discourse is inextricably linked to power and that any attempt to divorce NQF development and implementation from power struggles would be futile. More importantly, such effort could be better spent by recognising and exploiting the positive effects or “pearly ideas”, as expressed by Nkomo (2004b:2):

This is indeed the start of a new period of NQF development and implementation; a period that shows maturity that goes beyond our initial period of exhilaration and transformation – this is a time to accept that contestations are, and will most probably always be, part of NQF implementation. Instead of labouring to avoid contestations, we should rather manage and extract the pearly ideas from the contestations so as to give renewed momentum to an improved NQF.

Based on the findings, three recommendations for improved future development and implementation of the South African NQF have been made:

The first recommendation is that there is a critical need to inculcate an understanding of the NQF as a social construct in NQF stakeholders. Also identified as an origin of power in the NQF discourse it has been recommended that in addition to advocacy and communication, research be undertaken to create an awareness of the affinity of the NQF, as a social construct, to power struggles and to develop strategies to make the NQF, as a social construct, more effective.

Secondly, it is recommended that the compatibility between the NQF and the South African context be improved on a continuous basis. In recognising the finding that the NQF has been implemented in a historically contested terrain, it is further recommended that a greater emphasis be placed on the interrelation between the specific typological configuration of the South African NQF and the context within the country at the time it is being implemented. This would mean that longitudinal research is undertaken, such as has already been done through the NQF Impact Study (SAQA, 2004 and 2005b), but also that the purpose of the NQF is actively communicated to stakeholders. Most importantly, it is recommended that an “evolutionary” approach to NQF development and implementation be adopted, rather than the “revolutionary” approach that, although necessary in the first ten years, has now become obsolete and inappropriate.

Thirdly, it is recommended that the entrenched differences between educationalism and vocationalism need to be bridged, and not ignored or disregarded. Related to the second finding above, this would require that the scope of the NQF evolve from its current unified position to a more linked one. In doing so, the differences between education and training will be recognised and accommodated in a single NQF without conflating the principles of *difference* and *equivalence*. Furthermore, it is recommended that the concept of communities of trust (or zones of mutual trust, as used in the European context) be adequately researched so that strategies are developed to accelerate their establishment within the South African context, where trust between stakeholders is still affected by the legacy of apartheid. In addition, it is recommended that external influences and international trends be researched on an ongoing basis to ensure that lessons are learnt from other countries facing similar challenges. In this regard, collaboration within the SADC region, and with SADC Member States, is essential.

As this study draws to a close, the challenges of NQF development and implementation in South Africa, in the SADC region, in SADC countries and in many other countries and regions become very real challenges that will require considerable research and investment in the years to come. It is trusted that this Foucauldian critique of the development and implementation of the South African NQF, as one such attempt, will be scrutinised by supporters and critics alike, but above all, will support future development and implementation of the social construct that the NQF is.

Today we, as NQF stakeholders, are indeed the shapers *not* of a “mythical beast”, as the NQF was seen in 1996, but of the social construct that has a particular purpose, scope, prescriptiveness, incrementalism, policy breadth, architecture and governance, and that is the South African NQF. Today we have first-hand experience of how this NQF can be a “vicious malevolent monster” through the negative effects of power struggles that have plagued its development and implementation. Today we also have the opportunity to use the history of the NQF to explain the

present, to maximise the positive effects of power struggles, and to ensure that the NQF continues to be a benevolent force for good in our hands.

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