THE QUALITY ASSURANCE OF TEACHING AND LEARNING IN HIGHER EDUCATION IN SOUTH AFRICA: AN ANALYSIS OF NATIONAL POLICY DEVELOPMENT AND STAKEHOLDER RESPONSE

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Dissertation presented for the Degree of Doctor of Philosophy at the University of Stellenbosch

Promoter: Professor Johann Mouton

April 2006
Declaration:

I, the undersigned, hereby declare that the work contained in this dissertation is my own original work and that I have not previously in its entirety or in part submitted it at any university for a degree.

Signature:

Date:
The Quality Assurance of Teaching and Learning in Higher Education in South Africa: An analysis of national policy development and stakeholder response

Kathleen Margaret Luckett

Abstract

The context of this study is the introduction of a new national quality assurance system for South African higher education by an agency of the Department of Education. The purpose of the study is to conduct a critical policy analysis of the Council of Higher Education’s Higher Education Quality Committee’s policy formulation process. In doing so, the study seeks to understand how the quality of teaching and learning practice might be enhanced through quality assurance.

In order to answer this question the study examines the literature on quality assurance in higher education and proposes a simple conceptual framework for mapping different approaches to quality assurance. The framework is based on a normative judgment that communicative action is more likely to result in the improvement of teaching and learning practice than instrumental action.

Approaches to policy analysis and evaluation research are explored and it is argued that policymaking is a complex multi-faceted process requiring a pluralist research design. This is attempted in the study where a range of research methods are employed from within a critical social science paradigm.

The study analyses data gathered at each of the policy stages: setting the policy agenda, policy formulation, policy adoption and policy reformulation, but stops short of researching policy implementation in any depth. The study is therefore classified as a formative, clarificatory evaluation. It seeks to evaluate the conceptualization and design of instruments for quality assurance, stakeholder contribution to policy development and stakeholder response to policy proposals. In particular the study seeks to uncover the different values, discourses and ideologies that stakeholders subscribe to in the policymaking process.
The findings of the study show that the HEQC did attempt to work communicatively and consultatively with the higher education community and that it was, in part, due to its consultative efforts, that the final policy instruments were greatly improved. But the study also shows that the consultative process was only partially successful, with serious differences still existing between the HEQC and some stakeholder groups. Different stakeholder approaches to quality assurance are traced to deeper historical, cultural and ideological differences. The study suggests that these factors are likely to hinder the smooth implementation of the HEQC’s policies.

The findings of the study also suggest that the challenge of designing a model of quality assurance that caters adequately for both the improvement and accountability purposes of quality assurance was not entirely met in this policymaking process. Furthermore, the study suggests that because the HEQC’s policies were, from the outset, conceived of as a means of furthering the state’s transformation agenda, its idea of quality and its quality assurance procedures are beginning to work ideologically. This has the effect of politicizing the implementation process and undermining the HEQC’s efforts to improve the quality of teaching and learning practice in South African higher education.
Die Gehalteversekering van Onderrig en Leer in Hoër Onderwys in Suid-Afrika: 'n Ontleding van nasionale beleidsontwikkeling en belanghebbers se reaksie

Kathleen Margaret Luckett

Samevatting

Die konteks van hierdie studie is die bekendstelling van 'n nuwe nasionale gehalteversekeringstelsel vir Suid-Afrikaanse hoër onderwys deur 'n agentskap van die Departement van Onderwys. Die doel van hierdie studie is om 'n kritiese ontleding van die beleidsformuleringsproses van die Raad op Hoër Onderwys se Gehaltekomitee vir Hoër Onderwys (HEQC) uit te voer. Sodoende poog die studie om te verstaan hoe die gehalte van onderrig- en leerpraktyke deur middel van gehalteversekering versterk kan word.

Ten einde hierdie vraag te beantwoord, stel die studie ondersoek in na die literatuur oor gehalteversekering in hoër onderwys en stel 'n eenvoudige konsepsuele raamwerk voor om die verskillende benaderings tot gehalteversekering uit te stippel. Die raamwerk word gegrond op 'n normatiewe uitspraak dat kommunikatiewe aksie waarskynlik eerder aanleiding sal gee tot die verbetering van onderrig- en leerpraktyke as instrumentele aksie.

Benaderings tot beleidsontleding en evauleringsnavorsing word ondersoek en daar word aangevoer dat beleidmaking 'n komplekse proses met baie fasette is wat 'n pluralistiese navorsingsontwerp vereis. Dit word in die studie beproef waar daar 'n reeks navorsingsmetodes vanuit 'n kritiese sosiaal wetenskaplike paradigma ingespan word.

Die studie ontleed data wat in elk van die beleidstadia ingesamel is: darstelling van beleidsagenda, beleidsformulering, beleidsaanvaarding en beleidsherformulering. Dit gaan nie so ver om beleidimplementering na te vors nie, maar maak wel aanbevelings vir implementering gegrond op die bevindinge. Die studie word dus as
'n Formatiewe, verduidelikende evaluering geklassifiseer. Dit poog om die konseptualisering en ontwerp van instrumente vir gehalteversekering, belanghebbers se bydraes tot beleidsonwikkeling en belanghebbers se reaksie op beleidsoorstelle te evalueer. In die besonder poog die studie om die verskillende waardes, diskoerse en ideologieë te onthul wat deur belanghebbers in die beleidmakingsproses onderskryf word.

Die studie se bevindinge toon dat die HEQC wel gepoog het om kommunikatief en konsulterend met die hoëronderwysgemeenskap saam te werk, en die feit dat die finale beleidsinstrumente grootliks verbeter is, is gedeeltelik aan hierdie poging tot raadpleging toe te skryf. Die studie toon egter ook dat die raadplegingsproses slegs gedeeltelik suksesvol was en dat daar steeds ernstige verskille tussen die HEQC en sommige belanghebbergroepe bestaan. Belanghebbers se verskillende benaderings tot gehalteversekering kan teruggevoer word na dieper historiese, kulturele en ideologieë verskille. Die studie doen aan die hand dat hierdie faktore waarskynlik die gemaklike implementering van die HEQC se beleid gaan belemmer.

Die studie se bevindinge doen ook aan die hand dat die uitdaging om 'n model vir gehalteversekering te ontwerp wat genoegsame voorsiening vir beide die verbeterings- en aanspreeklikesproses verwant aan gehalteversekering maak, nie in hierdie beleidmakeningsproses die hoof gebied is nie. Voorts doen die studie aan die hand dat omdat die HEQC se beleid van meet af aan voorgestel is as 'n doel om die staat se transformasie-agenda te bevorder, die HEQC se idee van gehalte en die prosesse vir gehalteversekering ideologiesie te werk begin gaan. Dit het die verpolitiserings van die implementeringsproses tot gevolg en ondermyn die HEQC se pogings om die gehalte van onderrig- en leerpraktyke in Suid-Afrikaanse hoër onderwys te verbeter.
Dedication

This dissertation is dedicated to my parents in gratitude.

Acknowledgements

I am indebted to the following people who assisted me in the production of this dissertation.

Firstly, I would like to thank the Higher Education Quality Committee for the privilege of working there in 2002 and for permission to use the data gathered. Secondly, I would like to thank SAUVCA for the opportunity to gather further data during the comment phase of the policy development process. Thirdly, thanks are due to my supervisor for his wise comments on earlier drafts. Fourthly, I am grateful to my colleagues at the Universities of KwaZulu-Natal and Cape Town for carrying the load during my absences. Finally, to my family, thank you for your support and long-suffering patience.
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<tr>
<td>CHED</td>
<td>Centre for Higher Education Development</td>
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<tr>
<td>CTP</td>
<td>Committee of Technikon Principals</td>
</tr>
<tr>
<td>DoE</td>
<td>Department of Education</td>
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<tr>
<td>DVC</td>
<td>Deputy Vice-Chancellor</td>
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<tr>
<td>ETDP SETA</td>
<td>Education Training and Development Practitioner Sectoral Education and Training Authority</td>
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<tr>
<td>ETQA</td>
<td>Education and Training Quality Assurance body</td>
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<td>HE</td>
<td>Higher education</td>
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<td>HEFCE</td>
<td>Higher Education Funding Council for England</td>
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<td>HEI</td>
<td>Higher education institution</td>
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<td>MBA</td>
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<td>NQF</td>
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<td>NSB</td>
<td>National Standards Body</td>
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<td>PQM</td>
<td>Programme and Qualifications Mix</td>
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<td>QA</td>
<td>Quality Assurance</td>
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<td>QAA</td>
<td>Quality Assurance Agency for Higher Education</td>
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<td>QAWG</td>
<td>Quality Assurance Working Group</td>
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<td>RPL</td>
<td>Recognition of Prior Learning</td>
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<td>SAQA</td>
<td>South African Qualifications Authority</td>
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<td>SAUVCA</td>
<td>South African Universities Vice-Chancellors Association</td>
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<tr>
<td>SET</td>
<td>Science, Engineering and Technology</td>
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<td>SGB</td>
<td>Standards Generating Body</td>
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Chapter 1 Introduction

1.1 Background and the Researcher’s Perspective

The idea that South African higher education should be quality assured by an external agency of the state was first proposed by the Report of the National Commission on Higher Education (NCHE) in 1996. The idea was taken up in the Education White Paper 3 of 1997: A Programme for the Transformation of Higher Education and proclaimed as law in the Higher Education Act (No. 101 of 1997) (for a detailed analysis see Chapter 6: Setting the Policy Agenda). The proposed quality assurance agency was named the Higher Education Quality Committee (HEQC) and was established as a permanent committee of the Council on Higher Education (CHE), an independent statutory body established by the same legislation, to provide independent and strategic advice on higher education issues to the Minister of Education. Thus although established and funded by the Department of Education, the CHE and its HEQC do enjoy some measure of independence from the Department and the Ministry. The HEQC was publicly launched by the Minister of Education in May 2001 with a mandate, defined in the Higher Education Act of 1997, to:

- promote quality in higher education;
- audit the quality assurance mechanisms of higher education institutions; and
- accredit programmes of higher education.

This study aims to analyse and evaluate the HEQC’s policy formulation process and products during the period 2002-2004. This topic was selected firstly because the imposition of a national quality assurance system by government on higher education in South Africa is currently considered to be one of the more demanding and intrusive policy interventions with which institutions of higher education currently have to deal. Secondly, there has been much controversy and debate around quality assurance in higher education internationally, which suggests that it is both a theoretical and a practical challenge to develop an effective national quality assurance system for higher education. Thirdly, the study focuses particularly on the quality assurance of teaching and learning because this is the researcher’s area of expertise and because this is the area the HEQC decided to give primary focus. In particular, the study aims to reflect on the extent to which the HEQC has succeeded in one of its central aims; namely, to develop policy instruments for quality assuring teaching and learning that are

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1 Quality assurance is one of a set of mechanisms used by government in recent attempts to control and transform the higher education system. Others include planning and funding mechanisms.
likely to enhance the quality of teaching and learning practice. The intended impact of the study is to alert both parties, the HEQC as policymaker and higher education institutions as implementers and practitioners of the policies, to the likely problems and challenges that will need to be addressed if the national quality assurance system, and the institutional self-evaluation systems on which it rests, are to be successfully implemented and achieve their goals.

In 2001 the HEQC appointed an Executive Director and established a Directorate for each of its three functions; notably, adding ‘capacity development’ to its ‘quality promotion’ function. The responsibilities of each of the HEQC’s Directorates have since been refined to include the following: The Directorate of Quality Promotion and Capacity Development is responsible for the Improving Teaching and Learning Project, auditor and evaluator training and stakeholder liaison. The Directorate of Institutional Audit audits public and private higher education institutions on a six-year cycle. The Directorate of Accreditation is responsible for accrediting private higher education institutions, for accrediting all new academic programmes offered by public and private providers, for conducting national evaluations leading to the re-accreditation of targeted programmes and for the coordination of activities by other Education and Training Quality Assurers (ETQAs) in higher education.

During its ‘start-up’ phase 2001-2003, the HEQC set up a number of projects which employed consultants, mostly from the higher education sector, to assist the move from its conceptualization of quality (2002a) to the operationalization of a national quality assurance system for all universities, technikons and colleges in the public sector and for all institutions classified as higher education institutions in the private sector.

Early in 2002 the researcher (myself) was appointed as consultant project manager of the HEQC’s Improving Teaching and Learning Project. My first tasks were to set up a project Working Group and to write the Project Proposal for approval by the HEQC Board. The original purposes of the project were defined as follows:

1. To develop for the HEQC criteria and guides to good practice on teaching and learning to inform the HEQC’s institutional audit and programme accreditation systems and

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2 This is the term given to bodies responsible for quality assurance in the South African Qualifications Authority’s (SAQA) National Qualifications Framework (NQF) system. The HEQC operates as the umbrella ETQA for the Higher Education and Training Band on the NQF and is required by SAQA to coordinate quality assurance by other bodies such as professional councils, Sectoral Education and Training Authorities (SETAs), research councils and international quality assurance agencies.

3 The HEQC initially planned a three-year start-up phase from 2001-2003, but its policy instruments were finalized only by the end of 2004; hence this study covers the period 2002-2004, with data gathered during 2002 and 2003.
procedures, with the aim of ensuring that these contribute to the valid evaluation and enhancement of teaching and learning.

2. To engage the academic community in discussion on the suitability of the proposed criteria, suggested indicators and guides to good practice and to take the academic perspective into account in their development.

3. To operationalise the HEQC’s Directorate of Quality Promotion and Capacity Development’s commitment to promoting and enhancing effective teaching and learning practice. (Improving Teaching and Learning Project Proposal, 2002:4, see Appendix 1)

A full discussion on the process of carrying out these goals is given in Chapter 7, which describes the process of producing the ‘Guides to Good Practice’ and analyses their reception by different groups of stakeholders. This section provides only a brief overview of my involvement in the project. Preparatory work for the writing of the Guides included a needs analysis that was conducted by two members of the Working Group and two overseas consultants. A ‘Draft Framework’ for the project was written and presented as part of my preparatory research; this included proposals for a format for the Guides and a mapping of the key focus areas that should be addressed. First drafts of the seven Guides were written by members of the Working Group, working in pairs, following my models of the first and second Guides. The first versions of the Guides included, at the HEQC’s request, descriptors for minimum quality thresholds as well as good practice descriptors. The first drafts of the Guides were approved by the HEQC Executive Committee on 6 August 2002 for consultation purposes only. The Improving Teaching and Learning Project was formally launched by the HEQC at a workshop in Johannesburg for all Deputy-Vice Chancellors (Academic) on 14 August 2002. At the workshop my conceptualization and examples of the Guides were presented and participants were informed of the consultative process to be followed for gathering input on the Guides from the academic community. Prior to the Consultative Panels, the researcher edited each of the Guides and inserted Rationale and Discussion sections to frame the Evaluative Questions (criteria) and Suggested Descriptors (indicators). My role as editor of the Guides required attending each of the seven Consultative Panels convened during August and September 2002 and then editing the Guides on the basis of feedback received from the panels, the Reference Group and members of the HEQC Board. This third version of the ‘Guides to Good Practice’ was submitted to the HEQC Board in

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4 These were renamed the ‘Improving Teaching and Learning Resources’ in 2003. They can be found in Appendix 2.

5 A brief overview of the production process of the Improving Teaching & Learning Resources is also provided in the Introduction to the Improving Teaching and Learning Resources, see Appendix 2, Introduction P.3.

6 A Consultative Panel was run for each of the Guides.

7 These were set up to be broadly representative of the academic community in terms of institutional type.
December 2002 and approved for the HEQC’s internal use to develop criteria for institutional audit and programme accreditation (Minutes of HEQC Board Meeting 4/12/2002). At this point the work of the Improving Teaching and Learning Project was stalled while the HEQC developed and published for comment its proposals for criteria for institutional audit and programme accreditation during 2003.

In mid-2003 a new Acting Director was appointed to run the HEQC’s Quality Promotion and Capacity Development Directorate and the ‘Guides to Good Practice’ were renamed ‘Improving Teaching & Learning Resources’. I was then asked to assist with materials preparation and facilitation for 14 regional workshops to be run by the Quality Promotion and Capacity Development Directorate during September, October and November 2003 across the country. The workshops aimed to present the Resources to the academic community, to receive feedback for improving them and to initiate discussion on how they could be used in institutions. The intention was to begin to build institutional capacity for self-evaluation and the improvement of teaching and learning (see HEQC Improving Teaching & Learning Project Briefing Plans, June 2003:2). On the basis of my attendance at five of the 14 workshops, my field-notes, my report to the HEQC and a composite report on the workshops compiled by the HEQC, I undertook a final and fourth edit of the Resources early in 2004. It is this version of the Resources that is presented in Appendix 2. The HEQC is currently undertaking its own final internal edit and lay-out of the Resources and aims for these to be published on its web-site and disseminated to all higher education institutions by early 2005.

My role in the development of the Resources has therefore been to conceptualize them originally and to act as the main writer and editor thereafter. However, input was received from a wide range of people – including staff developers and educational experts who served on the Working Group and helped write the first drafts, senior managers and academics who attended the Consultative Panels, HEQC staff and Board members, a Reference Group of national and international quality assurance experts who commented on early drafts and academics, senior managers and education development personnel who attended the regional workshops. In editing the Resources it was not always possible to accommodate all of the comments received. The data for Chapter 7: Policy Formulation, was gathered by tracking

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8 The final published version of the Improving Teaching and Learning Resources can be found on the HEQC’s web-site at http://www.che.ac.za

9 Hard copy and CD versions were published in March 2005.

10 I was guided by early reading for the conceptual frameworks presented in the literature review chapters that follow and no doubt influenced by my own values and interests. Much of this early reading is listed in the ‘References and Further Reading’ sections of the Resources, see Appendix 2.
and analyzing the policymaking process for the Improving Teaching and Learning Resources that were developed by the Improving Teaching and Learning Project. My role as project manager enabled me to do this as a relative ‘insider’ using participant observation and interview methods.

As stated above, the HEQC then used the Resources for the development of its policy instruments, in particular, the criteria for institutional audit and for programme accreditation. The policy formulation process for these two crucial instruments was also tracked and analyzed, but this time from an ‘outsider’ perspective. I gained access to stakeholder responses to the draft instruments by working as a researcher for the South African Universities Vice-Chancellors Association (SAUVCA) and by helping to formulate the sectoral response to the HEQC. Stakeholder opinion on the HEQC policies was also gathered through interviews conducted during the HEQC’s Improving Teaching and Learning Workshops run at the end of 2003. In my own institution, it was also possible to gain access to the responses of academic staff involved in the HEQC’s national Masters in Business Administration (MBA) re-accreditation review. The data gathered through these three interventions is presented and analysed in Chapter 8: Policy Adoption.

From the outset, it is important to state my perspective, as the researcher conducting this study, and to alert readers to the likely biases and limitations of that perspective. I was engaged by the HEQC as an ‘expert’ in higher education teaching and learning. I therefore approached the tasks delegated to me by the HEQC as a curriculum and staff development practitioner with some expertise in teaching-learning theory and practice. During the course of the work, it became evident that the extent of my expertise was limited by my work context; namely English-medium public universities. My lack of experience and knowledge of teaching and learning issues in other higher education contexts such as Technikons, colleges and the private sector, clearly limited my ability to produce instruments that were applicable to higher education institutions across the system, all of which fall within the scope of the HEQC’s mandate from government. My own identity as an academic and my intensive work with other academics on their curriculum and teaching practice has allowed me to develop a good understanding of the pressures and constraints under which academics work. There is therefore a danger in this study that my sympathy for academics ‘at the chalk-face’

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11 I teach on a Higher Education Masters programme at my own institution that aims to develop the educational theory and practice of university teaching staff.

12 The Improving Teaching and Learning Project’s Working Group was deliberately composed of staff developers from across the spectrum of HE institutions, however, the uneven levels of expertise in the group meant that the perspectives of those from ‘historically white universities’ tended to dominate (see Chapter 7.1 below).
biases my judgments on the suitability and potential effectiveness of the HEQC’s policies and instruments in favour of ‘the affected’ (the quality assured) and against ‘the involved’ (the quality assurers). Chapter 5 explains my attempts to deal with this problem of bias.

Furthermore, in all dealings with the HEQC, my ‘insider perspective’ due to my access through participant observation, was always as a consultant to the HEQC’s Improving Teaching and Learning Project. In this sense I remained an ‘outsider’ to the HEQC which obviously limited my understanding of and access to key policy discussions and decisions that took place amongst the HEQC’s core staff.

The data-gathering process allowed me to play a range of roles. In the HEQC context my identity as consultant was probably further defined as a consultant from an English-medium university, with all the connotations of ‘whiteness’ and privilege that accompany such a definition in the South African context. Within the Working Group I was known as a colleague by most of the university members, but was unknown to the technikon members. In working for the SAUVCA and the Committee of Technikon Principals (CTP) (see Chapter 8), I was engaged as a researcher, but was also known and recognized by many of the participants at the SAUVCA National Quality Assurance Forum Workshops as a colleague, especially by those from the university sector. In gathering data from academics in my own institution, I was accepted as a colleague and/or a higher education researcher. In all cases, in terms of the four stakeholder roles in a policymaking process identified by Ulrich (1994): the clients, the decision-makers, the experts and the witnesses to the affected (see Chapter 5) my work and research was in the role of an ‘expert’. Inevitably, this has limited my understanding of the perspectives of those in the other three roles, particularly with regard to the client and decision-maker roles, for as suggested above, my affinity and sympathy tend to lie with those in the ‘affected’ role.

1.2 The Research Problem

As indicated in the title of the study, the content area is the quality assurance of teaching and learning in higher education in South Africa. The research question that the study seeks to answer could be normatively formulated in the abstract: ‘How can quality assurance improve teaching and learning practice in higher education?’ or more specifically: ‘How should a quality assurance system be designed in order to improve teaching and learning practice in higher education?’ But this question is far too broad and abstract to be answered empirically

13 This meant that I have had to obtain the HEQC’s permission for the use of all data obtained in this capacity.
and requires operationalization in a specific context. As described in Chapter 1.1 the context in which this question is to be answered is that of national policy development for higher education in South Africa by the HEQC in its start-up phase (2002-2004). The research question can thus be contextualized and operationalized to ask:

1) To what extent has the HEQC succeeded in developing policy instruments for the quality assurance of teaching and learning that are likely to improve teaching and learning practice in South African higher education institutions?

In order to break down the research question further, the distinction between analysis of a policymaking process and analysis in and for a policy process is helpful (Parsons, 1995, Anderson, 1997). The former refers to research on how social problems are defined, policy agendas set and how policy gets formulated, adopted, implemented and evaluated (see Anderson’s five stages of the policy process in Chapter 1.3). The latter refers to research (usually commissioned research) that is used to inform and feed into the policy formulation process itself. This study involves both types of policy analysis. The work done for the Improving Teaching and Learning Project involving the production of the Improving Teaching and Learning Resources (which later fed into the production of the audit and accreditation criteria) is an example of analysis in and for a policy process. This work is described and analysed in Chapter 7: Policy Formulation. The study as a whole constitutes an analysis of a policy process. The research question formulated under 1) above can therefore usefully be broken down into two sub-questions:

2a) To what extent did the Improving Teaching and Learning Resources provide the HEQC’s internal policymaking process with a valid, acceptable and feasible set of norms for good teaching and learning practice to guide its development of policy instruments for institutional audit and programme accreditation?

2b) To what extent do different stakeholder groups of the HE community believe the HEQC’s set of policy instruments for quality assuring teaching and learning are valid, acceptable, feasible and potentially effective?

The conceptual work required to answer the three research questions (1, 2a and 2b) is undertaken in Chapters 2, 3 and 4. The empirical work undertaken to answer question 2a), on analysis for policy, is presented in Chapter 7: Policy Formulation. The empirical work undertaken to answer question 2b) analysis of policy, is presented in Chapter 8: Policy Adoption.

This study is not an impact or outcome evaluation; it is far too early in the policy process for that. It is rather a formative, clarificatory evaluation of policy instruments, prior to their full
implementation. In this sense, the findings of the analysis and evaluation of the policymaking process to date can still be used \textit{in and for} that process to advise the HEQC and higher education institutions on improvements to their quality assurance instruments.

The unit of analysis in this study is a policymaking process, but the study does not complete all stages of that process. It progresses from the setting of the policy agenda, to the formulation of policy proposals, to policy adoption and the finalization of policy formulation, stopping short of evaluating two crucial phases, namely full implementation and outcomes impact. The policymaking process studied is made up of documents (for example those outlining policy instruments), events (for example meetings, workshops and seminars) and individual human behaviour (for example individuals’ participation in events and their responses to questionnaires and interviews). The key organizations involved in this policymaking process are the HEQC and higher education institutions, but other organisations are also engaged such as the South African Universities Vice-Chancellors’ Association (SAUVCA)\textsuperscript{14} and the Committee of Technikon Principals (CTP) and, behind the scenes, the Department of Education. In all cases, individuals in this study act and speak in organizational or institutional contexts as formal or informal representatives of their organizations or stakeholder group. For this reason, I have adapted Ulrich’s ‘critical systems heuristics’ (see Chapter 5) to classify individuals into the groups of stakeholders that he identifies in the policymaking process: \textit{decision-makers} (in this study distinguished at national level as HEQC officials and at institutional level as higher education managers), \textit{experts} (in quality assurance and teaching and learning, for example, quality assurance managers and staff development personnel), \textit{clients} (students) and \textit{the affected} (academics). This means that for purposes of this study, where the unit of analysis is the policymaking process, people are studied, not as individual actors, but always as representatives of particular stakeholder groups, that act out their collective concerns and interests in the policymaking process.

\subsection*{1.3 Outline of the Thesis}

The structure of the study follows the structure of Anderson’s conceptual framework of the policy process. He understands the policy process to be ‘a sequential pattern of activities or functions that can readily be distinguished analytically although they may be empirically more difficult to pull apart’ (Anderson, 1997:39). The five stages of the policy process identified by Anderson are as follows:

\textsuperscript{14} SAUVCA and the CTP have since merged to form a new organization, Higher Education South Africa (HESA).
1. Setting the policy agenda
2. Policy formulation
3. Policy adoption
4. Policy implementation

It is indicated below how these stages were used to structure the narrative of the policymaking process during the three years covered by this study.

The preliminary conceptualizing and theoretical work is undertaken as follows: The introductory chapter provides the background to the study and to the researcher in Chapter 1.1, the specification of the research question in Chapter 1.2, an outline of the thesis in this Chapter 1.3 and a list of definitions of key concepts used in the study in Chapter 1.4.

The literature reviewed to provide a conceptual and theoretical framework for the study is presented in Chapters 2, 3 and 4. Chapter 2 draws on literature from the quality assurance of teaching and learning in higher education. It also provides a conceptual framework for categorizing and analyzing different approaches to quality assurance in higher education. Chapter 3 outlines some of the theoretical issues and debates around teaching and learning in higher education that informed the production of the HEQC’s Improving Teaching and Learning Resources. Chapter 4 gives an overview of traditions and approaches to policymaking, policy analysis and evaluation research with a view to providing a theoretical justification for the research methodology and design employed in the study. Chapter 5 describes the research design and methods used to gather and analyze data for the empirical aspects of the study.

As previously noted, data was gathered from four interventions using participant observation or interview methods. Firstly, participation in the Improving Teaching and Learning Project’s Working Group’s production of the Improving Teaching and Learning Resources during 2002, allowed me to gather data on the policy formulation process and to conduct interviews with senior HEQC officials. Secondly, during 2003, participation in SAUVCA’s research process to formulate a response to the HEQC’s draft policy instruments provided an opportunity to gather data on stakeholder response from across the sector. Thirdly, the HEQC’s Improving Teaching and Learning Project’s regional workshops held late in 2003 allowed me to interview a range of participants. Fourthly, in order to gather more data on academic staff opinion, I interviewed staff involved in the HEQC’s first national review of programmes, the re-accreditation of MBA programmes conducted in 2003.
The empirical work for the study is described and analyzed in Chapters 6-9. These chapters are structured according to Anderson’s (1997) stages of the policy process. Chapter 6: Setting the Policy Agenda is based on contextual and textual analysis and discusses how the quality of higher education practice came to be identified as a public ‘problem’ in post-apartheid South Africa, and how quality assurance came to be seen as one of the ‘solutions’ to the ‘problem’. Chapter 7: Policy Formulation analyses the research and development work undertaken by the Working Group of the Improving Teaching and Learning Project during 2002 to produce the Improving Teaching and Learning Resources and to assist the HEQC in formulating its policy instruments for audit and accreditation. The chapter concludes with an evaluation of the Resources based on interview data from HEQC officials and also from institutional representatives who attended the HEQC’s Improving Teaching and Learning Project’s workshops in 2003. Chapter 8: Policy Adoption analyses the responses of the higher education sector to the HEQC’s proposals for policy instruments for audit and accreditation gathered in 2003. Firstly, a summary of responses from across the sector is presented on the basis of questionnaires distributed by SAUVCA using SAUVCA’s National Quality Assurance Forum for quality assurance managers as an organizational base. This is followed by an analysis of interview data gathered from participants in the HEQC’s re-accreditation of MBA programmes. This additional data was gathered in order to gain deeper insight into the responses of academics, particularly at the point of policy implementation. Thirdly, interview data gathered at the HEQC’s Improving Teaching and Learning Project’s workshops held at the end of 2003 is presented and analyzed. The data is organized according to Ulrich’s (1994) groups of stakeholders in a policymaking process: experts (quality assurance managers), decision-makers (academic managers) and representatives of the affected (academics). In Chapter 9: Policy Reformulation an analysis of the HEQC’s finalized policy instruments for audit and accreditation is undertaken drawing on some of the ideas and methods of theory-based evaluation. On the basis of the findings presented, Chapter 10 draws some conclusions, raises questions for further research as the policy process moves into full implementation stage in late 2004.

1.4 List of Definitions

Before embarking on a review of the literature, it is essential to first clarify the meanings of key terms used in the quality assurance in higher education discourse and in policy analysis and evaluation research. It should be pointed out that, because the definitions below are largely theoretical or connotative, their meanings are contested and dependant on the theoretical frame in which they are located. The meanings for these terms are selected to be consistent with the critical position adopted in this study.
Accountability – the responsibility to demonstrate publicly to external stakeholders that a service or product is achieving its aims, meeting legitimate expectations and is being provided in an effective and efficient manner.

Discourse – the complex of concepts, categories, ways of thinking and organising meaning-making practices that constitutes a power-infused system of knowledge. Discourse, as a mode of governance, delimits the range of possible meanings and practices under its authority to the advantage of some groups and to the disadvantage of others.

Discursive formations – the implicit mental rules by which social reality is constituted through language practices. Foucault calls the study of discursive formations ‘archaeology’.

Evaluation research – a systematic and evidence-based judgment about the quality, effectiveness, efficiency, relevance or impact of a programme, service or product. Evaluation can be used as a management tool to judge and improve organizational activities and processes. Evaluation research is defined by Anderson (1997:7) as ‘a variant of policy analysis which assesses the societal effects of a particular public policy’ and by Rossi and Freeman (1999:5) as ‘the systematic application of social research procedures for assessing the conceptualization, design, implementation and utility of social intervention programmes’ (quoted in Babbie & Mouton Babbie et al., 2001:335). The Rossi and Freeman definition is helpful for this study for it supports the definition of policy evaluation offered below; namely, that evaluation can be done at each stage of the policymaking process. It is also important to make a distinction between formal evaluation research as defined by Rossi and Freeman and ‘connoisseurial evaluation’ which is defined as evaluation conducted by people (usually peers) on the basis of their experience of the field rather than on the basis of their expertise in evaluation research.

Formative evaluation – the evaluative activities leading to useful information that can guide improvement, usually used to serve needs intrinsic to the process or practice concerned.

Ideology – a set of ideas, beliefs and meanings that serve to sustain relations of domination.

Improvement – a commitment to ensuring that the quality (of the inputs, processes, outputs, outcomes and impact) of a service or product continues to develop or change for the better.

Indicators – the quantitative or qualitative measures of the inputs, processes, outputs and outcomes of activities performed by an evaluand in fulfillment of its purpose. Performance indicators are used to claim the achievement of pre-specified goals. In a monitoring and evaluation system, it is the relationships between a set of indicators that is significant.
Institutional audit – an external scrutiny using systematic evaluation procedures that usually include peer review to guarantee that an institution of higher education has an adequate quality management system in place to assure and enhance its quality. Audit focuses on the processes that are believed to produce quality and does not evaluate quality itself. Audit reports are usually made public.

Monitoring – the regular oversight of the implementation of a programme that relies on routine management information to measure change over time and to establish whether the programme is achieving its targets or outcomes and if not, to alert managers to the need for corrective action.

Paradigm – a basic set of beliefs, values, assumptions and ideas that guide one’s thinking and practice. According to Terre Blanche and Durrheim, a paradigm defines for researchers the nature of their enquiry along three dimensions: ontology, epistemology and methodology, thus giving direction to the way in which one conducts research, evaluation and other social practices (1999:6).

Policy analysis – has an applied orientation and is the concern of this study. Analysis for policy involves the provision of an information base for the formulation of policy with the intention of assisting policy-makers to determine the best alternative for dealing with a current public problem. Analysis of policy involves the examination of the values, assumptions and ideologies underpinning a policy statement, a policy process and/or analysis of a policy’s effects, outcomes and impact.

Policy discourse analysis – the study of the effects (as opposed to the veracity) of policy texts and how ways of talking about and conceptualizing policy serve to construct and organize social reality; it analyses how policy discourses are used to encode and decode policy texts in ways that both enable and constrain their meanings by establishing discursive limitations of policy outcomes.

Policy studies – the study of public policy undertaken to gain greater understanding of political behaviour and the governmental process (not the focus of this study).

Programme – ‘a set of rules, routines and resources created to implement a policy or portion thereof’ (Anderson, 1997:272). Rutman (1984) offers a more open-ended definition, ‘any

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15 The production of the Improving Teaching and Learning Resources is an example of analysis for policy in that they provided an information base used by the HEQC to formulate its audit and accreditation criteria.

16 The second part of this study involves an analysis of the HEQC’s draft policy statements for institutional audit, programme accreditation and for the re-accreditation of MBA programmes.
intervention or set of activities mounted to achieve external objectives, that is, to meet some recognized social need to solve an identified problem’ (quoted in Babbie & Mouton, 2001:335) 17.

**Programme accreditation** — an achieved status awarded to a programme by an authorized body on the basis of summative evaluation conducted by external stakeholders to check whether the programme meets pre-determined threshold quality criteria, thus enabling the public certification of the attainment of minimum (educational) standards. Accreditation of higher education programmes usually focuses on the inputs, objectives or learning outcomes of a programme (its design) as well as on its implementation (process) and on the extent to which it achieves its objectives (outputs and impact).

**Programme theory** — the set of assumptions about the cause and effect relationships implicit in a policy or programme; that is, the assumptions that certain strategies, tactics, resources and activities will lead to certain social changes, outcomes, impacts and benefits.

**Public policy** — a course of action or ‘solution’ developed by government bodies, officials and agencies or a political project of a state institution to deal with a public ‘problem’ with available methods and resources and existing facilitation arrangements. Ball (1994a:10) argues that policy is both text and action, what is intended as well as what is enacted, ‘policies are always incomplete insofar as they relate to or map on to the wild profusion of local practices’. A public policy is based on law and is authoritative18, but public policy involves not just law-making, but subsequent activities to enforce or implement the law. It involves the setting of goals and values, the allocation of resources, the exercise of political power and usually the use of discursive rationalization to legitimate the process. Anderson (1997:14) distinguishes between substantive policies that directly distribute advantages or disadvantages, benefits or costs to people and procedural policies that set out how something is going to be done and who is going to take action. A sub-set of substantive policies is regulatory policies that impose restrictions on the behaviour of individuals or groups19.

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17 This study could be understood as an analysis of the policy statements or sets of rules and guidelines formulated to regulate the HEQC’s audit and accreditation programmes.

18 Anderson (1997:9) points out that governments have a monopoly over the legitimate use of law but that the authoritativeness of public policy is a necessary but not sufficient condition for its effectiveness.

19 It is suggest that the HEQC’s policies dealt with in this study are substantive and regulatory as well as procedural.
Public sector – a group of institutions that rely on and justify their activities in terms of the authority of the state. The public sector embodies the idea that public authority should only be used in the public interest (Taylor et al 1997:2).

Quality - an elusive, subjective and value-laden concept, associated in everyday usage with what is good, excellent or worthwhile (see Chapter 2 for discussion on contending meanings of quality in the quality assurance of higher education).

Quality assessment or quality control – the systematic and regular evaluation to measure or check a product or service against pre-determined standards leading to summative judgments about the quality of the product or service.

Quality assurance – the systematic internal and external management procedures and mechanisms by which an institution of higher education assures its stakeholders of the quality of its systems, processes, products and outcomes and of its ability to manage the maintenance and enhancement quality. This term usually subsumes the meanings of quality assessment, quality management and quality enhancement.

Quality enhancement – a commitment to improvement and development, usually intrinsically motivated in response to personal or professional drivers.

Quality management – the overall management functions, structures and personnel that determine and implement the quality assurance policy of an institution, which in turn aims to safeguard the quality of the institution’s services and products.

Quality management system – the system, procedures and processes that an institution establishes to quality assure its services and products. This usually includes management information systems.

Reliability – the extent to which scores obtained on a measure are reproducible on repeated administrations, that is, the concern that measurements are consistent and generalizable to other performances conducted under the same conditions.

South African higher education system – defined in the White Paper of 1997 as all education provision that is post-Matric or pegged at NQF Level 5 and above.

Stakeholders – the individuals, groups or organizations that have a significant interest in how well an institution, policy or programme or service functions, for example, providers, practitioners, decision-makers, funders, clients and beneficiaries.

Summative evaluation – the evaluative activities leading to a summary judgment about a programme or institution’s performance, usually used to serve needs extrinsic to the process or practice concerned.
Teaching and learning – an interactive process requiring the cooperation of both teacher and learner. Teaching is the inspiration and facilitation of learning; learning is conceptual and cognitive change that usually occurs as a result of direct or indirect interaction with a more knowledgeable and experienced other. Therefore, the quality of teaching can be judged by the quality of the learning it promotes.

The policy-making process – an inherently political process involving conflict and struggle amongst people with conflicting interests, values and desires on policy issues. Anderson (1997) suggests that there are five analytical stages to the investigation of a policy-making process (these are not necessarily clearly distinguishable empirically):

1. **Policy agenda setting** – the understanding of why a social condition becomes a public problem and how it gets onto a government’s agenda (see Chapter 6).

2. **Policy formulation** – the identification and statement of proposed regulations and courses of action to deal with a public problem (see Chapters 7 and 9).

3. **Policy adoption** – the development of support for a specific policy proposal so that the policy can be authorized or legitimated (See Chapter 8).

4. **Policy implementation** – the transformation of policy texts into specific programmes for action leading to social practice; the application of policy by administrative machinery (see Chapter 8.1.3).

5. **Policy evaluation** – the research leading to a judgment on the effectiveness of a policy, usually determining whether it achieved its goals, what are its outcomes and impacts and what groups of stakeholders it advantaged or disadvantaged. However, policy or programme evaluation can occur throughout the policymaking process, at each of the stages identified above. Attempts are frequently made to determine prospectively the likely effects of a particular policy alternative (see discussion on types of evaluation research in Chapter 4).

**Validity** – the extent to which the criteria and methods of evaluation are appropriate and actually measure what they are intended to measure, and the extent to which the inferences made on the basis of the findings are justified and dependable.

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20 This study deals with the first three stages of a policymaking process and touches on the fourth.
Chapter 2  Conceptualizing the Quality Assurance of Teaching and Learning in Higher Education

2.1  Introduction

Given that the topic of this study is policy development for and policy analysis of a national system of external quality assurance of teaching and learning by a state agency, the Higher Education Quality Committee (HEQC), the focus of this chapter is on the quality assurance of teaching and learning and on state-higher education relations. Other core functions of higher education such as research and community engagement are largely ignored, as are market-higher education relations. This reduces the scope of the study and is inevitably a limitation because, for example, both market and state influences on higher education are currently significant, whilst the evaluation of research is increasingly used to inform decisions about funding for research. The HEQC’s national quality assurance system includes the quality assurance of research and community service at institutional level. Furthermore, the HEQC’s system applies to both the public and the private higher education sectors; one of the South African government’s rationales for imposing a national quality assurance system on the higher education sector was the need to regulate a burgeoning private sector. However, given my experience of working in public institutions, my expertise in teaching and learning and my involvement in this area of the national policy development process, I have chosen to confine this study to policy development of a quality assurance system for teaching and learning in relation to the public sector.

The literature review in this study consists of three chapters, this one that presents a conceptual framework for the analysis of the quality assurance of teaching and learning in higher education; Chapter 3 that focuses on theories and debates in the teaching and learning in higher education literature and provides a theoretical rationale for the development of the HEQC’s Improving Teaching and Learning Resources and Chapter 4 that reviews the literature on public policymaking and identifies different approaches to policymaking, policy analysis and evaluation research. Chapter 4 also provides the theoretical background to Chapter 5: Research Design and Methods.

Chapter 2 seeks to establish a conceptual framework for analyzing the quality assurance of teaching and learning by drawing on the international literature on quality assurance in higher education. By way of introduction, it looks briefly at the reasons for the development of quality assurance in higher education, the development of a widely accepted model for quality assurance in higher education, the tension between improvement and accountability in the quality assurance of higher education and the debates around definitions of quality. A
conceptual framework for the analysis of the quality assurance of teaching and learning in higher education is then proposed, based on a simple matrix consisting of four quadrants. The remainder of the chapter describes typologies or models of quality assurance that characterize each of the quadrants in terms of their rationality, purpose, locus of power and control, agents, methods, results and consequences and likely definitions of quality. For each quadrant one example is provide from the literature on higher education quality assurance systems.

In his recent book, ‘Beyond All Reason’, Ronald Barnett (2003) makes the unsettling point that in the contemporary ‘age of super-complexity’ the traditional assumption that the university is the embodiment of universal reason, no longer holds (Barnett, 2003:1). He argues that the old liberal idea that the university is a site of reason and therefore a ‘public good’ is being eroded by various ideologies and external forces that have permeated higher education. These ideologies include quality, managerialism and entrepreneurialism. According to Barnett, such ideologies have been imposed on or assimilated into higher education discourse and practice because society and governments no longer trust institutions of higher education. The social contract that previously allowed universities to be funded and set apart as part of the ‘Enlightenment project’ no longer holds. As a result, Barnett argues that universities find themselves in a ‘transgressive situation’ sociologically (Barnett, 2003:12) where boundaries, identities and roles have become fuzzy and values have become diverse. This ‘fuzziness’ is also experienced at an epistemological level, where the notion of universal reason is under serious attack and universities no longer have a monopoly over knowledge production. Barnett stresses the point that higher education is now based on a range of different and competing values, as different stakeholders with different interests try to impose their purposes on higher education. Both the state and the market have ‘intruded’ into academic life in an unprecedented manner that often causes stress for both institutions and individuals.

Guthrie (1995) and Vidovich and Slee (2001) point out that it is the rise of globalised knowledge-based economies that have put pressure on nation states to develop their ‘human capital’ and high skills base in order to gain or retain an economically competitive position in the global market. Governments have turned to higher education to provide the ‘knowledge workers’ that this requires. Governments are now interested in higher education for the socially useful knowledge that it can deliver as a key component of national economic investment and as an instrument of economic mobilization and human resource development. This has led to a drive for greater responsiveness and accountability on the part of higher education, as governments seek to make these systems more efficient, effective and productive. Governments can no longer afford to leave higher education institutions to their
own devices, including their traditional practices of self-regulation. Governments now have
an instrumental view of higher education; they want to measure its productivity, instill a
culture of performativity and link the allocation of public funds to performance-based
accountability requirements. Vidovich and Slee (2001) argue that Western governments have
intervened between higher education institutions and the market, instituting a ‘managed
market’ regime in which the state imposes economically driven notions of accountability by
using funding levers to achieve compliance.

Neave (1998) has captured this changed relationship between the state and the public services,
and higher education in particular, in the concept of the ‘evaluative state’. He suggests that
this allows governments to steer higher education using ‘remote control’. This new
relationship is based on the notion of ‘contractualization’ in which higher education becomes
a public service (as opposed to a state service), contracted by the government to provide a
service to the public in return for rewards from government. Neave also notes that this is a
dynamic contract that is always renegotiable and conditional, meaning that the state and its
agents have the power to change the ‘rules of the game’ (Neave, 1998:268).

A detailed analysis of the South African state-higher education relationship in relation to the
development of a national quality assurance system is explored in Chapter 6. Suffice it to
mention here that an increase in the power and influence of the state over higher education is
an international trend, except perhaps in the USA (which is largely a market-driven system)
(Barnett, 2003, Brennan and Shah, 2000, Harvey and Knight, 1996) meaning that,
increasingly, public higher education institutions are having to reconstruct themselves in
response to state agendas. As suggested above, in the wake of globalization, state agendas
now define the purposes for higher education within the discourses of instrumental and
strategic rationality, which include extrinsic values and goals for higher education, such as
viewing the sector as an instrument for human resource development and economic growth;
and demanding improved efficiency and effectiveness through managerialism and quality

This changed relationship between higher education institutions and their host societies has
resulted in radical changes, particularly in the ways in which they are managed. The emphasis
on greater public accountability and the need for quality assurance is simply one aspect of this
change process. Brennan and Shah (2000) argue that it is not clear whether change results in
quality assurance or whether quality assurance is used to drive the change. One suspects that
the cause and effect runs in both directions. The changes previously discussed mean that
quality in higher education is no longer taken for granted. The traditional means of quality
assurance in this sector were based largely on the quality or excellence of the people involved
in higher education practices and mostly revolved around mechanisms for ensuring the quality of academic staff and knowledge production. These are discussed in detail by Trow (1999) and include practices such as those for ensuring the quality of staff: appointment procedures, probation leading to tenure, academic promotions and rewards – all based on rigorous peer review; those for ensuring the quality of research: peer review, external examination, publication review and requirements and rigorous peer review systems for research grants, recognition and rewards; those for ensuring the quality of students: admission requirements, examinations and external examining and the awarding of qualifications; those for assuring the quality of the curriculum: approval of programmes and modules by peer review and in some cases, staff development programmes and student opinion surveys. These traditional quality assurance practices are carried out primarily through peer review and are based on the norms and values of the academic community and on the assumption that quality is self-evident; the meaning of quality remains implicit. However, these quality assurance mechanisms tend to be used in uncoordinated and unsystematic ways meaning that they are unlikely to deliver accountability; nor do they necessarily lead to the ‘quality gap’ being fully closed; that is, the feedback that they provide is not systematically used for improvement because they do not form part of a coherent institution-wide system of quality management and monitoring. But Trow argues that traditionally this system worked because it could assume a commitment to and a culture of excellence. But, as discussed above, higher education institutions are now obliged to prove to society and governments that such a commitment exists.

The introduction of formal quality management systems into higher education institutions typically occurs as part of improved or new management systems. This is usually done at the instigation of governments that provide the legal framework for the system and often link the results to funding considerations. The concepts and models for quality assurance within this ‘new managerialism’ (Barnett, 2003) have been imported (often inappropriately) from management theory and practice that was originally developed for the private sector. Parsons (1995) gives an account of the development of quality assurance in the public sector as follows: The practice arose post World War II in the USA, based on the social democratic belief that the role of the state should be to manage the public and its problems, leading to the rise of a state bureaucracy and public administration. There was an assumption that politics could and should be separated from a rational public service that was understood as a rational means of serving the public interest. The dominant management approach in the public sector borrowed concepts and methods from the private sector ‘management science’ of the 1960s. This management science was based on the following beliefs and assumptions: goals and
objectives should be determined in advance and planning, monitoring and control should be undertaken top-down; task efficiency could be determined by ‘scientific methods’ and standardized measuring instruments could be used for evaluation; and the conditions of implementation were assumed to be fixed, stable and generalisable. Parsons (1995) notes that this model of public sector management was completely silent on the issue of values.

By the mid-1970s the welfare state was in fiscal crisis and many public projects were suffering from ‘implementation failure’. In the early 1980s conservative governments were returned to power in the USA and the UK under Regan and Thatcher; they turned to the neo-liberal belief that the market rather than the state could solve social problems. This led to ‘structural adjustments’ for better economic performance and included cuts in public spending. Public services were either privatized or reformed and strict controls over the costs and size of the public sector were imposed. A ‘new public management’ imported new management ideas, models and technologies from the private sector such as the following: governments should steer (rather than row) the public sector; public organizations should be driven by a sense of mission and focus on earning as well as spending; governments should use the leverage of the market to encourage competition in the delivery of services; government funding should be linked to outputs via performance measurement rather than inputs; the needs of customers should become a priority in the public service and, most importantly for the purposes of this study, governments should monitor and improve the performance of the public services via quality assurance. This led to the establishment of state-sponsored quality assurance agencies and the emergence of the idea of the ‘evaluative state’ (Parsons, 1995, Neave, 1998). According to Parsons, private sector models of quality assurance that were uncritically imported into the public sector include the notion of accountability – that public servants should be accountable to the customer or client and the taxpayer, as well as to the government; the idea of corporate management – that organizational missions and strategic planning should be linked to the ‘quality cycle’ to improve value-for-money and induce a business-orientated culture in the public sector; the concept of personnel management – where control is ‘down-loaded’ and staff are encouraged to self-regulate via performance appraisal and a mix of incentives and sanctions.

However, Vroeijenstijn (2000) argues that commercial and industrial models of quality assurance are not directly applicable to higher education. For example it is not clear whether the product produced by this public service is the graduate, the programme or research products. Furthermore, higher education serves a range of stakeholders (clients or customers) and the meaning of quality in the sector is itself contested. For these reasons, higher education has adopted industrial models but adapted them to suit its own environment. During the 1990s
general consensus developed around a generic model for conducting quality assurance in higher education. On the basis of their research for an OECD project on ‘Institutional Management in Higher Education’ involving 29 higher education institutions, seven quality assurance agencies and 17 countries, Brennan and Shah (2000) describe a generic model for quality assurance in higher education which remains based on the one originally proposed for European Union countries by van Vught and Westerheijden (1993). The general features of the model include:

- A national coordinating body with legal status but independent from government that sets out the quality assurance methods and procedures
- Institutional self-evaluation by HEIs, undertaken by academics themselves and reporting to the external quality assurance agency
- External evaluation by peers that includes a site-visit and face-to-face interaction
- Published reports that usually include recommendations for improvement (Brennan and Shah, 2000:11)

Brennan and Shah (2000) confirm that this is the dominant model used in the case studies of their research, but that significant variations exist related to the following: the focus of the evaluation (research, teaching and learning, community service, administration and management, et cetera), the unit of evaluation (institution, faculty, department, programme or individual) and crucially, who owns the process and what its consequences are.

In South Africa, the HEQC has followed this widely accepted model for institutional audit. With respect to programme accreditation, the HEQC will also follow this model for the final phase of its accreditation process (for the granting of full accreditation status) and also for the granting of self-accreditation status. (For further discussion see Chapters 7 and 9). As will become evident, many aspects of this model have since been adapted and implemented in both public and private higher education systems. But before analyzing models of quality assurance further, is it necessary to discuss the meanings of quality per se.

Quality is an elusive concept associated in everyday usage with what is good, excellent or worthwhile. It is always a subjective and value-laden concept and the meaning of quality in higher education is no exception.

We have no yardstick at our disposal to measure the quality of education. Standards and criteria are a matter of bargaining and negotiating between the parties involved. An absolute value for an academic level or the quality of a graduate does not exist. What is generally accepted as quality is a matter of opinion. (Vroeijenstijn, 1995:18)

Thus it is not surprising that discussions around the establishment of systems of quality assurance for higher education often entail debates about explicit conceptualizations of quality (Harvey and Green, 1993, HEQC 2002a). These are summarized in Harvey and Knight (1996) as: quality as exceptional, quality as perfection or consistency, quality as fitness for purpose, quality as value for money and quality as transformation. A brief explanation of the meaning of each of these concepts and a discussion on what the HEQC has to say on each in its explication of its ‘approach to quality’ in its Founding Document (HEQC 2002a) is offered.

Harvey and Knight (1996) argue that the first conceptualization, ‘quality as exceptional’, captures the traditional notion in which quality is understood as something distinctive, exceptional or excellent. They suggest that such notions are no longer appropriate for higher education because they are based on norm-referenced notions of elitism and exclusivism. It is notable that the HEQC (2002a) omits this definition from its conceptualization of quality.

Harvey and Knight (1996:4) suggest that the second definition, ‘quality as perfection or consistency’, sets up specifications or standards for processes and aims at ‘getting it right first time’ and that this conceptualization is clearly appropriate to the process of producing consistent products in the manufacturing industry. They suggest that this understanding of quality is appropriate to ‘quality control’ in industry and, whilst it may be appropriate for administrative processes in higher education, it contradicts the exploratory nature of intellectual endeavor. This definition of quality is also ignored by the HEQC.

The third definition, ‘quality as fitness for purpose’ is endorsed by the HEQC. Here quality is judged in terms of the extent to which a product or service meets its stated purpose, in other words, the output or product ‘does the job it was designed to do’. Harvey and Knight (1996) problematize this conceptualization when applied to higher education by asking ‘who defines the purpose(s) of higher education?’ and ‘how is “fitness” to be measured?’ They show that in the private sector, purpose is usually defined as meeting customer specifications or requirements and thereby earning customer satisfaction. But Harvey and Knight dismiss this conceptualization as inappropriate for higher education because students are not customers and are not always in a position to know what their learning needs are; instead they insist that students should rather be understood as co-participants in a learning process. When imported into higher education and other organizational contexts, the ‘fitness for purpose’ conceptualization of quality is usually taken to mean that the organization can demonstrate
that it has achieved its stated mission and goals effectively and efficiently, the emphasis being on managerial efficiency and effectiveness. The HEQC makes clear that this is the notion of ‘fitness for purpose’ to which it subscribes by elaborating it as ‘in relation to specified mission within a national framework that encompasses differentiation and diversity’ (HEQC, 2002a:14). The HEQC’s definition of this concept of quality qualifies the space given to institutions to define their own purposes in their mission statements by insisting that these must be consistent with the national (policy) framework, presumably as set out by the Department of Education. However, in its Founding Document (2002a) the HEQC leaves open the questions of who should define institutional missions and how and by whom they should be evaluated.

The fourth conceptualization of quality as ‘value for money’ is typically a market concept that emphasizes efficiency as well as accountability to or a ‘good deal’ for the customer or client. According to Harvey and Knight (1996), when governments apply this concept to higher education institutions, they are usually pushing for improved efficiency and competitiveness within the higher education system. In the South African case, the HEQC explains that this concept of quality is to be ‘judged in relation to the full range of higher education purposes set out in the White Paper. Judgments about the effectiveness and efficiency of provision are to include, but not be confined to labour market responsiveness and cost recovery’ (HEQC, 2002a:4). Here the HEQC seems concerned to widen the concept to include more than market-driven and cost-effectiveness concerns, but it widens the scope only insofar that it includes the concerns and purposes that the state holds for higher education. 23 Once again an instrumental view of higher education is subscribed to, namely that higher education is ‘for something else’, in this case the state’s purposes as set out in the White Paper (Department of Education, 1997).

‘Quality as transformation’ is the conceptualization that Harvey and Knight (1996) promote; they argue that because transformation implies a qualitative change of form, a process, it is the only definition that can account for education as a transformative and participative process in which the student is a participant, as opposed to a consumer, customer or client24. They go

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23 It is interesting to note that in its subsequent development of policy instruments, this notion of quality has been largely dropped from HEQC discourse. I suspect that this may be because it is almost impossible to measure the cost-effectiveness of higher education institutions in the public sector and certainly not in relation to government policy imperatives, for neither the government nor the institutions have the management information capacity to do so.

24 This definition of quality is in keeping with the ‘pedagogic project’ (see 2.2.5. below).
on to argue that quality assurance in higher education should focus on the quality of the student learning experience, which should be transformative, enhancing students’ knowledge and skills and empowering them; it should involve both cognitive and personal development (Harvey and Knight, 1996).

Critical transformation sees quality in terms of the extent to which the education system transforms the conceptual ability and self-awareness of the student. (Harvey and Knight, 1996:106)

In its elaboration of this conceptualization of quality, the HEQC explains its understanding as ‘developing the capabilities of individual learners for personal enrichment, as well as the requirements of social development and economic and employment growth’ (HEQC, 2002a:14). Here the HEQC appears to support Harvey and Knight’s vision of the personal transformation of students, but adds an instrumental element, namely that personal enrichment or transformation should also further the state’s ‘requirements’ for social and economic development. In fact, further on, the HEQC suggests that the two concerns are really the same thing, that what is good for students is also good for the country,

(Q)uality will be determined on the basis of the ability of the provider to offer (…) learning experiences which are responsive to the broad development needs of learners, thereby also addressing the knowledge, skills and service needs of the country at large. (HEQC, 2002a:14)

Finally, the HEQC adds a fourth umbrella concept to its three approaches to quality, (which in fact, as we have seen, is already inserted into all three of the approaches discussed above), namely ‘fitness of purpose’. The HEQC states that

The criteria [sic] indicated above will be located within a fitness of purpose framework based on national goals, priorities and targets. (HEQC, 2002a:15)

Here the state’s intention to use quality assurance as one of its ‘steering mechanisms’ is made quite overt, and this underpins the three conceptualizations previously mentioned.

The HEQC’s broad and eclectic conceptualization of quality and its strong underpinning of the concept with a ‘fitness of purpose’ definition, meaning the state’s purposes or ‘transformation agenda’ for higher education in South Africa, supports Barnett's (1999) argument that quality is really an empty concept and that behind it is always a tacit idea of higher education and of what higher education should be for. Thus what counts as quality is never neutral and always gets defined in particular contexts in terms of what the definer believes to be the purpose(s) of higher education. Therefore the definition of quality is usually a highly contested and ideological question. Barnett (2003) warns that quality starts to operate as an ideology when the two ideas, the purpose of higher education and the meaning of quality, become conceptually fused. When this happens quality assurance tends to take on the life of a social project (usually driven by the state) and the meaning of quality, its criteria and
indicators, all carry these implicit purposes and framing of higher education, whilst other meanings of quality tend to be dismissed or ignored.

Quality as an ideology, therefore, focuses its attention on dimensions of academic life that are expressions of the ideology. The filling out of the ideology, its realization in practice, not surprisingly, takes on the contours of its driving interests. Quality is not neutral. It is not independent of the wider socio-economic interests. It stands as a proxy for these interests, which in turn, it masks. (Barnett, 2003:95)

2.2 A Conceptual Framework for Analyzing Approaches to the Quality Assurance of Teaching and Learning in Higher Education

Given that quality involves issues of power and values and that the introduction of a national quality assurance system is likely to be embroiled in efforts to empower new interests and challenge traditional values, it would seem that an attempt to set up a conceptual framework for analyzing quality assurance systems, should focus not so much on how quality gets defined formally, but rather on whose interests it serves. The framework should be able to capture the answers to the following sorts of questions: ‘who decides what counts as quality?’, ‘who decides what the criteria or measures of quality should be?’ ‘who owns the quality system?’, ‘for whom is the evaluation done?’ In order to capture the different possible answers to these questions, and drawing on the work of Barnett (1999) Brennan and Shah (2000), Harvey and Knight (1996) and Trow (1999), the following framework is proposed. Trow proposes a framework for academic review (programme level) whilst Barnett proposes one that he claims can be used for analyzing quality systems at either institutional or national level. The framework proposed here will be applied at national and institutional level, but could also be applicable at programme level.

Brennan and Shah (2000) identify four ‘quality values’ that underpin different approaches to quality assurance; these are academic, managerial, pedagogic and employment. While adopting their ideas of ‘quality values’, renamed ‘rationalities’, new categories have been developed for this study. Barnett (1999) cautions that the grid has only general analytic value and that it cannot replace in-depth case studies of particular quality assurance systems, which will not always fall neatly into any one of the quadrants.
The two axes of the framework are labeled ‘power and control’ and ‘purpose’ respectively. The horizontal axis seeks to plot the power relations that are set up by the quality assurance system. The questions to be answered here are ‘who is in control of the evaluation?’, ‘who initiates it and who owns it?’ and ‘is the ownership held by people internal or external to the academic community?’ The two poles of this axis indicate whether control of the quality assurance system lies inside or outside of the academic community. Where the evaluation is controlled internally it may be at module, programme, departmental or institutional level, but the ownership of the evaluation remains within the control of the academic community, albeit in the hands of academics or academic managers. Where power and control are located externally, it means that the evaluation is controlled by people or bodies external to the institution, such as a government agency or a professional council. Barnett points out that the issue is not ‘who conducts the evaluation?’, as academic peers are often used as evaluators by

25 By this I mean ownership by academics themselves or by their accepted and recognized academic managers or leaders.
outside agencies, but rather ‘to whom are they accountable and in whose interests are they acting?’ Barnett emphasizes that with respect to the ‘power and control’ axis, no value judgments about the virtues of the two modes of control are intended, for both modes exhibit strengths and weaknesses.

Regarding the vertical axis labeled ‘purpose’, Barnett (1999) suggests that it is normative in character, as a value judgment is implied. This axis seeks to plot the purpose of the quality assurance system, ‘who is to be enlightened by the evaluation?’ and, crucially, ‘who designs it and who determines the evaluation criteria?’ Barnett suggests that this axis captures the answer to the question ‘to what extent is the self-understanding of those being evaluated enhanced as a result of the evaluation process?’ He notes that the vertical axis is based on an embedded premise, namely that enlightenment is maximized when it is self-generated and minimized when other-generated. His assumption is that genuine improvement, change (or emancipation) occurs through the advancement or transformation of self-understanding (Barnett, 1999). His implication is that the extent to which the evaluation has ‘hermeneutic or dialogic value’ the greater will be its capacity to generate enlightenment amongst academics; those affected by the evaluation who are the agents of improvement in teaching. He suggests that when the evaluation is for the enlightenment of those engaged in the teaching-learning process, it can help them better understand their practice and lead to improvement, self-empowerment and even transformation of practice.

Quality evaluation gains its greatest justification when, as a result, the actors centrally involved in offering programmes in higher education learn about themselves and, as a result, change, improve and even transform the quality of their own professional activities and services to society.’ (Barnett, 1999:87)

Following Habermas (1987), the positive pole of the vertical axis has been labeled ‘communicative action’. This refers to social action orientated towards mutual understanding in which participants are treated as genuine persons (as subjects rather than objects). Harvey and Knight (1996) would probably label this positive pole ‘transformative’ as the essence of their argument is that the goal of higher education should be the transformation of learners and that quality assurance should therefore be a transformative project aimed at improving the student learning experience to this end. ‘Transformative’ would therefore also be an acceptable label for the positive pole of the vertical axis.

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26 The concept is linked to Habermas’ ‘theory of communication’ in which he proposes a set of conditions and ethics for communication, which, if upheld, constitute a (utopian) ‘ideal speech situation’ undistorted by power relations, which Habermas maintains is the means to pursuing justice in a deliberative democracy.
The negative pole on the ‘purpose’ axis is labeled ‘strategic action’ to convey the instrumental character of evaluation that is carried out for the purposes of ‘enlightening’ an authority or third party (usually the state) for purposes that lie outside of the teaching and learning process. In Habermas’ early work (1984, 1987) on the theory of communication and discourse ethics, he understands strategic action as entirely negative; that is, as seeking its own ends and manipulating others in the process. But in his later work (1996), in which he develops a discourse theory of law, he uses strategic action to mean the ‘procedurally regulated bargaining’ that is necessary in democratic will-formation in order to take into account the concerns of different interest groups. The use here of the term ‘strategic action’ implies this later usage, in other words, certain forms of quality assurance have evolved to take into account the concerns and interests of a wide range of stakeholders such as governments, management and professions as well as students and academics. These different groups have competing interests in higher education and they are not necessarily committed to communicative action to achieve them. Thus quality assurance approaches at the strategic action end of the purpose axis are concerned to generate findings that serve the interests and purposes of ‘other’ systems or interests that are not part of the educational process itself. These other stakeholders could be internal managers or decision-makers or they could be external professional bodies or state agencies. Barnett contends that the evaluation of teaching and learning conducted to serve the purposes of third parties is usually for accountability and is therefore unlikely to offer enlightenment to those engaged in the educational process itself. The framework places ‘accountability’ as the most likely purpose of evaluation at the strategic pole of the purpose axis and ‘improvement’ as the most likely purpose of evaluation at the communicative pole.

The proposed framework gives four quadrants that can be used to classify and explain different conceptualizations of quality and different approaches and methods to the quality assurance of teaching and learning in higher education. The quadrants are labeled as follows:

1. collegial rationality
2. managerial rationality
3. facilitative rationality
4. bureaucratic rationality

In everyday usage the term instrumental would better capture my intended meaning. But Habermas reserves the term ‘instrumental action’ specifically for utilitarian action towards non-human phenomena as distinct from ‘strategic action’ which refers specifically to utilitarian action towards other people.
The use of these adjectives with the term ‘rationality’ indicates that these are ‘ways of thinking’ about quality assurance that lead to different approaches being adopted. In many cases these ‘ways of thinking’ can be traced back to particular discourses, orders of discourse and ideologies. For example, ‘managerialism’ can be viewed as an ideology which is widely adhered to in both higher education and government, (see for example Trowler and Knight, 2002, Morley, 2003, Barnett, 2003). Collegiality may also be viewed as a set of ideas that have evolved around the nature of the academic profession28. The ‘facilitative rationality’ in Quadrant 3 is not linked to any particular ideology, (if the practice is genuinely facilitative, it probably should not be) and exists outside of academic practice. However, not entirely consistently, I have located the ‘pedagogic project’ in this quadrant. The pedagogic project is concerned to promote and improve teaching and learning theory and practice in higher education. Whilst it is often housed within institutions29, typically in academic and staff development units, it remains external to the collegial rationality’s concerns. The pedagogic project lacks a strong institutional base and its promotion is dependent upon its agents forming alliances and being authorized by other more powerful agents and institutions such as senior management within institutions or the state from without.

The conceptual weight of the four quadrants is uneven because quality assurance in Quadrant 3 tends to give external support and validation to evaluation that is based internally in Quadrant 1, whilst evaluation carried out in Quadrant 2 tends to be internally managed in order to meet quality assurance requirements that are based externally in Quadrant 4. Thus the ‘deep structure’ or ‘inherent contradiction’ in quality assurance practice identified by Barnett, Harvey and Knight and Vroeijenstijn really lies between Quadrants 1 and 4. As illustrated in subsequent chapters, these tensions become more explicit when viewed as the perspectives of different stakeholders in the policy process.

2.2.1 Improvement and Accountability

The tension between improvement and accountability captured in the framework is a well-versed topic in the higher education quality assurance literature. Some experts suggest that the two concepts are contradictory and even mutually exclusive and therefore cannot both be goals of the same quality assurance system. Others argue that although in tension, it is

28 In fact Barnett (2003) suggests that the idea of a collegial community is now a myth, with little empirical basis; but the idea continues to work ideologically.

29 In this sense it should be located on the left-hand side of the quadrant, and could indeed be located as an arm of managerial rationality, near the middle of the vertical axis. However, for the purposes of this study (which evaluates the HEQC’s Improving Teaching & Learning Project), it makes most sense to locate the pedagogic project as a facilitative rationality external to institutions.
possible to hold the two together in one system. Quality assurance experience suggests that one pole of the axis will always dominate. For example, an emphasis on accountability will severely inhibit the improvement goal. But others argue that an emphasis on continuous improvement can deliver accountability as a by-product. Barnett adopts the first position in this statement.

It is not obvious that a single evaluation system could do justice to both sets of ideas at once because they are mutually exclusive descriptions of possible evaluation purposes and methodologies. (Barnett, 1999:83)

Harvey and Knight (1996) support Barnett’s position that there is an inherent or ‘deep structure’ contradiction between accountability requirements and continuous quality improvement for the enhancement of student learning, but adopt a weaker position on the contradictory relationship of the two concepts. They suggest that many accountability systems justify themselves with the argument that accountability requirements will lead to improvement. They argue that this assumption is wrong because quality assurance for accountability tends to de-motivate academics who feel that they are neither trusted nor valued by the third party to whom they must be accountable. Secondly, people tend to simply comply with accountability requirements in order to minimize their disruptive effects. Furthermore, accountability regimes are seldom linked to further improvement measures such as staff development, the dissemination of good teaching and learning practice and the encouragement of curriculum innovation. Harvey and Knight do admit, however, that accountability measures may, as a by-product, have an initial short-term impact and serve as a catalyst to internal innovation, but they claim that accountability measures are unlikely to have any long-term impact or direct influence on the quality of the student learning experience. This is because long-term improvement in teaching and learning depends upon the intrinsic motivations and understandings of the teachers (academics) concerned (Harvey and Knight, 1996). This supports Barnett’s point noted earlier, that improvement needs to be based on the development of self-understanding.

Vroeijenstijn’s work is an example of the second position. In discussing the role of an external quality assurance agency, he notes that ‘the involvement of summative aspects in external quality assurance may be a threat to the formative approach; it is difficult for external quality assurance to serve two masters’ (1995:12). However, Vroeijenstijn’s position is less dichotomous than that of Barnett (1999) and Harvey and Knight (1996). He suggests that an external quality assurance agency should attempt the difficult task of ‘navigating between the Scylla (of improvement) and the Charybdis (of accountability)’ in order to reconcile the two purposes in one system. But he supports Harvey and Knight in their claim that the best way to
design an external quality assurance system is to aim at quality enhancement and hope to achieve (partial) accountability as a side-effect (Vroeijenstijn, 1995).

In a paper on external quality assurance agencies, Harvey (1999) claims that the ‘ineffectiveness of external quality assurance is supported by numerous effectiveness and impact studies’ (1999:13). He re-iterates his belief that if external monitoring emphasizes accountability and results in judgments linked to status and funding, it will discourage open and honest evaluation, leading to a ‘reversion of the defensiveness of the cloister’ (1999:10). He suggests that the real gains of quality assurance are to be found in the gradual institutionalization of a culture of continuous improvement through internal self-evaluation (1999:9).

In an important contribution to this debate, Harvey (1999) introduces the notion of the ‘politics of quality’, claiming that external quality assurance is usually linked to the political agendas of governments, although ‘the politics is usually concealed behind a façade that suggests that quality assurance is amenable to technical and bureaucratic solutions’ (1999:22). This additional factor leads Harvey to suggest that external quality assurance models have three underlying rationales: improvement, accountability and he adds a third - compliance (to government policy preferences) (1999:24). Harvey explains that in the compliance model, quality assurance serves as a means of increasing state control over the academy and as a means of enforcing compliance with particular policy demands. This coercion may occur overtly, but usually it operates covertly and indirectly, often behind a discourse of improvement and of serving the interests of other stakeholders (1999:24). This introduction of a third dimension (compliance) into the improvement-accountability debate is important, for it helps to shift the debate from the setting up of dichotomies towards a more sophisticated understanding of the ways in which politics and ideologies ‘get into’ quality assurance. Harvey’s position also suggests that it may be possible (although very difficult) to design a model of quality assurance that includes both the improvement and accountability dimensions, provided that accountability and compliance motivations do not dominate.

Another and reinforcing perspective on the improvement-accountability debate is provided in Habermas’ (1996) account of law-making. In his book, Between Facts and Norms: Contributions to a Discourse Theory of Law and Democracy (1996), Habermas provides a political-philosophical framework for the problem of law-making and law enforcement in modern democracies. Some of his ideas and arguments are pertinent to the establishment and implementation of a national quality assurance system for higher education and in particular to the tension between improvement and accountability.
Habermas’ (1996) ‘discourse theory of law and democracy’ builds on his theory of communicative action and on the notion of ‘deliberative democracy’ in which there is a concern that citizens’ participation in the democratic process is rational in character. Before discussing Habermas’ discourse theory of law and democracy and its application to quality assurance, it is necessary to briefly re-cap his earlier work on the ‘Theory of Communicative Action’ (Habermas, 1984). Here Habermas suggests that social coordination is effected through language (i.e. discourse). He asserts that any competent speaker should, under suitable conditions, be able to make truth claims and moral claims (validity claims) that hearers can accept, solely on the basis of good reasons (rational argument). This ‘ideal speech’ situation is based on four assumptions:

- That members of a discourse community share a common understanding of the meaning of words, phrases, etc.,
- That they consider themselves rationally accountable,
- That they assume when they reach a mutually agreed resolution, this is based on defensible arguments that will not subsequently be proven to be false or mistaken,
- That if any of these conditions are shown not to have been met, this is sufficient grounds for re-opening the discussion.

Later Habermas (1987) makes a distinction between ‘communicative action’, where social coordination and agreements are reached ‘communicatively’ by meeting the conditions spelt out above, and ‘strategic action’. The latter occurs when one party tries to force its will on another through bargaining, threats or promises.30

However, Habermas (1987) also points out that reaching agreements communicatively (as opposed to strategic bargaining or coercive enforcement) requires background consensus on a large number of matters that are unproblematic for members of both parties. In other words, ‘lifeworld’ background, that is built on shared identities, cultural and intellectual resources and so on, is a significant factor in enabling ‘communicative action’. But, according to Habermas (1996), in modern societies, ‘pluralisation’ and ‘disenchantment’ (1996: iv) mean that the conditions for reaching background consensus are diminishing. This has led to a process of ‘societal rationalisation’ (1996:iv) in which there is a need to reach explicit

30 Habermas suggests that capitalist markets operate via strategic action using the medium of money, whilst bureaucratic administrations do so via the medium of power. (Both media are non-linguistic).
agreements on issues (such as the quality of educational provision), whereas in the past, the more homogeneous nature of societies allowed these to remain implicit.

Habermas’ (1996) analysis of modern democracies points out a paradoxical duality in modern law, namely a tension between ‘facts’ (facticity) and ‘norms’ (validity). ‘Facts’ are commands backed by threats or compulsory laws backed by sanctions, whilst ‘norms’ are laws or standards which embody a claim to legitimacy and which are based on an appeal to reason that all citizens (ideally) find acceptable. Habermas explains the tension between facts and norms as follows.

Modern law presents itself as Janus-faced to its addressees: it leaves it up to them which of the two possible approaches they want to take to the law. Either they can consider legal norms simply as commands (factual constraints on their personal scope for action) and take a strategic approach to the calculable consequences of possible rule violations; or they can take a performative\(^{31}\) approach in which they view norms as valid precepts and comply ‘out of respect for the law’. (Habermas, 1996:448)

Habermas explains that law is constituted by this tension between facticity and validity and that all democratic legal systems need to hold both these elements in tension. He aims to produce a theory of law that ‘situates the idealizing character of validity claims in concrete social contexts’. For him ‘the challenge is to maintain the tension between the context-transcending claims of reason and the always limited contexts in which human reason must ply its trade\(^{32}\) (1996: Translator’s introduction (xiii-xiv)).

In answer to the question ‘How is a legitimate system of law\(^{33}\) possible?’ Habermas suggests that

only those norms are valid to which affected persons\(^{34}\) could agree as participants in rational discourse. (Habermas, 1996:107)

In other words ‘norms’ are only valid and legitimate if they are agreed to through rational discourse by those who must comply with the system and carry its costs. This is linked to the idea of self-determination and ownership.

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\(^{31}\) I think this is an unfortunate translation as it has connotations of ‘performativity’ linked to a form of managerialism that uses performance- and competence-based appraisal. My reading of Habermas suggests that he means internally-driven consent.

\(^{32}\) I understand this ability to make sound context-specific judgments to be part of what acting professionally involves, hence the insistence on a role for ‘professional judgment’ in making quality-related decisions.

\(^{33}\) For the purposes of this study, read ‘system of quality assurance’.

\(^{34}\) Note the reference to ‘the affected’. This is also used by Ulrich in his ‘critical systems heuristics’ (see Chapter 4) which aims to build on Habermas’ work. In the case of the quality assurance of teaching and learning, ‘the affected’ are those who are being evaluated, that is, those who teach.
Citizens should always be able to understand themselves also as authors of the law to which they are subject as addressees. (…) The legal community constitutes itself on the basis of a discursively achieved agreement. (Habermas, 1996:449)

All reasonable affected persons of good will should be able to agree that it is in the interests of all, that these norms prevail in society. (Habermas, 1996:458-9)

Habermas’ theory replaces the old contract model of the law with a discursive, deliberative model. He suggests that the settling of norms by means of public argument should play a central role in any attempt to realize the possibility of legitimate law. Thus law-making should be based on democratic processes of opinion and will formation in the public sphere, drawing on citizens’ cognitive resources, but also on their interests, values and identities, such that these become institutionalized as expressions of ‘political will’ (1996: Translator’s Introduction, xxviii). Thus it is the practice of self-legislation that becomes legally institutionalized.

Habermas concludes that

The paradoxical achievement of law thus consists in the fact that it reduces the conflict potential of unleashed individual liberties through norms that can coerce only so long as they are recognized as legitimate on the fragile basis of communicative liberties … Social integration thereby takes on a peculiarly reflexive shape: by meeting its need for legitimation, with the help of the productive force of communication, law takes advantage of the permanent risk of dissensus to spur on legally institutionalised public discourses’. (1996: 462)

Applications of Habermas’ theory of communicative action and discursive theory of law to the establishment of a national quality assurance system might be the following:

- If those designing and implementing the quality assurance system wish it to lead to genuinely improved practice, as opposed to compliance, they need to ensure that, as far as possible, the system operates in the academic community via communicative rather than strategic action, (for both internal and external quality assurance practices). A shift to the enforcement of ‘facts’ (minimum quality thresholds) via strategic action (i.e. non-communicative action based on the exercise of bureaucratic power) by the HEQC or by institutional managers should be used only as a last resort, when communicative action breaks down and when it is clearly in the interest of students in the system to do so.

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35 For our purposes, read policy-making.

36 For our purposes read absolute academic freedom and institutional autonomy.

37 In its Founding Document, the HEQC takes a stronger position: ‘The HEQC will uphold the accountability requirements of higher education provision within the context of a strong developmental and formative approach to quality assurance. However, the HEQC will, where necessary, expose and act against persistent and unchanging poor quality provision’. (HEQC 2002a)
A national quality assurance system does require both ‘facts’ and ‘norms’, but the emphasis should be on building consensus around ‘norms’ for quality assurance (such as criteria for institutional audit or the Good Practice Descriptors in the Improving Teaching & Learning Resources). These norms should be discussed with and agreed to by the academic community under conditions of rational discourse so that they become legitimate and ‘owned’ by that community. The HEQC’s promotion of ‘norms’ for higher education practice should inspire people to work towards improvement. Minimum quality thresholds (threats or ‘facts’) used for accountability procedures (such as criteria for accreditation) should be back-grounded and kept to a minimum. The two instruments and their purposes, audit (based on ‘norms’) and accreditation (based on ‘facts’) should be kept quite distinct.

In order to cater for the diversity and uneven levels of development in the system, there should be a large ‘gap’ or distance between the ‘norms’ of the quality assurance system and the ‘facts’ of the system. This should enable the system to cater for a wide range of institutions. It may also prevent those with less developed quality assurance systems from focusing strategically on avoiding being caught out by the ‘facts’, whilst the high quality benchmarks enshrined in the ‘norms’ would mean that all institutions, even the strong ones, would be challenged to improve. As far as possible, rather than focusing on applying punitive sanctions to those who do not meet the minimum thresholds, the HEQC should offer incentives to reward those institutions that do attain the norms.

Habermas’ point about allowing ‘the permanent risk of dissensus’ suggests that the quality assurance system should encourage ‘double loop learning’. In other words during interaction between the HEQC and institutions, the academic community should be encouraged not only to allow their practices to be challenged by the ‘facts’.

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38 Writing on the political dimension of evaluation research, Carol Weiss (1991) states that both the subjects and stakeholders of evaluation tend to be willing to accept even negative results of an evaluation, provided that the criteria that are used are in keeping with their own values, beliefs and worldviews.

39 In single loop learning, if social actors carry out action strategies that fail to attain the outcomes they intended, they then change their action strategies in order to improve the outcomes, but they continue to operate under the same governing variables (e.g. quality assurance norms). In double loop learning, the governing variables themselves are questioned and if necessary changed, as a means of solving a particular problem. (Argyris, C. et al, 1987: 85-88)
and ‘norms’ (criteria) used by the HEQC, but also to critique the criteria, thus contributing to their on-going revision and improvement.

2.2.2 Academic Freedom and Accountability

Debates around improvement and accountability in the quality assurance of higher education are often underpinned by tacit assumptions relating to the liberal concepts of ‘academic freedom’ and ‘institutional autonomy’\(^{40}\). The ‘Education White Paper 3: A Programme for the Transformation of Higher Education’ (1997) defines academic freedom as ‘the absence of outside interference, censure or obstacle in the pursuit of academic work’ (1997:1.23). It also notes that in South Africa, academic freedom is regarded as a fundamental right protected by the South African Constitution. Following the UK Education Bill (1988), Bowden and Marton (1998) define academic freedom as ‘the right of academics to be free within the law to question and test received knowledge and to propose new ideas or unpopular opinions without placing their jobs or privileges in jeopardy’ (1998:220). However, they stress that this right is based on a social contract: this freedom is granted to academics on condition that it works for the public good; it should not be abused for academic self-interest. For the purposes of this study, one needs to ask to what extent does the imposition of a national quality assurance system constrain academic freedom and its public benefits and what sort of system would best preserve academic freedom and its public benefits? Bowden and Marton (1998) argue that the requirement that public money should be spent in an accountable manner is a basic democratic principle. Thus, academics should not object to being held accountable for the performance of the public money that their institutions receive. However, following Russell (1993), they argue that accountability must not be extended to the point where it interferes with the proper discharge of the service for which the money was granted in the first place. When this happens, the demand for accountability is literally *ultra vires* (Bowden and Marton, 1998:222). They conclude that for their part, academics should agree to be accountable to their governments for the public money they receive, whilst for their part, governments should not try to control the activities of academics beyond the limits of their competence, in other words, government officials should not try to make academic judgments. This point highlights the important role played by the expert academic peers on whom governments and their external quality assurance agencies have to rely, in order to make academic judgments on their behalf.

\(^{40}\) The latter is discussed in some detail in Chapter 6, so the focus here on the ideas of academic freedom and academic self-regulation.
The difficult task of managing the conflict of interest between academics’ need for intellectual freedom and the state’s need for accountability is explained by Jonathan as follows:

The core expertise of the academy lies in the preservation and dissemination of existing knowledge and in the production of new knowledge: the constitutive interests of the academy are thus epistemologically driven. The constitutive interests of the public which underwrites those activities, on the other hand, arise from social, cultural and economic circumstance: they are driven by evaluative and empirical considerations. The task for any government, as agent for the public and their interests, is therefore to facilitate epistemological work in the academy, in the name of freedom of thought and opinion as well as of an open and unforeseeable future (socially, culturally and economically) whilst carefully anchoring this within a framework of accountability capable of ensuring that the activities of publicly funded institutions and individuals are consistent with the current empirical and evaluative aspirations of citizens. (Jonathan, 2001:78)

Jonathan’s argument captures the ‘deep structure’ difference between the epistemic interest of the academy and the evaluative and empirical interests of governments. Her argument and that of Bowden and Marton above, suggest that a compromise between these two potentially conflictual interests is possible but difficult to achieve.

I now return to the conceptual framework established above in order to describe the quality assurance of teaching and learning typologies, models and practices that characterize each of the quadrants in terms of their rationality, purpose, locus of power and control, agents, methods, results and consequences and likely definitions of quality. Thereafter, for each quadrant, I provide an example from the literature on higher education quality assurance systems.

### 2.2.3 Quadrant 1: Collegial Rationality

Quality assurance in Quadrant 1 is based on collegial rationality meaning that it is conducted within the norms and values of ‘communities of scholars’. Traditionally, the key value in academia is the pursuit of knowledge for its own sake (the epistemic interest). The assumption is that, as professionals, academics do so independently and are in control of the conditions of their professional work. Other traditional collegial values include academic integrity, reasonableness, tolerance, respect for persons, discursive freedom, shared decision-making by the collegial group, (traditionally the department), and conservation of the realm of specialised knowledge, (traditionally the discipline) (Barnett, 2003). Collegialism remains an important value and ideal in most higher education institutions, although Kogan points out that it exists only in mixed or diluted forms, in tension with hierarchical, competitive and bureaucratic systems. (2002:59)

The purpose of this type of quality assurance is the enlightenment of academics, ideally, in order for them to understand better, learn more about their teaching practices and, as
professionals, determine how to improve, so that students learn better. However, given the value system of collegialism, the approach taken to teaching and learning is often elitist. Models of quality assurance for teaching and learning found in Quadrant 1 are typically controlled and owned internally and locally. Thus it would be the academic teaching staff (probably with their Head of Department), who would initiate and design the evaluation of their programme (or department) and determine the criteria for making context-specific judgments about its quality. This approach to quality assurance is typically connoisseurial, that is, evaluation based on academic judgment by peers with disciplinary and experiential expertise. The criteria for quality usually remain implicit with judgments reached through rational dialogue within shared meanings, that is, the methodology is interpretive and intersubjective.

The method most used in this model of quality assurance would be self-evaluation although it may be linked to external validation and feed into internal audit. In some cases a middle manager, such as a Head of Department or School, may initiate the evaluation and receive the results, with academic peers from other institutions validating the findings. In both cases the peers would typically be trusted academics from the same discipline who share a ‘feel for the game’. In this model, if institutional managers do play a role, it is usually to ensure that self-evaluations happen, that they are supported and reported and that they lead to improvements that are properly resourced, within an institutionally determined administrative framework. However, it is the academics themselves who are the key agents of the evaluation and who control it. If outside quality experts are involved, such as staff from an institutional quality unit, they act only by invitation in a supportive and facilitative role. In this model, students are typically regarded as novices or apprentices rather than as customers or clients. Student evaluations are likely to be taken into account, but are not accorded a heavy or stand-alone weighting; student opinion is likely to be triangulated with opinion data from other sources, usually that of external peers and from the lecturer him/herself.

The academic teaching staff is therefore the primary audience for the findings of the evaluation, which are usually reported in a diagnostic and advisory manner, that is, the product of the evaluation is ideally useful insider knowledge that can be used for formative purposes. The findings of the evaluation are ‘owned’ by the staff concerned and it is up to them to exercise their connoisseurial or professional judgment and decide how to take the findings forward and what measures of improvement are required. They also determine whether and to what extent the findings should be publicised. Because the purpose of the evaluation is intrinsically motivated enlightenment and improvement, the outcomes or consequences of the evaluation are typically non-threatening and are unlikely to be linked to
any extrinsic rewards or punishments. The findings of this type of evaluation tend to be high on validity and low on reliability because their design is often idiosyncratic and linked to the interests and concerns of particular teachers and contexts. Judgments about the effectiveness of this type of evaluation are based on collegial agreement that improvement has occurred. Barnett argues that this is what the evaluation of teaching and learning requires.

A genuine interest in the education process involves intricacy, particularity and intimacy and, of course, an understanding of context. This means that a concern about educational process is usually incompatible with the instrumental reason that works through quality as ideology, an impatient ideology that wants judgments and therefore cannot give time to do justice to detailed evidence. (Barnett, 2003:96)

The definition of quality that sits most comfortably in this quadrant is ‘quality as exceptional or excellence’.

Although there appears to be general agreement in the literature that this is the model of quality assurance most likely to lead to candid reflection, enlightenment and therefore genuine improvement of teaching practice, (Barnett, 1999, Harvey and Knight, 1996, Trow, 1999), this model of quality assurance is not without its weaknesses. It is based on human, interpretive practices in which interpersonal transactions are fundamental. But it is the personal nature of the model that is its weakness as well as its strength. The intimacy of the model means that it can become incestuous and protectionist; academic peers may tacitly protect each other from failure, for their turn will be next. The tendency for peer evaluators to be recruited from ‘old boy’ networks means that evaluators may lack critical distance. Furthermore, the intimacy of the evaluations may mean that the process becomes too personalised and cover-ups or avoidances are permitted, allowing power and personality issues to get in the way of sound judgment. Trow warns that the findings may be ‘captured by the academic guild’ and lose their critical edge (Trow, 1999). With respect to teaching and learning, improvements may be limited by common sense and conventional wisdom, allowing concerns for the discipline to take precedence over concerns for the student. A key criticism of this type of evaluation is that quality criteria, whilst understood tacitly within the academic community, may remain implicit and therefore opaque to outsiders. Thus the findings and results of the evaluation may not be sufficiently explicit and evident to outsiders. Finally, the model assumes that all academics are motivated by professional pride, that they do care about students and the status and reputation of their department or university; but clearly this is not always the case. This means that whilst catering well for the improvement purpose of quality assurance, this model on its own is unlikely to meet accountability requirements.
2.2.4 Quadrant 2: Managerial Rationality

In describing the rise of the ‘evaluative state’, Neave (1998) argues that this idea includes faith in good management as the key factor in the productivity of successful organisations. As governments seek to steer rather than row higher education, by imposing systems of accountability, they tend to do so by strengthening managerial authority in the institutions. This involves a shift to greater accountability, the use of corporate mechanisms, the establishment of formal, explicit systems and procedures and greater centralisation and regulation by management. This involves establishing mission statements, strategic planning, institutional framing of academic work, power shifts from Senates to Councils and a burgeoning multi-centred management and administration. In the process power shifts from senior academics and their departments to central management, causing institutional and systems values to dominate over academic values (Kogan, 2002). Gordon (2002) notes that the shift to managerial authority in higher education also undermines the traditional idea of leadership based on the idea of *primus inter pares* and instead emphasises hard managerial and entrepreneurial skills. These shifts include the monitoring of academic work through the establishment of institutional quality management systems which are believed to enhance the efficiency and effectiveness of institutions as organisations, usually in response to pressure from governments and other external pressures such as funding requirements, competition and expansion. Managers tend to view quality assurance as a useful management tool and use it to strengthen the institution and central authority at the expense of professorial and departmental power. On the positive side this trend in higher education can lead to improved information gathering and processing, improved institutional monitoring, more transparent decision-making and a more accountable culture (Brennan and Shah, 2000).

Models and practices for the quality assurance of teaching and learning in Quadrant 2 are based on managerial rationality. According to Barnett (2003) this is a pragmatic political and economic reasoning that works in the best interests of the institution, as institution, and often leads to a culture of ‘getting by’. Higher education managers exercise managerial rationality when they impose decisions on the academic community that are based on non-academic criteria. Kogan defines ‘managerialism’ in higher education as

> the shift in power from senior academics and their departments to the central institution and the dominance of systems over academic values, resulting in part, from an institution’s need to meet new demands with fewer resources. (Kogan, 2002:57)

Barnett suggests that contemporary forms of managerialism in higher education involve ‘decision-making shorn of a base of principles and ideas’ (Barnett, 2003:43) that simply see teaching and research as projects that must further the interests of the institution. This allows academic managers to make decisions based on institutional rather than academic criteria and
to present issues as technical problems, focusing on the means whilst ignoring their ends. Managerialism often embraces ‘a culture of performance and calculation’ borrowed from the private sector. Senior managers emphasise a shared vision, generic approaches and similar treatments to functions such as quality assurance, staff development and teaching and learning. This usually involves the standardisation of procedures and their documentation in which it is assumed that all academic practices can be made explicit, measured against generalised ‘performance indicators’, evaluated and rewarded in a manner that encourages individualism and destroys collegiality. Writing about the British quality assurance system, Morley supports this analysis, arguing that ‘the new managerialism and the resulting technicisation of human capacities have created new power relations in academia’ (Morley, 2002:133).

The purpose of quality assurance in Quadrant 2 is to enlighten senior management, to inform them about how well their goals for the institution are being achieved, enabling them to become more effective and efficient. Control of the evaluations is typically located at senior management level and usually devolved to middle management levels. The focus of this type of evaluation is on the institution as a whole and senior managers are the primary audience. This model of quality assurance is owned by higher education senior managers who, as discussed above, typically initiate institution-wide quality management systems, as part of their institutional management strategy, using quality assurance as a lever of control or change. In many cases senior managers are obliged to do this because of accountability requirements placed on them to report to government agencies. The model of evaluation is commonly that of pragmatic evaluation, (see Chapter 4), which ensures that the evaluation is useful to decision-makers. Evaluation methods are usually goal-based and summative in orientation. This means that the criteria for evaluation are usually management’s goals and objectives which are typically linked to institutional missions and goals and are common across the institution. This suggests that in this model, quality is usually understood as ‘fitness for purpose’. The most common method for doing this is to begin with self-evaluation, to have the findings validated by external peers and then to use the findings for summative purposes. Because internal quality assurance systems can benefit from external validation, inputs and reference points, institutional managers may form alliances with external quality assurance agencies to perform these functions. The evaluation criteria are usually determined by management in consultation with quality assurance experts, although they are often ratified by academic decision-making bodies, such as Senates. These quality assurance systems are usually run by the institutional quality assurance experts, using the expertise of external peers for judgments. Depending on how this is done, these evaluations may be perceived by
academics on the ground as more or less alienating and threatening. In some cases, Quadrant 1 type self-evaluations are ring-fenced and as far as possible kept formative and supportive at sub-unit levels, with only generalized and sanitized results being aggregated up for institutional reporting and summative decision-making purposes. However, according to Trow (1999), if they feed off type 1 self-evaluations, Quadrant 2 type evaluations tend to subvert them. This is because their results are linked directly to internal decision-making and may be linked to promotions and the allocation of resources. Definitions of quality that sit in this quadrant are ‘quality as fitness for purpose’ in relation to the institutional mission and perhaps ‘quality as perfection or consistency’. These definitions of quality are compatible with managerial rationality because they focus on improving the effectiveness and efficiency of the institution as a whole. Managerial rationality usually views students as clients or customers.

The strength of quality assurance models that fall into Quadrant 2 is that they can enhance effective management and promote a standardized and coherent quality assurance system across a higher education institution and in so doing, overcome some of the weaknesses identified for Quadrant 1 models. Depending on how they are carried out, it is possible for quality assurance systems to be owned by institutional managers, to ensure that academics are accountable and, at the same time, to not unduly undermine the transformative potential of self-evaluation. Such models would be plotted near the boundary between Quadrants 1 and 2. But, as Trow suggests, this is a difficult balance to maintain and requires very astute leadership.

Generally, the methodological weakness of models in Quadrant 2 is that they assume that human achievement of pre-determined goals can be objectively measured against pre-determined and standardised criteria (often based on those of an external quality assurance agency). This means that the evaluation results tend to be high on reliability but low on validity. Quality assurance systems in Quadrant 2 often make the behaviourist assumption that measurement, sanctions and rewards will motivate improvements in performance, whereas in fact, the evaluations are usually perceived by academics as an imposition which in turn, decreases their potential for enlightenment and the improvement of teaching and learning. Furthermore, within this approach students tend to be viewed as clients and customers rather than as participants in the learning process. This in turn leads to the widespread use of superficial student opinion surveys that produce little or no diagnostic feedback on teaching.
2.2.5 Quadrant 3: Facilitative Rationality

Quality assurance of teaching and learning models in Quadrant 3 are based on facilitative rationality. This means that the external authority subsumes its own agenda to that of the academic community. In other words, the external authority is prepared simply to facilitate and support the quality assurance processes that occur in Quadrant 1 by arranging for them to be externally authorised and validated and by aiming to provide expertise and useful feedback to the academics concerned. In the process, the external agent may also play a supportive role to institutional management by assisting to systematise and institutionalise quality assurance and by providing constructive feedback to them on institutional quality assurance systems.

The external agency would recognise and adhere to the principle that evaluation and improvement have to be self-generated to be meaningful. According to Trow (1999), the external agency could also become a repository for educational innovation and expertise, which it could disseminate through this advisory role.

Thus quality assurance models in Quadrant 3 are owned and controlled externally but are improvement-orientated because they aim to facilitate and support Quadrant 1-type self-evaluation and self-improvement. Because they are facilitative, the criteria used to measure quality would be owned internally - either negotiated with those to be evaluated or left to the insiders to determine – and this could happen at either institutional or programme level. A typical method of quality assurance in this quadrant is external audit, where the external agency validates the internal quality management system, but does not make judgments about quality per se. In other words, it assures that the institution has its own means for judging and improving quality effectively, but does not presume to impose its own criteria for quality or to make quality judgments itself. In this model of quality assurance the evaluators are typically expert peers who operate on behalf of the external agency but are also trusted and respected colleagues whose appointment is usually approved by the evaluated. In this model, the outcomes of the evaluation are neither punitive nor linked to resource allocation. The evaluation report is often confidential or the extent of its publication is negotiated with the evaluated institution’s decision-makers. An important characteristic of a truly facilitative external quality assurance agency would be its concern to be focused and efficient, not over-burdening hard-pressed academics with paperwork and time-consuming bureaucratic quality assurance demands.

Quality assurance models in Quadrant 3 are most commonly driven by governments or by professional bodies, but Harvey and Knight (1996) point out that market-driven models that evaluate customer satisfaction would also be applicable here. For example, client/customer satisfaction surveys such as graduate surveys, graduate destination surveys and employer
surveys on the employability of students would all be examples of market-driven quality assurance processes which indirectly measure the quality of teaching and learning. These may be initiated by external bodies, or run as collaborative efforts, but with a view to informing and improving the educational provision of the higher education institution concerned. (However, control of the curriculum would always remain firmly in the hands of the academics involved.)

The strengths of this type of quality assurance model is that it can serve as a stimulus to systematic internal self-evaluation and improvement processes, helping make institutional quality assurance processes more explicit and institutionalised. This model tends to support those working to promote the ‘pedagogic project’ (see below) and it can support institutional managers in setting the parameters and context for the development of a culture of continuous quality improvement. It can also play a crucial role in validating the improvement claims made by institutions and by providing expertise and resources for on-going improvement, thus overcoming the isolationist tendencies found in Quadrant 1. However, Trow (1999:24) warns of two weaknesses: firstly because the evaluations are external, they tend to be superficial and add little value to the self-evaluations conducted in preparation for the external evaluation or audit. Secondly, quality assurance models in this quadrant are inherently unstable because they are vulnerable to appropriation by those with accountability agendas and power, thus tending, over time, to be pushed towards the strategic action pole in Quadrant 4.

The definition of quality most likely to be adopted in models of quality assurance that sit in Quadrant 3 is ‘fitness for purpose’, with the purpose of the institution or programme being defined by insiders and the external agency simply assuring that the self-defined purpose(s) are being attained. Under certain conditions, it is possible for quality assurance in this quadrant to support ‘quality as transformation’ leading to genuine improvements in the quality of teaching and learning.

According to Barnett (2003), since the 1980s a ‘new pedagogy’ has emerged in higher education which seeks to promote teaching as a project in its own right. This new pedagogic project is informed by educational theory and good practice. In higher education, it is concerned to improve and professionalise teaching and learning practice by promoting theory-based teaching methods and by conducting research, including evaluation research, on teaching and learning practice. Adherents to the pedagogic project are usually located in staff or academic development units within a higher education institution but can also be found in agencies and units external to institutions of higher education. However, because the teaching project is usually sub-ordinate to the research project in higher education and remains a weak
concern of the collegial rationality, it needs to form alliances with more powerful external agencies (such as facilitative external quality assurance agencies and internally with institutional management), in order to gain the authority and resources necessary to promote its agenda in the academy. The pedagogic project typically views students as co-participants in learning and subscribes to a view of quality as cognitive development and learner transformation. The approach to quality assurance that this project supports is usually formative evaluation based on a constructivist methodology in which the evaluation criteria are generated internally by the evaluatees. The consequences of audit are neither punitive nor linked to resource allocation. With respect to the quality assurance of teaching and learning, the pedagogic project places responsibility for improvement in the hands of individual practitioners, that is, it desires to develop professional educators who act as ‘reflective practitioners’ (Schon, 1987), who conduct action research and reflect on their own teaching practice in order to improve it (see Chapter 3). The pedagogic project aims to develop models of quality assurance that work within the grain of collegial rationality, but at the same time introducing a greater understanding of and engagement with educational knowledge and concerns – which may inform evaluation criteria and feedback. The pedagogic project is compatible with and likely to ally with agents of the facilitative rationality. It therefore supports a model of formative internal evaluation validated by external evaluation, as described for facilitative models above. It would also support the non-judgmental and non-punitive use of evaluation results in order to ensure that these contribute to the improvement of teaching and learning. The pedagogical project is likely to promote a definition of quality as ‘transformation’ in the sense used by Harvey and Knight (1996) above, that is, a belief that quality higher education should provide a student learning experience that involves the student as co-participant and results in transformative learning for individual students.

The weakness of quality assurance models promoted by the pedagogic project includes the following. It is based on voluntarism that assumes that everyone has the will and the capacity for self-development, whereas in fact, this approach is difficult to sustain without support and incentives. It tends to be naïve about the effects of power and the way in which unequal power relations distort genuine attempts to be honest and improve. With respect to the ‘reflective practitioner’ approach, unless it is informed by the appropriate application of educational theory, one has to question whether an ‘epistemology of practice’ is sufficiently diagnostic to lead to improvement. And, as for all interpretive approaches, the findings are always only context-specific.
2.2.6. Quadrant 4: Bureaucratic Rationality

Models of the quality assurance of teaching and learning in Quadrant 4 are based on bureaucratic rationality. This is understood to mean that the authority on which the quality assurance is based is institutional or bureaucratic (for example the evaluators would be authorised by state power) as opposed to professional authority (where the evaluators would be appointed on the basis of their expert knowledge and experience). Bureaucratic rationality is, by definition, based on norms and values that are external to the ‘lifeworlds’ on which it is imposed. It therefore sits comfortably with an instrumental view of (higher) education. Bureaucratic norms and values are those related to governance and control such as administrative efficiency and systems-building priorities. Bureaucratic rationality tends to adopt a positivist epistemology because it is interested in setting up rule-based systems that can produce knowledge (in this case evaluation findings) that can be considered ‘scientific’, value-free, generalisable and comparative. This means that bureaucratic rationality tends to be context insensitive and accepts cross-context judgments as unproblematic. Evaluation conducted from a bureaucratic rationality would tend to view it as a technical procedure in which measures of quality, usually linked to external goals for higher education, can be made explicit beforehand and can be measured reliably. This type of evaluation tends to be high on reliability but low on validity. Bureaucratic rationality is not very interested in dialogue and deliberation; its main concern is to ‘get the job done’ across the system.

Quality assurance models in Quadrant 4 have an accountability (and often compliance) purpose and are externally owned and controlled. They reflect the values and interests of the external quality assurance agency and the government to which it reports. Quality assurance in this quadrant is typically initiated by governments in order to steer, monitor and control higher education, often through forming alliances or getting ‘buy-in’ from the management of institutions. According to Harvey and Knight (1996), this type of external quality monitoring is typically driven by governments that use quality assurance as a vehicle for generating government-defined change and for ‘steering’ institutions to meet their short-term policy imperatives. Change in higher education is understood as structural and to be driven top-down; bureaucratic rationality is often adopted when governments can no longer afford to allow change to happen incrementally in a bottom-up manner.

In Quadrant 4 models, the purposes of higher education are often pre-defined by government policy, tending to emphasise ‘goods’ extrinsic to the higher education system such as contributing to national economic growth and labour market needs. These interests feed into the external agency’s definitions of the standardized criteria by which quality is to be
measured uniformly across the higher education system. According to Barnett (2003), when this happens the quality project becomes ideologically invested.

Harvey and Knight (1996) show that whilst the international trend has been for state control over higher education to increase, governments are increasingly delegating their accountability requirements to higher education management in exchange for greater institutional autonomy. This suggests that there is a strong link between Quadrants 2 and 4 and that the power exerted by governments in Quadrant 4 tends to pull quality assurance arrangements in Quadrant 2 towards the strategic action and accountability pole.

Vidovich and Slee (2001) identify four types of accountability: professional accountability to peers (which belongs in Quadrant 1), market accountability to customers or students (which probably sits in Quadrant 2), democratic accountability to the community and society and managerial accountability to government. Vidovich and Slee note a shift in the last decade, in the UK and Australia in particular, from peer and democratic accountability to market and managerial accountability. However, I would argue that in South Africa in the post-apartheid period where democracy has been so recently established and the new government represents a large majority, the meanings of democratic accountability and bureaucratic accountability have come to overlap.

The quality assurance process in the model based on bureaucratic rationality is typically controlled by a government-appointed agency that usually has independent legal status but is funded by government. External quality assurance agencies are usually staffed by experts who wield bureaucratic and often legislative power. State-driven external quality assurance agencies are found in most First World countries and increasingly in developing countries as well. According to Brennan and Shah (2000:33) there is widespread acceptance of these agencies and of their accountability role as a ‘fact of life’ in state-higher education relationships. Typically the functions of such agencies are to assure minimum quality thresholds, to enforce efficiency requirements, to evaluate and monitor institutions and programmes in order to inform government decisions on funding and planning and provide information to students and the market. In compliance mode, quality assurance findings are sometimes used to ascertain the extent to which government policy goals have been achieved.

Typical methods used are institutional audit of quality management systems, the accreditation of individual institutions and programmes, the evaluation of research, national subject or discipline reviews and the external examination of students. Bureaucratic rationality typically

41 I have preferred to name the latter form of accountability ‘bureaucratic’ and suggest that this would sit in Quadrant 4.
promotes a pragmatic approach to quality assurance that involves external summative evaluation based on a goal-based, positivist methodology. As for the managerial approach, evaluation is to be useful for the external body and the evaluation criteria are typically the state or funder’s purposes and goals for higher education. This means that standardized criteria are used to measure performance and accountability across a system with a focus on inputs, outputs and outcomes. If the approach uses internal evaluations first, the threat of subsequent external judgment tends to force these into a defensive as opposed to open and honest mode, thus limiting their potential for improvement. The key difference between methods of quality assurance in Quadrant 3 and Quadrant 4 is that in the latter the criteria and standards for quality are pre-determined and prescribed by the external agency in order to attain generalizable and comparable results. This undermines more interpretative self-evaluation methods which become based on the need to provide evidence for meeting these externally defined criteria.

According to Trow (1999), this usually means that the self-evaluation tends to be ‘other-directed’ and therefore persuasive and defensive rather than open and honest. In this model, ‘self-evaluation reports’ are often compiled by full-time quality assurance experts under the supervision of institutional decision-makers and as such can become remote from life in the classroom. Models of the quality assurance of teaching and learning in this quadrant often view students as customers or clients and the expert peers appointed and trained by the external agency to undertake external evaluations are often defined very broadly to mean other higher education stakeholders such as employers or professionals, (as well as the disciplinary peers recognised by academics). Peer review is based primarily on the use of standardized criteria as opposed to professional judgment, with an emphasis on ‘neutral’ and ‘objective’ judgment. Peer review thus serves as a means of legitimating the external quality assurance system within the higher education community.

There are several difficult issues that external quality assurance agencies operating in Quadrant 4 have to face for the system to work effectively. They need to establish partnerships with strong institutional management. They need to gain legitimacy by co-opting senior academics onto their boards and review panels and at the same time they need to establish their credibility with the state. They also need to determine the extent to which their evaluation criteria will be standardised for reliability, or have some degree of flexibility for validity and to cater for diversity in the system. Linked to these issues is the question of how much discretion to allow to the peer review panels in the evaluation process. Factors which make the work of external quality assurance agencies difficult are the size, complexity and
diversity of higher education systems, lack of credibility with and resistance from academics and the often unrealistic expectations of governments.

As suggested earlier, the results and consequences of accountability judgments are usually severe, typically linked to decisions that determine whether a programme or institution can run (accreditation) and/or to whether or not it will be funded by the government. The results of this type of evaluation are usually assumed to be comparative and so they are published in order to impinge on the reputation of the evaluated and thus serve as a lever for improvement. This can have serious status and reputation implications for institutions, with those that have established reputations having more to lose.

The strength of this model (from a government perspective) is that it asserts government control and institutes a standardized model of accountability across the system in which all institutions receive equal treatment. It also allows the government to use the quality assurance system to change or ‘steer’ the higher education system towards state-defined goals. In terms of weaknesses, Trow (1999) suggests that one of the effects of quality assurance in Quadrant 4 is likely to be a reduction of diversity in the higher education system. This approach applies the same treatment to all and so assumes that one can validly and reliably use standardised criteria to measure performance across a system, regardless of differences in context. The focus on inputs, outputs and outcomes means that process is often ignored leading to ‘black-box’ evaluations with limited diagnostic reach for improvement. Patton opposes this model for similar reasons.

From time to time … regulations surface in various federal and state agencies that prescribe universal standardized evaluation measures and methods for all programmes funded by those agencies. I oppose all such regulations in the belief that local programme processes are too diverse and client outcomes too complex to be fairly represented nationwide, by some narrow set of prescribed measures and methods. (Patton 1990:493)

Trow (1999) also warns of the danger that the judgments by external quality assurance agencies may seem unresponsive, remote and even arbitrary from the point of view of the academics being evaluated. In such cases, quality assurance exercises are unlikely to contribute to the ‘deep’ self-generated improvement of teaching and learning advocated by Harvey and Knight (1996) above. In fact, precisely because the model of quality assurance found in Quadrant 4 is not based on the inner motivations and values of academic staff, and represents a shift in the balance of power away from academia and towards the state, Trow warns that such externally driven quality assurance processes are often resisted or subverted by academics on the ground. Alternatively, because of the high stakes involved there is also a

42 Vroeijenstijn (1995) suggests that genuine improvement will only happen if the report remains confidential and that coerced improvement is just another form of compliance.
counter tendency for this model to drive academics into a culture of compliance and conformity rather than to admit their weaknesses and make genuine improvements at the teaching-learning interface. Furthermore, the lack of easily quantifiable data to determine direct outcomes and impacts of messy social practices (such as teaching and learning) allows for the danger that in its stead socially and politically acceptable data are viewed as valid for evaluation purposes.

Recent empirical work by Brennan and Shah suggests that generally external quality assurance agencies tend to curtail the authority of academics and to weaken discipline-based cultures (Brennan and Shah, 2000:116). Neave (1998:282) points out that where states have deregulated and accorded self-regulatory powers to higher education institutions, this has not led to greater discretion for the institutions. Instead, by virtue of defining what and how quality is to be evaluated, the intermediary external agencies gather power for themselves.

Verkleij and Westerheijden (2002) have developed a ‘phase model’ of external quality assurance (cited in Jeliazkova and Westerheijden, 2002) based on two decades of quality assurance in European higher education. They suggest that all external quality assurance agencies experience diminishing returns, with easy wins for both accountability and improvement in the first round and increasing bureaucratization and window dressing in subsequent rounds. They claim that the perceived problem that external agencies are established to solve have a hierarchical order (although late-comers can jump-start by learning from others) (Jeliazkova and Westerheijden, 2002:434). Stage one addresses the problem of serious doubts about education standards. At this stage external assessment involves checking standards through technical verification against standards set up by the state. Stage two addresses doubts about the efficiency and public accountability of institutions leading to reports to the state that rank institutions and also identify good practice. Stage three addresses the problem of quality assurance capacity and institutions’ need for greater discretion. It results in self-evaluation reports and audit reports for both the institution and the state. Stage four addresses the need for a sustainable culture of quality improvement and the external agency begins to focus on improvement rather than accountability, producing audit reports primarily for the institution, whilst self-reporting on performance indicators is supplied to the state. However, what is interesting about this model is that progress in not guaranteed. Jeliazkova and Westerheijden (2002) note a regression in Europe to stages one and two as governments respond to internationalization (or Europeanization) such as the Bologna Declaration’s requirement for transparency and comparable quality indicators across national borders.
Despite these questions about the effectiveness of external quality assurance, there is widespread acknowledgement in the quality assurance in higher education literature that accountability is a legitimate demand in a democratic state and that governments have a constitutional obligation to account to Parliament for public monies spent.

Definitions of quality that are compatible with this quadrant are ‘quality as fitness of purpose’ and ‘quality as value for money’. The first is clearly linked to the use of quality assurance by governments to steer institutions towards meeting state-defined purposes and policy agendas for higher education. The second aims to determine whether public funding has been used efficiently and effectively, usually measured via performance and output indicators.

The conceptual framework enables us to make an important distinction between two ways in which the quality assurance of teaching and learning claims to be ‘transformative’. Firstly, following Harvey and Knight (1996), it could be claimed that quality assurance has the potential to be transformative in the sense that it can lead to the transformation of the teaching and learning micro-practices of the evaluatees in order to offer students transformative learning experiences, as discussed for Quadrants 1 and 3. Secondly, a government could claim that quality assurance is a means to wider social transformation as defined by that government’s purposes for higher education, meaning that quality assurance is understood as a means of achieving macro-social and economic transformation of society. Although both claims are about ‘transformation’ and both appropriate the term improvement, for the purposes of this study, it is important to distinguish between ‘a narrow, deep improvement’ that focuses on transforming students’ minds and this broader notion of ‘improvement’ that refers to improving society. The one is located in Quadrants 1 or 3 whilst the other is located in Quadrant 4. Clearly, there are ‘deep structure’ differences between these two understandings of transformation (and their appropriation of the meaning of improvement), but this is not always obvious in policy discourse about quality assurance.

This concludes the description of different approaches to quality assurance located in the four quadrants. However, when applying these typologies to real dynamic situations, the quadrants will inevitably prove to be too rigid and static. Analyses of real situations and case studies are likely to show shifts and compromises between the typologies.

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43 This definition of quality does not normally stand on its own, it is usually accompanied by ‘value for money’ or ‘fitness for purpose’ definitions as well, for it does not make sense to assure that an institution’s mission accords with government policy without also checking whether the goals of that mission are being achieved.
For example, Harvey and Knight (1996) distinguish between two types of collegialism: ‘cloisterism’ and ‘the new collegialism’. They define ‘cloisterism’ as a conservative, defensive and isolationist type of collegialism that they criticise for being inward-looking and elitist. Cloisterism is often defended by attempts to re-assert the principles of academic freedom and autonomy and the absolute right of the collegial group to determine academic matters. Cloisterism tends to be more evident in research-led universities and with respect to teaching; it tends to adopt a traditional charismatic and intuitive approach that tends to be knowledge- and staff-centred as opposed to student-centred. Cloisterism prioritises research over teaching and so those academics who subscribe to cloisterism, are typically not particularly interested in improving their teaching and view this sort of activity as a nuisance factor which takes time away from research (see Chapter 3 for further discussion). Cloisterism would tend to resist or subvert quality assurance by an external agency, thus representing a non-virtuous cycle.

By way of contrast, Harvey and Knight propose a ‘new collegialism’ in which ownership of academic processes is retained by the academic community, but transparently (Harvey and Knight, 1996). Academics who subscribe to the ‘new collegialism’ tend to be found in middle-range undergraduate teaching institutions. According to Harvey and Knight, they would be prepared to work with and accept advice from staff developers, the bearers of pedagogic project. They would be outward-looking, responsive to change, responsible, learning-orientated and prepared to be explicit about their academic demands and criteria to students and outsiders. They would value team-work and embrace a quality culture of continuous improvement. Key values of the new collegialism are professional expertise and explicit accountability. This ‘new collegialism’ is likely to be located closer to the pedagogic and managerial rationalities and may make alliances with these interests. In terms of the typologies, this development could be viewed as an outward-looking virtuous shift. Whereas an external quality assurance agency that sets out to be facilitative but that allows itself to be pulled into a Quadrant 4 type of quality assurance by government demands or bureaucratic pressures would represent a non-virtuous shift.

According to Barnett (1999), the international trend has been for models of quality assurance in higher education to move in non-virtuous cycles from Quadrant 1 to Quadrant 4,

What we are seeing in the modern age is a shift from the top-left quadrant to the bottom-right quadrant: a shift from forms of evaluation of quality characterized by certain sets of interests and values to their polar opposites. A realm of hermeneutic transactions (the academy) is becoming colonized by a technicism linked to purposive knowledge interests rooted in surveillance, control and external direction. (Barnett, 1999:86)

In his more recent analysis of quality assurance Barnett (2003) points out that quality can become a ‘pernicious ideology’, when it becomes a social project in its own right and imposes
itself as an alien force on the agents and activities of higher education. However, Barnett’s conclusion needs to be qualified by a challenge to policymakers that this trend is not inevitable and by the assertion that it is possible to develop a national system for quality assuring teaching and learning located in Quadrant 3. Barnett goes on to argue that provided higher education institutions are afforded ‘sufficient discursive space to allow the idea of quality to spring from the internal agendas of its agents, the academics’ (Barnett, 2003:101); quality can become a ‘virtuous ideology’ resulting in the improvement of the student learning experience and the development of the collective professionalism of academics.

2.3. Examples of the Four Approaches to Quality Assurance

In an attempt to concretize the different typologies of and approaches to the quality assurance of teaching and learning described above, I provide an example of each type drawn from the literature on quality assurance in higher education. I provide a brief description of a quality assurance system for each of the quadrants highlighting their purpose, locus of power and control, agents, methods and consequences.

2.3.1 A Quality assurance System based on Collegial Rationality

In order to illustrate a quality assurance system that is primarily consistent with collegial rationality, I have selected a local example, the University of Cape Town (UCT). Although this system was formally initiated only in 2001 and is still being developed, certainly in its policy documents, it shows a concerted effort to work within the grain of academic culture and values. The policy document, ‘Quality Assurance at UCT’ (2001), defines quality in a manner that would probably be acceptable to most academics: ‘the measure of the value of what we do, and the system of benchmarks that we use to make sure that we maintain and improve standards on a continual basis’. In contextualising its proposals, the document notes,

One strong theme that emerges from international experience is that quality assurance systems that rely overly on compliance to externally-imposed regulation may work against the interests of quality development in universities. This is partly because academics are intrinsically motivated, accustomed to autonomy and orientated towards a tradition of collegial peer-evaluation. It is also because of the drain that compliance systems place on participating institutions; it has been argued that these sorts of quality assurance regimes require an unacceptable sacrifice of time by academic staff who would otherwise be conducting the primary functions of teaching and research. (Quality Assurance Working Group UCT, 2001:4)

This policy document proposes an approach to quality assurance at UCT that will build on already established systems of accountability and development by updating them in accordance with the government’s expectations. With respect to the quality assurance of teaching and learning, the report recommends that the purpose of the system should be the monitoring and improvement of teaching and learning and assuring ‘the necessary enabling
conditions in which good teaching and learning can prosper’ (Quality Assurance Working Group UCT, 2001). The last point suggests that management should take a facilitative rather than a strategic approach to quality assuring teaching and learning. The report suggests that this should be achieved by focusing on the ‘student career’ and identifies three key areas related to this focus – the attainment of equity, assessment and evaluation and the enhancement of academic staff. This is in keeping with Harvey & Knight’s concern to place the quality of student learning at the heart of the system. With respect to the professionalizing of teaching, the report emphasizes a facilitative and improvement as opposed to an accountability-orientated approach.

The urgency of the need for secure and transparent quality assurance measures in teaching does not, however, mean that we should adopt a compliance-based approach in which attempts are made to enforce good teaching through inspections and check-lists. There is good evidence from international practice that this does not work. It is preferable to find ways to reaffirm the primary task of lecturers by promoting and supporting good practice through opportunities for professional development and by strengthening the ways in which we acknowledge sound and innovative teaching practices. This developmental approach underpins our recommendations for quality assurance measures in this area. (Quality Assurance Working Group UCT, 2001:18-19)

In a discussion on performance review of academic staff, the report promotes the idea of generating ‘communities of teaching practice’ and of recognizing and rewarding efforts to improve teaching practice.

(O)ur teaching practices (both good and bad) tend to be invisible for the purposes of our own reflective conversation within the institution. Our goal should be to make the creative and critical engagement with teaching and learning more visible within the institution, and to acknowledge and reward such work more effectively. (Quality Assurance Working Group UCT, 2001:20)

With respect to the locus of power and control, UCT is developing an integrated quality assurance system based on a network of committees and units. Accountability for quality assurance rests with the Senate and its Faculty Boards. Responsibility for the functioning of the system rests with the Senate Executive Committee supported by the Quality Assurance Working Group (QAWG) and led by the DVC (Academic). Line management responsibility for quality assurance works down from the DVC (Academic), to the Deans to Faculty Boards and Faculty Accreditation Committees44, to Heads of Departments and Programme Convenors and Academic Programme Committees. The UCT system is complicated by a ‘double grid’ system in which the intellectual and administrative home of academics is the Department, but teaching is delivered through programmes, which are housed in Faculties45. Compliance with

44 These approve new programmes and courses.
45 UCT could use the ‘double grid’ to their advantage by using interpretive, improvement-orientated evaluation methods for staff appraisal, course and departmental review – all located in departments, and reserving summative judgment-orientated evaluation methods for programme and faculty review.
reporting requirements to the HEQC is the responsibility of the Director of Institutional Planning who acts as a buffer between the academic units and the HEQC. Responsibility for educational development and for ensuring that the reviews lead to improvement lies with the Dean of the Centre for Higher Education Development (CHED).

The method of evaluating teaching and learning is based on a system of regular reviews of all units involved in teaching and learning; both academic departments and academic programmes are to be reviewed formally every five years, although the unit of review is a pragmatic decision and where feasible, these can be combined. Typically, the foundation of the system is self-evaluation.

The intended educational consequences (of the academic review system) will be the attainment and maintenance of appropriate management systems for teaching and learning, and the promotion of an effective environment in which teaching and learning can prosper. The unifying objective will be to support and enhance the creative drive of academics as teachers, and to recognise and reward the commitment made by students as learners. The bottom line is quality interpreted though critical self-appraisal. (Quality Assurance Working Group UCT, 2001:28)


‘UCT has chosen a … model of quality assurance which emphasizes self-evaluation and development, and which locates as much responsibility for quality assurance as possible in the hands of academics themselves. (…) The chief focus of the self-evaluation model is on the institution’s own capacity to identify problems and needs, and to address them effectively. (Quality Assurance Working Group UCT, 2004:2)

This report continues and explains the need for open and honest self-evaluation which it claims could lead to greater professionalisation of academic teaching thereby keeping it under the control of academics.

Instead of presenting ‘best-face-forward’ accounts of our work, we rather aim to produce balanced accounts which acknowledge strengths as well as areas of real difficulty and which then initiate developmental processes to address these difficulties and opportunities. This approach acknowledges that teaching and learning, and research, are complex processes and that sometimes there are no quick or easy ‘fixes’. It acknowledges also that there is no single model of ‘best practice’ and that good professionalism is often characterized by the quality of debate and even disagreement circulating in any particular context.

In this system, a review process is an opportunity to conduct an ongoing development dialogue about professional issues. (…) By making the issues and problems of academic practice more visible and clearly understood, we enhance our control over our professional environment, at a time when academic autonomy is under threat globally. (Quality Assurance Working Group UCT, 2004:2)

This position is not taken in the documentation which suggests that because the unit of judgment-orientated review is flexible, this could involve either a department or a programme.
The review process is based on a self-review portfolio, a review report and a follow-up report. The Guidelines for Academic Review provide areas for possible attention at different levels, course, major, programme or department, but crucially, encourages academics to identify ‘intrinsic priorities’ and to set the criteria for evaluation themselves. The Guidelines also refer to ‘general priorities’ emanating from faculty, institutional or national levels which it hopes will be considered and where relevant integrated into local frames of reference. It then lists a summarized version of the HEQC’s Improving Teaching and Learning Resources’ criteria for programme review for consideration. In compiling the self-review portfolio, academics are asked to evaluate their programme or department firstly against their own objectives and criteria, secondly against Faculty and institutional criteria and thirdly against the HEQC’s (pending) criteria for institutional audit. Here one can identify the concern of those designing the internal system to ensure that it remains meaningful to academics, whilst at the same time, being aware of the need for the institution to meet the HEQC’s requirements. The writers of the document acknowledge the ‘epistemic interest’ of academics, here referred to as ‘intellectual renewal’ as likely to be the ‘most generative motivation informing academic review’ (Quality Assurance Working Group UCT, 2004). The approach combines a recognition of collegial rationality with a concern to persuade academics to transparently and formally self-regulate,

A unit of review should be evaluated for effectiveness both against the goals it has set for itself in the course of its recurrent planning and renewal processes, and against its own capacity to effectively monitor and manage its own activities. (Quality Assurance Working Group UCT, 2004:5)

The UCT system requires annual on-going monitoring activities such as student evaluations of courses and external examining to be summarized and compiled by a self-review team into a 20 page self-review portfolio. In doing so academic teams have access to assistance from education and management information experts. Notably, the audience for the self-review portfolio is described as primarily for the staff of the unit itself and only secondly for external people such as the Dean, DVC and members of the review panel. The Guidelines suggest that the value of a self-review portfolio resides in its ability to critically evaluate issues relating to curriculum and teaching and learning and in the unit’s demonstrated capacity to act on its own reflections (Quality Assurance Working Group UCT, 2004:10).

46 At the same time there are recommendations for UCT’s external examining system to be up-graded, requiring external examiners to carry out more extensive responsibilities, in line with the suggested descriptors of the HEQC’s Improving Teaching & Learning Resources.
External academic reviews are conducted on a five-year cycle. An Academic Programme Review Committee consisting of at least two members external to UCT, one of whom must be an academic from another university, two members internal to UCT, one of whom should be an academic from another Faculty and one from CHED, is appointed by the DVC (Academic) in consultation with the Head of Department and Programme Convenor concerned. This committee then examines the self-review portfolio, conducts a one-day visit and compiles a Review Report. With respect to teaching and learning, the Review Panel is to report on the quality of the curriculum and levels of student attainment (collegial concerns), the professional development of staff, and the unit’s capacity to manage educational change (pedagogical and managerial concerns) and the extent to which the outcomes of the curriculum demonstrate efficiency and the ability to cater for diversity and equity (again pedagogical and managerial concerns as well as bureaucratic concerns). Here the collegial approach is overlaid with managerial concerns, possibly as a result of pressure from the HEQC to meet its requirements for institutional audit.

However, it is made clear that there is no direct link between decisions relating to resources and the results of the reviews. The self-review portfolio and the review reports are submitted in the first instance to the DVC (Academic) and the Dean and only ‘secondary reporting’ is made to the Senate Executive Committee via the Deans. Deans work with the unit concerned to formulate a ‘post-review development plan’. The final review report is posted on the institution’s intranet. It is the responsibility of the Head of Department or Programme Convenor to carry out the post-review plan and Deans are accountable for monitoring their progress. Deans report annually to the DVC (Academic) on the progress of post-review implementation for incorporation into the institutional audit portfolio for external audit. The review process itself is to be reviewed regularly.

Although UCT is still in the process of implementing its integrated quality assurance system and the full impact of its quality assurance policies and of the HEQC’s audit and accreditation requirements are not yet evident, in terms of policy intention, values and system design, the UCT quality assurance system arguably can be described as one based primarily on collegial rationality. The main reason for this judgment is that the system provides discretionary space to academics to determine their own evaluation criteria, it is controlled by the academic management system, its pedagogical and management interventions aim to be facilitative and there are attempts to provide institutional buffers between academics and the requirements of the external quality assurance agency.
2.3.2 A Quality Assurance System based on Managerial Rationality

Monash University, Victoria, Australia has been selected to illustrate a quality assurance system which illustrates an astute managerial, (albeit a ‘soft managerial’) approach to the quality assurance of teaching and learning. The policy document, ‘Quality at Monash: Values and Principles’ (2002), suggests that the nature of the quality assurance system at Monash is influenced primarily by the nature and aspirations of the organization as well as by external pressures and the requirements of international scholarship. In the rationale for the quality assurance system, the document states that the internal motivation for Monash’s quality assurance system is to promote the institution’s goals and strategic directions and its desire to become a ‘learning organization’ (Senge, 1990, cited in Monash 2002).

A thoughtful and empowering approach to quality is seen as being entirely appropriate for an organization with learning and the development of knowledge as its core concern, and a necessary condition for the development of a “learning organization”. (Monash University, 2002:1)

‘Quality at Monash’ (2002) represents Monash as an innovative, engaged and international university that is expanding and internationalizing its offerings and therefore needs to focus on good management. For these reasons it states that the Monash leadership is strongly committed to quality assurance and to carrying out the policy-making, planning, resourcing and decision-making that this requires. Whilst promoting the view that quality is everyone’s responsibility and supporting the development of professionalism and Schon’s (1983) idea of the ‘reflective practitioner’, the document also stresses that, in loosely coupled organizations such as universities, if Monash is to become a ‘learning organization’, then leadership and management must motivate, mobilize, organize and reward individuals and teams to deliver quality.

The document also notes external pressures on Monash that arise from the expansion and internationalization of its delivery and the growing use of information technology; for example, as an international university it needs to gain accreditation in other countries for its off-shore campuses.

It is clear that modern universities must meet multiple goals and navigate multiple agendas. It is no longer possible to think of a university defining its purpose and ways of operating without paying attention to the view of stakeholders such as students, staff, employers, professional groups, community groups, state, federal and national governments. (Monash University, 2002:7)

The document claims that Monash has developed a quality assurance system that meets its own vision and objectives and at the same time is aligned with national and international requirements (Monash University, 2002:3).
‘Quality at Monash’ lists the core values and principles that underpin its quality assurance system as follows: creating the agenda\(^{47}\); quality as the professional responsibility of each staff member; encouraging the development of a learning organization through continuous quality improvement; valuing diversity, devolution and comparable treatment\(^{48}\); an open and informed approach to quality and valuing both self-reflection and external reference in a planned and systematic approach to quality assurance that leads to action for improvement (Monash University, 2002:1).

The Monash ‘Guidelines for Academic Review’ (2002) state that the purpose of review is to ‘assist the university to assure itself of the quality of its academic endeavour and to utilize learning from this essentially developmental process in order to effect improvement’ (Centre for Higher Education Quality, 2002:1). The Guidelines also provide ‘guiding principles’ for review which state that the strategic directions of the university are to inform all reviews, benchmarking and input from external stakeholders is strongly encouraged and the importance and relevance of external professional and accreditation reviews is acknowledged. It also states that the purpose of academic reviews is to judge the effectiveness of processes and procedures and that this is best demonstrated by successful outcomes (Centre for Higher Education Quality, 2002:1). These statements suggest that the purpose of the quality assurance system is primarily to further the institutional mission and strategic plans, to improve the effectiveness of its provision and to enlighten senior management, with whom the power and control of the system lie. However, the Monash system emphasizes that everybody in the organization should be an agent of quality and it promotes improvement over accountability, adopting an audit rather than an accreditation approach to its academic reviews. This suggests that Monash adopts a ‘soft’ rather than a ‘hard’ managerial approach that would be located at the improvement rather than accountability pole of Quadrant 2 (see Figure 2 below).

With respect to methods of evaluation, the ‘Quality at Monash’ document promotes a ‘fitness for purpose’ approach to quality assurance by suggesting that all staff should consider the following questions at individual, team, unit, faculty and institutional levels:

‘What are you trying to do?’ (outcomes), ‘Why are you trying to do it?’ (purpose), ‘How are you trying to do it?’ (processes), ‘Why are you trying to do it this way?’ (reflection), ‘How

\(^{47}\) That is a ‘fitness of purpose’ approach using the institutional mission and objectives as evaluation criteria.

\(^{48}\) This suggests a tight-loose coupling approach with standardized institutional evaluation criteria that also try to take context into account.
will you improve it?’ (action for improvement) and ‘How will you learn and develop?’ (staff development, learning organization) (Monash University, 2002:5). The document also promotes the systematic use of the quality cycle (plan, act, evaluate and improve) at all levels across the institution. The Monash ‘Guidelines for Academic Review’ (2002) give flesh to these approaches for the quality assurance of teaching and learning. Firstly, quality assurance is Faculty based and responsibility for both accountability and improvement is located in the Executive Deans. The Centre for Higher Education Quality (CHEQ) provides expertise and assistance from the center, but on a cost-recovery basis. CHEQ also provides ‘terms of reference’ for the academic reviews to ‘ensure consistency of review across the institution’ and to ‘ensure that reviews meet the requirements of university strategic planning and policy documents’ (Centre for Higher Education Quality, 2002:3). These ‘criteria’ largely describe areas for scrutiny rather than specifying detailed quality standards. Their scope is comprehensive covering organizational structure and management, human and physical resources, course and subject profile, student profile, (teaching, learning and assessment), research and research training and professional and community activities. In terms of setting up the academic reviews, the Dean appoints the self-review team and selects the external review panels, the latter being approved by the DVC. The review panels consist of a larger group of stakeholders than the UCT review committees, and include external peers, members of professional councils, employers and students or recent graduates. As well as the CHEQ Terms of Reference, panel members are expected to use a long list of institutional policy documents, including Faculty Teaching and Learning Plans, programme and course approval documentation and business plans to determine whether the planned academic management system is effective. This effectiveness is to be judged in terms of its academic outcomes. Extensive information and support documentation is required in the self-evaluation report that forms the starting point for the review. Site-visits last three days and culminate in a review report which is submitted to the Dean and also to CHEQ. The Dean is responsible for ensuring that an implementation plan, based on the review findings, and linked to the Faculty Operational Plan, is drawn up and acted upon.

Recent additions to the Monash quality assurance system appear to be a focus on management and leadership that includes a Head of Department or School questionnaire developed by CHEQ for all staff to use in evaluating their Heads. The questionnaire focuses on the following leadership attributes: strategy and vision, leadership for teaching, leadership for research, fair and efficient management, development and recognition of staff, transformational and collaborative leadership and interpersonal skills. The questionnaires are
completed on-line and processed by CHEQ. At this stage the findings are used for formative purposes only (CHEQ, 2004a).

In keeping with its ‘fitness for purpose’ approach, CHEQ has also recently adapted the Australian Course Experience Questionnaire that the government (the DETYA) requires all Australian exiting students to complete. The Monash Experience Questionnaire is to be administered to all Monash students annually (CHEQ, 2004b).

The Monash quality assurance system makes a useful distinction between monitoring and review, suggesting that monitoring should be informal, formative and a continuous professional responsibility leading to self-evaluation reporting, whilst review (described above) is formally organized every five years with a summative orientation. With respect to the monitoring and self-evaluation of teaching, CHEQ provides a set of self-evaluation questions and a self-evaluation tool to assist teaching staff, all of whom are expected to keep a teaching portfolio. Teaching portfolios are expected to show how staff members evaluate their own teaching and how they act on the findings to develop their teaching practice. The listed purposes of evaluating teaching are: to enable staff to self-improve, to provide information to students and to allow the Faculty and university to judge the teaching performance of academic staff (CHEQ 2004a). Thus, although set up as a formative process for professional development the evaluation of teaching is also linked to the staff appraisal system, which is summative in nature.

2.3.3 A Quality Assurance System based on Facilitative Rationality

Examples of external quality assurance agencies that have adopted a facilitative rationality include the Australian Universities Quality Agency (AUQA, 2002), the Association of Dutch Universities, Vereniging van Samenwerkende Nederlandse Universiteiten (VSNU) and the University Grants Committee (UGC)’s Teaching and Learning Quality Process Reviews in Hong Kong. However, in the Netherlands a recent shift towards a more bureaucratic system focusing on accreditation suggests that the VSNU system will soon become defunct 49. The Hong Kong UGC is a non-statutory advisory committee that acts as a buffer between the higher education institutions and the state’s concern for accountability and value for money and conducts audits that look only at teaching and learning processes and outcomes

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49 According to de Vries (2001), the Ministry of Education wants a more transparent system that will apply international benchmarks and be independent of sector organizations such as the VSNU. A National Accreditation Organisation was proposed in 2001 which will set up or accredit existing Visiting and Validating Bodies to accredit academic programmes and replace the 15 year-old university-driven peer review system of the VSNU.
(University Grants Committee, 2002). However, a parallel organization exists, the Hong Kong Council for Academic Accreditation that accredits institutions and programmes. Because of uncertainty about the impact of this second organization and its impact on the work of the UGC, the research focuses rather on the AUQA which is concerned primarily with institutional audit.

In Australia, AUQA succeeded a summative, judgment-orientated national quality assurance system that was run by the Committee for Quality Assurance in Higher Education from 1993-1995. The latter external quality assurance agency reviewed the quality of teaching and learning, research and community service in Australian universities and the results were directly linked to funding awards from the Quality Assurance and Enhancement Fund. Although participation in the reviews was voluntary, none of the public Australian universities refused to be audited because of the high stakes attached. However, the system came under strong attack for rewarding the already strong and for undermining the weaker institutions. In 1995 there was a change of government and the summative audit system was scrapped (Harman, 1998). In the meantime, the Federal government has established a reporting system that collects outcomes data from institutions on graduate attributes, employee feedback, the employment destinations of graduates (the national Graduate Destination Survey) and graduates’ perceptions of teaching quality (the national Course Evaluation Survey). The Federal government publishes the results of these data annually in the ‘Characteristics and Performance of Higher Education Institutions’ (Harman, 1998).

In this context, AUQA was established in 2000, began pilot audits in 2001 and full implementation of its audit system in 2002. As a relatively new external quality assurance agency, led by David Woodhouse, previously Director of New Zealand Universities’ much praised Academic Audit Unit, AUQA appears determined to establish a national quality assurance system based on a facilitative rationality. AUQA was established by the Ministerial Council of Education from whom it receives operational funding. It is an independent not-for-profit organization responsible to the Federal government for conducting quality audits of self-accrediting Australian higher education institutions and State and Territory Government higher education accreditation authorities on a five year cycle; providing public reports on the outcomes of these audits; reporting on the relative standards and international standing of the Australian higher education system and its quality assurance processes and commenting on

50 By virtue of being recognized as a university by the government, Australian universities are automatically self-accrediting, that is, they approve their own programmes and award their own qualifications.
the criteria for the recognition of new universities and accreditation of non-university higher education awards (AUQA, 2002).

AUQA defines audit as ‘a systematic and independent examination to determine whether an organisation’s planned arrangements are suitable to achieve its goals (approach), whether its practice conforms to its plans (deployment), whether these arrangements achieve their desired results (results) and whether the organization is learning from its self-evaluation of its approach, deployment and results (improving)’ (AUQA, 2002). AUQA’s unit of evaluation is the whole institution and it judges the effectiveness of the institution’s quality management system and its self-monitoring capacity (which is assumed to be already in place and functioning effectively) in order to ascertain whether the institution’s processes are effective in achieving its objectives, as measured against its own plans. The audits are based on the higher education institution’s self-reviews and AUQA, acknowledging the diversity of institutions, negotiates with the auditee the criteria to be used and the best way of expressing the findings. It is critical to note that AUQA uses the institution’s own goals and objectives as the criteria for its judgments.

AUQA has been explicit in stating that its purpose is to judge institutions within the context of their own mission, and not to question the appropriateness of that mission. (Martin, 2003:7)

Institutions are responsible for advising AUQA which of its criteria (objectives) are most relevant and desirable at the time of the audit and it is up to the institution to determine how to measure these, that is, to develop appropriate quantitative and qualitative indicators for measuring performance and improvement on these criteria. Where there are other external requirements (e.g. professional accreditation) that need to be met, AUQA also checks on the extent to which institutions have incorporated these into their institutional quality procedures. Through its audits, AUQA makes judgments about the appropriateness and effectiveness of a higher education institution’s quality assurance system. AUQA claims that its findings are intended to be fair and useful and that it wishes to work in partnership with higher education institutions and to add value to their activities (AUQA, 2002). This information presented above suggests that AUQA does operate in genuine partnership with Australian higher education institutions (with institutional managers in particular) who are the primary agents of quality assurance in this system and who are allowed within the AUQA framework, to wield considerable control over the agenda of the AUQA audits.

AUQA’s audit method revolves around the institution’s self-evaluation report, termed a Performance Portfolio. The format of these portfolios is negotiated as AUQA believes that there is no single model for self-evaluation and it wants to encourage diverse and critical approaches (AUQA, 2002). Performance Portfolios typically address the following areas:
institutional objectives and how the quality assurance system helps achieve these, management structures and their effectiveness, external examining, academic review processes and findings, key performance indicators and their interpretation, planned actions on the findings, linked to a time-scale, resources and responsibilities. Research outputs, overseas operations and relationships with stakeholders are also considered. AUQA sets up the audit panels in consultation with the auditee. Site-visits last from two to five days culminating in an audit report. Institutions comment on the report before publication. The report makes judgments on quality assurance arrangements and their effectiveness and looks at outcomes (quality per se) only in order to test the effectiveness of quality assurance systems and claims made about quality assurance. The report does not mention individuals and does not aim to be exhaustive. It lists commendations and recommendations, alerting the institution to areas for further action, without stipulating what improvements should be made. If serious weaknesses are revealed through the audit, AUQA will return in three years time to review progress. Thus the consequences of audit in the AUQA system affect the reputation of an institution, but there is no link to funding or formal status. To assist higher education institutions in their improvement efforts, AUQA has established a ‘Good Practice Database’, which it hopes will promote and disseminate good practices throughout the sector.

AUQA’s facilitative approach that regards quality as the institution’s ‘fitness for purpose’ and primarily an institutional responsibility is illustrated by the following principles that underpin its approach to audit: audit should be thorough, flexible, collaborative, cooperative, supportive, transparent and open. The guidelines that AUQA provides to its auditors include the following: respect the objectives and values of the higher education institution, strengthen the credibility of self-review, contribute to the organisation’s self-learning and check that the review is designed primarily for internal needs and audiences (AUQA, 2002). This facilitative approach is reinforced by the advice that it gives to institutions: concentrate on your own needs and develop quality assurance systems to achieve your own objectives; do not develop your quality assurance system oriented to what you believe AUQA wants; liaise with AUQA to tailor the audit to the institution as much as possible; as far as possible use documentation that already exists; avoid extra writing; select your own outputs measures related to your objectives; ensure that the process is useful to academic activities; get as much benefit out of the self-review as possible (Woodhouse, 2003:137). Woodhouse describes how in its start-up phase, AUQA tried to allay fears about an inspectorial system by visiting all institutions and stressing its intention to be ‘supportive, economical, flexible, and cognizant of the characteristics of the institutions and agencies it audits’.

Quality audit … is a systematic way of implementing the learning process in an organization. Thus internal quality audit is a good mechanism for quality improvement.
AUQA has, therefore, set up its procedures and approach so as to be as supportive as possible to institutions and agencies in their own continuing improvement. (...) In this way, external quality audit does not detract from the institutions’ ability to improve, but augments it. (Woodhouse, 2003:139)

Monash University’s well-planned and well-managed internal quality assurance system that aims to serve institutional needs and goals, as described above, illustrates the effectiveness of the AUQA ‘fitness for purpose’ approach to quality assurance. It would seem that this approach works particularly well in First World contexts where there is strong institutional leadership, management and quality assurance capacity as well as adequate resources to run sophisticated and effective internal quality assurance systems.

2.3.4 A Quality Assurance system based on Bureaucratic Rationality

An example of a bureaucratic approach to the quality assurance of teaching and learning is that practiced in the UK during the last decade. Because this research is concerned particularly with the quality assurance of teaching and learning, it focuses on the Teaching Quality Assessments practiced by the Higher Education Funding Council for England (HEFCE) 1993-1995 followed by Subject Reviews 1995-2001. The latter were taken over by the Quality Assurance Agency for Higher Education (QAA) in 1997 and in 2000 incorporated into its Academic Review process.

In the 1990s the Thatcher government imposed a national quality assurance system on UK universities based on academic audit and subject assessment.

As a result today the UK arguably has the most comprehensive and complex system of quality regulation of any country in the world as well as the longest history with this new form of accountability. (Dill, 2002:2)

In 1992 the Higher and Further Education Act established Funding Councils to develop evaluation methods for the allocation of state funding for teaching and research. The UK government wanted greater value for money and greater accountability in the public services generally. As a result the HEFCE was established in 1992 to conduct Teaching Quality Assessments (TQAs) and the following year the Higher Education Quality Council (HEQC) was established to conduct institutional audits. The HEFCE designed a system to judge the quality of teaching and learning in universities, which according to Dill (2002), was based on the expertise of inspectors from Her Majesty’s Inspectorate and the Department of Education and Science who had experience of evaluation only in schools and polytechnics. The system was based on an initial self-evaluation followed by a site-visit in which the actual classroom performance of undergraduate lecturers was judged by observation. Subject areas were judged to be excellent, satisfactory or unsatisfactory against a set of performance and quality indicators developed for six criteria which included teaching techniques, accommodation,
resources and lecturer performance. Dill (2002:12) comments that the judgments of the HEFCE were based on ‘a very superficial account of teaching and learning’. This was a performance-based accountability system directly linked to funding. Reports on the TQAs were published to provide ‘market signals’ to ‘consumers’ and the press began the practice of using the results to publish league tables which ranked institutions. Dill (2002) notes that the advantages of this system was that it did put the monitoring of teaching on university agendas and it facilitated a conversation around the professionalisation of teaching. However, he suggests that its negative consequences were overriding, for example the site-visits caused fear and anxiety amongst academic staff, lowering their morale, it encouraged a focus on formal lecturing performance and so stultified teaching innovation, the findings were not particularly useful to teachers and it resulted in a culture of compliance (Dill, 2002). Dill concludes that the relative costs of the system outweighed the relative benefits and that this may be because the evaluation instruments were invalid for higher education and were based on an inadequate understanding of the underlying causes of poor teaching quality.

In 1997 the National Committee of Inquiry in Higher Education (the Dearing Report), recommended that the quality of teaching should be based on ‘subject standards’. It also recommended that the audit and the TQA systems be brought under one agency, the Quality Assurance Agency for Higher Education. In 1997 the HEFCE contracted the newly established QAA to review the quality of teaching ‘to secure value from public investment’ by ensuring that all education funded by the HEFCE was of approved quality, by using subject review judgments to inform funding, ‘to encourage improvements through the publication of review reports’ and to provide ‘effective and accessible public information’ on the quality of higher education (QAA, 1997:2). The QAA attempted to improve the evaluation methods of the TQA by moving towards a more subject-specific (as opposed to generic) approach and towards a more outcomes-based approach that included the review of student work and reports of external examiners by trained subject specialist reviewers. It also tried to alleviate pressure on academics by no longer giving individual grades for teaching observations. According to the Subject Review Handbook (QAA, 1997), the providers’ aims and objectives would provide the framework for the review; the quality of the student learning experience and student achievement would be judged against these. Reviewers would ask ‘to what extent do the student learning experience and student achievement, within this aspect of provision, contribute to meeting the objectives set by the subject provider?’ (QAA, 1997:51). The QAA subject review method involved a self-assessment report, a site-visit by subject specialist reviewers to gather further evidence and then a judgment on a scale of 1-4 in each of six areas of provision to give an overall ‘graded profile’ of the quality of provision in a
particular subject. The six areas were defined as curriculum design, content and organization; teaching, learning and assessment; student progression and achievement; student support and guidance; learning resources and quality management and enhancement. For each area a detailed set of questions and prompts were supplied for providers and for reviewers (see The Subject Review Aide Memoire, QAA, 1997). An overall summative judgment on a scale of 1-4 was given for each subject reviewed: grade 1 meant ‘subject to further review within a year’ whilst grade 2 or better meant ‘quality approved’ (QAA 1997: 8). The results of the reviews were published in Subject Review Reports which included the graded profiles. These, plus Subject Overview Reports which gave a composite picture of the discipline reviews, were widely distributed and placed on the internet to inform the public.

Although the QAA claimed that its subject reviews were based on the principle of ‘fitness for purpose’, the detail and the prescriptive approach of the Aide Memoire suggests that this was rather an outcomes-based approach to an accountability evaluation. It is not unsurprising that the QAA was perceived by academics as an agent of the Funding Council (Newton, 2002, Morley, 2003).

In 2000 the QAA up-dated its quality assurance methods by integrating institutional audit and subject reviews into one system of Academic Review. The purposes of academic review are defined as ‘providing accountability for the public and private resources invested in higher education’, ‘generating useful and useable information about standards’ and ‘promoting the enhancement of provision’ (Randall, 2001:36). In the new system the main concern of the QAA was to assure the academic standards of the outcomes of higher education programmes. Thus, the QAA became concerned with standard setting and so began the process of developing ‘subject benchmark standards’ for each of 42 identified subjects and with developing a higher education qualifications framework to provide generic level descriptors for qualification exit levels to ensure consistent use of qualification titles; both were to be used as instruments of subject review. At the same time the QAA put more emphasis on how institutions formulated their programme specifications. These were to include specified learning outcomes and become public information. According to Randall, the then CEO of the QAA,

The provision of public information involves more than reporting on the performance of individual institutions. The key reference points against which the judgments in reports are made must also be available, understandable and understood. The Agency works with the

51 Subject benchmark standards are defined as ‘statements representing general expectations about standards in an academic discipline, particularly in relation to intellectual demand and challenge’ (QAA, 2000:15).
higher education sector to define expectations about standards in an accessible manner. (Randall, 2001:32)

The QAA also developed a ‘Code of Practice for the assurance of academic quality and standards in higher education’ which set out ‘precepts of good practice’ for internal quality assurance systems and provided criteria ‘against which academic reviewers can make their judgments on both subject provision and institutional management’ (QAA, 2000a:2). Thus in the new form of academic review, the QAA reported on programme outcome standards: the appropriateness of the learning outcomes (in relation to relevant subject benchmarks and qualification levels), the effectiveness of curricular and assessment arrangements (in relation to the intended learning outcomes), and the achievement of students (in relation to the intended learning outcomes and the subject benchmarks); the quality of learning opportunities: the effectiveness of teaching, learning resources, student support; and thirdly, institutional management of standards and quality: arrangements for dealing with the approval and review of programmes, assessment procedures and the management arrangements for awarding credit and qualifications (in relation to the Code of Practice) (QAA, 2000c). For this third area, the review was to investigate particularly the procedures for approval, monitoring and review of academic programmes and the procedures for acting on the findings of external examiners, subject reviews and other external reviews. This third area was to be scrutinized at institutional level and the findings linked to those of the subject reviews. The method for the QAA’s academic review was based on an initial self-evaluation followed by a peer review evaluation. Peers included subject specialists as well as external stakeholders such as employers and students.

Under the academic review system, a summative report would make an integrated threshold judgment about academic standards in an institution on the basis of judgments on each of the three areas described above: a ‘confidence’ judgment was given if reviewers were satisfied with current standards and confident that those standards would be maintained in the future; a ‘limited confidence’ judgment was given if standards were adequate, but there was doubt about the ability of the institution to maintain them in the future and a ‘no confidence’ judgment was given if current and future standards were in doubt. The report also mentioned good practice, strengths and weaknesses and action points for improvement that were designated, ‘essential’, ‘advisable’ or ‘desirable’.

In 2001 there was backlash from leading universities in the UK against the QAA. Most universities complained of ‘quality assurance fatigue’ and the head of the QAA was forced to resign. Under new leadership, the QAA undertook an extensive consultation process culminating in a new quality assurance regime which it claims has a ‘lighter touch’.
The move to an audit-based process for the external quality assurance of higher education has in large measure been prompted by general recognition, in Government and HEFCE, as well as by institutions and their representative bodies, of the need to reduce the burden of accountability on institutions. (QAA, 2002:15)

After eight years of subject review, the QAA now declared that the subject/academic review system had provided sufficient evidence that the quality of programmes in UK universities was generally high and that internal quality assurance systems were sufficiently robust to maintain that quality. The QAA announced that it could now embark on a more selective approach based on the principle of ‘intervention in inverse proportion to success’ (QAA, 2002). Full subject reviews will now only be conducted where the audit judgment suggests that there is cause for concern about quality and standards at programme level. The mission of the QAA remains ‘to promote public confidence that the quality of provision and standards of awards in higher education are being safeguarded and enhanced’ (QAA, 2002:1). The new quality assurance system now being implemented by the QAA is based on institutional audits with five day site-visits conducted on a six-year cycle with a mid-point visit. This integrated system aims to combine the scrutiny of internal quality assurance systems at institutional level with investigations on how effective these systems are at the programme level (the point of delivery). Thus subject reviews are now being replaced with ‘audit trails’ which are estimated to cover four to six programmes per audit and to take about 25% of the audit team’s time. Audit trails are designed to provide verification that the institution’s quality assurance system is working as intended, to check the quality of what students are actually achieving and to verify the institution’s public claims against the experience of students (QAA 2002). The method of evaluation used on the audit trails is similar to that used in the academic reviews. The QAA is also concerned to check the accuracy, reliability and completeness of the information that institutions publish about their programmes and the standards of their awards. In addition, the QAA has now introduced ‘developmental engagements’ which are purely formative procedures run by the QAA that allow an institution to test the effectiveness of its quality assurance system at programme or subject level. The QAA remains committed to working towards a national system that has clear and explicit standards. To this end it continues to work with the national qualifications framework, subject benchmark statements, programme specifications and its Code of Practice for the assurance of academic quality and standards in higher education.

In conclusion, it would appear that although the QAA has lightened the accountability burden on higher education institutions in the UK, the system still remains accountability-orientated and based on a bureaucratic rationality and therefore located in Quadrant 4. The system remains externally driven and owned and the QAA continues to define externally the criteria.
and standards for review. The consequences of audit and audit trails continue to be severe as they are linked to funding decisions and are widely publicized.

This chapter has proposed a simple conceptual framework for analyzing approaches to the quality assurance of teaching and learning. It has presented four case studies and located these within the framework. A limitation of this analysis is that it is based on documentation only. A full case study analysis would of course require research into practice as well.
Chapter 3 A Conceptual Framework for Teaching and Learning in Higher Education

3.1 Introduction

One can very briefly trace the following trends in the historical development of teaching in higher education. The first mediaeval universities were controlled by the Church and were established as teaching institutions. This continued to be the primary function of universities until the nineteenth century when, with the rise of the nation state’s influence over education, the Humboltian model encouraged universities to undertake research as well as teaching. Teaching and research appear to have co-existed in universities without tension until the post World War II period. During this period research began to be funded and rewarded by the state and the corporate sector and increasingly became the dominant project of the universities (Barnett, 2003). Increasingly, research outputs were seen by government and business as returns on investment in higher education. In turn this has led to greater competition and individualism in universities, which, according to Barnett (2003) has altered, if not destroyed, the character of collegialism in universities.

Since the 1950s teaching has been unable to compete with research and has become a second status activity. Only in the 1980s did teaching become a social project in higher education. During this period teaching began to be asserted as a research-driven sub-discipline with its own body of theory and research-based practice. This focus on a more explicit pedagogy in higher education coincided with the massification of higher education and with changes in the student population. For the first time large numbers of first-generation university students who lacked the ‘cultural capital’ to learn independently began to enter universities. In South Africa, the massification of higher education has been constrained by a lack of funding for the majority of students who cannot pay their own way and by the low numbers of school leavers that qualify for higher education entrance. However, an emphasis on an explicit pedagogy also emerged in the 1980s in South Africa, but was triggered instead by the entry of small numbers of black ‘under-prepared’ students into ‘historically white institutions’. This new pedagogical project is based on a body of educational theory that can be learnt and practiced, meaning that teaching in higher education is increasingly understood and advocated as a professional practice, as opposed to the charismatic, intuitive model of teaching that has traditionally been practiced by collegialism. According to Barnett (2003), research and teaching have now become separate and competing ideologies in higher education; he describes research as an epistemological project aimed at knowledge production and teaching as an ontological project aimed at professionalizing teaching to produce skilled graduates.
3.2 Collegial Traditionalism

Before moving on to discuss the new pedagogic project in higher education, it is important to first understand the traditional collegial model, compatible with the collegial rationality described in Chapter 2, that was dominant in higher education until the 1980s. This model focuses on the teaching of content knowledge by academics who are not particularly interested or concerned with the teaching-learning process. In this model it is assumed that good teachers succeed through charisma rather than through any knowledge of education theory. In elite contexts, where students could be assumed to be well-prepared for higher education studies, this approach worked through an implicit model of apprenticeship. Moore and Young (2001) describe this approach as ‘neo-conservative traditionalism’ and characterize it as follows. The curriculum is structured as a linear hierarchical organization of knowledge and is based on the insulation of the disciplines; it is understood as a given body of knowledge based on canonical texts. Teaching promotes respect for authority and for traditional academic values, which include seeing education (especially the disciplines) as an end in itself. The disciplines are regarded as the most important social organizations in higher education and provide an institutional specialist base for guaranteeing quality and standards. General, formative academic knowledge and education is kept quite separate from vocational education.

In this model, the problem of poor learning is typically located in the student; if students fail they may be regarded as unintelligent and unmotivated, and in the South African context, if black, as ‘under-prepared’ or ‘disadvantaged’ by the schooling system. In the South African context, where this model was prevalent during the 1980s, student deficits were generally not viewed as the problem of academics and typically language or education experts were called in to give remedial academic support or bridging programmes to those students who were considered deficient learners. In this model the idea of staff development does not exist; it is not considered necessary. Thus resources for improving teaching and learning, such as those produced by the HEQC and analysed in this study, would be considered redundant.

The pedagogical project that developed in higher education in the 1980s is captured by a range of, sometimes competing, ideas and ideologies, discourses and social practices. One way of making sense of this is to follow Grundy’s (1987) application of Habermas’ (1971) three ‘knowledge-constitutive interests’ to curriculum and pedagogy. In this early work, Habermas was concerned to show that scientific thinking and its emphasis on effectiveness and efficiency is but one way of viewing the world, which is not particularly helpful for guiding social and ethical action. His proposal for the three knowledge-constitutive interests is based on the *a priori* assumption that knowledge is always produced for a purpose and is
therefore always interested and produced on the basis of certain values and assumptions. Habermas categorized all of human rationality into three knowledge-constitutive interests: the technical (empirical-analytic) interest, the practical (historical-hermeneutic) interest and the emancipatory (critical) interest. According to Grundy (1987), the technical interest understands ‘curriculum-as-product’, the practical interest understands ‘curriculum-as-practice’ and the emancipatory interest understands ‘curriculum-as-praxis’. Following Grundy (1987), a brief description of each of the three paradigms of curriculum and pedagogy is given followed by the implications of these for staff development. The purpose of this discussion is to provide a lens for analyzing the HEQC’s pedagogic project with a particular focus on the production of the ‘Improving Teaching and Learning Resources’ (HEQC, 2005).

### 3.3 Curriculum-as-Product

Grundy (1987) defines the technical interest as ‘a fundamental interest in controlling the environment through rule-following action based upon empirically grounded laws’ (1987:12). This interest is concerned with the ability to predict (and therefore to control and manipulate) the environment and it gives rise to instrumental action that is judged in terms of its efficiency and effectiveness. The technical interest is dominant in the domains of science and technology. According to Grundy (1987), when applied to education, this understanding of curriculum has developed within a ‘culture of positivism’. Grundy provides the following caricature of education conducted within the technical paradigm. The curriculum is understood as a plan and/or a product, in which a set of learning outcomes and teaching inputs are delivered through an education process that is designed to produce pre-specified outputs. It is assumed that teaching unproblematically results in learning and that educational outputs can be measured against the intended learning outcomes. It is assumed that curriculum objectives or learning outcomes stand in a deterministic relation to educational practice. A curriculum based on the ‘technical interest’ tends to objectify knowledge and to view it as a body of given information to be transmitted by lecturers to students. As with the collegial or neo-conservative traditionalist model above, this approach is likely to be underpinned by a deficit model of the learner. It often adopts simplistic behaviourist or cognitivist, competence-based theories of development and learning.

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52 It is critical in this discussion that the reader does not confuse the critique of knowledge and action based on the technical interest as applied to curriculum and pedagogy with a critique of this form of knowledge in general. The technical interest, as employed by the experimental method in the natural sciences for example, is wholly appropriate and effective. What is at issue rather is the inappropriate application of this way of knowing and doing to the practice of teaching and learning. Arguably, there are some forms of learning, for example the memorization of large bodies of knowledge that may quite appropriately be taught, learnt and assessed by technical means.
3.3.1 Technical Instrumentalism

Moore and Young (2001) suggest that the most recent development in this paradigm of curriculum and pedagogy is what they term ‘technical instrumentalism’. They describe this as education that claims to be productive for the global market and a competitive knowledge-based society and that claims to produce trainability, flexibility and employability in learners. This version of ‘curriculum-as-product’ aims to integrate general and vocational education through a curriculum that promotes generic, transferable skills. They explain how originally this model was confined to vocational education, but since the 1990s it has become a dominant educational discourse in general, formative education as well. They suggest that this model survives in higher education only because it has managerial and bureaucratic support, for it has no social or institutional base in higher education, which continues to be largely disciplinary based.

In the technical instrumentalist model, problems with the quality of education systems are typically located in curriculum structure, which is critiqued for being out-dated, fragmented, inefficient, cumbersome and unresponsive to the needs of society. This is often linked to a critique of teacher-centred as opposed to learner-centred education. The solution to this problem is proposed as the reform of curriculum structures to modular, credit-based units of learning that can be accommodated on qualifications frameworks, thus providing ‘seamless pathways’ for learner progression. This model thus requires standardized units of learning, programmes and qualifications in order to establish the equivalence and portability of learning achievement on a qualifications framework. In South Africa this model has been combined with an outcomes-based approach to curriculum design that attempts to make the curriculum more rational, transparent, explicit and measurable.

Trowler (2001) argues that NQFs are based on a market-place rationality in which knowledge is commodified and treated like money; it can be exchanged, transferred, ‘cashed in’ and assumed to be of equitable value irrespective of where or how it was ‘earned’. He is critical of the standardization of the curriculum (which he claims becomes mechanistic, atomistic and overly explicit) and of the nominalization of the learner (who he claims becomes an individualised ‘container’ of knowledge and skills in the labour market). He concludes that NQFs embody a reductionist understanding of social and educational life (Trowler, 2001:185).

According to Matseleng Allais (2003b) national qualifications frameworks are recognized as neo-liberal, market-orientated mechanisms that are used internationally only for vocational training. South Africa is the only country that has attempted to impose a national
qualifications framework (NQF) and outcomes-based education on the whole education and training system. In South Africa the idea of an NQF emerged in progressive trade unionist circles in the early 1990s. It was linked to a national development project aimed at making the South African economy internationally competitive via the ‘high skills’ thesis. It was argued that the use of outcomes-based education would define ‘world class standards’ (derived from workplace competencies) on a NQF which could then be used to train and qualify a highly skilled, mobile and flexible work-force, which in turn, would put South Africa on the path to economic competitiveness, leading to economic growth, employment growth, higher wages and the alleviation of poverty. The standard-setting technology adopted by the South African Qualifications Authority (SAQA)\textsuperscript{53} is based on the definition of workplace skills using learning outcomes, which in turn are used to formulate unit standards and qualifications that are registered on the NQF. These unit standards and qualifications are in essence decontextualised curriculum statements, indicating what should be taught, learnt and assessed, irrespective of institution, location, context, assessors, \textit{et cetera}. Those who conceived of this system idealistically proclaimed that this (technical and reductionist) approach to education would overcome the historically ‘bad’ dichotomies between education and training, mental and manual skills, theory and practice, academic and everyday knowledge, and formal and informal education. The NQF became a project for social integration and it was believed that the NQF, with its representative and democratic procedures, would be able to overcome social differentiation by asserting the equivalences of the dichotomies listed above (Matseleng Allias, 2003b).

Ever since its establishment in 1995, lone voices from the higher education sector (see for example Jansen, 1998, Muller, 1998, Luckett and Luckett, 1999, Morrow, 2000, Ensor and Ogude, 2001, Shalem \textit{et al.}, 2004) have been critical of SAQA and its mechanisms for standard-setting and quality assurance as inappropriate for higher education\textsuperscript{54}. However, given its progressive origins in the liberation movement and its claims to be a social project for the transformation of the whole of the education and training system for equity and social justice, criticism of SAQA and the NQF is invariably interpreted by its adherents as elitist and even reactionary. But, as argued by Matseleng Allias (2003a), despite its lofty aims, the methods and mechanisms used by SAQA have become increasingly reductionist, restrictive

\textsuperscript{53} SAQA was established in 1995 to develop an NQF for the whole of the South African education and training system.

\textsuperscript{54} Following Habermas’ criticism of the dominance the technical interest, it is suggested that the problem lies not in the use of this paradigm for training, but in the assumption that it is applicable to all forms of education and training and in the lack of critique of the values that underpin it.
and bureaucratic, leading to an undermining of the expertise and professionalism of educators, particularly with respect to curriculum knowledge.

While striving to create an anti-authoritarian system, South Africans are in fact engaged in building a highly prescriptive and controlling system, which will not solve the problems of poor quality learning programmes or elitist institutions; it is not an adequate mechanism to change bad practice, and in fact focuses energy away from the most important areas of debate in an education and training system. (Matseleng Allais 2003a:16)

However, because the legislative reach of SAQA is all encompassing, the HEQC has been obliged to work within its system as the Education and Training Quality Assurance body (ETQA) for the ‘Higher Education and Training Band’. In the Introduction to the Improving Teaching & Learning Resources, the HEQC is presented as sympathetic to the concerns about the NQF expressed by the higher education sector, but legislatively bound.

Given the seriousness of the criticisms … (of the NQF from the higher education sector), the HEQC, as the umbrella ETQA responsible to SAQA and the Department of Education for the quality assurance of higher education, is in a difficult situation. Politically it remains committed to the vision of an NQF in which higher education plays a constructive role and practically it has to work within the SAQA-NQF system. (Appendix 2.0, p.16)

The Introduction to the HEQC’s Improving Teaching & Learning Resources spells out some of the criticisms of the technical instrumental model of curriculum as developed by SAQA in South Africa (see Appendix 2.0, p.13-16). These are briefly summarized here: Firstly, following Ensor (2001), it is asserted that the attempt to integrate education and training fails to recognize the importance of context and the different social logics embedded in different institutions and consequently the different kinds of knowledge and learning that they produce. Secondly SAQA’s standard-setting and quality assurance methods are critiqued for separating educational functions. This position is supported by Allais.

Crudely put, the South African notion of quality assurance as realized in the bulk of SAQAs structures, is that once “skills, knowledge, attitudes and values” have been defined (by stakeholders), providers must deliver programmes against them. Quality assurance is the technical process (by different set of “assessors”, not discipline experts) who evaluate the extent to which providers assist learners in achieving them; in other words, quality assurance is underpinned by the idea of “production to a standard”. (2003a: 317)

Thirdly, the unit standards and outcomes-based methods as defined by SAQA are criticized for being an overly prescriptive and deterministic approach to curriculum design (and quality assurance) that may be appropriate to workplace training, but not to the complexities involved in learning disciplinary knowledge and research practice in higher education. This is also supported by Allais as follows.

Outcomes-based education is not inherently neo-liberal, and is open to different interpretations and approaches. There should be, therefore, the possibility for debate and critique. However, a technology of standards has been adopted which inclines towards reductionism. In addition, the systems and structures set up to implement the NQF have tended to be remote from educational practice, and have concretized and ossified the approach described above. The logic of the structures is a bureaucratic one, which tends to
replace the application of thought and debate with the need for standards to conform to official requirements. All these factors have contributed to a lack of critical engagement and debate about curriculum and pedagogical issues. (2003a: 318)

Critiques from higher education emphasize how the SAQA system marginalizes and cannot account for the content and conceptual frameworks of the disciplines. It thus tends to ignore the need for professional judgment in assessment (and also in quality assurance). Furthermore, the SAQA system is viewed as subscribing to a positivistic and naïve understanding of the nature of language. The problem of trying to capture (curriculum) ‘reality’ definitively in explicit and unambiguous language is explained below.

Descriptive language, no matter how precise and exhaustive, can never succeed in anchoring itself to a reality; it can only move “sideways” through the realm of words in attempting to do so…. The idea(l) that shared language (e.g. definition) reflects a shared reality is an article of faith which unfortunately can only be “substantiated” in more language and thus not really substantiated at all. (Stromayer and Hannah 1992:36 quoted in Webb 1996:84)

With respect to the interpretation and application of standards for the curriculum and for quality assurance, higher education protagonists argue that this ‘shared reality’ is shared and anchored to a reality only by experts with experience in the same discipline or profession and not by all ‘stakeholders’, as assumed by the SAQA system.

The implications of these understandings of learning are that the ever more detailed specification of statements of learning outcomes, assessment criteria et cetera will not enable ‘outsiders’ to fully understand the intentions or effects of learning (Shalem et al, 2004). It is only ‘insiders’, disciplinary or professional experts, who can provide the content and context required to make statements of learning outcomes and assessment criteria meaningful. This suggests that at the level of complexity demanded by higher education and professional practice, primary responsibility for the design and evaluation of curricula should remain in the hands of those who teach, namely members of disciplinary and professional communities of practice that share a common epistemic culture, norms and discourse. (HEQC, Improving Teaching & Learning Resources, Appendix 2.0, p.14)

Without recognizing and relying on this shared expertise, the SAQA system is doomed to become bureaucratic in its implementation, as non-experts cannot supply the ‘context and meaning necessary to make informed judgments about the nature and quality of learning achieved’ (HEQC, Appendix 2.0, p.15).

3.3.2 Implications for Staff Development

Webb (1996) suggests that it is tempting for staff developers to work in the technical paradigm because it allows the provision of ‘positivist prescriptions for “good” teaching practice’ based on the empirical research literature, as if education were a science (1996:29). However, Webb warns that

educational research is misconceived if it is seen as adding building blocks on the way to educational advance and the revelation of ultimate truths. We are not in the business of erecting ever more truthful propositions upon secure foundational knowledge. Indeed, if
we proceed by trying to “discover” the “natural” “laws” which should govern educational practice, then we have to accept that such natural laws are beyond contestation. (1996:29)

The problem of the contested, uncertain and context-dependent nature of educational theory which does not have generalizable or predictive power suggests that one should be wary of promoting generic methods of ‘good teaching practice’ as these are likely to be used inappropriately to impose a prescriptive and limited view of ‘good teaching’ on a diversity of teaching contexts.

However, staff development in the ‘curriculum-as-product’ paradigm tends to assume that there are generic teaching skills which are assumed to be unproblematically applicable to all teaching and learning contexts. Whilst this approach may be useful for giving novice lecturers basic survival skills, there is a danger that this approach will trap them in a technicist understanding of teaching and learning in which they focus only on perfecting methods and techniques for transmitting information.

Webb (1996) also questions the unthinking use of the term ‘development’, as often used in models of staff or student development typically adopted in the technical paradigm.

A conception of development links our current endeavours to the broad historical, social and intellectual themes which characterized the rise of science, and particularly its manifestation in evolutionary theory and psychology, throughout the eighteenth, nineteenth and twentieth centuries. Use of the word “development” thus brings with it much that we could do without. (Webb, 1996:32)

He argues that one should avoid using the term as if it were ‘natural, progressive and good’ implying a normative model based on evolutionary recapitulation, that is, viewing development as a given, stagist growth path leading to a universal end-point. Instead he argues that development is not a unitary concept for which a model can be provided, rather, it is a site of contestation (1996:32).

3.4 Curriculum-as-Practice

According to Grundy (1987) an understanding of education from within Habermas’ practical (or historical-hermeneutic) interest would define ‘curriculum-as-practice’ and adopt an interpretive approach to teaching and learning. Habermas (1971) claims that the basic orientation of the ‘practical interest’ is towards the understanding of people’s words (discourse) and actions (social practice) through interaction. This kind of knowledge seeks to answer the question ‘What ought I to do?’ and is therefore concerned with values and the ability to make judgments about how to act morally and rationally within a specific social situation. It results in subjective knowledge (as opposed to rule-following knowledge) that is usually produced through meaning-making interaction with one’s environment. Hermeneutic inquiry involves a continuous, reflective interpretation of interactions and the meanings and
assumptions that underlie them. It also emphasizes the importance of respect for the individual and openness to change.

Following Grundy (1987), the definitive features of curriculum and pedagogy based on the practical interest are the following. Firstly, curriculum construction is understood as an ongoing activity that is shaped by various contextual influences within and beyond the classroom and is accomplished interactively, primarily by teachers and students. (Cornbleth, 1990:24)

Thus the need for curriculum design, development and evaluation to be based on the reflective and responsible judgment of the teacher is emphasized. It is assumed that it is the responsibility of individual teachers to (re)interpret national and institutional curriculum goals and objectives in their own classrooms and programmes. Grundy suggests that a commitment to reflection often requires a transformation of the teacher's consciousness; for one of the most important aspects of ‘reflective practice’ is that it serves to bring to consciousness those assumptions and values which are taken-for-granted in everyday teaching practice (see below for further discussion). She quotes Gadamer in support of this point:

The real power of hermeneutic consciousness is our ability to see what is questionable. (...) Reflection on a given pre-understanding brings before me something that otherwise happens behind my back. (Gadamer 1977 in Grundy 1987:91)

Within this paradigm, knowledge is understood as socially constructed, value-laden and provisional. As well as developing disciplinary knowledge and skills, it is believed that the curriculum should also promote creativity and the development of personalised knowledge, a sense of self and the ability to reflect on values and inner dispositions leading to the construction of reasoned value systems (Harvey & Knight, 1996:122).

This suggests that, unlike an understanding of curriculum based on the technical interest, the curriculum is understood to be more than a document (e.g. a unit standard or a qualification standard), a plan or a prepared package of materials. Rather a curriculum document is viewed as a proposal to inform a teacher's judgment as she goes about her teaching practice. It is the practitioner who judges what is appropriate in practice. Thus the relationship between theory and practice is not deterministic, but dialectic. This gives the practitioner greater control over both theory and practice. Curriculum policy-making, planning, implementation and evaluation are understood to be reciprocally related and dynamically integrated in practice.

55 But note the criticisms of the ‘reflective practitioner’ model where it is argued that the capacity of individuals for self-deception requires that self-reflection be situated in the context of inter-subjective social perspectives and against a background of educational knowledge and theory.
In this paradigm, it is the learner's understanding, thinking and reflective processes that are the central focus of the curriculum. This does not mean that learning outcomes should not be stated and achieved, but rather that they are secondary to the learning processes of achieving them. Thus key concerns become: ‘what should students have the opportunity to learn?’ - the selection of content is important and should be justified on both cognitive and moral grounds. Secondly, ‘how might teaching be improved to enable better learning?’ - the emphasis is on the process of learning that should be meaningful to the learner. Thirdly, ‘what values do these learning opportunities reflect and sustain?’ – teaching is understood to be a value-laden activity.

In this paradigm the problem of poor quality teaching and learning is likely to be located in the curriculum itself; that is, in the interaction between teachers and learners, who may be failing to understand each other and to establish inter-subjectivities that enable good communication.

Theories of learning consistent with this view of teaching and learning are likely to be constructivist, in which learners are understood to actively build and change their own cognitive structures (in the mind) through social interaction (in the environment). Constructivist approaches (both Vygotskian and Piagetian) understand new knowledge to arise from a structured relationship between the external cultural environment and the mind of the learner. Whilst Piaget and Vygotsky differ on whether the developmental mechanisms are natural or social, Moll (2002:18) suggests that one should view learning as both naturally and socially constructed. This can be understood to mean that learning occurs as a result of dialectical interaction between individuals and their socio-cultural environments. However, this does not mean that, given the right mediation, ‘anybody can learn anything’; rather ‘the nature of things’ (in this case learners’ and teachers’ innate abilities and other environmental constraints) both hinder and make possible the social construction of learning. A constructivist approach suggests that teachers should organize sets of learning activities designed to re-organize learner’s conceptual frameworks according to increasingly complex ways of knowing. The key is to change in the way in which learners see and understand the knowledge they are learning about. This position is supported by Harvey & Knight (1996: 121) who argue that for learning to be transformative, it should, in Piaget’s terms, involve accommodation (a change of cognitive structure) as opposed to assimilation (simply integrating new information to existing structures). Bradbury (2000:72) expands this idea by suggesting that the task of the mediator (teacher) should be to re-represent the intrinsic character of a task, and in particular its ‘epistemic character’, so that learners can change and
develop their mental schemata by ‘borrowing the consciousness of the teacher’, in order to be able to carry out like tasks independently in the future.

A significant point about the constructivist approach is that it places agency for learning firmly with teachers and learners and highlights the importance of the social and cultural environment in which learning occurs (Tharp and Gallimore, 1988). This approach suggests that effective teaching is a highly skilled, intellectually demanding endeavour that requires not only a knowledge of learning theory and the ability to be self-reflective, but also an in-depth understanding of and ability to make explicit the conceptual webs and epistemic assumptions of one’s discipline or field.

3.4.1 Implications for Staff Development

A model of staff development that is compatible with this interpretive approach to teaching and learning is that of the ‘reflective practitioner’. According to Webb (1996:55), this model views the individual’s educational practice as a humanist project and assumes that all individuals have the capacity for growth and self-development. This approach emphasizes values such as respect for the individual, responsibility and commitment. The term ‘reflective practitioner’ was originally coined by Donald Schon (1983, 1987) who describes a view of professional practice from the hermeneutic paradigm. He acknowledges the uncertain nature of professional knowledge, which he claims is rather ‘knowing-in-action’ that develops, often tacitly, from experience, as opposed to the direct application of theory to practice. Schon (1987) thus proposes the possibility of an ‘epistemology of practice’ that can be constructed as practitioners make their ‘knowing-in-action’ explicit to one another. He suggests that it is when this reflection on practice dialogues with relevant theory provided by a theoretician (in this case the staff developer), that new forms of understanding and acting (professional knowledge) develop. Thus it is only when the theory and practice of the profession engage in dialectical relationship that professional education is enhanced (Schon, 1987:40).

Some implications of Schon’s work for staff development in higher education are firstly that it provides a means of professional development that is accessible to academic staff (practitioners), it puts responsibility for their development in their hands and it provides a means for them to reclaim their professionalism with respect to education. This approach is adopted in the HEQC’s Improving Teaching & Learning Resources.

We would argue that it is important for academics to reclaim their professionalism and that one way to do so may be to revive a commitment to learning (about teaching and learning) as a professional value and an intrinsic ‘good’ of higher education. (…) This endeavour is worthy of scholarship and we would argue, needs to be given greater respect and support in the academic community. A commitment to the scholarship of teaching could be pursued deliberately by academics, who, as professional educators, take control of their
teaching practice and seek to reflect, research, build theory and improve practice, supported by communities of good teaching practice. Such educators would be in a position to use quality assurance measures to improve their teaching and learning, provided they were given the institutional and deliberative space to do so. (Appendix 2.6, p.3)

Secondly, universal prescriptions of professional practice are not possible. For example, one could not produce a check-list of criteria to measure ‘good teaching practice’. Thirdly, development should be viewed as an open-ended process that can change both parties – developed and developer, teacher and student. Because there is no blue-print and because theory stands in a dialectic rather than prescriptive relationship to practice, staff development for teaching requires deliberation, debate and the exercise of professional judgment. However, this does not mean that good teaching depends on personal characteristics; good teaching can be developed and it should be informed by learning theory.

Criticisms of the ‘reflective practitioner’ model include the following: Firstly, not all reflection is sound enough to result in the sustained improvement of practice; ‘in the act of self-reflection, the subject can deceive itself’ (Habermas, 1974 quoted in Luckett, 1996:6). For reflection to be honest, informed and critical it is crucial that it is undertaken in the context of interaction with a group of education researchers and practitioners and with reference to educational theory.

In Improving Teaching & Learning Resource No.6, the HEQC suggests that reflection should be informed by evidence and that this can be provided through the self-evaluation of teaching.

As a result of this process of observation and theory-based reflection in a supportive educational community, ‘reflective practitioners’ are able to adapt and improve what they do in an on-going way. The self-evaluation of teaching is key to reflective practice, since it is the means by which educators observe and gather data on their practice in order to facilitate reflection and improvement. If observation and reflection on teaching are to be rigorous, self-evaluation needs to interrogate the assumptions (particularly about learning) on which teaching is based, as well as teaching strategies/approaches themselves. This is particularly important in South Africa where assumptions about what students ought to know are often invalid because of the poor quality of the learning experiences that have previously been made available to them. (Appendix 2.6, p.12)

The point made about the need to raise to consciousness for critical reflection the everyday beliefs and assumptions that academics hold about teaching and learning is in keeping with the hermeneutic tradition. Given that most academics have already taught for some time with no professional training except common sense, expediency and naive theories of

56 This was the argument used by the Working Group of the IT&L Project for not producing a Resource on teaching practice as requested by the HEQC.

57 This point is emphasized in the HEQC’s IT&L Resources (see Appendix 2.6 p.5).

58 See Grundy’s quote from Gadamer.
learning, it is often necessary for them to first reflect on and critique their current practice before change and improvement can take place. However, sustained improvement requires engagement with educational theory as well.

A second criticism of the reflective practitioner model is that cycles of continuous reflection and the improvement of practice are difficult to sustain without support. Lack of immediate success, lack of recognition and workload pressure often discourage a second attempt. This may be because the model is based on an individual as opposed to social view of identity. Support for the scholarship of teaching by management in the form of human resource policies such as appointments, promotions and tenure is therefore important for its survival.

A third criticism of the reflective practitioner model is that it ignores unequal power relations. In this respect it suffers from the same idealism evident in Habermas’ ‘ideal speech situation’, in that it assumes that reflective practitioners will spontaneously deliberate about their practice openly and honestly, without allowing the effects of power to distort their communication. (This point is discussed in more detail under the critique of action research).

### 3.5 Curriculum-as-Praxis

Habermas’ third knowledge-constitutive interest is the emancipatory interest, which when applied to education understands the ‘curriculum-as-praxis’ (Grundy 1987). This paradigm is derivative and builds upon the interpretive approach on the basis of the critique that the practical interest ignores unequal power relations established by social structures, which in turn, distort subjective judgments and communication. The emancipatory interest therefore asserts the need not only to critique social structures and conditions that distort subjectivity and communication, but also to challenge and change them, (with a view to ensuring the conditions for democratic, rational, non-coercive communication and social justice). Habermas’ analysis of the nature of communication and his assertion of the ‘ideal speech situation’ provides the model for a just and rational society, namely one in which the conditions for ‘ideal speech’ are guaranteed and all are empowered to speak. The emancipatory interest is thus concerned with emancipation, empowerment and the ability to engage in autonomous social action as a result of authentic critical insights into the social

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59 In my experience of running a staff development programme at the University of KwaZulu-Natal based on this model, lecturers are unlikely to sustain more than one improvement cycle unless they are affirmed and supported by senior academics in their department or school, as well as a group of educationists and lecturers carrying out similar projects.

60 This utopian ideal based on a consensus theory of truth is critiqued by Ulrich who claims to make it practicable in his ‘critical systems heuristics’ methodology, see Chapter 3.
construction of human society (Grundy, 1987:19). When applied to curriculum and to teaching and learning, this interest would assert the socially constructed and contested nature of knowledge and also subject the everyday experiences of both learner and teacher to ‘ideology critique’ so that what was considered to be ‘natural’ can be exposed as ‘cultural’ and therefore eligible for change. An understanding of curriculum as praxis also encourages awkward questions to be asked about the educational process itself, such as ‘Whose interests does this institution or programme serve?’, and ‘Does the curriculum operate to emancipate the participants through the learning process?’ (Grundy 1987: 122) Not only are such questions asked, but action is planned to change the situation under critique. In this manner theory and social action are brought together in a dialectical relation.

3.5.1 Implications for Staff Development

The application of the emancipatory interest to improving teaching and learning and to professional or staff development in particular has been widely disseminated and popularized through the action research method (see for example Carr and Kemmis, 1986, and Kemmis and McTaggart, 1988). The emancipatory interest has also been applied to adult education largely through Mezirow’s (1981) theory of ‘perspective transformation’ which combines ideology critique and Freire’s (1974) work on conscientization. When applied to staff development, this model promotes action research as open-ended, progressive and collective enquiry in which teachers have a voice, leading to the ‘emancipation’ of those involved. The method has become codified in the four moments of the ‘action research cycle’ - planning, acting, observing and reflecting. When discussing the ‘reflective practitioner’ model under the practical interest, I emphasized the importance of a growth in self-understanding as the basis for self-generated improvement. The action research emancipatory model builds on this idea, but emphasizes the importance of working collaboratively in small groups in order to undertake rigorous ‘ideology critique’ of one’s own assumptions as well as of those of society, through rational discussion and critique within the group. Zuber Skeritt defines action research as follows.

Action research is collaborative, critical (and self-critical) enquiry by reflective practitioners who are accountable to make the results of their enquiry public. They evaluate their own practice and engage in participative problem-solving and in continuous professional development. (Zuber Skeritt 1992:47)

Action research understands the research process itself to involve social change. Thus practitioners plan, implement, document, analyze and reflect on changes to their practice with a view to continuous self-improvement. The findings of action research are fed directly back into practice in an iterative change process.
The limitations of the action research model are now discussed. These criticisms are derived from the fact that action research has its roots in critical theory and suffers from the same tendencies towards idealism and utopianism (Webb, 1996). Webb (1996) notes the following weaknesses and limitations of the action-research model of staff development. Firstly, it places the staff developer in a ‘vanguard’ role because it is the educationist’s responsibility to ‘enlighten’ practitioners and emancipate them from their common sense internalized ideologies or ‘false consciousness’. Secondly, it is based on Habermas’ consensus theory of truth which is generally unattainable. For example, it is not clear how practitioners in action research groups should agree on the ‘right’ course of action. The model assumes that what is ‘good’, ‘emancipatory’ or ‘transformative’ will become evident in the group, on the basis of rational dialogue and a sharing of experience, thus empowering to all concerned. Webb questions whether this is in fact the case, and suggests that the identification of ‘good’ teaching and learning practice remains contested and uncertain. Thirdly, he is skeptical about the assumption that a collaborative approach necessarily results in greater enlightenment. He warns that group processes sometimes override individual concerns and that the interests of the powerful within the group may come to dominate. In other words, Habermas’ quest for the ‘ideal speech situation’ where power does not distort communication and where the best argument prevails is unlikely to be achieved in action research groups.

This completes the discussion on different approaches to curriculum and teaching and learning based on Habermas’ three knowledge-constitutive interests. What is missing from the discussion is comment on the post-modern perspective. In this regard, the social realist position as expounded by Moore and Young (2001) summarized below.

Moore and Young (2001) challenge the post-modern critique in which the academic curriculum is viewed as elitist, ideological and partial because it is based on arbitrary assumptions about knowledge and culture in which all viewpoints are interested. They oppose the postmodernist position for having no theory of knowledge and for dichotomizing and polarizing the issues to the extent that all knowledge becomes of equal value and all knowledge is reduced to the conditions of its production, that is, it is always ‘only some people’s knowledge’. In other words, this position descends into relativism because it is trapped in the assumption that objectivity can only be supported by asocial positivism. Instead they assert that ‘locating knowledge socially does not necessarily lead to the abandonment of truth and objectivity’ (2001: 452). So, whilst admitting to the social and historical nature of knowledge, Moore and Young (2001) insist that cognitive goals and interests cannot be reduced to non-cognitive interests. They argue that this is because knowledge producing communities have their own constitutive principles, collective codes and values and
epistemological cultures which aim to transcend their conditions of production in the quest for ‘truth’ and ‘objectivity’. They explain that curriculum knowledge is seldom monolithic and that all forms of knowledge are contested (in different ways) in their intellectual fields.

The social realist position, as expounded by Moore & Young (2001), suggests that institutions of higher education are supposed to serve the ‘cognitive’ or ‘epistemic interest’\(^{61}\), as distinct from any other social interest that might bias or disadvantage particular groups in relation to the higher education curriculum.

Curriculum knowledge must be underpinned by social institutions and social networks of expert practice and epistemological cultures that have developed primarily from cognitive interests. (Moore & Young, 2001: 454)

This position suggests that academics should play a key role in assuring the quality of teaching and learning in the higher education curriculum and that peer review should be a primary mechanism.

The objectivity of peer reviews has a social basis in the codes, traditions and debates of different intellectual fields that give it a degree of autonomy beyond the professional interests of any particular group of academic peers. (Moore & Young, 2001: 453)

### 3.6 Conclusion

By way of conclusion to this chapter I attempt to link the different approaches and paradigms of teaching and learning to the rationalities that were identified in Chapter 2 with regard to the quality assurance of teaching and learning in higher education. Firstly, collegial or ‘neo-conservative’ traditionalism is obviously linked to the collegial rationality identified in Quadrant 1. This rationality often implicitly supports a view of ‘curriculum-as-product’ based on the technical interest, but with an emphasis on the transmission of disciplinary knowledge.

The ‘technical instrumentalist’ version of ‘curriculum-as-product’ is mostly supported by the managerialist and bureaucratic rationalities in Quadrants 2 and 4 and is sometimes contested or rejected by academics. The managerial and bureaucratic support for technical instrumentalism is in keeping with an instrumentalist view of education in general and with a concern to make higher education more efficient and responsive to the needs of society and the economy. The hermeneutic view of ‘curriculum-as-practice’ based on the practical knowledge-constitutive interest would be compatible with the pedagogic and facilitative rationalities that aim to change traditional collegial teaching practice, but with a focus on meaning-making and the development of professional judgment. This signals that the pedagogic project has to either compromise with or support managerialist goals in order to be

\(^{61}\) This position is supported by Jonathan’s (2000) discussion on academic freedom (see Chapter 2) in which she characterizes the academic community as being driven by an ‘epistemic interest’.
authorized in its attempts to change collegial practice. This is particularly likely to be the case in research-led universities where the pedagogical project is weak and often resisted by research-focused academics. In middle range institutions, where the academic community is less driven by research, academics are more likely to choose careers as academics-as-teachers and to embrace the pedagogy project with greater enthusiasm. ‘Curriculum-as-praxis’ based on the emancipatory interest tends to have a very weak hold in higher education and may only be strongly subscribed to in some adult education departments. However, there is some support for this approach amongst staff developers, particularly regarding the promotion of action research as a method of staff development (although in these cases the emancipatory agenda usually remains low key and limited to the classroom context). Paradoxically, in the South African context, where many government bureaucrats were previously African Nationalist Congress or United Democratic Front struggle activists, an emancipatory motivation and agenda remains evident in their discourse about the transformation of higher education (see interviews with HEQC officials in Chapter 7). Awareness of the fact that they may be promoting ‘technical instrumental’ or ‘bureaucratic’ means to emancipatory ends is not always evident.
### Chapter 4: Approaches to Public Policymaking, Policy Analysis and Evaluation Research

This chapter discusses different traditions in the theory of public policymaking and links them to methodologies for undertaking public policy analysis and evaluation research. This discussion is necessary in order to establish a conceptual framework for Chapter 5 which describes and justifies the research design and multi-method approach used in this study. The different traditions in the theory of public policymaking are linked to particular policy analysis and evaluation research methods on the basis of shared ontological and epistemological assumptions. These ‘traditions’ are used to structure the literature reviewed in this chapter. However, it is important to note that the links between the different traditions and methods are not necessary links; they are rather ‘natural’ links. It is quite possible to work within one tradition of policymaking and to use one or more unrelated research methods from different research paradigms to analyse the same policy. The point of this discussion is not to assert rigid paradigmatic incommensurability, but rather to provide a map for navigating the choppy waters that surround policy analysis and evaluation methodological debates and to understand the stories of justification and validation that different policy researchers tell. This discussion also serves to locate the critical methodology employed for this study in broader methodological issues and debates.

The traditions and methods of policy analysis and evaluation research discussed are organised as follows: Firstly the experimental and pragmatic traditions located in the post-positivist paradigm; secondly the constructivist tradition located in the interpretive paradigm, thirdly the critical tradition located in the critical paradigm and fourthly post-structuralist and theory-based approaches located in the pluralist paradigm.

### 4.1 The Post-positivist Paradigm

The experimental and pragmatic traditions of policy analysis and evaluation research are both located in the post-positivist paradigm because methodologically both aim to establish cause-and-effect relations between policy or programme objectives, inputs and outputs and impact. Both traditions take an ‘instrumentalist’ approach to research in that they aim to describe (and predict) social action but are not interested in ‘deep theories’ that explain social action in

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62 Approaches to policymaking are often tacit.

63 Policymakers and policy analysts are usually different people.
terms of some underlying reality. This is why evaluation research in these traditions has been critiqued as ‘black box’ evaluation, for they do not open the ‘black box’ of process to understand how or why particular outcomes and impacts are achieved. Instead, both assume that human performance can be objectively measured in order to determine the extent to which goals or objectives have been achieved. Both assume that by these means social science can contribute to improved governance or management and thus to the improvement of society. However, the experimental tradition uses (quasi-) experimental methods borrowed from the natural sciences and so is concerned to prove claims about cause and effect relations. Conversely, the pragmatic tradition is less methodologically rigorous and uses a loose case study method with a view to producing results that are useful to decision-makers.

4.1.1 The Experimental Tradition

Historical Development

In the nineteenth century, the emergence of the methods of natural science provided a framework for the development of the study of political science and public administration based on the following assumptions: that the laws that govern human behaviour are independent of human control; that social systems are similar across time and space and that the use of quantitative social science methods was therefore justified (Parsons, 1995). The empirical analysis of social problems was based on the Enlightenment idea that the application of knowledge and science to social problems would improve social conditions. The philosophical frameworks that provided the foundations for this approach to policymaking and analysis are firstly, Machiavelli’s idea that knowledge could be used for governance; secondly, Bacon’s concept of science as observation and induction and Hume’s understanding of successionist causality; thirdly, Bentham and Mill’s idea that it is possible to calculate human welfare (utilitarianism) and fourthly, Dewey’s idea that social science should become involved in the betterment of society and government (pragmatism). Later, in the 1960s Popper suggested that because of the limitations of human knowledge and institutions, policymaking should be understood as ‘piecemeal social engineering’ and that the science of social problem-solving is necessarily incremental and experimental. Popper’s ideas were later applied to evaluation research theory by Donald Campbell and Rossi and Freeman.

World War II gave impetus to the development of policymaking and evaluation as social science through the application of operations research and the techniques of economics to social problems. Writing in the USA in the 1940s and 50s, Harold Lasswell established policy science as a distinctive discipline that is problem-orientated, contextual and multi-methodological. He emphasised the importance of the political scientist’s objectivity and
technical rigour. Policy evaluation developed as a distinct sub-discipline the 1960s in the USA during Kennedy and Johnson’s ‘war on poverty’ and the ‘great society’ programmes in which the government came to be seen as the key social problem-solver and social science as a form of (social) engineering. In order to be acceptable, early programme evaluation, for example Campbell and Stanley (1963, 1966), had to employ objective and scientifically acceptable research methods and procedures (cited in Babbie et al., 2001).

From the 1960s onwards, a second influence on policy analysis and evaluation research in the public sector was the importation of management ideas developed in the private sector in the USA. This led to an emphasis on the importance of management in achieving greater efficiency and effectiveness in the public sector; ‘public administration’ was renamed ‘public management’. Peter Drucker’s (1964) ‘management by objectives’ technique was widely adopted in the public sector and this influenced the adoption of the stagist approach to the policymaking process (see Anderson, 1997).

**The Rational-Purposive Approach to Policymaking**

In the early stages of its development, public policy was understood as a rational-purposive linear activity. It was understood as a top-down intervention based on causal relations. Policy documents were understood as expressions of political purpose that communicated policy intentions to policy implementers. Policy implementation was understood as a social experiment, the results of which could be verified empirically by disinterested researchers.

**Post-positivist Approaches to Policy Analysis and Evaluation Research**

The mainstream post-positivist model of policy analysis and evaluation research that emerged in the 1960s asserts that the role of evaluation research in policymaking is to deliver factual, objective knowledge that can be used instrumentally by rational policymakers and decision-makers to solve social problems. It searches for cause and effect relationships (between policy objectives, inputs, activities and outputs, outcomes and impacts) and applies rigorous social science methods, drawing on quantitative statistical and mathematical measurement techniques. It seeks to evaluate public policies and programme objectives, often seen as hypotheses to be tested against their outputs, outcomes and impacts, on the basis of efficiency and effectiveness criteria. Evaluation is thus understood as an objective, neutral research exercise that aims to deliver causal explanations, to measure the extent to which objectives are achieved and to measure the social impact of the policy or programme. It is assumed that evaluation contributes to social improvement through a process of experimental replication of those programmes that have been proved to work.
The classic text on evaluation as experiment is Campbell and Stanley (1963) which, taking a critical realist position, builds on the work of Karl Popper and understands that theories can never be verified, only falsified. They therefore advocate that social reforms be understood as social experiments that proceed by trial and error, using experimental and quasi-experimental methods taken from the natural sciences for their evaluation. They advocate the establishment of control and experimental groups so that the comparison of results can be attributed to the treatment given to the experimental group, thus enabling attribution of cause to the isolated variable. Campbell’s overriding concern in evaluation research was to secure the internal validity of the evaluation results.

According to Pawson and Tilley (1997:7), in the face of the messiness and complexity of open social systems, the experimental approach became obsessed with the problem of internal validity in the attempt to secure causal inference. In the 1970s disillusion with the experimental model set in because it failed to meet its own rigorous criteria for internal and external validity and appeared unable to overcome the problem of inconsistency of outcomes in different contexts. Disillusion with the results and practical considerations, (such as the high costs, time involved and ethical considerations linked to setting up randomly selected control and treatment groups), led to a modification of the experimental model with quasi-experimental and pre- and post-test studies becoming the more typical research design for positivist approaches to evaluation research. In quasi-experimental research the treatment group is usually compared with a readily available ‘comparison group’ rather than using random selection. Alternatively, in time series designs, the experimental group’s performance is compared against its own performance at different times. This means that cause and effect relations cannot always be confirmed; instead correlations and inferences are made.

**Critiques of Post-positivist Approaches**

Key challenges facing experimental and quasi-experimental studies remain the difficulty in selecting and controlling the variables, difficulties in establishing comparable groups and the enduring possibility of rival explanations. More general difficulties faced by this model of policy analysis and experimental and quasi-experimental evaluation research are that policy goals are rarely clear and uncontroversial and are usually too vague to be specified as dependent variables for causal analysis. In addition policy goals are usually framed by normative or value assumptions which are regarded as given. It is difficult to prove causality. Researchers often meet with official resistance when data-gathering and policy impacts are

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64 The requirement to prove that the treatment X and only X was responsible for the outcome, i.e. that the inference made between the independent (X) and dependent (Y) variable is valid.
often diffuse. In his later work (Campbell 1978, 1979), Campbell himself rejects the influence of logical positivism\(^{65}\) on quantitative approaches to evaluation and now regards qualitative research using the case study method as the best means available for delivering valid knowledge.

This is not to say that such common-sense naturalistic observation is objective, dependable or unbiased. But it is all that we have. It is the only route to knowledge – noisy, fallible and biased though it be. (Campbell, 1979:54 quoted in Shaw, 1999:22)

In a typical critique of post-positivist approaches to evaluation research, Dunn (1983) suggests that the experimental approach is based on an objectivist ontology developed for the study of physical systems. It therefore assumes a stable external environment in which experimental trials can be conducted independent of the preferences of the reformers and the researchers. Instead, Dunn contends that social systems are ‘symbolically mediated’ and that a jurisprudential rather than the experimental metaphor is more appropriate to the judging of social reform (1983:258). According to Virtanen and Uusikyla (2004), this model is an under-socialised explanatory model that ignores context and values, thus ignoring the specific mechanisms used by particular actors to translate the objectives into results in particular contexts (2004:83). Pawson and Tilley (1997) assert that this is because the model asks the wrong question. It asks ‘what treatment works?’ (to which the answer was invariably, ‘nothing much’), instead of asking why or how a particular treatment has certain effects in certain contexts (1997:11). Stame criticises the experimental approach as ‘black box’ evaluation, that is, it simply attributes the difference between conditions before and after the intervention to the intervention without being able to explain how or why the results were achieved (2004:58). This model assumes that verification of the (internal) validity of a policy or programme can result in a summative judgement, irrespective of the programme’s theory, that is, what happens inside the ‘black box’ (Stame, 2004:60). Evaluators using this approach are criticised for avoiding values debates, for screening politics out of the evaluation as an interference and for not taking the political context into account. Furthermore, the model is criticised for assuming absolute rationality on the part of social actors and that evaluation judgments will be used instrumentally by decision-makers. Carol Weiss (1991) has pointed out the disappointing utilisation of evaluation research, contending that it is political factors rather than research findings that are the key drivers of policy change or termination.

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\(^{65}\) Michael Scriven took up the challenge of establishing an objective, logical model of evaluation free from the threats of subjectivity and relativism. However, his model is widely regarded as unpractical (Shaw, 199:24).


4.1.2 The Pragmatic Tradition

The term ‘pragmatic’ is used to describe an approach to policy analysis and evaluation research that emphasises ‘the importance of common sense and practical thinking’ (Mertens, 2005:26). It is an approach that chooses to ignore theoretical or methodological debates in the interest of producing research results that are useful and workable. This approach has developed out of an impatience and disillusion with the methods and results of post-positivist approaches, but is not based on a theoretical critique of the ontology, epistemology or methodology of the post-positivist paradigm.

Historical Development

Despite the fact that the intellectual foundations of positivism and post-positivism were undermined in the 1970s, this paradigm has continued to underpin the dominant approaches to policy analysis and evaluation research, perhaps because it allows the possibility of pure rationality, objectivity and neutrality on the part of the analyst or evaluator. In the 1970s, policy analysis and programme evaluation were confronted with the problem of ‘overloaded government’ and the reality of large-scale implementation failure. This pushed policy analysts to widen their scope and to begin researching implementation, institutions and the behaviour of bureaucrats and professionals on the ground. In the 1980s the supply-side monetarist revolution in government thinking, epitomised by the Thatcher and Regan governments, led to the belief that markets are more efficient in addressing social problems than governments. Anti-statist arguments suggested that government interference may even ‘make things worse’. This resulted in the development of a more pragmatic approach to policy analysis and evaluation research, as management science models from the private sector were used to develop the ‘new public management’ approach. The ‘new public management’ asserts that, when it comes to management, there are no differences between the public and private sectors. It attempts to keep management of the public sector rational by removing political considerations from decision-making, but with respect to evaluation research, it admits that not all policy achievements can be measured, and so adopts a more pragmatic approach to research methodology. However, despite giving up on a ‘science of evaluation’, Pawson and Tilley (1997) assert that this form of evaluation has become a ‘mantra of modernity’ in which the state continues to try to control from the centre, albeit indirectly, by commissioning evaluations, reviews, audits, appraisals, quality assurance and so on. Following Pawson and Tilley (1997), this ‘new managerialism’, developed in response to the failure of the

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66 By using the term ‘pragmatic’ in this way, I am using it in its everyday sense rather than linking it to the work of early pragmatists such as William James, John Dewey and George Herbert Mead.
experimental model, is termed the ‘pragmatic approach’. It remains a goal-based approach located in the post-positivist paradigm with an emphasis on providing information for decision-making.

**The Pragmatic Approach to Policymaking**

The pragmatic approach is typically adopted by the ‘evaluative state’ (Neave, 1998) that seeks to impose its goals and policies and extend its power by collecting information in management information systems, monitoring and controlling behaviour and by using rational methods, such as performance management, to try to change the behaviour of public servants. Performance management is based on the identification of objectives of criteria and performance indicators for successful performance by institutions and individuals. It is based on the belief that human performance can be objectively measured against pre-specified standardised criteria. People, policies and programmes are evaluated by quality management systems and obliged to prove their accountability by meeting pre-specified criteria and indicators. People and organisations are encouraged to improve their current levels of performance through the use of incentives. According to Parsons (1995:558), the evaluative state is a higher form of Weber’s industrial rationalism in which bureaucratic control is exercised to promote change through rational-legal means that shift power from professionals to managers and bureaucrats. This description accords with the model of quality assurance located in Quadrants 2 and 4 and based on the managerial and/or bureaucratic rationalities identified in Chapter 2. It is also typically the approach adopted for quality assurance in higher education by government agencies and higher education management.

**Pragmatic Approaches to Policy Analysis and Evaluation Research**

Pragmatic policy analysis and evaluation research is primarily concerned with the utility of the evaluation for decision-makers and their policymaking process and so takes their goals and objectives as the focus of the evaluation (see for example Stufflebeam 1983). In contrast to its experimental predecessor, this approach is less concerned with methodological rigour than with delivering useful evaluation results. It views evaluation as reformist and incrementalist, its use being dependent on issues of political feasibility. Pragmatic policy analysis or evaluation research tends to adopt two types of research design. The first is a descriptive and open-ended case study type of design that is more suited to policy analysis or to improvement-orientated evaluation. It asks ‘to what extent are the intended objectives being achieved?’ with a view to the evaluator making an informed judgment on the extent to
which the decision-maker’s goals have been achieved. The second type of research design is more appropriate at the programme level and is concerned to check levels of accountability in judgment-orientated evaluations. It sets up a closed system in which criteria and performance indicators for the attainment of the decision-makers goals are specified. The evaluator then makes criterion-referenced judgments about accountability by verifying the extent to which a particular case corresponds with the pre-specified indicators of performance. This model of evaluation is based on the assumption that if the correct inputs and implementation processes are adopted, then the desired results (outputs, outcomes and impacts) will follow. As with experimental designs, it is not particularly interested in opening the ‘black box’ to explain how or why a particular result is achieved.

According to Mertens (2005), Stufflebeam (1983) was a pioneer of this ‘pragmatic’ approach. He analysed a programme into four components: context, input, process and product (CIPP) and suggested different evaluation questions for each component (Mertens, 2005:52). Because of their focus on the decision-maker’s goals and objectives and the utility of the evaluation for decision-makers, Pawson and Tilley (1997) locate Patton’s and Weiss’s work within this approach (see Patton, 1990, 1997, and Weiss, 1991, 1997). Carol Weiss’s work on the relation between policy analysis and policymaking processes is seminal. She advocates a use-led model of evaluation research and instead of assuming that evaluation findings will be used rationally and instrumentally by decision-makers, Weiss’s research shows that the relation between evaluation results and policymaking is indirect, uncertain and dependant on the interplay between the policymaker’s ideologies, interests and sources of information. She suggests, therefore, that evaluation should play only an ‘enlightenment’, ‘symbolic’ or ‘knowledge creep’ role rather than try to prove what works. Weiss does not focus on evaluation methodology, although her later work might support a theory-based approach. This suggests that her work might be better classified as ‘theory-based’ evaluation (see 4.4.2.).

Patton argues that Weiss is overly pessimistic and that evaluation can be useful to policymaking and decision-makers, particularly at the level of programme evaluation. Patton’s work is typical of the first more descriptive, goal-based type of evaluation design, as opposed to the criterion-referenced design used for accountability judgments. Patton’s ‘utilisation-focused evaluation’ views evaluation as a form of applied research that focuses on the intended use of the evaluation and examines effectiveness, (the extent to which people are achieving their goals). Patton states that the purpose of evaluation should be to ‘inform action,
enhance decision-making and apply knowledge to solve human and social problems’ (Patton 1990:11). But he stresses that the worth of an evaluation should be justified by its usefulness; that is, by its practical utility to decision-makers and policymakers. Rather than getting involved in the ‘paradigm wars’ about research methodology, Patton advocates that a neutral researcher should adopt whatever methods are appropriate to the purpose of the research. He sees research methods as a ‘tool box’ from which skilled evaluators can use their professional judgement to select context appropriate methods. Patton concludes that ‘the human factor is the great strength and the fundamental weakness of qualitative inquiry and analysis’ and so advocates the use of a judicious mix of both quantitative and qualitative methods.

**Critiques of Pragmatic Approaches**

The pragmatic approach is not without its problems. Managers often battle to set clear, measurable objectives and with respect to the accountability model, it is difficult to set defensible and measurable criteria and indicators against which to measure actual performance. Furthermore, there is usually a lack of easily quantifiable data to prove their achievement. This makes it difficult for evaluators to determine the direct results and impacts of interventions. As suggested above, the accountability performance-based model, in particular, does not necessarily require the ‘black box’ to be opened - thus adopting an instrumentalist view of social interventions. It is also accused of being overly prescriptive, encouraging conformity and stifling creativity and innovation.

Minogue (1997) criticises the managerial rationality evident in the pragmatic approach to policymaking for assuming that there can be a near perfect system of decision-making, that decisions can be perfectly administered, that there is a rational relationship between ends and means and for its over-reliance on quantifiable knowledge. Instead, taking a critical position, he asserts that nothing gets done which goes against the interests and values of the dominant group (1997:20). Furthermore, he questions whether those in powerful positions, who are called upon to make decisions, by definition, can ever adequately grasp first-hand knowledge of the problems they are called on to solve. He suggests that information is always inadequate and is often abused, resulting in contextual simplification at best and contextual occlusion at worst. Furthermore, Minogue complains that many decision-makers do not want honest evaluations; ‘it is not so much a question of speaking truth to power but of power deciding what the truth is’ (1997:24). Minogue suggests that there will always be a gap between theory and practice in policy research because the consequences of policies are so unpredictable and unintended.

Social systems are simply not predictable enough to be described as manageable; rational management and control in such circumstances are impossible’ (Minogue, 1997:27).
Pawson and Tilley (1997) criticise Patton’s utilisation-focused evaluation for emphasising ends rather than means and as a result being methodologically weak and eclectic. They criticise Patton’s approach as having no epistemological or ontological basis for its selection of research methods. They suggest that technical rigour is subsumed by pragmatic concerns about the social and political acceptability of ideas such that, ‘he who pays the researcher call the methodological tune’ (1997:14).

Despite these criticisms, Patton’s work continues to be popular and widely used by evaluator practitioners. Furthermore, the pragmatic approach probably remains the most widely used approach and the dominant model of evaluation and quality assurance in both the public and private sectors, despite the fact that its core ontological and epistemological assumptions have come under fire from evaluation researchers.

4.2 The Interpretive Paradigm

4.2.1 The Constructivist Tradition

*Historical Development*

In the 1970s and 1980s a new genre of policy studies emerged which broke ranks with the post-positivist tradition. This new tradition rejected the rational-actor model borrowed from economics in favour of approaches developed in sociology, phenomenology, anthropology and cultural studies. New insights from the ‘linguistic and cognitive turn’ in social theory included the understanding that meaning is socially constructed and that human action is therefore culturally, cognitively and discursively mediated. The very concept of rational choice came to be seen as a myth and instead policy analysts began to take an interest in how social choices are shaped and mediated by institutional arrangements and everyday social practices and discourses. Policies and programmes were no longer understood as the products of human design carried out by instrumentally orientated individuals. Instead they came to be understood as an amalgamation of the constructions of a range of stakeholders embedded in historical, cultural and cognitive frameworks maintained and reproduced by institutions.

In the 1970s the influence of phenomenology and interpretive sociology were felt in management studies. Organisations were no longer seen as reified objects but rather as the product of collective human processes of meaning attribution (Checkland, 1995). In the 1980s, a school of ‘policy sociology’ developed which began to look at implementation processes, the role of human agency, the contexts of actors and how local practice and discourse shapes policy (Raab, 1994). Ozga called for a new policy sociology that would be ‘rooted in the social science tradition, historically informed and draw on qualitative and
illuminative techniques’ (quoted in Troyna, 1994:4). In education, policy sociologists such as Stephen Ball (1999a) began to take on the theoretical challenge of analysing both policy and practice, macro and micro dimensions of policy, structure and agency and of embedding policy analysis in an understanding of history and culture. In evaluation research, Patton (1990) promoted qualitative evaluation and Guba and Lincoln (1989) developed ‘fourth generation evaluation’ as a polemical response to earlier experimental and pragmatic goal-based approaches in the post-positivist paradigm.

**Constructivist Approaches to Policymaking**

Vickers, writing in the mid-1960s, was one of the first to take a constructivist approach to policymaking and management. He rejects the goal-seeking model of human activity as inadequate and argues that organizations and public institutions in particular, exist to provide for our need for regulated coexistence, to maintain stability in social relationships and to enhance the quality of relationships between individuals. He seeks to challenge the dominance of instrumental and economic efficiency criteria, arguing that the public sector provides goods and services that cannot be produced by the market. Instead he suggests that the quality of public services should be judged on the manner in which citizens are treated when drawing on a service (Johnson, 1995). Vickers (1995) understands policymaking as institutional regulation and as communicative activity. He asserts that all policymaking and political action inherently affects others and takes sides. Judgment and action are organised within ‘appreciative systems’ and are made, not only to achieve goals, but to maintain or modify relationships. Vickers suggests that an organisation’s ‘appreciative system’ is made up the values, norms and ideas that are used to frame the world and make it coherent (1995:62). It is on the basis of appreciative systems that a combination of reality judgments and value judgements is made. It is these judgments that guide decision-making and action. It is the history and culture of the organisational appreciative system itself that informs these judgments (Vickers, 1995 and Checkland, 1995). According to Vickers (1995), the task of policy analysts should be to expose the assumptions (appreciative systems) that underlie the factual conditions and value judgments that are made during policymaking processes.

Vickers’ constructivist approach has generated a range of further proposals for understanding the policymaking process. Rein and Schon (1983) draw on phenomenology and Vickers’ idea of an appreciative system to suggest an approach to policy analysis that involves identifying the taken-for-granted assumptions that underpin people’s understandings and actions in the public policymaking situation. They suggest that this should involve analysing the ways in which policy problems are named, the context of the policy environment, its institutional setting and its discursive norms. In a situation of policy dispute, they suggest that one needs
to understand the sources of conflicting frames; ‘the work of frame reflection is both cognitive and affective’ (Rein & Schon 1983: 164). A similar approach is taken by Colebatch and Lamour (1993, cited in Parsons 1995), who suggest that policy analysis should involve a study of the ‘assumptive worlds’ of decision-makers. This includes understanding their frameworks of meaning, their institutional settings and their underlying values. On the basis of Vickers’ work on the importance of values and value judgments, Majone (1989) suggests that policymaking should be understood as a process of norm-setting rather than solution-seeking. He argues that policymaking is about persuasion, argument and problem definition in which a value system is implicitly proposed.

These constructivist approaches to policymaking understand policy as a social transaction that involves symbolically mediated change processes. Constructivist approaches have, however, gone further and examined the implementation process. In the rational-purposive approach to policymaking the role of politicians (policymakers) and administrators (policy implementers) is kept distinct; the service provider is understood simply to carry out policies as intended. Constructivist approaches have challenged this assumption as simplistic and not borne out empirically. Instead, policy implementation is understood as part of the policymaking process - a process of interaction between policymakers’ goals and intentions and the contexts, perceptions and local interests of the implementers. Policy implementation is understood as a change process that involves the micro-structures of political and organisational life in which the policy itself gets remade. Implementation is understood as an evolutionary learning process as opposed to a rational ends-means process. In a critique of the rationalist model, Lewis Gunn argues

implementation is not a process in which x follows y in a chain of causation. Unlike a sausage factory, the output of public agencies is not so well defined and quantified or evaluated – and what actually counts as success or failure is a matter of controversy and conflict. (Gunn, 1978 quoted in Parsons, 1995:467)

An early implementation theorist, Lipsky (1977), emphasises the importance of understanding the ‘street-level behaviour’ of bureaucrats. He argues that top-down control is not an effective means of policy implementation. Instead effective implementation should be built up from the knowledge and experience of those at the front-line of service delivery. This necessarily requires that street-level bureaucrats be accorded high levels of discretion to decide what is feasible and appropriate in their circumstances (Lipsky 1977 cited in Parsons, 1995:470).

Two studies in the constructivist tradition apply these understandings of policy implementation specifically to institutions of higher education. Firstly, Maasen and Gornitzka (1999) researched the relationship between government policy and organisational adaptation in universities. Their analysis employs both resource dependency theory and neo-institutional
theory. The former seeks to understand how organisations relate strategically to other actors in their external environment in order to manage their dependency on others for resources. On the assumption that institutions are driven by self-interest, the resource dependency approach looks at how higher education institutions respond to sanctions and rewards set up by governments. This approach is constructivist because external environments are not treated as ‘objective realities’ but as social constructions that are perceived and interpreted by institutional leaders who must also take into account internal perceptions and power struggles.

Neo-institutional theory builds on Vickers’ insights and emphasises the cognitive and normative factors in policy adoption and implementation. It contends that the extent to which policies get implemented depends on the extent to which they are legitimated and institutionalised locally. Because organisations require stability, it is only those reforms that are compatible with an organisation’s identity and culture that are responded to. Maasen and Gornitzka’s research suggests that the stronger the organisation, the more likely it is to exhibit resistance or inertia towards external policies (1999:300). They suggest that

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\text{(t)he more a policy departs from existing behaviour and procedures, the more resistance it will encounter when implemented and the more it will be affected by the tendency to transform a reform back towards the established order. (Maasen & Gornitzka, 1999:309)}
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They conclude that implementation studies show the need for organisational arrangements to buffer policy implementation. Successful implementation in higher education requires political and organisational leadership, adequate resources and ‘policy coherence’ with institutional norms (1999:313).

Trowler (2002) also advocates a constructivist approach to policymaking, which, in his definition, includes implementation. He asserts that policymaking is a messy, contingent process in which policy gets remade as it is put into practice. Following Reynolds and Saunders (1987, cited in Trowler, 2002) idea of an ‘implementation staircase’, Trowler shows how policy gets ‘refracted’ up and down the staircase, as practitioners at each level\(^{68}\) in the process reinterpret policy to reflect their interests, priorities and pressures. Trowler argues that, as opposed to the clean, simple rational-purposive model, policy implementation is fraught with conflict, negotiation and compromise, particularly in bottom-heavy, ‘loosely coupled’ organisations such as universities. He asserts that policy decoding is an active (re)interpretative process that should be analysed as socially constituted within communities of practice and their attendant discourses.

\(^{68}\) The levels used in Trowler’s adaptation of the implementation staircase are: national – institutional – departmental – classrooms – students.
Naturalistic and Qualitative Approaches to Policy Analysis and Evaluation Research

In the 1980s new approaches to policy analysis and evaluation research emerged in keeping with general trends in the social sciences and in response to criticisms of the experimental and pragmatic traditions. Evaluation theorists such as Guba (1987), Guba and Lincoln (1989), Patton (1990) and Stake (1983, 1995) proposed new models of evaluation that emphasised the differences (as opposed to similarities) between natural and social systems.

These naturalistic or qualitative approaches adopt the interpretivist view that social reality is based on people’s everyday meanings and that truth is always the product of a particular framework of beliefs, values and assumptions. They suggest that evaluation should thus focus on stakeholders’ meanings and the extent to which the intervention has influenced their ways of thinking. Qualitative and naturalistic approaches tend to focus on implementation processes and on ensuring that the evaluation is useful to ‘insiders’, rather than programme goals and results that are often the concerns of ‘outsiders’. These approaches seek to answer the question, ‘what is going on?’ as opposed to the questions ‘what treatment works?’ and ‘did x cause y?’ asked by the experimental tradition.

The methods adopted in naturalistic evaluation are usually qualitative, responsive and participatory, involving the participants in the research process. Qualitative methods are used to gather the subjective experiences and opinions of stakeholders in naturalistic settings. These data are interpreted in context by the researchers who act as negotiators or facilitators between different groups of stakeholders. The evaluation aims to inform stakeholders through a collaborative process in which the results are determined through a process of negotiation (truth as agreement) leading to useful, authentic but local results that cannot claim wider generalisability. In theory the evaluation findings are open-ended and always open to further negotiation and interpretation. Patton lists the following characteristics of qualitative evaluation: it is naturalistic (studies real-world situations unobtrusively); it uses inductive analysis (it does not test the ‘hypothesis’ set up by the programme goals); it takes a holistic perspective (it does not focus only on cause and effect relations); it uses qualitative data (it captures thick description to capture personal perspectives); the researcher’s personal contact and insights are encouraged (the researcher aims to be understanding and non-judgmental as opposed to being detached and neutral); it focuses on the uniqueness of the case and the research design aims to be context sensitive, flexible and responsive to new findings (1990:40-41).

Guba and Lincoln’s (1989) ‘Fourth Generation Evaluation’ is perhaps the best-known text on naturalistic or responsive evaluation. Guba and Lincoln reject the experimental approach on ontological grounds and instead propose a relativist ontology in which social reality
(including interventions) is understood to be constructed by people in particular contexts. They reject previous evaluation approaches (which they term the measurement, description and judgment generations) on the grounds that they are over-committed to the scientific paradigm. Guba and Lincoln are critical of the post-positivist tradition and caricature it as follows: it assumes that evaluation is value-free, it cannot accommodate value pluralism, it assumes that the evaluator is neutral and unassailable and it tends to empower managers at the expense of other stakeholders. Instead, Guba and Lincoln propose a social and value-orientated model of evaluation in which the evaluator seeks to uncover the multiple constructed realities of the participants in a programme, focusing on their different views, values and interests. They claim that the aim of evaluation should be to improve cooperation between stakeholders through the negotiation of meaning. The relationship between the researcher and researched should be one of joint control and mutual teaching and learning. Guba and Lincoln have developed a set of ‘trustworthiness’ criteria to ensure the validity of evaluation findings based on authenticity and consensus.

Another example of a qualitative approach to evaluation is Robert Stake’s (1983, 1995) responsive evaluation using the case study method. Stake’s approach involves comparing the ‘observed values’ of the programme with the expectations and criteria held by key stakeholders. It includes a participatory methodology and may also fall into the critical tradition. Stake understands the purpose of evaluation to be gradual, incremental change, but he insists that improved practice results from personal experience and not from evaluation findings presented by a third party. He therefore advocates an approach that focuses on local stakeholders, on their understandings, needs and participation. He suggests that the evaluator take a facilitative role, using the case study method to provide descriptions of outcomes and values that are useful to stakeholders. He claims that these case study evaluations should contribute to the democratisation of knowledge and to ‘naturalistic generalisations’ in local settings (Stake, 1995).

The reflective practitioner approach to the development and improvement of teaching practice (discussed in Chapter 3) is compatible with naturalistic and constructivist approaches to evaluation. A reflective practitioner model of evaluation would ask teachers to evaluate their own teaching practice and adopt an action research process to improve it. Usually, the action research process is participatory so that individual teachers can learn from each other.

**Critiques of Constructivist Approaches**

Constructivist or naturalistic approaches to policy analysis and evaluation suffer from the same weaknesses as all interpretive or phenomenological research, namely that in (over)-emphasising subjectivity, they fail to grasp the effects of structure on society. Critical
theorists would argue that the social world is made up of more than the sum of individuals’ perceptions and beliefs and that institutional and structural features of society act independently of individuals (or at least create and limit their possibilities for action). Consequently, naturalistic approaches are criticised for ignoring systemic asymmetries of power. Thirdly, these approaches are critiqued for adopting an ‘over-socialised view of reality’ (Stame, 2004) which involves the assumption that subjects are rational and autonomous and that by understanding their lifeworlds, researchers get closer to reality. This is linked to an (over) reliance on the interview method and to the adoption of a naïve view of language and meaning in which ‘truth’ is believed to be located in the subjectivities of respondents. Finally, there is a danger that the ontological and epistemological assumptions outlined above lead to an inability to rise above context and the likelihood that evaluation never emerges from endless cycles of relativism.

Evaluation data derived from constructivist inquiry have neither special status nor legitimation, they represent simply another construction to be take into account in the move toward consensus. (Guba & Lincoln, 1989:45)

Despite these criticisms, constructivist evaluation provides a corrective balance to the undersocialised approaches within the experimental and pragmatic traditions. Babbie and Mouton (2001:357-358) suggest that naturalistic evaluation is best used under the following conditions: when it is necessary to gather contextual knowledge of an evaluand before finalising the evaluation design; when insider perspectives are important to the evaluation; when the focus is on the implementation process; when the purpose of the evaluation is formative rather than summative; when it is important to study the entire intervention in its natural setting; when it is possible to use unobtrusive research methods and when triangulation and multiple methods can guarantee the validity of the evaluation research.

4.3 The Critical Paradigm

4.3.1 The Critical Tradition

Historical Development

The policy planning disasters in the USA such as the ‘War on Poverty’ and the Vietnam War led to cynicism towards technically sophisticated policy planning and analysis. This included disillusion with approaches located in the positivist paradigm such as critical rationalism and cost-benefit analysis. Instead policy theorists began to call for an analysis of policy interventions that included an investigation into normative assumptions and their effects. In response, some policy analysts began to draw on the critical tradition to develop new approaches to policymaking.
The critical tradition is based on the work of Karl Marx and according to Babbie & Mouton, its ‘single most distinctive feature … is its insistence on science becoming an emancipatory and transformative force in society’ (2001:34). Neo-Marxist approaches to policymaking are based on a critique of the liberal idea that public policies are promoted in the public interest. Instead they assume that policies structure reality to suit the interests of the capitalist class, the conditions for capital accumulation and the reproduction of the capitalist system, which includes enhancing the legitimacy of the state. According to Babbie and Mouton (2001), the critical tradition accepts the following premises of both positivism and interpretivism; the need for causal theories based on objective observation and the need for interpretive description based on inter-subjective understanding. However, the critical tradition is also concerned with ‘deep structure’ theory, that is, to research below the level of empirical observation in order to understand how social agendas are set and how power is exercised through systems of beliefs, values, assumptions and ideologies. An example of such a Neo-Marxist approach is Gramsci’s concept of ‘hegemony’ which explains how the ruling class controls and defines social reality through manufacturing ‘consent’ to its ideas and ideologies (Buci-Glucksmann, 1980).

Another influence in policy studies that emerged in the 1970s was the ‘new sociology’. Neo-Marxists were no longer satisfied with reading political action straight off from class structure and the nature of capitalism. Instead they now called for policy analysts to investigate policy processes, the nature of institutions, policy actors’ meaning-making activities and how historical and social structure and conjuncture condition human agency.

The critical tradition to policymaking has been strongly influenced by the work of Jurgen Habermas, a significant member of the Neo-Marxist Frankfurt School, who provides the philosophical framework for ‘critical policy analysis.’ The Frankfurt School viewed the regulation and bureaucracy created by public policy as based on strategic or instrumental rationality and to function as an instrument of domination and control. Policy theorists have taken Habermas’ (1971) third knowledge constitutive interest, the emancipatory interest, that is concerned with the human capacity for self-reflection in order to enhance autonomy and responsibility (Babbie & Mouton, 2001:34), as the starting point of their analyses. According to Habermas, this involves ideology critique and methodological self-reflection in order for people to free themselves from self-deception, ideological distortions or ‘false consciousness.’

The aim of critical social science is to liberate people from their state of alienation through the process of self-reflection and ultimately by removing structural contradictions through social action. (Babbie & Mouton, 2001:36)

Habermas’ (1984, 1987) later work on a procedural theory of communication, in which he calls for ‘communicative rationality’ in public debate as an alternative to ‘strategic rationality’,
has also been influential in policy analysis in the critical tradition. Rejecting an individualised conceptualisation of reason, Habermas proposes that reason is developed through intersubjective communication in specific contexts.

This later work by Habermas and the influence of the ‘linguistic turn’ in 20th century philosophy more generally, led to an ‘argumentative turn’ in policy studies.

With the coming of the post-positivist social sciences, ... language is recognised as a medium and a system of signification through which actors do not simply describe but create the world. (Hajer, 1983:44)

Policy theorists now began to look at how policy discourses shape the policymaking process and the way in which social problems and policy solutions are constructed. Both policymaking and policy analysis came to be understood as a form of argument used to persuade the public and to manufacture their consent to the implementation of policies that may not work in their interests (Parsons 1995:152).

Critical Approaches to Policymaking

Ozga and Gerwitz (1994) claim that critical policy research can contribute to the goals of critical social science in the following ways:

It recognises the potentially intrusive and repressive character of much state action; it can uncover and challenge the assumptions that inform policymaking; it can expose the effects of policy on the ground (particularly when these are unjust); it can explain how injustices and inequalities get (re)produced and it can develop strategies for social transformation. (1999:123)

Some of the best-known proponents of the ‘argumentative turn’ in policy studies are Fischer and Forester (1983, 1987) and Dryzek (1983, 1990). Dryzek explains how the argumentative turn seeks to overturn the objectivist and instrumental rationality that had previously dominated policy studies and to replace it with normative models based on practical reasoning and communicative rationality. Following Habermas, he advocates a model of policymaking in which the only authority is a good argument, the criteria for which are its empirical soundness and the validity of its normative judgments. Dryzek advocates the use of a third party to mediate and resolve any conflicts and insists that his method is not utopian.

Fischer and Forester (1983) discuss how the argumentative turn needs to address the problem of how to adjudicate between the different frames and interpretations identified in the constructivist tradition. Following Habermas, consensus is usually the device that is advocated, but Fischer and Forester note that one needs to understand and critique the conditions under which consensus is reached. Building on Habermas’ concept of participatory and discursive democracy, they recommend a set of communicative ethics for policymakers.
and analysts to use to ensure that illegitimate uses of power in policy processes can be exposed.

Healey (1983) also builds on Habermas’ notion of communicative rationality and claims that

(1)the progressive challenge is to find ways of acknowledging different ways of experiencing and understanding while seeking to ‘make sense’ together – this demands holding on to a discursive reasoning capacity. (1983:236)

As noted, Habermas offers a conceptualisation of reason formed within inter-subjective communication. For him, knowledge claims are validated through discursively established principles of validity (comprehensibility, integrity, legitimacy and truth). But Healey rejects Habermas’ claim that differences can be resolved through the application of these principles and that this will prevent power from determining consensus. Instead Healey suggests that policymaking should draw on the lifeworlds of all stakeholders in order to achieve adequate levels of understanding through respectful discussion between discursive communities – a process that will require reflexivity, mutual learning and the possibility that established power relations can be challenged.

According to Hajer (1983), the real challenge in critical policy research is to find ways of combining the analysis of the discursive production of reality with an analysis of extra-discursive social practices. He claims that in order to become dominant, discourses first need to be accepted and adopted by social actors and then become institutionalised and reflected in institutional practices. It is this process of the institutionalisation of discourses in specific contexts that should be the concern of policy analysts. However, Hajer (1983) does not provide a methodology for carrying this out69.

Parsons (1995) calls for a more modest agenda for policy analysis. He notes that in democratic societies there is a belief that policymaking will make a difference (an illusion held by both politicians and the public). Instead he asserts that governments are not all-powerful and often not in control of situations. As a result, policymaking is often a matter of getting out of difficult situations and of ‘muddling through’. Policymaking is as much symbolic as it is substantive; governments use policies to provide stability, develop consensus and legitimacy and to build hegemony. Parsons suggests that policymaking should be viewed as a communicative process in which citizens are viewed as co-producers of policy. He contends that policymaking should aim to improve people’s democratic and political capacities and that evaluation research should engage in the bottom-up evaluation of policy

69 In a small way, this study attempts to bring the analysis of discourse and social action together.
using communicative rationality, it should be ‘a mode of public learning informed by enlightenment and emancipation values’ (Parsons, 1995:613).

A critical policy analysis would explore the relevance of alternative integrative and communicative methods for the analysis of policy. It would aim to enrich policy argument and debate and clarify the role of values in shaping policy in order to extend and enhance democratisation. (Parsons, 1995:616)

Parson’s call for a critical approach to policy analysis is in many ways answered by Ulrich’s ‘Critical Systems Heuristics’.

**Critical Approaches to Policy Analysis and Evaluation Research**

Ulrich’s (1994) critical systems heuristics is discussed in some detail because it informs a research method used in this study, and, in particular, the design of the interview schedules used to elicit the opinions of stakeholders. Following the critical tradition, Ulrich (1994) claims that the defining of social problems and the designing of solutions are constituted by human intentionality and therefore require moral judgment as well as expertise; but that current methods of policy analysis and programme evaluation are helpless with respect to value judgments or the ‘normative content’ of any reform. To meet this need, Ulrich developed a method ‘critical heuristics of social planning’ or ‘critical systems heuristics’ which he claims builds a bridge between systems philosophy and practical philosophy by using the systems idea as part of practical reason.

By ‘critical’, Ulrich means ‘the art of judgment’, which presupposes implicit or explicit standards or norms against which to judge something. Following Kant, he insists on the importance of critiquing such standards or norms self-reflexively.

In the context of applied social inquiry and planning, being critical therefore means to make transparent to oneself and to others the value assumptions underlying practical judgments, rather than concealing them behind a veil of objectivity. (Ulrich, 1994: 20)

By ‘system’, Ulrich suggests that we cannot know the ‘whole system’, that is the totality of relevant conditions on which our practical _a priori_ judgments depend. Instead, we should reflect on ‘the inevitable lack of comprehensiveness in our understanding and design for social systems’ (Ulrich, 1994:21).


In developing this method, Ulrich critiques Popper and the critical rationalists for subjecting social action to ‘instrumental rationality’. Instead, he draws on the work of Kant, Habermas and Churchman to provide a theoretical foundation for his method. He accepts Kant’s
distinction between theoretical or pure reason, (which makes decisions on the basis of the theoretical validity of hypotheses) and practical reason, (which makes decisions on the basis of the normative validity of practical propositions) and builds on the latter. Ulrich claims that his method can be used by both policymakers and ordinary citizens to reveal the normative content of a proposed policy or plan (developed through practical reason) and, in so doing, help answer the question, ‘what ought we to do?’ (the question posed by Kant for practical reason). By ‘normative content’ he means the underlying value assumptions of the policy or plan and its ‘life-practical implications’ or side effects for those at its receiving end. For Ulrich, all social planning is politically and morally relevant and is therefore of public concern. He poses the question

How can those involved claim rationality for their action even though not all the affected may benefit or agree with the costs imposed upon them, and some may be seriously harmed? How can conflicts of interests between the involved and the affected be resolved with reason? (Ulrich, 1988: 142)

His quest is to make policymaking as socially rational as possible, by insisting that any plan for improvement should be normatively acceptable to those affected by it, as well as to those involved in its formulation. He proposes that this agreement or consent be secured by the policymakers through rational dialogue and value clarification with representatives of ‘the affected’.

From Churchman and systems philosophy, Ulrich (1994) borrows the idea that the drawing of boundaries, (a priori boundary judgments made by policymakers), gives access to the policymakers’ underlying value judgments. His method involves the identification of four social roles involved in any social policy and he formulates three questions that the policymaker or analyst should ask of each role respectively (see Chapter 5). Ulrich claims that this investigation will heuristically expose the boundary judgments, value assumptions and partiality of the policy in question – for interrogation by those affected by it.

We can determine the boundary judgments that are constitutive of social maps and designs if we can give a systematic list of the social actors to whom the planner must refer in order to understand the normative content of his maps and designs. (Ulrich, 1994: 245)

For implementation, Ulrich seeks to develop a ‘practical model of practical discourse’ (Ulrich, 1988:143) which overcomes the limitations of Habermas’s ‘ideal speech situation’. He shares Habermas’s commitment to the ‘Enlightenment project’ of working to improve the rationalization of social systems as a means of human progress. He draws on Habermas’s theory of ‘communicative competence’, which includes an understanding of rationality as being dialogical (in this case between the policymakers or ‘the involved’ and ‘the affected’), as opposed to a monological justification of practice based on theoretical reason. As noted above, Habermas claims to use universal properties of discourse to secure rational consensus
on practical matters. Therefore, for Habermas, an ‘ideal speech situation’ would require that those involved and affected in policymaking decisions participate equally in a rational dialogue in which the ‘force of the unforced argument’ becomes the justification for practical knowledge (the policy). However, Ulrich regards this as ‘theoretically compelling but pragmatically desperate’ (Ulrich, 1996a:172) and suggests that Habermas’ ideal speech situation is seldom possible in practice. Instead he claims that ‘critical systems heuristics’ can only hope to secure the conditions for undistorted communication by expanding the notions of discourse and civil society (Ulrich, 2003). As noted above, Ulrich’s method is based on his proposal that in any policy process there are four social roles and he poses three questions for each role. He suggests that policymakers use his twelve questions self-reflectively to interrogate their own policies. He also encourages policymakers to test their value assumptions and judgments in dialogue with ordinary citizens affected by the policy 70.

Following Churchman, Ulrich argues that ‘the affected’ are competent to engage in such a dialogue by virtue of their ‘affectedness’ rather than by virtue of their ‘communicative competence’ (as suggested by Habermas).

In his overview of qualitative evaluation, Shaw states that ‘there is still no prominent theorist of critical evaluation who will stand for the application of critical theory to evaluation (1999:33)71. However, Shaw suggests that critical evaluators would hold to the following principles: top-down management-driven evaluations cannot be progressive; naïve participatory methods do not guarantee emancipatory outcomes; democratic consensus in evaluation research cannot be assumed; critical evaluation needs to engage with social structure beyond the local context of the inquiry and critical evaluation requires the use of multiple methods (Shaw, 1999:34).

Despite Shaw’s claim otherwise, Babbie and Mouton (2001) suggest that there is a school of participatory evaluation that is based on critical theory and has its origins in the participatory action research paradigm. Four key ideas in this paradigm are taken up in this approach to evaluation are: the participation of the researched in the research to the extent that they share control of the research process; an emphasis on the dialectic between theory and practice (praxis) in which groups produce practical knowledge leading to action in particular contexts; an understanding of the research process as one of capacity-building and empowerment of the

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70 In this study I used Ulrich’s 12 questions to frame the interview schedules used to elicit the opinions of the different groups of stakeholders involved (and affected) by the HEQC’s ensemble of policies.

71 His ignorance of Ulrich may be due to the fact the Ulrich’s work is located in management and systems theory literature rather than in evaluation literature. Ulrich’s ‘critical systems heuristics’ meets all of Shaw’s principles for critical evaluation except for the last and possibility the penultimate.
researched; a political commitment to challenge unequal power relations or more strongly (in the Southern tradition), to ‘liberate the oppressed’ and transform the consciousness of those involved (Babbie & Mouton, 2001:358).

An explicitly participatory approach to evaluation research in the critical tradition is ‘empowerment evaluation’ (Fetterman, 1996 cited in Babbie and Mouton, 2001), which, according to Babbie and Mouton (2001:359), adheres to the four key ideas from the participatory action research paradigm listed above, with particular emphasis on the evaluator ‘taking the side’ of disempowered groups and the evaluation enhancing participants’ power of self-determination in order to contribute to their ‘liberation’. However, this approach may not have overcome some of the criticisms of interpretive approaches discussed previously. For example, it is not clear how consensus on the evaluation results is reached in empowerment evaluation. Nor is it clear exactly how the effects of social structure are taken into account in the process of capacity-building and empowerment.

Mertens (2005) renames the critical paradigm the ‘transformative’ paradigm, which she claims ‘is beginning to focus on the meaning of social justice and fairness within evaluation’ (2005:54). Within this paradigm she identifies five types of evaluation, empowerment evaluation (as described above), development evaluation, participatory evaluation, inclusive evaluation and feminist evaluation. Participatory and empowerment evaluation have been discussed. According to Mertens, developmental evaluation has been pioneered by Patton (1994) and involves the evaluator becoming part of the programme’s developmental team. The purpose of this type of evaluation is learning, innovation and change. Inclusive evaluation is reminiscent of aspects of Ulrich’s critical systems heuristics described above. According to Mertens (2005), it aims to include those marginalized groups who will be affected by the decisions that result from the evaluation. It goes further and aims to link evaluation results with social action that redresses power imbalances and improves the lot of the least advantaged. In a similar vein, feminist evaluation uses collaborative methods and aims to produce evaluation results that challenge gender inequities.

**Critiques of Critical Approaches**

Ulrich’s ‘critical systems heuristics’ is criticised by Jackson (2000) on several grounds: Jackson suggests that Ulrich adopts a limited notion of social critique which ignores the Neo-Marxist question about ‘what are the material conditions that have given rise to this policy or these ideas and their dominance?’ Jackson also accuses Ulrich of methodological immaturity, namely that he bases his method on Habermas’s emancipatory approach which adheres to a naïve theory of radical social change or emancipation. But Ulrich himself seems to be aware of this criticism and in a later article, denies that he constructs an advocacy role for the policy
analytic or that he takes the ‘side of the oppressed’ (Ulrich, 2003: 166). He claims that his emancipatory orientation is not an ideological commitment, but rather a methodological effort to secure authentic communication between the ‘affected’ and the ‘involved’ (Ulrich, 2003).

The most serious criticism raised by Jackson is that Ulrich’s method is no less utopian than that of Habermas, which he sought to improve. Habermas wanted to complete Kant’s project of constituting society rationally, but, as we have seen, he shifts the focus from Kant’s subjectivism to a philosophy of inter-subjectivity and sets out a procedural model of rationality. Habermas’ concept of communicative rationality is based on a belief in the consensus building ‘force of the better argument’, which he claims to be a universal property of all rational communication. As we have seen, Ulrich claims to provide a methodological way through Habermas’ idealism. But Jackson (2000) questions why those involved (the powerful) would bother to take into account the views and concerns of the affected. He suggests that it is power, not reason, that settles disputes in the public sphere and that, in the final analysis the ‘better argument’ is produced through power and not through rational dialogue. In this respect, Midgley (2000) makes the point that ‘critical systems heuristics’ is useful only in situations where participative rational debate is possible; it cannot work under conditions of coercion. Ulrich himself admits that his method depends upon the acceptance of the democratic idea, which includes a ‘functioning public sphere’ (Ulrich, 1996a: 174). In a later article, Ulrich (2003) admits that all communicative situations are more or less coercive, but that his method can be used to expand the notions of discourse and civil society, so that, even when a particular coercive situation closes down dialogue, civil society should offer people the possibility of voicing their dissent and concern in other forums.

In critiquing Habermas and Ulrich’s utopianism, Jackson (2000) is drawing on poststructuralist perspectives. Habermas, Ulrich and transformative evaluation based on the participatory action research tradition would be critiqued from a poststructuralist position for several reasons. Firstly, poststructuralist theorists such as Foucault and Derrida (see Flyvbjerg, 2001), contend that all communication is already penetrated by power and that rationality and power cannot be separated out in order to arrive at consensus rationally, as Habermas advocates. Rather than putting faith in communicative rationality, negotiation and debate, one should rather ask how power is operating in a particular local context through discursive and coercive means. In fact, because they hold that meaning is constantly deferred and never fixed, deconstructionists would not assume that communication offers the possibility of consensus at all; nor would they see this as desirable. Furthermore, a poststructuralist critique would insist that there are no universals in social science, nor are there universal principles for resolving differences between social groups. This perspective...
would challenge the assumption that a method of doing policy analysis or evaluation research, or for that matter, any policy, law or government, could provide any guarantees of freedom or democracy.

Finally, Parsons notes that because of their idealism, the ideas of the critical theorists have made little headway in the real world of policy making and analysis to date (1995:452). It is difficult to judge the accuracy of such a sweeping statement. Certainly Ulrich has had an impact on the theory and practice of critical systems thinking. In this study, Ulrich’s method is used to frame the data gathering and analysis on the opinions of stakeholders. But, because of the complex nature of policymaking and analysis, it is complemented in this study by other methods, namely participant observation, critical discourse analysis of policy documents and theory-based or clarificatory evaluation of policy design. The second and third of these methods are discussed in the next section.

### 4.4 Pluralism

In the aftermath of post-modern and deconstructionist challenges to the assumptions and certainties of the Enlightenment project, policy analysis and evaluation research appear to currently operate in a context of pluralism. For example, Parsons writes

> we consider policy analysis to be essentially a boot-strapping activity. No one theory or model is adequate to explain the complexity of the policy activity of the modern state. The analyst must accept the pluralistic nature of the inquiry, both in terms of the interdisciplinary quality of the investigation and the need for the hermeneutic tolerance of diversity. The analysis of public policy involves an appreciation of the network of ideas, concepts and words which form the world of explanations within which policymaking and analysis takes place. (1995:73)

Ball (1997) describes policies as ‘awkward, incomplete, incoherent and unstable’ (1997: 265). He recommends understanding the policy process as a struggle over meaning that is best studied across levels and over time. He suggests that policy analysis should move away from ‘eliminative reductionism’ and rather use ‘multiple theories’ that can provide alternative discourses to ‘struggle against incorporation’ (Ball, 1997:268).

According to Pawson and Tilley (1997), evaluation research has reached a similarly pluralistic position. Currently evaluators are less concerned with paradigmatic purity than with the complex nature of evaluation research, which many are realising requires a pluralist vision and approach (1997:24).

As examples of pluralistic approaches, Pawson and Tilley describe Rossi and Freeman’s (1985) ‘comprehensive evaluation’ and Cronbach’s (1982) educational evaluation. These

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72 Ball suggests that the effects of a policy trajectory need to tracked over a 5-10 year period.
approaches seek to combine insights from both the positivist and interpretive tradition in their evaluation designs.

Pluralism, by definition, is eclectic and inclusive. Thus it does not lend itself to a coherent overview, as has been attempted for the three discrete paradigms discussed above. Instead, only the two approaches to policy analysis and evaluation research that are pertinent to this study are selected for discussion. They do not fall readily into any of the three paradigms already discussed. In the context of a pluralist research design, this review focuses on how post-structuralist insights have been employed in policy analysis, and by critical policy analysts in particular. Secondly, theory-based approaches to evaluation research are reviewed and, in particular, that of ‘realistic evaluation’ advocated by Pawson and Tilley (1997) as an approach that combines the rigour of the experimental tradition with insights from the constructivist tradition. It should be noted that the first method operates at the macro-level of policy analysis, at the level of discourse and ideology, whilst the second operates at the level of the programme.

4.4.1 Post-structuralist Approaches to Policy Analysis

Whereas critical approaches to policy analysis seek to identify and critique the value assumptions underlying policies by looking at the gap between the ‘is’ and the ‘ought’ from the perspective of the ‘affected’ or the ‘oppressed’, policy analysis undertaken from a post-structuralist perspective refuses to set up universal ‘oughts’. This approach rejects any form of universal in human nature or society and rejects both positivist and emancipatory social science (Babbie and Mouton, 2001:40). Instead post-structuralist approaches view all social practice as historically and culturally specific and shaped by particular discursive formations or ‘orders of discourse’ that are historically contingent. Discourse is understood to be socially constitutive and to function in dialectical relation to social practice (Chouliaraki and Fairclough, 1999). In outlining a discourse analysis approach to policy analysis, Gale (1999) sets out a list of premises for this approach. Firstly, as political projects of state institutions, public policies are recognised as political artefacts, constructed in specific historical and political contexts; these contexts ‘get into’ the policy production process. Secondly, policy texts attempt to discursively create and recreate their own contexts and rationales. Thirdly, they stand in ‘inter-textual’ relation to other policy texts and the analyst therefore needs to

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73 The pluralist research design adopted for this study is described in Chapter 5 where post-structuralist insights are used to analyse the policy context and the wider political environment in which the suite of HEQC policies were generated, whilst a truncated theory-based approach is used to analyse the design of a set of policy instruments.
understand how meaning is shaped by and shifts between these texts. Fourthly, Gale suggests that the challenge in this form of policy analysis is to explain how certain discourses become dominant, become acceptable and legitimate and allowed to frame particular ‘policy settlements’. He explains that ‘policy settlements’ are always asymmetrical because different groups have differential capacity to ‘make their meaning stick’. Invariably it is the dominant group that achieves this in a moment of hegemony in which it becomes possible for the dominant discourse to claim self-evident and universal status. Policies often have unequal material and discursive effects and the analysis should expose these.74

Post-structuralist approaches to policy analysis also take up the deconstructionist emphasis on the ‘birth of the reader’ and the ‘death of the author’, meaning that they do not make the modernist assumption that the meaning of the text automatically corresponds to authorial intentions. Instead they focus on the plurality of readings that multiple readers will produce. According to Codd (1988), policy texts get reinterpreted and reconstituted by different readings in different contexts. The purpose of analysing policy documents is to understand their differing effects on the production of meaning by readers. This plurality of meanings can serve as evidence of the text’s ‘inherent ideological ambiguities, distortions and absences’ and enable the analyst to ‘penetrate the ideology of official documents and expose the real conflicts of interest within the social world they claim to represent (Codd, 1988:246).

Ball (1994a) argues that policy needs to be analysed both as text and as discourse and then their effects need to be explained. He suggests that as texts, policies are ‘crude, simplistic and abstract’, they are neither clear, complete nor closed and as products of compromises, policies are typically the cannibalized products of multiple influences and agendas. There is ad hoccer, negotiation and muddle within the state and within the policy formulation process. (Ball, 1994a: 18)

In understanding policy as discourse, Ball argues that the effects of policy are primarily discursive, namely that policy ‘changes and limits our ways of thinking and allows only certain voices to be heard as meaningful and authoritative’ (Ball, 1994a:23). Following Foucault, he explains that discourses define what can be said and thought, who can speak and with what authority. If people take up the positions constructed for them by policy discourses

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74 Both ‘critical policy analysis’ and ‘critical policy sociology’ use discourse analysis as a method of analysis, and in both, the ‘critical’ element remains, namely a concern for social justice and at the least a concern that the analysis explain how certain groups are disadvantaged and others advantaged by the policy. However, these discourse analyses tend not to share the critical tradition’s commitment to act to ‘change the world’ for example, by setting up normative models for policymaking. Instead, their analyses are offered a posteriori as resource for those involved in political struggles around policymaking.
they are simultaneously entering a system of power, values and practices constituted by the policy discourse.

But Ball makes a strong case for recognising the agency of the practitioner in policy implementation and for the analysis to recognise the ‘creative adaptation and invention’ that implementation requires. He describes policies as ‘textual interventions in practice’ that ‘pose problems to subjects that must be solved in context’ (1994:18). He notes that public policies set the timing, location, content and ‘rules of the game’ for the contest between policymakers and practitioners.

As far as analysing policy effects is concerned, Taylor (1997) suggests that the use of discourse analysis in critical policy analysis enables the analyst to undertake a fine-grained analysis of policy processes at the micro-level and to link this to an understanding of the historical and social context at the macro-level. She claims that the former allows the analyst to show how policies as texts construct particular meanings that work to mask social conflicts and foster commitment to the notion of ‘universal public interest’. The latter should enable the analyst to explain how policies have real social effects and are linked to the production and maintenance of consent (Taylor, 1997:27).

The review now turns briefly to the theoretical insights provided by Foucault (1972, 1977), cited in Flyvbjerg (2001), on whom critical policy analysts such as Ball (1993, 1994a, 1994b, 1997), Taylor (1997) and Gale (1999, 2001) depend. Foucault claims that power is exerted through discourse and that truth-knowledge does not stand outside of power and discourse, but rather, truth-knowledge is itself a product of particular discursive practices. This means that no knowledge is disinterested. Foucault also distinguishes between ‘negative power’ that is coercive and acts to enforce laws, and ‘positive power’ that is enabling and allows people institutional space to do things. Foucault rejects the structuralist view of power that sees it only as negative, acting down on people and instead analyses how power is internalised within individuals leading to their ‘governmentability’. As we have seen, the implications of these insights for policy analysis are that policies are viewed as the products of particular discourses that are assumed to work in conjunction with power to get people to do things. In order to ensure that policies achieve their purposes, policymakers exercise power in both its negative and positive senses. Thus policy analysts using a Foucauldian approach would ask, ‘what rationalities (or discourses) are at work when those who govern, govern?’ and ‘how do discourses achieve their effects through policy texts?’ (Flyvbjerg, 2001:123).  

75 This view of power is typical of Marxist and Neo-Marxist approaches.
According to Parsons (1995), Foucauldian approaches have also been used to deconstruct managerial approaches, such as human resource management and management by objectives, to show that these ‘panoptic disciplines’ are imposed to get people to internalise their ‘technologies of control’ such that employees’ ways of thinking and motivation conform to the goals of the organisation. These analyses would claim that quality assurance, staff appraisal and even self-evaluation all have a role to play in this process of self-regulation and conformity leading to high levels of governmentability within an organisation.

**Methods of Post-structuralist Approaches to Policy Analysis**

Despite their theoretical richness, post-structuralist approaches to policy analysis tend to be weak on method. Methodological debates and self-critique are common in the post-structuralist policy analysis literature (see Maguire and Ball, 1994, Taylor, 1997 and Gale, 2001). Critical policy sociologists tend to trace their origins from Ogza’s call for a method that is ‘rooted in the social science tradition, historically informed and draws on qualitative and illuminative techniques’ (1987:144 quoted in Gale, 2001: 380). However, Ball (1993:9) complains that the conceptual tools available for educational policy analysis are ‘blunt and irrelevant’. Troyna (1994) criticised Ogza’s definition for lacking a ‘critical edge’ and called for a more critical policy analysis that could link ‘personal troubles’ with ‘public issues’. Maguire and Ball (1994) argue that policy studies are methodologically unsophisticated because, like many interpretive approaches, they tend to take issues of language and meaning for granted. According to Gale (2001), methods typically used by critical policy analysts are ethnography, participant observation and semi-structured interviews plus the analysis of policy texts as discursive representations. Gale concludes that because it is the analyst who ultimately produces the interpretation, it needs to be demonstrably based on empirical analyses of policy texts and their effects (2001:383).

With respect to methodology, Ball (1993, 1994) calls for ‘policy trajectory studies’ that link the micro- and macro-aspects of policies, that are cross-sectional, cover a range of stakeholder perspectives and include both policy formulation and implementation and its effects. He sets out a method of policy analysis that combines three approaches: critical policy analysis, post-structuralism and critical ethnography. He claims that this combination of methods enables him to ‘examine the moral order of reform’, analyse policy texts as discourses and to use ethnographic methods as a means of ‘insurrectioning subjugated knowledges’ (1994:2-3), in a manner similar to Foucault’s genealogy studies.

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76 The study of non-institutionalised knowledges.
However, Gale (1999) claims that Ball fails to deal adequately with policy as ideology. Gale (2001) builds on Ball’s work but suggests a method for ‘critical policy sociology’ more closely based on the work of Foucault. This method involves analysing policy as archaeology, as historiography and as genealogy. ‘Policy archaeology’ is intended to reveal the ‘orders of discourse’ or the policymakers’ ‘implicate social order’ and to analyse what the conditions were that made the emergence of a particular policy possible. Policy archaeology analyses how a particular social problem gets named, gains the ‘gaze’ of the state and explores why some actors are involved and not others. It seeks to explain what rationalities are drawn upon to justify the policy solutions and legitimate the state’s actions. Foucault claimed that discourses of governmentality equate the happiness or productivity of individuals with behaviours that reinforce the social order (Scheurich, 1994: 306). According to Gale, ‘policy historiography’ involves understanding the substantive issues that a policy seeks to address. The analyst should study policy texts and related documents to find the incoherences and contradictions in the texts and to reveal who is advantaged and who is disadvantaged by the policy. ‘Policy genealogy’ looks at specific policy realisations and implementations and, through interviews, seeks to understand what compromises and conflicts are involved.

**Critiques of Post-structuralist Approaches to Policy Analysis**

Post-structuralism and post-modernism have been accused of being ‘negative moments’ rather than contributions to the development of social science. Their lack of a positive contribution may be linked to their weakness in research methodology and research technique, for example, Babbie and Mouton are ‘not sure what a postmodern social science would look like’ (2001:43). Despite the attempts of theorists such as Ball and Gale there remains a tendency for post-structuralist policy analyses to jump from the data to a (preconceived) narrative. It appears that the quest to successfully link the micro and macro levels of analysis have not yet been successfully achieved. It is suggested that in order to achieve this, more rigorous methods of discourse analysis would need to be imported from other disciplines, for example from applied linguistics, Fairclough’s ‘critical discourse analysis’ (Fairclough 1995, Chouliaraki and Fairclough, 1999) or from functional linguistics, Halliday’s (1994) functional

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77 With respect to the methods employed for this study, I undertake a weak form of policy archaeology in Chapter 6 on agenda-setting, policy historiography in Chapters 7 & 9 on policy formulation and a weak form of policy genealogy in Chapter 8 on policy adoption and stakeholder issues around implementation.
systemic grammar. However, these methods require considerable expertise and are very labour-intensive.

Secondly, there is a danger in post-structuralist perspectives that all of social life is reduced to discourse and the materiality of the social world gets lost. One rather needs to rather understand discourse as only one moment in social practice (Chouliaraki and Fairclough, 1999:28). Furthermore, the over-emphasis of the ‘linguistic turn’ can lead to epistemological relativism, where all discourses are viewed equally as particular constructions of reality (Chouliaraki and Fairclough, 1999:136). Instead, if one views discourse as only one moment in social practice, one can evaluate discourses in terms of their empirical fit with reality in the course of material or social practices.

Thirdly, one needs to ask whether knowledge is indeed always interested. Should knowledge be entirely reduced to the conditions of its production and to the interests of its producers? Social scientists such as Mouton (1996) and Moore and Young (2001) argue for the existence and recognition of the epistemic or cognitive interest pursued by all serious and honest researchers that enables them to take into account (to a certain extent) their political and social interests, in the production of knowledge. Theory-based evaluation argues (as do other approaches in the post-positivist tradition) that evaluation research can deliver disinterested findings provided the rigour of the research design and methods is such that it can guarantee (to a certain extent) the validity of the findings.

Fourthly, despite the attempts of analysts such as Ball (1994a) and Gale (2001) to hold micro- and macro-analyses together, Apple’s concern about critical sociology of education’s uncritical use of Foucault may well apply to those post-structuralist policy analyses that over-emphasise micro-analysis at the local level and ignore the role of social structure and the role of the state.

It has proven all too easy in educational scholarship and theory to accept Foucault’s epistemological position whole and uncritically. There is a world of difference between emphasising the local, the contingent and non-correspondence and ignoring any determinacy or any structural relationships among practices. (Apple, 1996:141)

This concludes the discussion on post-structuralist approaches to policy analysis. When this approach is used in Chapters 6 and 9 an attempt is made to ensure some degree of methodological rigour by borrowing some of the techniques from Halliday’s functional systemic grammar. Furthermore, in this study, the post-structuralist approach is used in

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78 Post-structuralists may object to the deep Neo-Marxist structuring of society assumed in Fairclough’s work and to Halliday’s assumption that language can be analysed on the basis of its inherent and universal underlying functions (structures).
combination with other empirical methods such as participant observation and interviewing stakeholders.

### 4.4.2 Theory-based Approaches to Evaluation Research

This review of approaches to policy analysis and evaluation research concludes with an account of theory-based evaluation because it provides a useful synthesis of and advance on the pragmatic and constructivist traditions.

According to Stame (2004), Chen and Rossi (1989) were the first to raise the issue of the ‘empty black box’ problem in descriptive, goal-based evaluations that simply check whether the policy or programme goals and objectives have been achieved. According to Mertens (2005), Chen and Rossi’s approach involves the evaluator constructing a model of how a programme works using both stakeholder theories as well as insights from social theory to guide the formulation of evaluation questions and data-gathering. Donaldson (2003) expanded on this approach by suggesting that a programme theory includes an analysis of the social problem, the programme to address it and the implementation context. He advocates first making the programme theory explicit before working with stakeholders to define the criteria and methods of the evaluation.

Carol Weiss (1997), whose work seems to defy categorisation, also contributed to the development of theory-based evaluation in her work on the utilisation of evaluation. According to Stame (2004), Weiss defines evaluation as a rational activity in a political environment and claims that good programme theory will also take into account how politics works in practice. Weiss distinguishes between descriptive evaluation that focuses on implementation and programmatic evaluation that focuses on mechanisms of change and suggests that the latter should be the main focus of evaluation.

Theory-based evaluation is described by van der Knaap (2004: 17) as an approach that puts rationality as its centre but also includes in its research design contextuality and subjective judgment. It seeks to answer the questions ‘how is the programme working?’ or more specifically, ‘what works, how does it work, under what conditions and for whom?’ (Pawson & Tilley, 1997:85). Van der Knaap (2004) argues that theory-based evaluation needs to hold together both post-positivist and constructivist approaches and that this demands the adoption of a broader conceptualisation of rationality. Theory-based evaluation focuses on the mechanisms of change and on the assumptions about these held by policymakers or programme designers. It also sweeps in values, context and uses multiple methods. Van der Knaap suggests that the technical capability of post-positivist evaluations to measure programme efficiency and effectiveness remains unchallenged and that this explains the
continued dominance of this paradigm. However, because not everything can be measured quantitatively and because such evaluations don’t ‘get into the black box’ and explain how and why a programme works, van der Knaap argues that it can only result in ‘single loop learning’ for improvement of a given programme design as opposed to ‘double loop learning’ for programme innovation. Similarly, Stame (2004) critiques post-positivist goal-based evaluation for simply attributing the observed difference before and after an intervention to the intervention and for failing to explain the mechanisms of success or failure (2004:58).

Pawson and Tilley’s (1997) ‘realistic evaluation’ is a substantial work serving as source material for the discussion that follows. They argue for a return to the quest for demonstrating causal relations in evaluation. They suggest that this requires a shift from the experimental model’s successionist theory of causality (based on Hume’s philosophy) to the realist generative theory of causality. The latter emphasises the mechanics of explanation, that is, how an outcome or effect is triggered by a particular mechanism acting in a particular context. As suggested by Stame (2004), Pawson and Tilley (1997) critique Hume’s model of causation for being based on inferences made on the basis of regular patterns between causes and their effects, rather than from actual observation of the internal change process. They explain that the key to any successful intervention is getting people to change social practices and that this must include a consideration of the mechanisms of change; that is, the potential of a programme to cause change. It is the actions of participants, ‘the internal release of underlying generative powers of individuals and communities’ that make programmes work (1997:215). This occurs through both individual action (agency) and institutional action (structure). Thus a programme should provide the reasons and resources to enable participants to change and evaluation should investigate specifically what causes people to do things differently inside the black box in particular contexts and under certain conditions.

In the theory-based approach, the central task of evaluation is to test a programme’s theory; that is, ‘did its actions result in the intended consequences, and if so, how?’ As with pragmatic evaluation, theory-based evaluation takes the objectives of a policy or programme as its starting point and asks to what extent the programme has met these. It then looks at the assumptions on which the programme’s activities were based and tests these to see if they were correct. It is the collection of assumptions on which the programme interventions are based that constitutes the ‘policy/programme theory’.

A policy theory expresses the ‘promise’ – the logically assumed – causality between the means, instruments and the programme objectives. (van der Knaap, 2004:18)

Pawson and Tilley (1997) insist that the careful articulation of a programme theory is a prerequisite to sound evaluation. The key to explaining a programme theory is to understand the
mechanism that transforms the causes (inputs and interventions) into effects (outputs and outcomes). Pawson and Tilley (1997) claim that an action is causal only if it generates regularities that are fired by mechanisms acting in particular historical and institutional contexts.

Programme theories must be framed in terms of propositions that explain how mechanisms are fired in contexts to produce outcomes. (Pawson & Tilley 1997:84)

Thus they summarise their understanding of a programme theory in the formula: \( C + M = O \).

- **C** for context suggests that programmes are always embedded in pre-existing institutional and social contexts that include norms, beliefs and values. An evaluation needs to ascertain what are the institutional, social and cultural conditions necessary for the programme’s change mechanisms to operate successfully. It also needs to understand how the changes introduced alter the balance of choices and relations for participants. The operation of a mechanism is always contingent on context.

- **M** for mechanism indicates the underlying causes that generate changed patterns of behaviour, that is, the reasoning and resources that the programme offers. Programmes introduce new ideas, opportunities and resources into existing sets of social relations and organisational structures. These are a combination of agency (people’s capacities and choices) and underlying social structures (that enable and limit what they can do). An evaluation should focus on ascertaining whether the causal mechanisms which generated the original social problem have been disabled by the programme and whether the programme’s mechanisms are enabling participants to overcome the problem situation.

- **O** for outcomes refers to the patterns of regularities indicating changed social practices caused by the combination of particular mechanisms working in particular contexts. An evaluation should be able to see whether the programme’s \( M+C=O \) theory or ‘hypothesis’ is confirmed by examining patterns of outcomes.

Pawson and Tilley emphasise that this formula for programme theories does not lead to universal generalisations but rather to temporary specifications of what works because ‘outcomes only follow when particular mechanisms have been triggered in particular contexts’ (1997:86). They suggest that a key question to pursue is why the programme works for some people and not for others. The evaluation should aim to explain the causes of failure as well as of success. They claim that the strength of an evaluation should be judged by its explanatory power and that the key purpose of evaluation should be to improve the realisation of a programme’s objectives (1997:218).
With respect to methods of data-gathering, Pawson and Tilley (1997) criticise the pragmatic, pluralist approach for suggesting that evaluators should select appropriate research methods from a ‘tool-kit’ of methods without giving them criteria on which to make the selection and prioritise the data. They are also critical of the constructivist unstructured method of interviewing for assuming that the matter under investigation and the interviewee’s ideas are one and the same thing. They reject the constructivist view that the data gathered should be faithful to the research subject’s thoughts and deeds. They likewise criticise the structured interview approach because the researcher’s theories and ideas remain opaque to the interviewee, often leading to misunderstandings. Instead, Pawson and Tilley propose that the interview itself should be theory-driven and that the subject matter of the interview should be the evaluator’s ‘hypothesis’ of the programme’s theory (C+M=O). They claim that the purpose of data-collection is to capture those aspects of subjects’ understanding that are relevant to the evaluator’s ‘hypothesis’ and to demonstrate the extent to which respondents’ beliefs support the programme theory under consideration. The purpose of the interview therefore is for the evaluator to make explicit to the interview his/her programme theory and its conceptual basis. The interviewee is then invited to respond critically to the evaluator’s ‘hypothesis’. The evaluator refines, elaborates and confirms her programme theory on the basis of the interviewee’s responses. It is on this basis that appropriate research methods can be selected.

Only when we know what precisely it is that we are studying can we reach into the tool-kit for the appropriate instrument. (Pawson & Tilley, 1997:158)

In a manner similar to that proposed by Ulrich (see Chapter 5), Pawson and Tilley (1997) suggest dividing those involved in a programme into different groups of stakeholders – in this case into policymakers, participants (beneficiaries) and practitioners (actors). On the premise that all actors possess only partial knowledge, they suggest that the role of the evaluator should be to cross-fertilise the interpretations of the different groups. However, they suggest that it is crucial for the evaluator to understand the policymaker’s programme theory and to discuss with them their understanding of the assumptions on which it is based (1997:202). Thereafter, the evaluator ‘feeds off’ the programme trying to elicit the reasoning that it incorporates. The evaluator needs to test the different subjective understandings of stakeholders against each other and against the empirical data on the programme’s effects and to position them within a wider model of social explanation. In so doing, the evaluator refines his/her understanding of what works, for whom in what circumstances.

With respect to the utility of evaluation findings, Pawson and Tilley (1997) claim that one cannot get conclusive evidence from only one study. They suggest that in order to build ‘middle range’ theories that can feed into the improvement of policy and practice, one needs
to use evaluation cumulatively. Rather than working towards descriptive generalisation from a representative sample (which they claim is an unrealistic goal), they advocate using ‘analytic induction’ to abstract from a particular case study (specification) to middle range theory (abstraction), back to further case studies, using the C+M=O formula. In this way, they claim that it is possible to discern patterns, test hypotheses and develop useful middle range theory.

The pathway of cumulation depends on finding sets of interlinked hypotheses that act as a conduit between abstract concepts and real-world actions. (1997:124)

Furthermore, the design and evaluation of particular programmes should be part of a larger theory-building project.

The design of a programme should not be just a matter of trial and error and folk wisdom and self-scrutiny. Practitioners ought to be informed and carry a set of well-worn principles into a programme in order to refine them to meet local conditions. (1997:126)

In conclusion, Pawson and Tilley (1997) claim that their theory-based approach allows evaluation to overcome the limitations of subjectivism. They claim that ‘power does not always overwhelm knowledge’ and that it is possible to produce objective evaluations that can deliver real lessons for programme stakeholders (1997:213). However, because programmes are ‘inherently fragile’ entities in open social systems, prediction in evaluation research will never be possible. One should rather aim to produce ‘a family of answers’ as opposed to immutable laws (1997:129).

Theory-based evaluation, particularly as theorised by Pawson and Tilley (1997), appears to overcome some of the limitations of both the positivist and constructivist traditions in evaluation research. However, their method is likely to be demanding and time-consuming to apply. In Chapter 9 a truncated version of their approach is used in the analysis of the HEQC’s policy theory.

4.5 Conclusion

The different traditions and approaches to policy analysis and evaluation research are now applied to the conceptual framework set up for categorising approaches to quality assurance in Chapter 2 (see Figure 3 below). Quadrants 2 and 4, based on managerial and bureaucratic rationalities respectively, most often adopt pragmatic models of evaluation in which the achievement of manager, funder or government objectives become the focus of the evaluation.

The collegial rationality in Quadrant 1 is most likely to adopt interpretive approaches to evaluation and cloisterism, in particular, is likely to adopt a connoisseurial model based on peer review. In this form of evaluation the criteria remain implicit and evaluators (academics) make subjective judgments on the basis of their professional expertise and experience.
Facilitative rationality in Quadrant 3 is more difficult to pin down and may adopt either pragmatic (the descriptive, open-ended form) or interpretive approaches that are concerned to understand and support internal processes. The reflective practitioner approach, commonly advocated by the pedagogic project is an interpretive form of evaluation that would be located in Quadrant 3. In Chapter 7 it is suggested that the Improving Teaching and Learning Working Group promoted a reflective practitioner model of evaluation and worked consciously within the interpretive paradigm.

The tensions and miscommunication between different stakeholder groups in the policymaking process analysed in this study may be linked to the fact that they adopt different rationalities and assume different approaches to evaluation, in particular the interpretive versus the pragmatic approach.

In conclusion, the review undertaken in this chapter suggests that the development of the theory of policymaking, policy analysis and evaluation research is not necessarily cumulative or progressive. Rather different theories and approaches seem appropriate for different evaluation purposes and contexts. Chapter 5 advocates a multi-method approach for this study in which different approaches and their methods are employed to analyse different stages of a policymaking process. This study is located in the critical paradigm because it is concerned with social justice and democracy in the policymaking process and its implementation effects. Critical policy analysis is concerned to expose the workings of social structure and power and to clarify the value assumptions and value conflicts between those involved in formulating policy and those who must implement and be affected by it.

This chapter has located a range of traditions in public policymaking and their attendant methods of policy analysis and evaluation research within four meta-theoretical paradigms – the post-positivist, the interpretive, the critical and the pluralist. It has traced the development of methods of policy analysis and evaluation research from experimental and quasi-experimental methods to pragmatic approaches, constructivist approaches using naturalistic and qualitative methods, critical approaches using multi-methods and to the pluralist paradigm where post-structuralist and theory-based approaches were explored. The purpose of this review is two-fold: to provide a theoretical framework for the methodology adopted in this study and to provide a frame for understanding the different approaches to and methods of evaluation that were proposed and eventually adopted in the development of the HEQC’s instruments for the quality assurance of teaching and learning in South African higher education.
CHAPTER FOUR
APPROACHES TO PUBLIC POLICYMAKING

Figure 3: Plotting Approaches to Evaluation on the Conceptual Framework
Chapter 5  Research Design and Methods

This chapter outlines the methodologically pluralist design employed for this study. It then describes in more detail the methods, instruments and processes undertaken to collect and analyse the data.

5.1.  Research Design

5.1.1  Introduction

This study employs a pluralist methodology, meaning that it uses different methodologies and their attendant methods and techniques in combination in the same study. The reasons for this choice are firstly that policymaking is a highly complex and multi-dimensional process meaning that policy analysis is also a complex, ‘boot-strapping activity’ (Parsons, 1995). Furthermore, in ‘critical systems heuristics’ Ulrich (2003) advocates adopting ‘deep complementarism’ based on Kant’s view of the unity of critical reason (which includes knowledge claims about both normative rightness, (practical reason) and empirical truth (theoretical reason)). Thus Ulrich would support methodological pluralism as appropriate to a critical approach to policy analysis. Secondly, policymaking proceeds through a number of stages and, in the researcher’s judgment, certain methodologies and methods were better suited to particular stages than others. Thirdly, because the study explores a process, it employs primarily qualitative methods. According to Patton, the study should ‘remain sufficiently open and flexible to permit exploration of whatever the phenomenon under study offers for inquiry’ (1990:196); in other words, the design should have emergent properties.

Jackson argues that methodological pluralism allows one to take maximum advantage of what the different research paradigms have to offer, provided one uses them flexibly and in a theoretically informed way (Jackson, 1999:19). Along similar lines, Mingers (1997) argues against philosophical paradigmatic incommensurability on the grounds that the case for the mutual exclusivity of paradigms has been over-stated; he claims that paradigms are permeable at the edges. He argues further that recent philosophies of science, such as Bhaskar’s critical realism and Gidden’s structuration theory, suggest that the objective and subjective dimensions of reality can be held together. Thirdly, he points out that particular research methods can be dislodged from their ‘home paradigms’ and be used successfully in another one (Mingers, 1997:9). Mingers distinguishes between three types of methodological pluralism: ‘loose pluralism’ in which a discipline encourages the use of a variety of paradigms and methods but does not specify how and when they should be used; ‘complementarism’ in
which different paradigms are viewed as internally consistent and are seen as more or less appropriate for different research situations; and ‘strong pluralism’ in which the use of different paradigms and a blend of methodologies is advocated for intervening in real-world problems (Mingers, 1997:9). The approach taken in this study is best described by Mingers’ notion of complementarism.

Having noted the pluralistic approach adopted in this study, it should also be pointed out that the ‘home paradigm’ of the study is the critical paradigm. This is because this is the paradigm best suited to an exploration of the social world comprising social systems, institutions and organizations in which individuals participate through shared inter-subjectivities. The critical paradigm is also concerned to promote social justice and democracy and to explore below the level of empirical observation to try to expose the workings of social structure and power and clarify value assumptions and their effects. However, this study does not pursue the full critical agenda - it provides a critical analysis of a policymaking process but does not advocate or conduct emancipatory social action for change. Instead, assuming that the findings of this study are published and read, it may provide a resource for critical self-reflection by the various policy actors and this may or may not influence their future actions in the policymaking process. In this sense this study could be described overall as a weak non-interventionist form of ‘critical policy analysis’. Mouton and Muller make the distinction between ‘weak interventionism’ (scholarly critique) and ‘strong interventionism’ (strategic research for policy) and note that this coincides with the distinction between intellectuals as ‘interpreters’ or ‘critics’ and intellectuals as ‘legislators’ or ‘reconstructors’ (Mouton and Muller 1995:164-5 quoted in Badat, 2004a:4). These distinctions are helpful in classifying this study as ‘weak interventionism’ and the researcher’s role as that of interpreter and critic. However, it should be pointed out that this position followed on from an engagement with the policymaking process in which the researcher functioned as a ‘reconstructor’.79

A further reason for the study’s stopping short of the full critical agenda is that it has an exploratory rather than an interventionist purpose in which the empirical gathering of data around a particular policymaking process is described and analysed, leading to tentative explanations, that will be based on retroduction as much as induction (Mouton, 2001). This study could also be described as a formative, improvement-orientated evaluation of a policy formulation and adoption process. Its focus is on evaluating the conceptualization, design and ‘take-up’ of a set of policy instruments and not on their implementation and impact. The

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79 The former role, which included undertaking research for policy, involved advocacy and as a result it has been important in this study of policy for the researcher to distance herself from this former role.
study could also be described as the first step in a theory-based evaluation because it aims to evaluate the strength of the logic of the causal model behind the policy and to test the plausibility of the assumptions that it makes about how the desired change will occur. The first part of such an approach involves a process of ‘clarificatory evaluation’. The study does this by articulating the policy theory and questioning its assumptions and by gathering the opinions of a range of stakeholders on the acceptability, validity and implementability of the policy. However, because it is not a full implementation, outcomes and impact evaluation, the study’s conclusions and recommendations can only be interim and advisory; no final, summative judgments can be passed. Instead, as the policy cycle moves into full implementation at the time of writing, at the end of 2004, the findings of the study might alert policy-makers and actors to short-comings in the policy conceptualization and design and to the opinions, perceptions and assumptions of other stakeholders, but no direct intervention in the process is anticipated.

The purpose of a study determines its design. Therefore, at this point it may be useful to remind the reader of the research questions formulated in Chapter 1 for this study:

1) To what extent has the HEQC succeeded in developing a set of policy instruments for the quality assurance of teaching and learning that are likely to improve teaching and learning practice in South African higher education institutions?

2a) To what extent did the Improving Teaching and Learning Resources provide the HEQC’s internal policymaking process with a valid and acceptable set of norms for good teaching and learning practice to guide its development of policy instruments for institutional audit and programme accreditation?

2b) To what extent do different stakeholder groups of the HE community believe the HEQC’s set of policy instruments for quality assuring teaching and learning are valid, acceptable, feasible and potentially effective?

The unit of analysis of the study is a policy process with a focus on the HEQC’s set of policy instruments for the quality assurance of higher education in South Africa. The aim of the study is to analyse and evaluate their design and development process. The study thus involves an analysis of the policy context, the policy documents themselves and the ‘theory’ on which they are premised. The population to which the research applies is all higher education institutions in the South African higher education public sector. The data gathered is made up of the words and actions of representatives of the various stakeholder groups around this set of policy instruments in order to better understand the rationale for the instruments and how they are being adopted and likely to be implemented. The institutional
The location of the stakeholders is either the HEQC itself or the public higher education institutions\(^{80}\).

The method of selecting individual actors, events or texts as data sources used in the study could be described as purposive, for the researcher did try to include credible representatives of all stakeholder groupings from across the spectrum of institutional types. However, the method of selection may be more honestly described as opportunistic; the researcher used whatever opportunities became available to get access to data. ‘Research, like diplomacy, is the art of the possible’ (Patton, 1990:13). This means that the process of data-gathering has been rather ‘messy’ and ‘ragged’: in terms of chronology, the data-gathering process began with participant observation, complemented by interviews, from within the HEQC’s policymaking process. But this ‘insider’ perspective was truncated at the end of 2002 \(^{81}\). In 2003, the researcher gained access to further data through an organization (SAUVCA) - that was called on to respond to and comment on the HEQC’s policy proposals. Thereafter, data was gathered around the margins of HEQC events in which the researcher participated, the Improving Teaching and Learning Workshops of 2003 and the Auditor Preparation Workshop of 2004. In order to gather adequate data for each of Ulrich’s (1994) ‘social roles’ in policymaking, the researcher was obliged to supplement data on the ‘academic voice’ by conducting interviews at three institutions, but this was necessarily on the implementation process of a specific instance of only one of the policy instruments (the MBA re-accreditation process). Thus the selection of data has been based largely on what access to data was naturally available to the researcher. It is hoped that the unevenness and ‘patchiness’ of the data gathered is compensated for by the multi-methodology used in the study.

The researcher’s access to data was secured in the following ways. Access to data gathered via documentary analysis, participant observation and interviews during my involvement in the HEQC’s Improving Teaching and Learning Project was formally granted by the HEQC on condition that I do not use the names of people or institutions in this study or in publications based on it. This permission includes the use of documentation related to the Improving Teaching and Learning Project\(^{82}\). My access to interviewees was assisted by the fact that I was known to have done research for the HEQC and, in many cases, I was one of the

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\(^{80}\) At the time of researching, the government’s institutional mergers had been proposed but not implemented, hence the old terminology, universities and technikons is retained.

\(^{81}\) I had originally planned to conduct the research entirely on the Improving Teaching and Learning Project but at the end of 2002 the HEQC unexpectedly put the project on hold in order to focus on the urgent matter of designing its criteria for audit and accreditation (see Chapter 7).

\(^{82}\) This was agreed to in an e-mail from Professor S. Badat, CEO of the CHE written on 16/10/2002 in response to my letter of 7/10/2002 to the CHE.
facilitators of the HEQC workshop that provided the setting for the interviews. In all cases I made it clear that the interview data was for my own research purposes and that individual names and institutions would not be used. In all cases the individuals concerned, including HEQC officials, gave me permission to use the interview data for this purpose. The only reason given by participants at the HEQC workshops for refusing to be interviewed was that they had not yet read and familiarized themselves with the HEQC’s draft policies. Unfortunately this was the case for the majority of academics approached at the workshops. As noted above, this led me to subsequently interview academics involved in the HEQC’s MBA re-accreditation process. In these cases, access was granted through Heads of Schools.

Access to data during the comment phase of the process was granted by SAUVCA as a condition of my agreement to conduct research for that organization. SAUVCA granted me permission to use the data gathered whilst conducting research for their policy responses and also to use the SAUVCA policy responses themselves.

With respect to policy documentation, the finalised versions of all policy documents referred to in the study are now available in the public domain; this is also the case for the HEQC’s draft framework and criteria documents for institutional audit and programme accreditation and the SAUVCA and SAUVCA-CTP responses to these documents. However, my references to the Improving Teaching and Learning Resources are based on the last version edited by myself in April of 2004 on the basis of feedback gathered at the HEQC workshops. The final published version is not yet available at the time of writing. Stakeholder opinions on the Improving Teaching and Learning Resources were based on the version before this that was presented as a draft at the HEQC workshops at the end of 2003.

The research design for this study is structured according to Anderson’s (1997) stages of the policy cycle, taking the first three stages – setting the policy agenda, policy formulation and policy adoption – and adding a fourth, policy reformulation. Following a pluralist methodology, different research methods are employed for each of these four stages, selected from across meta-theoretical paradigms on the basis of their appropriateness and also of practical data-gathering considerations.

83 The was agreed to by e-mail on 6/03/2002 and communicated to all quality assurance managers in a circular of 13/03/2003.

84 The final version of the Improving Teaching and Learning Resources is expected to be available on the HEQC web-site by February 2005.
5.1.2 Researching Setting the Policy Agenda

In Chapter 6, the setting of the policy agenda and its socio-political context is described and analysed using ‘policy archaeology’ (Gale, 2001) (see Chapter 4 above) and critical discourse analysis (Fairclough, 1992, Fairclough, 1995, Luckett, 1997, Chouliaraki and Fairclough, 1999). As discussed in Chapter 4, these methods sit in the critical paradigm but include post-structuralist perspectives. Following Gale (2001), the policy documents are viewed as political artefacts and discursive representations. Fairclough defines discourse as ‘not just a way of representing the world, but of signifying the world, constituting the world in meaning’ (1992:64). Following Luckett (1997), critical discourse analysis is understood to comprise three moments: the analysis of the conditions of production and interpretation of a text, that is, text as socio-cultural practice; the analysis of the processes of production and interpretation of a text, that is, text as discursive practice and thirdly, the analysis of the formal properties of a text using objectifying techniques to unpack the lexico-grammatical patterns of choice. It is the combination of these three moments of critical discourse analysis that enables the analyst to re-interpret and explain how the patterns of choice in a text are shaped by orders of discourse and by socio-cultural practices. In other words, this method enables the analyst to explain why and with what effects the text is saying and doing what it is. The method used in Chapter 6 employs only the third and second moments of a full critical discourse analysis, that is, it examines the extra-linguistic conditions and the discursive processes of production of a suite of policy texts in order to understand the post-apartheid socio-political context and policy environment in which the new policy texts for the quality assurance of higher education were produced. The emphasis in this chapter is on tracing the development of the idea of quality assuring higher education, understanding why the quality of higher education was seen as a public problem and why imposition of a national quality assurance system was seen as (one of) its solution(s). In this method the researcher is the research instrument and the data sources are all policy documents. The ‘policy archaeology’ undertaken in Chapter 6 describes the socio-political conditions of production which in turn make possible and constrain certain ‘orders of discourse’ which in turn shape people’s rationalities (their ways of thinking, speaking and of writing) that shaped the production of particular policy texts. This broad analysis sets the socio-political and discursive context for the finer grained critical discourse analysis of the documents that set out the HEQC’s two policy instruments for institutional audit and programme accreditation undertaken in Chapter 9. In Chapter 9 the formal properties of the texts are analyzed using the first moment of critical discourse analysis. Critical discourse analysis depends entirely on the interpretation of the researcher and so, as a method, it should be complemented by empirical work.
5.1.3 Researching Policy Formulation

The focus of Chapter 7 is on the development of the Improving Teaching and Learning Resources and on evaluating the extent to which they achieved their goals - one of which was to provide a resource for the formulation of the HEQC’s two key policy instruments, the criteria for institutional audit and programme accreditation. The main research method employed in Chapter 7 on the policy formulation process was participant observation in natural field-settings. This is complemented by survey questionnaires and interview data that captured both policymaker and stakeholder opinion. The methods used for this stage of the analysis reside largely in the interpretive paradigm, but, by understanding the interview data as both a source of information and as a source of interpretation (see below), I included a critical dimension as well.

The data sources for this chapter are primarily observations of meetings, workshops, consultative panels, et cetera, as captured in the researcher’s extensive field-notes taken whilst working as project manager for the HEQC’s Improving Teaching and Learning Project during 2002. The field-notes are complemented by project documentation such as minutes of meetings, project proposals and draft policy instrument texts. Patton argues that direct observation has several advantages for analysts or evaluators. It allows the researcher to understand the context in which the policy or programme operates; to become aware of everyday routines so sensitizing the researcher to nuances and enriching the data. It also allows the researcher to gather information that may otherwise be hidden from the researcher (Patton, 1990:202-3). The method of participant observation is interpretive, that is, it is dependent on the researcher’s perceptions and selections and is therefore also susceptible to researcher bias.

The validity and reliability of qualitative data depends to a great extent on the methodological skills, sensitivity and integrity of the researcher. (Patton, 1990:11)

The data collected from participant observation was triangulated with interview data based on the self-reporting of HEQC officials and other stakeholders, the intended users of the Resources. This data was captured through face-to-face interviews administered by the researcher and based on structured interview schedules (see discussion on Ulrich’s twelve questions 1994, 1996). The data collected via participant observation is the primary source of data for describing the policy development process, whilst that collected from the interviews forms the primary basis of the researcher’s evaluation of the Improving Teaching and Learning Resources, that is, for the answering of research question 2a). The limitations of the data collected for Chapter 7 are that it is entirely qualitative data gathered on the basis of
‘purposive’ and ‘opportunistic’ sampling. These limitations are to some extent checked by trianguating the researcher’s perceptions with those of other stakeholders and by the use of formal project and HEQC documentation, some of it written by people other than the researcher.

5.1.4 Researching Policy Adoption

Two research methods were employed for gathering data for Chapter 8 on policy adoption. The first was two standardized, structured self-administered questionnaires completed by Quality Assurance Managers, supposedly in consultation with their senior managers. The questionnaires were designed to elicit opinion on the HEQC’s draft policy proposals, one for institutional audit and the other for programme accreditation. As discussed above, these were carried out as part of commissioned research for the SAUVCA and in the first case for the SAUVCA and the CTP combined. The methodological advantage of this research method is coverage, that is, it provided an opportunity to gather data from across all universities and technikons in the sector (in the first survey) and from all universities (in the second survey). This is the only data in the study gathered from the total population of public higher education institutions or universities and so it was used to indicate quantitative measures (percentages) of stakeholder opinion as well as to indicate qualitative findings. The two questionnaires, the research instruments, can be found in Appendices 4.1 and 4.2. They were drawn up on the basis of issues arising from the HEQC’s policy proposals, but also included open-ended questions based on Ulrich’s twelve critical systems heuristics questions. A limitation of this research method was that, given the time constraints set by the HEQC for consultation and comment on its policy proposals, Quality Assurance Managers battled to conduct adequate consultation processes within their institutions. This meant that the data gathered was, in many cases, based on the informed opinions of Quality Assurance Managers speaking on behalf of their institutions, rather than on the collective voices of institutional executives, committees or Senates as intended. A limitation of all survey questionnaires is that the responses are often hurried and superficial.

The survey questionnaire method used in Chapter 8 was complemented by face-to-face interviews using structured interview schedules administered by the researcher \(^{85}\). The interviews enabled the researcher to gather more in-depth opinions on the HEQC’s policy instruments as well as the opinions of a wider range of stakeholders. It is in this process of gathering a wide range of stakeholder opinion that an adaptation of Ulrich’s (1994, 1996)

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\(^{85}\) In these interviews I included questions on the Improving Teaching & Learning Resources. The data gathered in response to these questions is presented and analysed in Chapter 7.
method of critical systems heuristics was employed. As discussed in Chapter 4, on the basis of the premise that all policies should be normatively acceptable to those affected by them, critical systems heuristics aims to expose the partiality, value assumptions, boundary judgments and life-practical implications of a policy. It aims to empower those ‘affected’ by the policy so that they can engage more critically with the policymakers in the policy formulation process. This method seemed most appropriate for the gathering of stakeholder opinion during the comment period and adoption phase of the HEQC’s policymaking process. Patton argues that gathering opinions from different stakeholder groups in an evaluation is a form of ‘theory triangulation’.

A concrete version of ‘theory triangulation’ for evaluation is to examine data from the perspective of various stakeholder positions with different theories of action about a programme. It is common for divergent stakeholders to disagree about programme purposes, goals and means of attaining those goals. These differences represent different theories of action that cast the findings in a different light. (Patton 1990:470)

Ulrich’s (1994, 1996) twelve critical systems heuristics questions were used as a template for designing the research instruments, the interview schedules, and were adapted to suit the purpose and context of this study.

With regard to its method, Ulrich’s ‘critical systems heuristics’ consists of twelve questions that he claims to be ‘critically heuristic categories of pragmatic mapping’ (Ulrich, 1994:44) because they conceptualise those aspects of the real world that are crucial to understanding the complex and normative nature of any policy design. According to Ulrich, the first boundary that policymakers of a social policy or system will have drawn is that around the social system to which the policy refers, in this case, both the public and private sectors of the higher education system. The second boundary that they will have drawn is that between two categories of social actors – those involved in planning the policy and those affected by the policy. The former are those who are factually involved in the policy formulation process, (a process of will formation), who have some kind of resources to contribute to the policy. Some of the policymakers are often also affected by the policy, but differ from ‘the affected’ in that they can usually voice their concerns during the planning process. The latter are those who are actually or potentially affected by the implementation and outcome of the policy and will have to live with its consequences and unwanted or unintended side-effects or risks 86.

86 As noted above, Ulrich argues that it is ‘the affected’ who should remind ‘the involved’ of their moral responsibility for all the practical consequences of their planning effort (Ulrich, 1983:256). Furthermore, he insists that it is only the voluntary consent of ‘the affected’ that can legitimate the costs and risks imposed on them by the policy. He suggests that before imposing a policy, ‘the involved’ should publicly secure the consent of ‘the affected’ (Ulrich, 1983:257).
The ‘critical systems heuristics’ method involves identifying four social roles related to the policy process: three roles belong to the ‘involved’ category – the ‘client’ role (which is linked to the policy’s basis of motivation), the ‘decision-maker’ role (which is linked to the policy’s basis of power and sources of control) and the ‘expert’ role (which is linked to the policy’s basis and sources of knowledge). The fourth social role belongs to the ‘affected’ category, but Ulrich argues that this group is large and difficult to specify, so that, for practical purposes, it needs to be represented by a smaller group which he calls ‘witnesses’; those who can bear witness to the concerns of those who do not have a voice. The affected category is linked to the policy’s source of legitimation.

In the case of the HEQC’s policy formulation, the HEQC are obviously the ‘decision-makers’ in the ‘involved’ category but they also drew into the policymaking process groups of consultants, ‘experts’ from the higher education sector. Thus the involved group was made up of decision-makers and experts and only marginally included ‘clients’ (students) and representatives of the ‘affected’ (academics). As described below, the HEQC did seek to consult the ‘affected’ by running various consultative panels, seminars and workshops at which their draft policies were presented for discussion and comment. They also initiated a ‘comment’ stage in the policymaking process when stakeholders were invited to send their written comments on the policy drafts to the HEQC. However, for various reasons, that are discussed in the chapters that follow, the voice of academics and students did not come through strongly in the HEQC’s attempts at consultation. The empirical research conducted for this study confirms the difficulties entailed in obtaining the opinions of these two groups of stakeholders at this early stage in the policymaking process. In the end I failed to obtain student opinions and had to resort to an immediate instance of implementation to obtain academics’ opinions. However, despite these constraints, I did persevere with this adaptation of the Ulrich method.

For each of his four social roles, Ulrich identifies a principle concern and a key problem for the policy-maker or analyst to investigate. Below the twelve ‘critically heuristic’ questions of Ulrich’s method are described. Their application to specific research instruments for the gathering of stakeholder opinion is outlined as is the more general way in which these questions informed the investigation.

The Client Role:

1. A policy’s basis of motivation revolves around the client or beneficiary role. In Ulrich’s method, the first question to establish is ‘who is the policy’s client, and whose interests does it actually serve?’ With respect to the HEQC’s policies, the client is the student, as indicated in the analysis on the policy texts in Chapter 9. The question about whose
interests the policies actually serve is clearly a contested one that I sought to explore in the interviews with stakeholders.

2. The principle concern with respect to the client is to establish the policy’s purpose and its potential consequences. As indicated in the analyses below, the HEQC claims that its policies will work to serve the interests of students.87 A question on the likelihood of the HEQC’s policies achieving their intended purpose formed the basis of a question to all representatives of the expert, institutional decision-maker and affected groups in the interviewing process.

3. The key problem surrounding the client role is ‘what is the policy’s measure of improvement? How is what constitutes an improvement decided and by whom?’ This question goes to the heart of the research questions set for this study that seeks to document and analyse the process undertaken by the HEQC for determining its measures of improvement, that is, criteria for audit and accreditation. According to the critical systems heuristics method, if students are to be the main beneficiaries of the policy intervention, then, it is they who should confirm that the policy’s measures of improvement do indeed represent measures of improvement from their own perspectives. Unfortunately, as mentioned above, I was unable to gather student opinion on the HEQC’s policy instruments because they were insufficiently involved and informed at this stage of the process. The HEQC’s efforts to do so were also unsuccessful88 (see Chapter 7). I suggest that this is because the HEQC’s policy instruments, that is, the criteria and indicators for institutional audit and programme accreditation, are too abstract and far removed from students’ everyday experience. Student opinion is crucial to informing judgments about the quality of educational provision, but this is probably best gathered after implementation and in the context of specific instances of delivery. This means that this aspect of the Ulrich method was not achieved in this study.

The Decision-maker Role:

4. According to Ulrich, the second area to investigate is the policy’s basis of power and sources of control. Ulrich claims that it is important to understand a policy’s ‘decision environment’; what conditions of success those involved control and what conditions are beyond their reach. The first question in this regard is ‘who is the decision-maker and

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87 The data suggests that some HEQC officials are particularly concerned to protect disadvantaged, poor, black students from sub-standard provision.

88 As a result of the lack of student involvement in quality assurance in higher education, the HEQC has recently embarked on a ‘Quality Literacy Campaign’ for students, to inform them of their policies and to develop awareness and support for them in the student sector.
who is in a position to change the policy’s measures of improvement?” The answer is the HEQC (with the funder of the HEQC and higher education, the Department of Education also in a position to change the policies’ measures of improvement). Chapter 6 indicates the fairly constrained policy environment within which the HEQC has to operate and the demanding ‘transformation imperative’ that it is obliged to promote. Furthermore, as noted in Chapter 2, the HEQC cannot function without the support and cooperation of higher education managers, in particular, Vice-Chancellors, Deputy-Vice Chancellors (Academic), Deans and Heads of Schools or Departments. Although higher education managers cannot formally change the HEQC’s measures of improvement, within their own institutions, they do have the power to negotiate, adapt and interpret the HEQC’s requirements. Thus in this study data were gathered from two groups of decision-makers, the HEQC as external decision-maker and higher education managers as internal, institutional decision-makers.

5. The decision-makers’ principle concern is resources, ‘what resources and other conditions of success are controlled by the decision-maker; on what sources of decision power does the policy rely?’ The HEQC itself does not control very large resources and is dependent on the Department of Education for the bulk of its budget. As already noted, it relies on the cooperation of academic managers to gain access and legitimacy for its work, and on the expertise of academics to act as peer evaluators in its quality assurance procedures. However, the HEQC wields considerable bureaucratic power and this is its main source of ‘decision power’. The HEQC’s decisions on whether or not to accredit programmes is, for the public institutions, a condition of funding by the Department of Education and, for the private institutions, a condition of being granted permission by the Department to operate. Furthermore, the fact that the HEQC’s decisions are made public has serious implications for the reputation and therefore marketing opportunities of institutions. Thus the HEQC’s decisions have serious implications for the funding and reputations of public institutions. But, as suggested above, its power to effect improvement in institutions depends heavily on its getting support from higher education managers who control budgets and staffing decisions within institutions. A question on ‘conditions of success’ and the extent to which the decision-makers believed that they had control over these was posed to both groups of decision-makers in the interviews.

6. The key problem identified by Ulrich for decision-makers is ‘what belongs to the policy’s environment and what conditions does the decision-maker not control?’ As is indicated in Chapter 6, the HEQC is operating in a volatile, busy policy environment and has influence, but not control, over what the Department of Education, the chief decision-
maker in the policy environment, does. Furthermore, higher education managers do not have full control over what actually gets done within their institutions. Power in institutions is very devolved and fragmented, leaving large amounts of discretion to Heads of Department and to academics. Thus a question explored in this study is the extent to which the decision-makers are constrained by their lack of control over key conditions and areas of practice.

The Expert Role:

7. The third area that Ulrich suggests investigating is the policy’s basis and sources of knowledge, that is, ‘what counts as ‘facts’ or relevant knowledge for the project?’ Here one should try to establish the expertise or knowledge that underpins the policy and supposedly guarantees its success. An understanding of the limitations of that knowledge helps to understand the policy’s potential sources of failure. According to Ulrich, the questions to be asked by the policy analyst are ‘who is involved as planner or expert; who is considered competent to participate in the drawing up of the policy?’ In this study the policy development process that involved HEQC officials, experts and representatives of institutional decision-makers and to a lesser extent the ‘affected’, is described in some detail in Chapter 7.

8. The question relating to the principle concern for the expert role is ‘on what expertise does the policy rely?’ In this study, with respect to expertise on the quality assurance of teaching and learning, the HEQC relied on the expertise, experience and research conducted by the Improving Teaching and Learning Working Group. The development of the Improving Teaching and Learning Resources was the first project that the HEQC embarked on and it relied partly on the outputs of this project to inform its development of policy instruments for audit and accreditation (with respect to the quality assurance of teaching and learning). Chapter 7 describes how the HEQC drew South African higher education teaching and learning experts into its policy formulation process. The evaluation of the Improving Teaching and Learning Project’s work, which is based on stakeholder opinion data collected through the interviews, serves to indicate some of the limitations of that work and its consequences for the HEQC’s policy-making process.

9. The key problem to be addressed with respect to the expert role is ‘what is the guarantee that the policy will be implemented and will work?’ This is the key issue raised by theory-based programme evaluation and in this study is applied in a more focused way to the HEQC policies in Chapter 9. Questions relating to the implementability and workability of the policy were also asked of stakeholders in the survey and interview questions and are reported in Chapter 8.
The Affected Role:

10. The final area to investigate in Ulrich’s method is the policy’s *basis and sources of legitimation*. This involves asking how the policy takes into account the interests of those who are *affected* by it and on whom the policy may impose undesirable risks, costs and consequences. According to Ulrich (1996), only the voluntary consent of those *affected* can legitimate the policy. These questions are intended to uncover the policy’s ethical assumptions and deficiencies, particularly with respect to those who are ‘affected’ by it. The first question to ask in this respect is ‘*who is witness to the interests of those affected but not involved?*’ In the case of this study, the *affected* are the academics and middle managers who will have to implement the HEQC’s quality assurance requirements and show that they are making efforts to improve their management and teaching practice. During the study it proved difficult to capture the voice of the *affected* directly, mostly because academics were not yet sufficiently engaged with or informed about the HEQC’s policies. Only small numbers of academics attended the HEQC events to which they were invited and those who did were often ill-informed about the new policies and as a result said that they were unable to answer the researcher’s interview questions. For this reason, I had to rely on the opinions of other stakeholders, that is, academic managers and quality assurance managers to report on how they believed academics would respond to the HEQC’s policies. I was also obliged to ‘tag on’ an additional case study aimed at capturing the voice of academics in particular. It was possible to capture the voice of academics affected by the HEQC’s MBA programme re-accreditation process because this policy had reached implementation phase and was already affecting these academics’ working lives. In other words, the HEQC’s MBA re-accreditation exercise served as a ‘critical incident’ that the researcher could use to gather more in-depth information on academics’ attitudes towards the HEQC and programme re-accreditation policy.

11. The *principle concern* for the witness to the affected role is, ‘*to what extent are those affected given the chance of emancipation from the premises and promises of those involved?*’ The issue of the degree of discretion granted to those who must implement and be affected by the HEQC’s policies became an important issue for discussion with institutional stakeholders in the data-gathering process. See for example the questions in the interview schedules eliciting academics’ views on being accountable to the government for the quality of their teaching and on how they think quality assurance measures should be carried out.

12. Finally, the *key problem* to be considered for the affected role is ‘*on what world views is the policy based; what are the differing views on what counts as improvement between*
those involved and those affected and how will the intervention deal with this?’ In this study, a framework for categorizing the different rationalities involved in (and affected by) quality assurance was proposed in Chapter 2. The researcher attempted to capture differences in values and world-views by asking interviewees a specific question on this in the interview schedules. This data was analysed using the four rationalities identified in the conceptual framework on approaches to quality assurance. With respect to official decision-makers, Chapter 6 attempts to capture the government’s world-view regarding higher education. During the actual policy process, research done for this study contributed both to informing the development of the HEQC’s policy instruments and to the official sectoral response to them. However, the study does not go so far as to intervene further in the policymaking process in order to deal with the differences between stakeholders that it exposes. In this sense, the study does not answer the second part of Ulrich’s last question and so falls short of his full method of critical systems heuristics.

As discussed in Chapter 4, a limitation of Ulrich’s method, from a post-modernist viewpoint, is its inadequate accounting for power and its belief in rational dialogue as a means to greater consensus and more democratic processes of policymaking. With respect to the former criticism, the use of critical discourse analysis and the attempt to analyse the interview data on two levels, both as sources of information (subjective ‘truth’) and as sources of interpretation (instances of discursive practice), is intended to uncover the ideological and discursive workings of power, at least through the written and spoken word. With respect to the second criticism, the research done for SAUVCA did contribute to the sector’s response to the HEQC’s draft policy instruments, and the analysis of the revised instruments in Chapter 9 suggests that, to a large degree, the HEQC responded seriously and rationally to the SAUVCA comments. This suggests that the critical systems heuristics approach (and its belief in rational dialogue) was effective (to an extent) in the context of this particular policymaking process. However, the study also seeks to expose the limitations of the approach by documenting the extent to which the unequal power relationship between the HEQC and other stakeholders (particularly the affected) allowed the HEQC to close off dialogue and the consultation process when it chose to. In this sense, there is an attempt in the study to use post-structuralist perspectives to overcome the limitations of the critical approach and of critical systems heuristics in particular.

5.1.5 Researching Policy Reformulation

In Chapter 9, the analysis of policy reformulation, the fourth stage of the policy process, aims to provide a more in-depth evaluation of the design of the HEQC’s finalized policy
instruments for institutional audit and programme accreditation. This chapter assesses the extent to which the HEQC responded to comments from stakeholders made during the comment phase and assesses the extent to which the policies are likely to realize their aims. It asks what is the HEQC’s policy theory, on what assumptions is it based and are these assumptions likely to hold? These questions are similar to the critical systems heuristics question No.9 above. The method used to investigate these questions is theory-based programme evaluation complemented by a critical discourse analysis of the final policy documents. The data sources for this chapter are the finalized policy texts, the interview data and also a further interview with two senior HEQC officials.

I selected the theory-based approach for the final analysis of the policy instruments’ design because it helps to make explicit the assumptions and the logic behind the theory of causation on which the design is based. It therefore provides a useful tool for assessing the extent to which the policy is likely to work, that is, result in the stated and desired changes (the first research question posed in this study). I then used the method recommended in Pawson and Tilley’s (1997) ‘realistic evaluation’, namely using interviews to present the researcher’s draft programme theory to key informants for comment and validation. It is unfortunate that the data-gathering process evolved in such a way that I did not have sufficient time or access opportunities to pursue this method further.

In Chapter 9 I complement the theory-based approach to evaluation, (which, according to Pawson and Tilley (1997) holds together perspectives from both the post-positivist and constructivist traditions), with a brief critical discourse analysis of the finalized policy documents, thus bringing to the analysis critical and post-structuralist perspectives as well. This critical discourse analysis builds on that conducted in Chapter 6 on the policy environment. In the discourse analysis in Chapter 9 I use formal textual analysis using objectifying techniques to identify specific examples of patterns in the lexico-grammar that demonstrate that the text is a product of a particular process of policy formulation. I attempt to identify in the text the workings of discourse, the positioning of readers and the subscription to particular value systems.

5.2 Research Methods

In this chapter section I take each of the research methods and instruments, explaining in greater detail exactly how they were designed and used in this study. For each research method and instrument, excepting the first, I describe my access to the data and the research setting, the development of the research instrument, the process of data-gathering, selection (sampling) and data coverage, where relevant, and the processes of capturing, editing and
analyzing the data. I conclude the discussion on each method and instrument with a note on how I sought to avoid error during the research process and also on what limitations of that method remain.

5.2.1 Critical Discourse Analysis of Policy Texts

As explained above I conducted a critical discourse analysis of the policy context in Chapter 6 and a more detailed critical discourse analysis of policy texts (that describe specific policy instruments) in Chapter 9. This section covers both instances of the method’s use. Where the categories established above for describing empirical research methods do not apply, they are ignored.

Access

Access to the policy documents analysed for this study was unproblematic as most of the documents are already in the public domain. As a researcher involved in some of the HEQC processes, I did have access to early drafts of HEQC policy documents and this facilitated the work in most cases. However, in some cases, unexpected and on-going changes by the HEQC meant that I had to continually revise some aspects of the work.

Development of the Research Instrument

The research instrument in critical discourse analysis is the researcher. This makes the explanation of one’s method all the more important.

Data Gathering, Selection and Coverage

For Chapter 6, I collected and read all the key policy texts relating to the government’s transformation of South African higher education produced during the period 1990-2002. I ensured that my selection covered all the relevant policy texts for this period and that the selection was therefore representative of the policy environment being explored. I also read relevant texts written by well-known South African policy analysts to support my own analysis.

Data Capturing and Analysis

In Chapter 6 I used the third and second moments of critical discourse analysis outlined above. I first sought to understand the broader socio-cultural and political-economic context that was driving the policy developments and to reconstruct the extra-linguistic conditions that both made possible and constrained the development of particular social practices and the ‘orders of discourse’ that constitute them. I also sought to understand the development of the more immediate institutional context in which the HEQC has to operate. In so doing I sought
to reconstruct the policymakers’ ‘implicate social order’ (Gale, 2001) or ‘appreciative systems’ (Vickers, see Chapter 4 above).

This led to the second moment of critical discourse analysis in which the analyst seeks to uncover the discursive shaping of the (policy) texts’ production by identifying the central discourses and sets of institutional meanings and values (and value assumptions) that policymakers used to justify and rationalise their policies and to legitimate the government’s policy ‘solutions’. I was particularly interested to uncover the meaning of ‘transformation’, its rationale and content with respect to higher education, as this is probably the dominant discourse that drives policymaking in post-apartheid South Africa. In doing so, I aimed to uncover the ‘orders of discourse’ that informed the African National Congress government’s transformation of higher education and that define what is possible and not possible to think and say about particular areas of concern. However, given the scope and number of documents to be covered, the analysis in Chapter 6 was conducted at a fairly superficial level, focusing on general trends, ideological effects and discursive practice, rather than on detailed textual analyses.

Chapter 9 deals with a more detailed description and analysis of the formal properties of a set of specific policy texts. Here, I sought to uncover how the lexico-grammatical patterns of choice in the texts are shaped by the text’s discursive and socio-political context. I did this by applying in a selective and very simplified manner some of the techniques of Halliday’s (1994) functional systemic grammar. Halliday suggests that such an analysis should demonstrate how and why the text means what it does and why it is valued as it is. I used two of Halliday’s three components of a text’s context, namely its ‘field’ which deals with the ideational function of the text and describes its experiential domain, ‘what is being talked about and what are the goals of the writer or speaker’ (Butt et al., 1995:13), and its ‘tenor’ which deals with the interpersonal function of the text, ‘what the text is doing as a form of social interaction and how the writer indicates identities, relations and attitudes’. In this method of discourse analysis the discursive analysis is built up as the formal description of the text takes place. Halliday (1994) claims that his grammatical categories are determined by their function and so should be understood as the realizations of semantic patterns. This means that lexico-grammatical choice can be traced back systematically to social and ideological function in the context of the text’s production.

In order to conduct the analysis, I selected four passages from each the HEQC’s four final policy documents on the basis of their discursive and ideological weight. I then undertook a simplified analysis of these passages only, using Halliday’s techniques. I worked in this
manner because Halliday’s method is very labour-intensive and time-consuming and my purpose was to provide an illustrative rather than comprehensive analysis.

**Avoidance of Error and Limitations**

Chapter 6 deals with an analysis of the socio-cultural and discursive practices of the producers of an ensemble of policy texts on the basis of the researcher’s interpretation of the texts themselves and by referring to the work of other policy analysts. Such an analysis is limited by the researcher’s capacity and bias. This limitation can, to a certain extent, be counteracted by analyzing the talk of others around the policy texts. In this sense, the interviews with HEQC officials (the producers of some of the texts) and with representatives of key groups of stakeholders (the interpreters of some of the texts), afforded me an opportunity to validate my own textual analysis.

Chapter 9 deals with a more detailed but highly selective formal analysis of a set of policy texts. Here again the analysis is based entirely on the researcher’s capacity and interpretation. The use of theory-based evaluation, a different method from a different meta-theoretical paradigm produced different results and may serve to limit the effects of researcher bias.

### 5.2.2 Participant Observation of Policy Development

According to Patton

> The purpose of observation data is to describe the setting that was observed, the activities that took place in that setting, the people who participated in those activities and the meanings of what was observed from the perspective of those observed. (Patton, 1990:202)

He continues that descriptions should be factual, accurate and thorough and that the criterion for good observation is whether it allows the reader to enter into and understand the situation described. In Chapter 7 below, where I describe and analyse the data gathered through participant observation, I aim to provide the reader with an understanding of the perspective of the Improving Teaching and Learning Project’s Working Group, as this was the organizational location from where I participated in the HEQC’s policymaking processes.

**Access and the Research Setting**

As described above, I was granted formal access to data through participant observation, interviews and documentation by the HEQC, whilst I worked full-time as project manager of the Improving Teaching and Learning Project during 2002, and then again when I assisted the HEQC in facilitating five out of 14 of the Improving Teaching and Learning Project’s regional workshops in 2003. My role as a full-time consultant researcher to the HEQC during 2002 also gave me access to numerous informal conversations and interactions that must have...
informed my perceptions. With respect to disclosure, I took the option of full disclosure, giving a full explanation to members of the Improving Teaching and Learning Project’s Working Group and to senior HEQC officials of my research purposes and intentions. However, the fact that my observations were multiple, covering a period of a very busy year, probably meant that, as time went on, many of the participants forgot that I was researching the process. With respect to participant observation of the HEQC workshops in 2003, in all cases the HEQC official chairing the workshop introduced me both as co-facilitator and as researcher, but the details of my research were not communicated in any detail to the participants. When asking permission to interview individual participants, it was therefore necessary to clarify with each interviewee my research purposes and exactly how the data would be used.

The research settings were always institutional. In most cases the settings for meetings was an HEQC office or the CHE boardroom in Pretoria. I had a desk in a secretary’s office next to the Director of Quality Promotion and Capacity Development’s office and many informal discussions took place there. In cases where Working Group meetings extended overnight the settings for my observations were hotel or guest-house conference rooms. In other cases we had shorter day-long meetings either at the HEQC or in the Johannesburg airport conference rooms. On 14 August 2002 the project ran a seminar on behalf of the HEQC to introduce all Deputy-Vice Chancellors (Academic) to the project and the HEQC’s vision for capacity development in quality assurance. This seminar was held at the Birchwood Hotel in Johannesburg. The project also ran seven Consultative Panels to get feedback from the academic community on its draft Resources. These were held either at in the CHE boardroom or at the Johannesburg airport. The HEQC regional workshops held in 2003 were all, but one, hosted by institutions that provided the venues for the workshops. In the one exceptional case, the HEQC had to pay for hotel facilities in Durban.

**Development of the Research Instrument**

As mentioned above, the research instrument in participant observation is the researcher herself and in this case, I was able to participate as a full member, (in fact as manager) of the Improving Teaching and Learning Project’s Working Group. This enabled me to build up trust and credibility with the Working Group members and with some members of the HEQC staff. In this role I also had access to various HEQC in-house documents, meetings, Board meetings and public seminars. In all of these cases I was invited in my capacity as manager of the Improving Teaching and Learning Project. I was often required to deliver reports on the project but in many cases had to leave the meeting once the project’s item on the agenda had been dealt with. This meant that, given my role as a consultant, my access to the inner
workings of the HEQC was limited and sporadic. I reported to the Director of Quality Promotion and Capacity Development and so my access to inside information was dependent on what she decided I needed to know for the purposes of running the project. However, because the HEQC was at the time still a small organization in the start-up phase of its existence and the Improving Teaching and Learning Project was its first project, I was probably privy informally to more information than would normally be the case. Of course the confidential and personal nature of some of the information gathered means that it would not be appropriate to disclose it in a study such as this, but this point is mentioned because it must to some extent have coloured my perceptions as I synthesized the legitimate data gathered. Patton asserts that for qualitative research and for participant observation in particular

> Analysts have an obligation to monitor and report their own analytical procedures and processes as fully and truthfully as possible. (1990:372)

This certainly is my aim in the descriptions that follow.

**Data Gathering, Selection and Coverage**

As indicated above, I attended and observed all activities related to the Improving Teaching and Learning Project during 2002. This included several initial meetings with the Executive Director of the HEQC and later with the Director of the Quality Promotion Directorate late in 2001 and early in 2002, prior to my formal appointment. The project held an introductory meeting on 27 November 2001 and its first formal meeting of the Working Group on 21 February 2002 followed by 5 formal meetings of the project’s Working Group during the course of the year. There was an additional meeting called to hear the draft report of the project’s ‘Needs and Capacity Analysis’ at the University of Cape Town on 10 May 2002. As mentioned above the project ran an important seminar in August for DVCs (Academic) and seven consultative panel meetings during August, September and October of 2002. Additional HEQC in-house noteworthy meetings that I attended included reporting back to the HEQC Executive Committee, HEQC inter-project planning meetings, observation of meetings of the audit and accreditation framework Working Groups, consultations with Prof. John Brenan, Dr. Stella and Prof. Graham Webb, international experts from the UK, India and Australia respectively, who were consulting to the HEQC in its start-up phase and HEQC Board meetings on 1 October 2002 and 4 December 2002 where drafts of the Improving Teaching and Learning Resources were provisionally approved. I also attended other meetings, as the HEQC’s representative, with external stakeholders, including the South African Universities Vice-Chancellors’ Association (SAUVCA), the Committee of Technikon Principals (CTP), the Education and Training Practitioner Development Sectoral Education and Training
Authority (ETDP SETA), the Departments of Education and Labour, the South African Qualifications Authority (SAQA) and the HEQC’s Quality Assurance Managers Forums. In some cases these meetings were directly related to the Improving Teaching and Learning Project’s business, for example the meetings with SAUVCA and the CTP to discuss cooperation between our and their research projects. But in other cases these were not directly related, for example the meetings with SAQA and the ETDP SETA around the HEQC’s attempts to exempt higher education from SAQA’s requirement to have all assessor’s (that is academics) registered by the ETQAs (that is the HEQC for higher education) and discussions with the Departments of Education and Labour around standard-setting and finalizing the New Academic Policy for Higher Education. I attended such meetings on behalf of the HEQC because they were related to teaching and learning issues and because I think, the HEQC was short staffed at the time. These meetings with other policy players created a context that helped me understand the complex and sometimes difficult policy environment in which the HEQC was operating.

These activities provided me with the opportunity to interact with HEQC officials, quality assurance experts, other policy players and institutional representatives. I also interacted more regularly with members of the Improving Teaching and Learning Project’s Working Group, staff developers and academic development personnel, drawn from across institutional types in the country. These activities also gave me access to a range of accompanying policy-related documentation and HEQC in-house documentation. Useful project documentation that I collected includes the Improving Teaching and Learning Project’s Proposal and Framework, Action Plan (there were several versions), Needs and Capacity Analysis Report, agendas and minutes of the Improving Teaching and Learning Working Group’s meetings and sections of HEQC Board minutes relating to the Project.

I also gathered data specifically related to feedback on the Improving Teaching and Learning Resources for editing purposes. After the Working Group developed the first drafts, these went through two rounds of editing, both done by myself – firstly on the basis of feedback from the Consultative Panels, the HEQC Board and the Reference Group at the end of 2002 – and secondly, on the basis of feedback from the HEQC’s regional workshops in April of 2004. The Consultative Panels were made up of academic managers and senior academics,

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89 The names and institutions of the Improving Teaching and Learning Project’s Working Group members can be found under the List of Contributors on p.21 of the Introduction to the Resources, see Appendix 2.0.

90 The names and institutions of the people who made up these three groups can be found in Appendix 2.0 at the end of the Introduction to the HEQC’s Improving Teaching & Learning Resources under ‘List of Contributors’.
who were regarded to have expertise in the particular area with which the Improving Teaching and Learning Resource under discussion dealt. These individuals were deliberately drawn from across institutional types and backgrounds. Institutions were also invited to send postgraduate students, although not many attended. The HEQC Board is made up of individuals of standing drawn from government, labour, business and higher education and some because of their expertise in quality assurance. The project’s Reference Group consisted of organizational representatives from the HEQC Board, partner organisations such as the SAUVCA and the CTP and also a few international higher education or quality assurance experts.

With regard to the regional workshops, I submitted a report to the HEQC on feedback data that I had gathered from the five workshops I attended. This included specific comments on the Resources and also notes taken on report backs and discussions around institutional strategies for the improvement of teaching and learning, evaluation comments on the workshops and suggestions made to the HEQC for taking the project forward. I also had access to the more general report compiled by the Acting Director of the Quality Promotion Directorate, on the basis of reports from all the facilitators of the 14 workshops that collated feedback on the Resources, evaluations of the workshops and suggestions on how the project should be taken forward. The Acting Director’s report therefore collated data gathered from all higher education institutions in the country, including private providers, whilst my own field-notes and report gathered more detailed data generated by participants from the following institutions:

91: Workshop No.4 - the University of Cape Town, the University of Stellenbosch, the University of the Western Cape and four private providers; Workshop No. 5 – the University of Durban-Westville, the University of Natal and 14 private providers; Workshop No.7 – the Durban Institute of Technology, Mangosothu Technikon, the University of Zululand and eight private providers; Workshop No.10 – Technikon Pretoria, Technikon North West, Technikon Northern Gauteng and six private providers; Workshop No.13 – the University of the Witswatersrand, Vaal Triangle Technikon and seven private providers. This list indicates that I managed to gain access to the full range of institutional types in South Africa with an even spread of universities and technikons and from the most advantaged and prestigious to the weakest and historically disadvantaged. I deliberately selected the workshops that I would attend with a view to obtaining a representative sample of institutional types (purposive sampling).

91 The workshops happened just before the first mergers and so pre-merger names of institutions are used. The HEQC deliberately tried to organize the workshops in such a way that as far as possible merger partners attended the same workshop.
In terms of selection of data, I simply gathered field-notes and accompanying documentation on all activities that, as an employee and consultant to the HEQC, I was obliged to attend and on any data related to the revising of the Improving Teaching and Learning Resources. In reporting on this data in Chapter 7, I have attempted to be faithful to the full range of data gathered. My coverage of events relating to the Improving Teaching and Learning Project’s work in 2002 and to a lesser extent in 2003, was comprehensive and I had access to a representative range of opinions on the Resources. However, my own interpretation has guided the selection of the data presented in this study. In selecting data for presentation the aim has been to provide a fair reflection that is representative of all the data collected. I also gathered data as participant observer, using the same methods as those described above, during the SAUVCA National Quality Assurance Forum’s workshops held on 10 and 11 April 2003 and on the 6 November 2003 to discuss the sector’s response to the HEQC’s proposals for criteria for institutional audit and programme accreditation respectively. This data is described and analysed together with the results of the survey questionnaires in Chapter 8.

**Data Capturing, Editing and Analysis**

I captured field-notes by hand in a large hard-backed A4 note-book, taking care to capture dates, places and participants of each event I attended. I always left the left-hand side page clear for my own observations and comments, often filled in soon after the event took place. I also used this page to make notes (in a different colour) on follow-up activities that I would have to undertake for the HEQC. It is the notes on the left-hand pages that I used primarily to construct the story of the Improving Teaching and Learning Project presented in Chapter 7. The field-notes and accompanying project documentation are used to provide evidence for that story.

My analysis of the Improving Teaching and Learning Project’s work was informed not only by the data collected through participant observation and project documentation, but also by the data on the project and its products gathered through the interviewing process described below. I also used the conceptual frameworks provided in Chapters 2, 3 and 4 to explain and critique the approaches to the quality assurance of teaching and learning promoted by myself, the Working Group and other stakeholders.

**Avoidance of Error and Limitations**

As suggested above, the process of data collection via participant observation was fairly comprehensive. However, it could not be fully representative because of the limitations of time and place and the fact that the researcher did not have access to all HEQC documentation.
and processes during the period under study. The danger of researcher effects on the data gathering process during participant observation is not considered to be very serious, as in most cases, people were used to my presence and in most cases, the data was being gathered for HEQC purposes as well as my own. In other words, the data were gathered in naturalistic settings and this contributed to their reliability.

However, the process of data analysis was inevitably influenced by observer bias. The researcher’s insights and interpretations which are limited to a particular perspective - that of a staff development expert from an historically advantaged institution, working as a consultant to the Improving Teaching and Learning Project, et cetera. I attempted to overcome these limitations during data collection by accessing and recording as wide a range of opinion and perspectives as possible in as reliable a manner as possible. In the data analysis I attempted produce an account of the policy development process that was faithful to the data at my disposal. However, during the process of data collection and analysis I was aware of my own concern to show that, despite difficulties, the Improving Teaching and Learning Resources were eventually considered to be a successful product. Because of the large amount of personal investment that I put into the production of these documents, it has been difficult to undertake their evaluation in a distanced and disinterested manner.

In terms of the methodology of the evaluation of the Improving Teaching and Learning Resources, the researcher’s perspective is deliberately triangulated with the perspectives of other stakeholders gathered through participant observation during the Consultative Panels and the Improving Teaching and Learning Project’s regional workshops and in more depth through the interviewing process described below, in an attempt to counteract researcher bias. This allows for the researcher’s perspective (as expert and writer) to be balanced with those of HEQC officials (as decision-makers) with those of academic managers (as internal decision makers) and academics (as representatives of the affected). However, in the interviews, interviewee reactivity to the researcher and to her role in producing the Resources may well have caused respondents to fulfill the researcher’s expectations and to offer overly positive comments on the Resources. Hopefully, the likelihood of interviewer reactivity during the interviews is to some extent balanced by the comments made by participants at the Consultative Panels and regional workshops, where in more naturalistic settings, the comments were directed not at the researcher in person, but at the Improving Teaching and Learning Project and at HEQC more generally.
5.2.3 Survey Questionnaires on Stakeholder Opinion

Two survey questionnaires were run as part of the methodology of this study with a view to obtaining more reliable and representative data than that obtained through participant observation.

Access and the Research setting

Access to these data was gained through SAUVCA and the activities of the SAUVCA National Quality Assurance Forum (SNQAF). During the comment phase of the policymaking process in 2003, SAUVCA (and the CTP) needed to compile a representative response from the higher education sector to the HEQC’s two discussion documents, the ‘Proposed Criteria for the HEQC’s First Cycle of Audits: 2004-2009’ released in mid-March 2003 and the ‘Proposed Criteria for the HEQC’s Programme Accreditation Cycle: 2004-2009’ released at the end of September 2003. I was approached by the SNQAF Convenor to assist him in formulating the SAUVCA response and agreed on condition that I could also use the data gathered for my own research purposes. This was agreed to by the SAUCA Secretariat and consequently, with regard to the first response to the proposals for audit criteria, the Convenor of the SNQAF sent out a circular on 13 March 2003 inviting all Quality Assurance Managers to a SNQAF Workshop to be held at the Indaba Hotel, Fourways, Johannesburg on 10-11 April, 2003 to discuss the HEQC’s proposals. The circular included the following reference to my research

Kathy Luckett has agreed to compile a questionnaire on audit issues which will be sent out to QA managers shortly. I realize that you are all very busy people but earnestly request you to reply to the questionnaire promptly. In this way a preliminary analysis of returns can be compiled before 10 April and this will give us a good idea of where to focus discussion at the workshop. Kathy will also be using the questionnaire responses in her current research. All replies will be treated as strictly confidential. Once, again, please assist planning for the workshop and Kathy’s research by completing and returning questionnaires promptly. (SAUVCA, Circular 32/2003).

The circular also noted that the aims of the workshop had been discussed with and supported by senior officials of the HEQC and that they were invited to the workshop. ‘QA colleagues at the Technikons’ were also invited in the light of the pending merger of SAUVCA and the CTP. On 13 October 2003, a similar circular was sent to all Quality Assurance Managers of universities only92 inviting them to attend a workshop to discuss the sectoral response to the HEQC’s proposals for programme accreditation criteria at the Johannesburg airport Conference Centre on 6 November 2003.

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92 As for the audit criteria workshop, QA Managers from the Technikon sector were invited, but unfortunately could not attend as the date clashed with another CTP event. With respect to the programme accreditation criteria, SAUVCA and the CTP submitted separate responses.
In both cases the research setting was a conference centre and the organizational setting was the SNQAF whose membership is made up of university Quality Assurance Managers. People in this forum know each other quite well and the discussions were informal and frank and sometimes heated. In both cases the workshops were chaired by the SNQAF Convenor. As already noted, Technikon colleagues were also present at the first workshop. In both cases a senior official from the HEQC was present. In the audit workshop the HEQC official made a presentation, but, because of time constraints in the programme accreditation criteria workshop, the official only observed the proceedings. My contribution was to make a short presentation early in the programme, presenting key findings from the survey in the first workshop and pointing out key issues in the HEQC document in the second.

**Development of the Research Instruments**

In both cases, the research instrument was a questionnaire designed by the researcher. The instruments were designed under considerable time pressure, given that the HEQC allowed institutions only four weeks to formulate their responses to its proposals. This meant that there was insufficient time to pilot the questionnaires. Instead, in the case of the first one, I sent a first draft to my supervisor and to the SNQAF Convenor, both experienced researchers, for pre-test and comment. In the case of the second questionnaire, I sent a draft to the SNQAF Convenor only. The first questionnaire was sent to all Quality Assurance Managers of both universities and technikons by the SAUVCA office on 17 March. They were self-administered and returned electronically to me and copied to the SAUVCA office by the 28 March. The SAUVCA office took on the task of following up those who failed to respond by the deadline. This gave me just sufficient time to process the responses and prepare my presentation for the SNQAF workshop on 10 and 11 April. The second questionnaire was sent electronically to all Quality Assurance Managers on 22 October. Again it was self-administered, but this time, in order to give respondents more time, SAUVCA asked them to bring their questionnaires and draft responses with them to the workshop on 6 November. After some initial presentations and discussion, participants were given clean copies of the questionnaire and asked to complete them in a slot just before the lunch break. From the point of view of my own research, this was an unfortunate decision for two reasons, firstly, many workshop participants came to the workshop without doing their ‘homework’ and so failed to complete their questionnaire in the time allocated. Others promised to send me their questionnaires later, and never did. Secondly, I think that those who battled to complete their questionnaires, who tended to come from the weaker institutions, may have been unsure of

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93 The two questionnaires can be found in Appendix 4.
how to respond and were probably influenced or assisted by later workshop discussions in formulating their responses, thus contributing to the homogenizing of responses. In this sense, I think that the process for administering the questionnaires was more robust in the first case than in the second.

Regarding the design of the questionnaires, respondents were asked to provide their names, positions and institutions. This information was used to help me analyse the data but has been kept confidential in its reporting. The first questionnaire was divided into Sections A and B, the first section consisted of questions with closed answers using the four Likert response categories, strongly agree / agree / disagree / strongly disagree, plus an additional not sure / not applicable / no response category and an opportunity for respondents to comment on their answers. According to Babbie and Mouton (Babbie et al., 2001:234), a questionnaire should be designed so that ideally these categories are exhaustive and mutually exclusive. The analysis showed that this was not always the case, respondents were not always sure whether their opinions fell into the ‘strongly agree’ / ‘agree’ categories and likewise into the ‘disagree’ / ‘strongly disagree’ categories. In the first question I aimed to make links with previous policy documents such as the draft Institutional Audit Framework (2002f) and the Founding Document (2002c) in order to test whether respondents’ expectations were being met. In the second and third questions I aimed to find out whether respondents were happy to accept the HEQC’s shift from a facilitative to a bureaucratic model of quality assurance, but I framed the question in terms of the common SNQAF discourse which used the distinction between a ‘fitness of purpose’ and a ‘fitness for purpose’ approach to signal this shift. Further questions were based on key proposals in the HEQC document and followed its structuring of the criteria into three different levels of scrutiny. I attached a list of the criteria using a clearer numbering system because the HEQC draft had used a confusing numbering system that lost the hierarchies. The questions were usually phrased as a statement summarizing an aspect of the HEQC’s proposals followed by a positive statement with which respondents had to agree or disagree on the four-point scale. I used the positive form in order to avoid posing leading questions. Section B comprised of open-ended questions inspired by Ulrich’s twelve questions for his critical heuristics method (see 5.1 above). Questions 8–10 focus on more practical issues relating to implementability and capacity development needs; these questions were inserted at the request of the SNQAF convener. The instructions to respondents appear to have been understood as there was a very low percentage of unanswered or misunderstood questions. However, with hindsight, I think that a major flaw in the questionnaire was its use of double-barreled questions in questions 2, 3, 10, 16, 19, 27 and 28. I now think that I should have separated out the questions using the contingency question format, as advocated by
Babbie and Mouton (2001). However, a check on the not sure / not applicable / no response category for these questions shows that all respondents answered these questions with the exceptions of number 27 (2 ‘not sure’ responses), number 19 (1 ‘not sure’ response) and number 28 (1 ‘not sure’ response). The fact that the questionnaires were used together with the HEQC documents probably enhanced their clarity and therefore the reliability of the data.

On the basis of experience gained through administering the first questionnaire, I designed the second questionnaire to gather opinion on the HEQC’s proposals for criteria for programme accreditation more simply. Firstly, I collapsed the four point scale into simple ‘yes’ ‘no’ options after realizing that people found the graded distinctions difficult to make and also realizing that the reasons given for their positions often gave an indication of the strength of their position. This time I phrased the statements in the first person plural, rather than impersonally as previously, in order to encourage the respondents to answer on behalf of their institutions and not just for themselves. The statements in questions 1-7 were more general than those phrased for the first questionnaire. Questions 6 and 7 on readiness for implementation were inserted at the request of the SNQAF Convenor. Given that the HEQC initially proposed 30 criteria for programme accreditation, rather than go through each one, I asked the respondents to mention only those for which they had specific criticisms. This required respondents to do some preparation before attending the workshop and, in retrospect, I realized that this meant that it was largely the opinions of the stronger institutions and the more confident quality assurance managers that were expressed in response to this question.

Questions 9-11 were inspired by the Ulrich set of questions, but I this time I did not feel that I could ask more or less the same group of people the same questions, thus this aspect of the questionnaire was considerably simplified and condensed. Generally the questions seem to have been clear and unambiguous, with no signs of serious misunderstandings in the responses. The fact that many of the issues were discussed in the workshop before the completion of the second questionnaire would have assisted respondents in understanding the questions. In addition, the fact that the HEQC documents provided a common reference point between the researcher and the researched also enhanced the accuracy and reliability of the data gathered.

**Data Gathering, Sampling and Coverage**

The sample for the questionnaires was the total population of quality assurance managers and their institutions in the public higher education sector. The process of data-gathering was greatly enhanced by the fact that it was done in the name of SAUVCA and the SNQAF in particular, an organization to which many of the quality assurance managers hold strong allegiance. This helped to legitimate the research and the fact that it was ‘for real’, that is, it
was contributing to the sectoral response to the HEQC, meant that most respondents took the exercise seriously and attempted to respond as completely and honestly as possible. Furthermore, the issues under discussion were importantly and directly related to the quality assurance managers’ jobs and many would have had a vested interest in getting their opinions on the criteria through to the HEQC. In most cases, the quality assurance managers were also the people responsible for compiling the responses of individual institutions to the HEQC and so the questionnaires and workshops were useful to them as preparation for this task. Given the detailed nature of the task involved, the quality assurance managers (quality assurance experts) were the best group of stakeholders to engage in this work, that is, most were competent to answer the questions and those who were not were assisted by the SNQAF workshop processes. These factors must have contributed to the good response rates: 60% for the first questionnaire and 71% for the second.

In terms of coverage, 35 participants attended the first SNQAF workshop to discuss the sectoral response to the audit criteria and 23 attended the second to discuss the accreditation criteria. 16 out of 21 universities and 5 out of 14 technikons responded to the first questionnaire. As there was no significant difference between responses from the two sectors, I analysed university and technikon responses together – giving a 21 out of 35 response rate, i.e. 60% response rate. The second questionnaire had 15 out of 21 responses, a 71% response rate. In both cases there was an even spread between historically advantaged and disadvantaged institutions.

With respect to the first questionnaire, it should be noted that the HEQC sent out its audit proposals mid-March and set a deadline for responses by 14 April. This placed enormous pressure on SAUVCA and the respondents, causing SAUVCA decided to drop its initial requirement that Quality Assurance Managers first consult with senior management in their institutions before completing the questionnaire and attending the workshop (Field-notes 12 March 2003). This was unfortunate for the purposes of my own research, as the input of Vice-Chancellors, Deputy-vice-Chancellors and Deans would have greatly enriched the representativeness and scope of the data. In the event, SAUVCA managed to negotiate a 14-day extension with the HEQC for the submission of responses. For the second questionnaire, the HEQC granted a six-week comment period, but given the time of year, people again complained about the tight deadlines.

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94 Not all institutions did so, some were happy to let SAUVCA do the work for them.
95 The inclusion of technikons lowered this figure, as technikon quality assurance managers probably did not feel as committed to the exercise as did university respondents. When calculated separately, the response rate for universities was 76%, whilst that for technikons was only 36%.
Data Capturing, Editing and Analysis

Given the manageable number of responses, I collated them manually and reported both in quantitative and qualitative findings to SAUVCA (see Appendix 4). I captured the qualitative comments according to negative and positive categories and translated positive and negative responses to the closed questions into rounded-off percentages. In the case of the first workshop, the main findings were reported to the participants for discussion. The SNQAF Convenor used this data as evidence to inform and back up the sectoral response to the HEQC.

Avoidance of Error and Limitations

In designing, administering and analyzing the questionnaire instruments, I attempted to avoid error through the following means. Firstly, I aimed to make the questions clear and unambiguous, with clear references to the HEQC document concerned. Secondly, in reporting the findings, I was careful to capture the responses accurately and comprehensively. As a result, I think reasonably representative and reliable sets of data were captured. Unfortunately, the data was elicited from the same group of stakeholders, but this was largely unavoidable, given the levels of competence in quality assurance issues required and the tight HEQC deadlines.

With respect to the reliability of the data collection, my instruments and the data-gathering processes may have been lacking to a certain extent. This conclusion is drawn from the fact that the general tone set at the SNQAF workshops was fairly critical of the HEQC, especially as set by the stronger historically advantaged institutions (see report on the critical incident at the first workshop in Chapter 8). However, the presence of an HEQC official at both workshops served to check this tendency and allowed the HEQC an opportunity to explain itself. The second instrument was better designed than the first (the problem of the double-barreled questions in the first), but the process of administering the first questionnaire was more reliable than that used for the second.

With respect to validity, standardized questionnaires are often weak in this aspect because they are often inflexible and crude (especially the closed questions) and can result in capturing the lowest common denominator in a superficial manner. Furthermore, surveys rely on self-reporting of social attitudes and behaviours and cannot capture these directly (Babbie and Mouton, 2001:263). But the validity of this research exercise was enhanced because it was relevant and meaningful to the research participants.

Finally, in terms of the pluralistic methodology adopted for this study, the survey questionnaires did help to gain coverage and representativeness of opinion and so helped to
eliminate the unreliability of the researcher’s own observations. The survey questionnaire findings are also triangulated with those from other research instruments, in particular those from the in-depth interviews.

5.2.4 Interviews with Stakeholder Representatives

The strength of the interview method is its capacity to access the perspectives, attitudes and opinions of the interviewees (Babbie and Mouton 2001:288), in this case of representatives of the stakeholder groups identified by Ulrich’s critical systems heuristics method. As explained above, this method was selected for use in this study because of its pertinence to researching the attitudes, opinions and value assumptions of different groups of stakeholders on the acceptability, legitimacy and validity of the HEQC’s new policies.

Access and the Research setting

My access to the interviewees through the HEQC’s Improving Teaching and Learning Project has been explained above. When asking for permission to conduct the interview, the interviewees were warned that they should reckon on the interview taking up to an hour of their time. Before conducting an interview an attempt was made to first establish a rapport in the hope that interviewees would feel relaxed and unthreatened. I explained the purpose of my research and how the data would be used. I also assured interviewees that their names and institutions would not be revealed in the reporting of the research. I asked their permission to use a tape-recorder and gave them a copy of the interview schedule, first checking that they understood all of the questions. In some cases interviewees told me beforehand that they would prefer to omit certain questions.

As discussed above, I was unable to find students (representatives of the client role) who were in a position to give an opinion on the HEQC’s quality assurance policies. With regard to the witnesses to the affected role (academics) I had similar problems. On looking at my interview schedule (see Appendix 9.5) most of the academics whom I approached at the Improving Teaching and Learning workshops refused to give an interview on the grounds that they were not competent to answer most of the questions, that is, generally they indicated that they were insufficiently familiar with the Improving Teaching and Learning Resources and that they had not read any of the other HEQC documents. I therefore had to find other ‘witnesses to the affected’, namely academics in a different HEQC policy-related context to get sufficient coverage of data on this role.

The interviews were all conducted in neutral, unthreatening settings. Those of quality assurance managers, academic managers and a couple of academics were all held around the
HEQC’s regional workshops on Improving Teaching and Learning in an institutional setting, for example during the lunch breaks on a bench outside, or in a break away room of a conference centre. HEQC officials were interviewed in their offices at the HEQC and the academics affected by the MBA review were interviewed in their university offices or meeting rooms.

**Development of the Research Instrument**

The theory and general application of Ulrich’s (1994, 1996) critical systems heuristics method to this study has been explained above. I designed the research instruments (interview schedules using the critical systems heuristics method) with the aim of eliciting in-depth, honest and detailed responses from representatives of the stakeholder groups, and in particular, with a view to gaining their opinions on the ‘principle concerns’ and ‘key problems’ identified by Ulrich for each ‘social role’. With this in mind, I prepared a standardized interview schedule for each of the following stakeholder groups: external decision-makers (i.e. senior HEQC officials), internal decision-makers, (i.e. academic managers, these were DVCs (Academic), Deans or Directors of units), experts (i.e. quality assurance managers or equivalent) and the witnesses of the affected (i.e. academics, I included Heads of Departments in this category as I felt they were closer to the affected role than the decision-maker role and could thus represent the academic world-view). As explained above, I had difficulty in finding a representative number of academics to interview at the workshops and so had to revise the interview schedule to cater for those academics affected by the HEQC’s MBA review. I had also discounted interviewing students as clients (see below).

The interview schedules can be found in Appendices 9.1 – 9.6. I designed two different schedules for HEQC officials, a general one (Appendix 9.1) for officials who were not immediately involved in the Improving Teaching and Learning Project and a more specific one (Appendix 9.2) for those who were closer to the work of the project and to the development of the criteria instruments. Appendix 9.3 was used for academic managers (which included DVCs (Academic), Deans and Directors) and Appendix 9.4 was used for Quality Assurance managers (which included Heads of Academic Planning units or Academic Development units where these units also carried the quality assurance function). Appendix 9.5 was designed for academics and Heads of Departments and this schedule was revised for academics and Heads of Departments who participated in the MBA review process, see
Appendix 9.6. Below, I indicate how Ulrich’s critically heuristic set of questions was used to inform the construction of the questions in the interview schedules.\textsuperscript{96}

Ulrich’s questions on the client role did not feature prominently in the design of the questionnaires, but Question No. 2 on the policy’s purpose and potential consequences was tackled in questions to academic managers and quality assurance managers around the ensuring of accountability and improvement in the quality of higher education provision (see Appendix 9.3 No.8 and Appendix 9.4 No.7). The question of the potential consequences of the policy was also asked of academics (see Appendix 9.5 No.6 and Appendix 9.6 No.8). Ulrich’s Question No.3, although intended for clients, seemed appropriate to also ask of ‘the affected’, and so I included a question to academics on their views on what should be the ‘policy’s measure of improvement’ (see Appendix 9.5 No. 8 and Appendix 9.6 No.11).

Regarding the decision-maker role, Ulrich’s Question No.5 on resources and conditions of success, the principle concern for decision-makers, was captured in Appendix 9.1 No.6 and Appendix 9.2 No.4 and 6 for HEQC officials and in Appendix 9.3 No.3 and 4 for academic managers. Ulrich’s Question No.6 on the conditions beyond the decision-makers’ control was captured in Appendix 9.1 No.8 and Appendix 9.2 No.8 for HEQC officials and in Appendix 9.3 No.4 for academic managers.

Regarding the principle concern for the expert role, Ulrich’s Question No.8 on the policy’s expertise is captured in Appendix 9.4 No.1 for quality assurance managers and Appendix 9.3 No.1 for academic managers (although this group is classified as decision-makers rather than experts, I thought that they would be competent to comment on this issue). I considered Ulrich’s Question No.9 on the ‘guarantee that the policy will work and be implemented’ to be a key question for evaluating a policy at this adoption stage of the process and so asked this question of all groups of stakeholders (Appendix 9.1 No.7 and Appendix 9.2 No.5 for HEQC officials), (Appendix 9.3 No. 2 and 8 for academic managers), (Appendix 9.4 No.3 and 7 for quality assurance managers) and (Appendix 9.6 No.9 for MBA academics).

Regarding the affected role, I found Ulrich’s Question No.11 difficult to operationalise, and attempted to do so in Appendix 9.5 No.1 and 5 and in Appendix No.9.6 No. 2 and 6. Ulrich’s Question No.12 on the key problem for the affected, namely conflicting world views regarding what counts as improvement is similar to Question No.3 for the client role. As

\textsuperscript{96} Each interview schedule is indicated by its Appendix No. and the No. that follows indicates the specific question number in the schedule. Ulrich’s questions are indicated as follows ‘Ulrich’s Question No. x’. Note that for each set of three questions, the first has been dealt with by identifying the stakeholder group that takes up a particular social role. Thus Ulrich’s questions 1, 4, 7, and 10 were not specifically used to construct questions in the interview schedules.
stated above, the question of intervening in the policy process to deal with the differences identified was beyond the scope of this study. However, I did aim to identify differences in stakeholder views on ‘what counts as improvement’ and in the analysis, I aimed to link this to the different rationalities and attendant approaches identified in Chapter 2. I therefore aimed to elicit evidence of underlying value and world view differences from all groups of stakeholders, but with more emphasis on this in the interview schedules for ‘the affected’, that is, academics. I attempted to probe HEQC officials’ values around quality assurance in Appendix 9.1 No. 3 and 4 and in Appendix 9.2 No.3. I attempted to probe academic managers’ values around quality assurance in Appendix 9.3 No.7 and those of quality assurance managers in Appendix 9.4 No.5. Regarding academics, I dealt with this issue in Appendix 9.5 No.9 and Appendix 9.6 No.12. Because, in Ulrich’s method, the views of ‘the affected’ are crucial for legitimating a policy, I tried to supplement and enrich my data on the views of academics by gathering indirect data, that is, by asking other groups of stakeholders to comment on what they thought academics would think of the HEQC’s policies\(^97\), (see Appendix 9.2 No.3b, Appendix 9.3 No.7b, Appendix 9.4 No.4 and 5b).

I also included questions relating to the evaluation of the Improving Teaching and Learning Resources for HEQC officials (Appendix 9.1 No.1 and 2, Appendix 9.2 B No.1-4) and for academics (Appendix 9.5 No.4)\(^98\). I also slipped in questions relating to immediate policy issues and experiences known to the interviewees, for example, I asked some of the HEQC officials to comment on their perspectives on the institutions’ responses to the audit criteria (Appendix 9.2 No. 1 and 2), I asked academics about their experience of the Improving Teaching and Learning Project’s workshops (Appendix 9.5 No.2 and 3) and I asked MBA academics about their experience of the HEQC’s re-accreditation site-visits (Appendix 9.6 No.1, 3, 4 and 5).

In conducting the interviews, I used the interview schedules in a flexible manner, allowing respondents to make digressions and to omit certain questions. I also added my own probes where necessary in order to keep the interviews flowing.

With respect to the question of the representativeness of the sample and the reliability of the interview instruments, whilst I aimed to draw out equally the opinion and views of all stakeholder groups (except the clients, for practical reasons), because critical systems

\(^{97}\) I also made use of this strategy in the SAUVCA survey questionnaires to quality assurance managers.

\(^{98}\) I did not ask academic managers and quality assurance managers a specific question on the Improving Teaching and Learning Resources, but most did comment on them in their responses to the general questions on the HEQC’s policy instruments.
heuristics is a method developed in the critical paradigm, I understand it to be deliberately biased in favour of understanding and representing the position of ‘the affected’, precisely because it understands this view to be under-represented in the policymaking process and this group to be disempowered and ‘left out’ by those involved in the process. In this sense, one could argue that the bias in the method is deliberate and is intended as a corrective measure.

Data Gathering, Sampling and Coverage

When gathering the interview data, I always noted the interviewee’s name and position and the date and place of the interview. I allowed an hour per interview, but depending on the interviewee’s knowledge and interest, some interviews took only twenty minutes whilst others went on for up to two hours. In a few cases we ran out of time and I had to complete the interviews telephonically on an agreed evening. In other cases, the interviewees took the schedules and agreed to send me an e-mail on the remaining questions. Apart from these exceptions, all interview data was captured on tape. I also took copious notes during the interviews as a check and back-up to the recordings. Many of the interviews could be classified as ‘key informant’ interviews, that is, the interviewees were selected because they had particular knowledge and expertise in the issues involved. For the MBA academics interviews I used focus group interviews on four occasions (see Appendix 9.11 MBA 3, MBA 4, MBA 6 and MBA 7) in order to save time, but these were never larger than groups of two or three people and so allowed all interviewees to participate, with the exception of one instance where the Head of School dominated and rather crowded out the opinions of the other two members of staff (see Appendix 9.11 MBA 3).

As stated earlier, my approach to sampling or rather selection was both purposeful and opportunistic. As explained above, it was not possible to find students (Ulrich’s client role) competent to respond to the interviews. My experience of student participation at the Improving Teaching and Learning Project’s Consultative Panels suggested that they were insufficiently informed to respond competently to questions on the HEQC’s policies. This opinion was confirmed at the one and only workshop that I observed where three Student Representative Council members were present (see field-notes 13 & 14/11/2003). With respect to selecting HEQC officials and MBA academics, my approach was purposeful, that is, I deliberately targeted certain people to interview. I conducted six interviews with HEQC officials and was satisfied to have covered the key players, namely the most senior officials and the person responsible for actually writing the draft policy documents. With respect to the other interviews conducted at the HEQC Improving Teaching and Learning Project’s workshops, the selection of these events was purposeful in that I knew that those attending were likely to be informed about and interested in HEQC issues. During the workshops I
noted those participants who showed potential as good interview candidates, that is, those who were well-informed and/or demonstrated strong opinions on issues during discussions. Others, such as the quality assurance managers, I already knew from other quality assurance-related events. I then approached these individuals, but some, especially academics, self-selected not to be interviewed, meaning that on some occasions I felt that I was operating opportunistically, that is, finding anyone who agreed to be interviewed. But in most cases the interviewees proved willing and competent to be interviewed and many were highly motivated to share their opinions on the HEQC’s policies. This was so particularly in the case of the quality assurance managers and the MBA academics as these were the two groups who had most intimate knowledge and/or experience of the policies. In all I interviewed six HEQC officials (see Appendix 9.7), seven academic managers (see Appendix 9.8), nine quality assurance managers (or equivalent) (see Appendix 9.9) only three academics (see Appendix 9.10) and eleven MBA academics in eight interviews (see Appendix 9.11) giving a total of 36 interviewees and 33 interviews conducted in all, with a fair spread of interviewees across three of Ulrich’s four social roles - decision-makers, experts and the affected, and omitting the clients.

Data Capturing, Editing and Analysis

All the interview data that was recorded on tape was transcribed into MS Word by a research assistant. I then checked the transcriptions against my notes and added to them and edited where necessary. Where requested, the transcriptions were also sent to interviewees for checking. Once the transcripts were finalized they were imported into NVivo and coded according to themes that emerged from the content of the data and from Ulrich’s questions. I first used ‘free nodes’ and then later grouped these into families of nodes under the following ‘trees’: Policy Instruments – categorized into the following branches: Improving Teaching and Learning Resources, proposals for audit criteria, proposals for accreditation criteria, MBA re-accreditation criteria and the proposals for the granting of self-accreditation status – for each policy instrument data was divided into positive and negative comments; Approaches to Quality – categorized into the following branches: collegial, managerial, facilitative, pedagogical and bureaucratic rationalities; and Stakeholder Concerns – categorized into the following branches: policy expertise and acceptability, resources and conditions of success, feasibility and implementability, beyond control, policy effectiveness and value/world-view conflicts - for each of the five stakeholder groups: HEQC officials, academic managers, quality assurance managers, academics and MBA academics. With regard to the latter tree, I started off following Ulrich with different concerns for the different stakeholder groups, but later decided to make these uniform across the groups so that I could make comparisons
between the groups in the analysis, although of course, certain groups had more to say on some concerns than others. ‘Left-over’ free nodes that did not lend themselves to tree clusters included: issues around transformation, mergers, a single quality assurance system, market forces and academic freedom. These issues were included in the analysis only where pertinent. Having coded the data according to these tree and branch nodes, I then printed it out node by node, with the attributes and stakeholder group of the interviewee attached to each comment. This enabled me to identify patterns, trends and relationships in the data, for example to link certain positions, values and rationalities to certain groups of stakeholders and to identify trends in the responses to the different policy instruments.

In categorizing and analyzing the interview data in this way, I was able to analyse the data at two levels. Firstly, although interviews do not provide direct access to minds or behaviour, I could interpret the data as realist accounts and as sources of information, that is, I assumed that people were telling me ‘the truth’ and that they therefore provided me with access to information, for example, on the acceptability of the different policy instruments or about conditions surrounding the implementability of the HEQC’s policies. Secondly, I also interpreted the same interview data as realizations of discursive practice, that is, as sources for interpretation that could give me insights into the world-views, values, discursive repertoires and ‘orders of discourse’ that the interviewees drew upon when answering the questions. At this second level, one looks for patterns of social meaning encoded in the rationalities and discourses that are adopted by different stakeholders (Hammersley, 2003). It was here that the conceptual framework for different approaches to quality assurance developed in Chapter 2 provided a useful frame for categorizing and analyzing the different rationalities and world-views of stakeholders. It is the linking of the two levels of analysis and the identification of patterns and relationships between them that makes for an interesting analysis.

Avoidance of Error and Limitations

In an attempt to check the accuracy and reliability of the interview data, in all cases I asked interviewees if they would like to see a copy of the interview transcript for comment. Five HEQC officials, three academic managers, one quality assurance manager and one academic requested this opportunity. On receiving their corrections (which were all minor) I returned the corrected version to the interviewee.

In an attempt to enhance the reliability of the data and reduce interviewee reactivity, I assured the respondents that neither their names nor institutions would be revealed in my findings, hoping that this would encourage them to speak out openly and fearlessly about their opinions. I think that in many of the interviews this aim was achieved. However, I think that some of the interviews must have been affected by researcher expectancy, that is, because
most of the interviewees knew that I was involved in the production of the Improving Teaching and Learning Resources, this affected how they responded to my questions, in particular to those related to the quality of these documents. This probably means that my findings on stakeholder evaluation of the Improving Teaching and Learning Resources are overly positive. The only factor that may have mitigated this tendency, to some extent, may be that I was also able to capture opinion on the Resources at the workshops through participant observation, where the comments were made more generally and directed at the HEQC rather than at me.

In conclusion, with regard to analyzing the interview data, I aimed to achieve internal validity, that is, to ensure that my claims are justified by the data. As discussed above, I also aimed to enhance the validity of the analysis by triangulating both data sources and research methods.

### 5.2.5 Theory-based policy evaluation

In Chapter 9: Policy Reformulation, a truncated adaptation of theory-based evaluation, based on Pawson and Tilley’s (1997) method for ‘realistic evaluation’ was employed in order to analyse the HEQC’s finalized policy instruments for institutional audit and programme accreditation. The theory-based approach to evaluation focuses on analyzing whether and to what extent a policy and its programmes is likely to result (or has resulted) in its intended consequences. In other words, it asks what the mechanisms are that cause the inputs and interventions to result in the outputs and outcomes. Theory-based evaluation is interested to understand and explain the actual change mechanisms of a policy and to explain how a policy intends to get people to change their social practices. It focuses on a policy’s theories of change and the assumptions made about these in the policy design.

### Access and the Research setting

Access to the finalised policy documents was simple because by this stage (2004) they were in the public domain. Access to senior HEQC officials as ‘key informants’ was difficult because in this case, the reason for meeting was entirely for my own research purposes. Eventually I managed to get two officials to agree to spend time with me during breaks at the Auditor Preparation Workshop held on 25-27 August 2004 at the Birchwood Hotel, Johannesburg, where I was a participant and they were facilitators. I spent the first meeting explaining the theory-based approach to evaluation and showing them my table representing draft policy theories for audit and accreditation. They agreed to have a discussion on the table the following day. Both meetings were very rushed and interrupted. One official who was called away sent his remaining comments by e-mail.
Development of the Research Instrument

Following Pawson and Tilley (1997), the analyst or evaluator’s ‘hypothesis’ of the policy or programme’s theory becomes the research instrument. This draft policy theory is then presented first to the policymakers and then to other stakeholders for their critique and validation. Pawson and Tilley note that it is particularly important for the analyst or evaluator to understand the policymakers’ beliefs and assumptions, as these are what inform the policy theory. The analyst’s representation of the policy theory then becomes the subject matter of the interviews in which respondents are asked to comment on the extent to which they support it. The analyst collects and records the responses and uses them to refine the programme theory and to understand the different perspectives and assumptions made by key stakeholders.

I went about designing the research instrument in the following manner. Firstly I read and re-read the policy documents, the two audit and accreditation framework documents as well as the criteria documents. I then captured a draft policy theory in table form, initially for each of the two policy instruments, accreditation and audit. I constructed two tables by adapting and blending a version of the logic framework for programme evaluation with Pawson and Tilley’s ‘Context + Mechanism = Outcome’ formula. I structured representation of the policy theory under the following headings: causal factors and purpose, context, mechanisms, immediate outcomes and impact and included a column below each of these for the sets of assumptions that I thought each aspect of the programme theory was based on. In this way I located activities and resources above the line and the reasoning supporting them below the line. Regarding Context, Pawson and Tilley (1997) suggest that the analyst needs to document what are the current social and institutional contexts in which the policy/programme operates and to discover what contexts are necessary for the change mechanism to operate successfully. For Mechanism, they suggest defining clearly what are the activities, resources and reasoning that are assumed to result in changed patterns of behaviour. For this column I attempted to sum up the key mechanisms proposed by the HEQC for its institutional audit and programme accreditation programmes (and later added mechanisms for its quality promotion and capacity development programme, which uses the Improving Teaching and Learning Resources as benchmarks). Pawson and Tilley define Outcomes as regularities or patterns of changed social practices. Here I summarized the key claims made in the policy texts about intended outcomes, separating out short-term immediate outcomes from long-term impacts. The finalized table representing the HEQC’s integrated quality assurance system, that is, its institutional audit, programme accreditation and quality promotion and capacity development programmes, can be found in Appendix 10.
Data Gathering, Sampling and Coverage

As described above, I tried out Pawson and Tilley’s (1997) method of interviewing only once, with two key informants. The two HEQC officials had taken my tables away the previous evening and agreed to comment on them the next day. They did not want the discussions to be taped, saying that it was just an informal discussion. This meant that I had to conduct the discussion and take notes at the same time. We worked together on one copy of the tables and I made corrections and notes on them as they talked. I later inserted their more extensive comments as footnotes to the final table. Despite the difficult setting, Pawson and Tilley’s method of interviewing worked well, the discussion with the HEQC officials was animated and they were clearly challenged by the policy theory tool and both asked for copies of the revised version. During the discussion-cum-interview, it was decided that it made more sense to combine the two tables into one that would encompass the HEQC’s integrated approach to quality assurance and also include its quality promotion and capacity development functions. The revised and validated table capturing the HEQC’s integrated policy theory and comments from the two key HEQC officials is presented in Chapter 9.

As stated above, this was a very truncated use of Pawson and Tilley’s method, I used it only as a validation check on my own interpretation of the HEQC’s policy theory. It was not used to obtain a representative body of data from across all policy stakeholders as recommended by Pawson and Tilley 99.

Data Capturing, Editing and Analysis

After the ‘interview’ I revised the table and sent it by e-mail to the two officials concerned for their confirmation. They both agreed that the revised version adequately captured their responses.

When conducting the analysis, I took the list of assumptions from the tables and used these as probes to find out what representatives of other stakeholder groups had said about these issues in the interview data gathered using the Ulrich method. Interestingly, the Ulrich method, that focuses on the key problems and concerns of stakeholders, did elicit concerns relating to some of the perceived unfounded assumptions made by the programme theory.

Avoidance of Error and Limitations

I sought to avoid error and misrepresentation by confirming the revised version of the programme theory table with the HEQC officials concerned, and I used the method to validate...
my own interpretation of the HEQC’s policy theory. As noted above, the main limitation of my use of the theory-based approach was that I used it with only two people very late in the research process.

5.3 Conclusion

With respect to the extent of the objectivity of the methods used in this study, there was a danger of ‘researcher effect’. This would have been most evident in my bias towards wanting the Improving Teaching and Learning Resources to be considered a success (as a result of my involvement in their production) and also in my sympathy for academics (as those most ‘affected’ by the HEQC’s policies). It is also likely that my identity and bias was picked up by some of the interviewees, causing ‘respondent reactivity’ to interfere with their responses, especially regarding their evaluation of the Improving Teaching and Learning Resources. In the analysis, I tried to control for these effects firstly at a conceptual level, by using the theory on evaluation set out in Chapter 4 to critique the work of the Improving Teaching and Learning Working Group.

Secondly, methodologically, I hoped to counter my own bias by triangulating both data sources (gathering opinions and interpretations other than my own) and research methods (for example by using survey questionnaires to counter my own participant observations). However, the extent to which I was successful in countering bias in the study is open to debate. The only data set that could claim representivity was the survey questionnaires. The other data sets may have captured more strongly the voices and concerns of those from the historically English-medium universities than from other institutional types. This was a result of my having easier access to this group. This problem with qualitative research is summed up by Patton.

The human factor is the greatest strength and the fundamental weakness in qualitative enquiry and analysis (Patton, 1990:372).

I aimed to enhance the reliability of the data by taking the usual measures used in qualitative research to try to ensure that the data was accurate and consistent, for example by recording the interviews and having the transcripts checked by (some of) the interviewees. With respect to the representativeness of the data sets, the use of purposive and opportunistic sampling was to some extent off-set by the use of the survey questionnaires that covered the total population of institutions (but through only one set of stakeholders, the quality assurance managers or experts). In many respects, the data gathered for this study, of necessity, had to be gathered largely from experts and decision-makers, that is, those ‘involved’ in the quality assurance
policy process, because at this early stage in the policymaking process, they were the only groups competent to deal with the issues. As explained above, I had difficulty in finding representatives of the ‘client’ and ‘affected’ groups who could engage with the issues. In this sense, a limiting factor in the use of the Ulrich method was that I tried to use it for evaluating and analyzing the early stages of a policymaking process, when it was probably designed for and could have been used more effectively at the end of the process, that is, after implementation. My belated discovery of Pawson and Tilley’s (1997) work on a method for using the theory-based approach to evaluate, in particular, the design or theory of a policy or programme was unfortunate, for the study may have been enriched if I had had time to use this method more extensively with a wider group of stakeholders. However, I suspect that the sophistication of the research instrument would have confined its usefulness to only those stakeholders with high levels of knowledge and expertise in quality assurance. It is unlikely that this method would have overcome the problem of obtaining greater input from ‘the clients’ and ‘the affected’.

With respect to the validity of any claims made in this study, it is important to state that because of the nature of the data, its selectivity and use of largely qualitative methods and the fact that inferences are made using primarily retroductive rather than inductive or deductive logic, only limited empirical conclusions can be drawn. The evidence is not sufficiently robust to prove any strong relationships between variables. Thus the conclusions do not have external validity; that is, they are not generalisable to other populations and situations. Instead, it is hoped that the findings and the researcher’s interpretations of these will be considered to achieve adequate levels of internal validity on the basis of the internal coherence of the study. The significance of this study does not lie in the strength of its empirical findings but rather in its attempt to illustrate a multi-method approach to the analysis of a complex policymaking process.
Setting the Policy Agenda

Chapter 6

The first stage of the policymaking process identified in Chapter 1 is that of problem identification and agenda setting (Anderson, 1997). The questions to explore at this stage of the policy analysis are ‘How does an issue become identified as a public problem?’ and ‘How does it get onto the government’s policy agenda?’ This chapter seeks to understand the policy context or the ‘context of influence’ in which the HEQC’s policies and instruments have been formulated. It seeks to describe how the ‘problem’ which led to the social intervention came to be defined as a ‘problem’ in the first place and what values, discourses and ideologies framed these developments. This enables the policy analyst to understand how the proposed interventions are justified and what values and norms were employed or assumed in doing so. According to Parsons (1995), the way in which a social problem comes to be defined determines the way in which policymakers will seek to address it.

A problem has to be defined, structured, located within certain boundaries and be given a name. How this process happens proves crucial for the way in which a policy is addressed to a given problem. The words and concepts we employ to describe, analyze or categorize a problem will frame and mould the reality to which we seek to apply a policy or ‘solution’. … Values, beliefs, ideologies, interest and bias all shape these perceptions of reality. (Parsons, 1995:88)

The importance of unpacking the policy context is further explained by Peters and Marshall as follows.

A problem does not “officially” exist in isolation but in a network defined by the policy context. The policy context is itself, a network of policies and programs that contribute to the definition of a set of related problems. This is where the problem in question is to be situated initially; by reference to the received definition of concepts, the underlying value assumptions and interests that determine the policy context and thereby identify a problem under a certain description. (Peters and Marshall, 1995:274)

With respect to public policy, one needs to understand a government’s justification for its intervention, which is invariably made in terms of the ‘public good’ or the ‘public interest’, that is, some form of collective social good, such as the provision of high quality public higher education. The meanings of such public goods are always theory- and value-laden and so it becomes imperative for the analyst to unpack the discourse of the policy context in order to understand the social theories, values and implicit theories of change used by a government to define and justify its policy agenda and its subsequent programmes and interventions.

This chapter therefore attempts to answer the following two questions:

1. What was the policy context in which the need for the quality assurance of higher education was defined, justified and put on the policy agenda?
2. What were the underlying ideologies, orders of discourse and value assumptions that drove this agenda?

In order to do so the development of the ‘quality assurance’ idea in education policy documents in post-apartheid South Africa is traced, showing how quality assurance came to be viewed as a necessary ‘steering mechanism’ of the state in the project to transform the inherited higher education system to serve the needs of national reconstruction and development. The analysis attempts to uncover how this context shaped the ways in which the concepts of ‘quality’ and ‘quality assurance’ are defined and justified in the policy texts.

The framing of a policy issue takes place in a series of nested contexts: global trends, a macro-national context, a proximate policy environment and finally an immediate institutional and organizational context. It is beyond the scope of this study to deal in any detail with the first two contexts; the focus in this chapter will rather be on a detailed analysis of the third context, the proximate policy environment.

6.1 The Global Context

Chapter 2 described how globalization and accompanying dominance of neo-liberal market-driven economics has led to a shift in state-higher education relations and in the way in which higher education is managed. The neo-liberal discourse includes the assumption that state expenditure on higher education should be justified in terms of economic imperatives, particularly on the ability of higher education to position national economies for success in the global market. A sub-theme is the massification of higher education, the collapse of the idea of the social welfare state and cuts in social spending leading to the concern by governments to get institutions to do more with less. Typical trends in higher education that have developed in this context are:

- declining investment of public funds in higher education, despite higher levels of participation, resulting in the need for higher education institutions to diversify their sources of funding;
- the importation of managerial, quasi-market or entrepreneurial management models to higher education;
- curriculum reform to make higher education more responsive to labour market needs and to make graduates more employable; an emphasis on industry-academic links in research resulting in a shift from basic to applied research;
- increasing privatization of higher education that competes with public provision;
the requirement by governments for higher education to demonstrate efficiency, effectiveness and value for money through accountability measures such as scrutiny by external quality assurance agencies.

According to Dale (1989) and Ball (1994a), the capitalist state faces a number of problems that often lead to the contradictory nature of reform. These are the need to create the conditions for capital accumulation and economic efficiency, the need to create the conditions for the (re)production of the ruling class, the need to create social order and stability (linked to the problem of governance and control) and the need to retain legitimacy. Dale (1989) explains how the state is not simply an administrator; it also exercises moral and educational leadership and in so doing attempts to build hegemony in support of the current ruling bloc. In other words, it also plays an ideological role to ensure that the rule of the ruling elite continues. The expectations of the ruling elite tend to find their way into the state’s agenda for education. This is confirmed by Castells (2001) who identifies similar functions (that are sometimes contradictory) that institutions of higher education are expected to play by governments. Firstly they are expected to generate new knowledge that provides the motor for national development, secondly to train a skilled labour force, including the state bureaucracy and professional class, thirdly they are expected to select and form the dominant social elites and fourthly they are expected to act as state ideological apparatuses (Castells, 2001:210).

Dale suggests that the pressures of globalization and the neo-liberal ideology have resulted in an increasing emphasis on the first and second functions. However, if the state is to get higher education achieve these two goals, it needs to control the system more tightly, often in the face of cuts in state spending. Dale argues that these tensions or contradictions lead to the state controlling higher education more strongly via a bureaucratic rationality, thus placing greater weight on the ideological or legitimation function of education\textsuperscript{100} (1989:13).

\section*{6.2 The Macro-National Context}

With respect to the second context, the macro national context, suffice it to mention that the Mandela period (1994-1999) was characterized by symbolic, nation-building activity and in the public services, the need to overcome the inheritance of the fragmented apartheid systems by building unitary streamlined, national systems. This period was also characterized by a flurry of policy formulation to lay out a vision for a democratic society. The Mbeki period (1999- the present) has been characterized by a commitment to delivery and implementation

\textsuperscript{100} It will be demonstrated below that the legacy of \textit{apartheid} means that Castells’ third function (to select and form an elite) is also emphasized. In this context the need for institutions of higher education to promote equity has a moral status and so plays a legitimating function.
by the government in the face of accusations of a policy or implementation gap, that is a mismatch between policy intentions, policy practice and policy effects (Sayed and Jansen, 2001:6). In many spheres of government this has highlighted the difficulties of implementation and the lack of management and administrative capacity in the public services.

Perhaps more significant than the change of political head, was the ANC government’s shift in macro-economic policy framework. In 1996 it moved from a Keynesian type framework to a neo-liberal model. On coming to power the ANC had adopted the RDP (Redistribution and Development Programme) involving extensive state intervention in the economy and a ‘growth through redistribution’ philosophy. It subsequently came under huge pressure from the World Bank, International Monetary Fund and the local business sector to move away from (over)-spending on social services and to rather focus on productivity and slashing the budget deficit. In 1996 a self-imposed structural adjustment programme, GEAR (Growth, Employment and Redistribution) was announced. This included a series of neo-liberal reforms and the opening up of the economy to global markets. For higher education this encouraged the development of a private sector and the demand from government that it produce knowledge for innovation, highly-skilled graduates and a black middle class that would all contribute to making South Africa more competitive in the global market.

6.3 The Proximate Policy Environment

In order to provide background for the third context, the proximate higher education policy environment during the period 1994-2004, an account of the sociological history of the South African higher education system and the institutions that comprise it is provided. A list of the pre-merger institutions of higher education can be found in the table in Appendix 10, adapted from Cooper and Subotzky (2001). The table shows South African institutions categorized into historical sub-types with the year of their establishment indicated in brackets. This pre-merger picture of South African higher education was just beginning to dissolve at the time the data for this study were collected (2003). Most of the mergers cut across institutional type, histories and cultures in an attempt to eradicate the ‘geo-political imagination’ of the founders of apartheid. However, precisely because of the durability and tenacity of history and culture in the shaping of individual rationalities, these institutional typologies remained valid for the analysis of the data.

The oldest pre-World War II universities, Cape Town, Stellenbosch and Pretoria were established by the Cape colonial government using donor funding. Despite Union in 1910, it was clear from the beginning that English-speaking and Dutch/ Afrikaans-speaking South
Africans would have separate universities to cater for their different languages, cultures and affiliations. After World War II the University of the Cape of Good Hope (an examining body that awarded degrees, modeled on the University of London) was dissolved and the various post-Matric colleges that had grown out of top schools for white males, became recognized as universities. This included UNISA which became a distance college and to which the only black college, the missionary initiated college of Fort Hare, was affiliated. It is noteworthy that all four liberal English-medium universities had been established prior to apartheid higher education policy, namely the Extension of Universities Act of 1959. They were modeled on the Scottish curriculum and upheld British notions of liberal and humanist education. It is also noteworthy that the ‘big four’- the oldest universities with the strongest research track records (Cape Town, Stellenbosch, Witwatersrand and Pretoria\textsuperscript{101}) have been left relatively unscathed by the recent mergers.

Under the new Afrikaner nationalist government a wave of new universities were established under the Extension of University Education Act of 1959 in order to establish racially segregated institutions. The Universities of the Western Cape and Durban-Westville were established for Coloureds and Indians respectively. The Universities of Fort Hare, Zululand and the North were established as ‘tribal colleges’ for the Xhosa and Southern Sotho; Zulu and Swazi and Sotho, Venda and Tsonga respectively (Cooper and Subotzky, 2001). These colleges fell under the control of the Minister of Bantu Education and were staffed and managed largely by Afrikaner nationalists. Students were tightly controlled by management and these institutions developed authoritarian cultures.

In 1967, in response to the needs of the growing manufacturing industry four Colleges of Advanced Technical Education\textsuperscript{102} were established in the urban areas of South Africa to offer three-year post-Matric national diplomas. These and the three subsequently established historically white technikons were staffed and managed mostly by Afrikaans-speakers and their students were predominantly white Afrikaans-speaking males training to work as technicians in the mines, railways and manufacturing industries.

In the late 1970s the apartheid government gave ‘independence’ to four ‘self-governing homelands’- Transkei, Bophuthatswana, Venda and Ciskei (with KwaZulu refusing to take ‘independence’). This led to the establishment of a second wave of black institutions-three black universities and five black technikons in order to train administrators and technicians

\textsuperscript{101} Rhodes University also falls into this category but it is not clear whether this was by accident or design as it was originally to have been merged with Fort Hare.

\textsuperscript{102} In 1979 these were renamed Technikons and in 2004 some became Universities of Technology.
for the public services of the various homelands. Two technical colleges were also up-graded to become technikons - ML Sultan for Indians and Peninsula Technikon for Coloureds. As apartheid-created institutions, these second wave ‘historically black institutions’ shared the same strict government control and authoritarian culture as those established in the 1960s. However, by the 1980s many of the historically black institutions of higher education became centres of student protest, despite heavy state repression.

According to Hall et al. (2002:92), the situation inherited by the new South African state in 1994 was a strange mixture of direct state control for some institutions and a surprising degree of autonomy for others. The six Afrikaans-medium universities and the four English-medium universities enjoyed considerable institutional autonomy and academic freedom, allowing most of the English-medium liberal universities to become centres of anti-apartheid opposition. In contrast, the Technikon sector was under direct state control and shared a national curriculum (as it still does). Despite student resistance, the six ‘homeland’ universities remained tightly controlled and governed as an integral part of the homelands’ civil service whilst the two universities for Indian and Coloured students stood somewhere in-between.

Badat (2004b) characterizes the first stage of higher education policymaking in the new South Africa as the review of higher education and the establishment of a new regulatory framework (1995-1998). This analysis is based on the process of review undertaken by the National Commission on Higher Education (NCHE) followed by Education White Paper 3 and the Higher Education Act of 1997. Badat characterizes the second stage (1999 - to the present) as one of hard policy choices (see below). (Hall et al., 2002) propose a slightly different periodisation based on models of governance. They view the period from 1994 until the publication of the Department of Education’s National Plan for Higher Education in 2001, as the period of ‘cooperative governance’ in which academic freedom and institutional autonomy were guaranteed through block grant funding and an expectation of self-regulation by individual institutions. They describe the governance of the public higher education system as a ‘loose system of state steering and supervision’ (Hall et al., 2002: 134). During this period the state hoped that the social contract established through its concept of ‘cooperative governance’ would ensure that all higher education stakeholders would put the greater interest of national reconstruction and development above their own particular interests. However, by the turn of the century there was a crisis in higher education governance, particularly in the inability of some historically black institutions to govern themselves. Furthermore, the great inefficiency and wastage in the system (see below) was no longer to be tolerated by a market-driven state. This shift in the government’s approach was signaled by amendments to the
Higher Education Act of 1997 that gave the Minister of Education powers to intervene directly in the affairs of individual institutions and also to close down or merge institutions. According to Hall et al. (2002), the publication of the National Plan in 2001 marks a shift in the relation between the state and HE institutions from one of ‘cooperative governance’ to one of ‘conditional (institutional) autonomy’. They argue that the South African state does not have the capacity to impose direct control over institutions partly because, together with institutions, it cannot produce the quality of information required for a rational top-down approach. Nor, they argue, would this be desirable. However, they suggest that the National Plan, the Department of Education’s three-year rolling plans, in which institutional ‘Programme and Qualification Mixes’ must be approved prior to offering, and the new funding framework \(^{103}\), which makes provision for both prospective and retrospective funding, is a move in this direction. The state has now established a ‘web of governance’ which allows it to use policy instruments such as planning, funding and quality assurance (in particular the accreditation of programmes by the HEQC) to control both the inputs and outputs of the system. At the same time, the state’s entrenchment of the rights of academic freedom and ‘conditional’ institutional autonomy (see the White Paper and the Higher Education Act below), is meant to afford academics a meaningful role in shaping institutional policy with respect to all matters related to teaching and research through their Senates.

Hall et al. explain that their concept of ‘conditional autonomy’ is based upon two different understandings of autonomy: substantive autonomy and procedural autonomy (2002:112-113). They define the former as academic freedom; the right to determine substantive matters such as an institution’s primary goals, who should teach (staff appointments), who should be taught (admissions), what to teach (the curriculum) and control over the carrying out of research, all without outside interference. They argue that the right of academics to enjoy this substantive autonomy at institutional level must be guaranteed by the state through the protection and promotion of the rights and responsibilities of Senates. Alternatively, procedural autonomy is defined as the control of enabling factors such as funding and quality assurance. The argument is that with the amendments to the Higher Education Act of 1997, the publication of the National Plan, the draft new funding formula in 2001 and the launch of the HEQC in 2001, that control of procedural issues in the system has been taken over by the state; a ‘web of governance’ now directly controls these enabling functions. Hall et al.’s Report to the Council on Higher Education on ‘Governance in South African Higher Education’ concludes that at the present conjuncture (2001 onwards) institutions of higher

\(^{103}\) See also the recently released ‘Statement on Higher Education Funding: 2004/5-2006/7 (February 2004).
education currently enjoy a relationship of ‘conditional autonomy’ from the state, in which substantive autonomy continues to be guaranteed but the procedures of funding and quality assurance are now under direct state control (Hall et al. 2002:97-98). They conclude

If, however, conditional autonomy is to prove an effective balance between, on the one hand, the needs of the state to direct HE in the interests of development and, on the other hand, the needs of institutions to preserve and defend an environment in which teaching and research can prosper without outside interference, then the rights and responsibilities of the academic sector must be guaranteed and asserted. (Hall et al., 2002: 98)

One of the questions which this study investigates is the extent to which the HEQC’s policy instruments for institutional audit and programme accreditation are likely to maintain this delicate balance – is it possible to confine quality assurance to ‘procedural matters’ without interfering with matters of ‘academic substance’?

Within this crude framework of governance trends, key policy documents for higher education in post-apartheid South Africa are reviewed. In doing so, two policy tracks are identified: the first is linked directly to the Department of Education and deals specifically with higher education, the second deals with education and training in general and is linked, via the South African Qualifications Authority (SAQA) to the Departments of Labour and Education. Each track is dealt with in turn.

6.3.1 The Department of Education

The earliest relevant preparatory policy document dealing with higher education is probably the National Education Policy Investigation (NEPI)’s Report of the Post-Secondary Education Research Group (National Education Policy Investigation). This report aimed to investigate the inadequacies of the higher education system inherited from the previous apartheid government and to make recommendations on how to overcome these. The NEPI Report did not deal specifically with quality assurance, but it was the first to raise issue of the tension between equity and quality. The writers were concerned that the demands for equity and increased access in the future higher education system of a democratic South Africa would need to be balanced with the need to meet acceptable ‘quality standards’ NEPI (1992:117). In terms of underpinning values, the NEPI project was explicitly committed to furthering the principles of non-racism, non-sexism, democracy, redress and a unitary system.

With respect to higher education, the first move by the new democratic government in South Africa was to appoint a National Commission on Higher Education (NCHE) in 1995 which undertook a comprehensive investigation into the system. The Report of the National Commission on Higher Education: A Framework for Transformation recommended the following with respect to quality matters: a single, coordinated higher education system in
which the mechanism for assuring quality across the diversity of institutions and programmes, including those in the private sector, would be external evaluation undertaken by a national quality assurance agency. The NCHE recommended that the government establish such an agency under the Council on Higher Education (also proposed by the NCHE). The NCHE Report suggested that in order to gain acceptance and legitimacy, the quality assurance agency should operate on the following principles

- it should work within the framework of the South African Qualifications Authority (SAQA) Act,
- it should formulate criteria and procedures in consultation with HE institutions,
- it should focus on improvement rather than sanctions and the outcomes of evaluation should not be directly linked to funding
- its methods should combine external evaluation and institutional self-evaluation.

(NCHE, 1996:12)

These recommendations were to be repeated a year later in the Education White Paper 3 (see below). The NCHE justifies its proposals on the basis of international trends where quality assurance by government agencies has been used to promote accountability, improve quality and provide assurance to students and employers of the value of higher education. The NCHE argues that quality assurance is an essential element in the internal governance of institutions and in the new relationship of ‘cooperative governance’ that it proposes between government and higher education, in which the state ‘steers’ the higher education system through incentive and evaluation rather than through detailed regulation and legislation (NCHE, 1996:107-8). It is worth noting that at this early stage, the NCHE envisaged a quality assurance system that would both serve as a state steering mechanism for transformation and at the same time adopt an improvement orientation. The NCHE believed that quality assurance could be used to promote quality per se and thus overcome the great discrepancies in quality that existed in the system.

Hall et al. (2002) argue that cooperative governance is a distinctly South African version of ‘state supervision’ in which, due to lack of state capacity and a weakly integrated higher education system, the state had to rely on ‘a range of roles and obligations in a variety of coordinated arrangements and shared responsibilities’ (NCHE 1996:177) as a form of social contract and commitment to the transformation of higher education in the interests of national reconstruction and development. The NCHE outlines the roles and responsibilities of the four principle stakeholders in South African higher education as follows.

- Government ‘should exercise its powers … in a transparent, equitable and accountable manner and in a discernable pursuit of the public good’ and should take into account ‘the social, cultural and economic needs and concerns of all potential (direct and indirect) beneficiaries of higher education’. Government should allow ‘the maximum degree of practicable autonomy’ and show a
‘commitment to consultation and negotiated solutions to problems’ through taking a proactive, guiding and constructive role’.

- Managers of HE institutions should show ‘a willingness to interact and establish relationships with a wide range of partners’. They should be responsive to national and regional needs, and should promote a favourable institutional environment.

- Academic staff should exercise responsibility by showing ‘dedication to the values of higher education and a readiness to serve these values with academic integrity, in a spirit of independent and critical thinking’. Academic work will ‘be open to scrutiny and will be voluntarily subjected to the measures of quality assurance that prevail in the system’. Responsible staff will give priority to the different learning needs, the academic progress and the personal well-being of all the students entrusted to their educational care and guidance’.

- Students ‘have legitimate expectations and demands which should be met while recognizing that the potential benefits of higher education offer a privilege which carries its own responsibilities. Students ‘have a role to play in the facilitation and orderly continuation and transformation of academic programmes.’ (NCHE 1996: 177-179 quoted in Hall et al., 2002: 32).

As it turned out, by 2001 these principles came to be regarded as wishful thinking on the part of the Department.

The work of the NCHE fed into in the Education White Paper 3: A Programme for the Transformation of Higher Education (Department of Education) (the White Paper) and subsequently the Higher Education Act of 1997. As the government’s response to the NCHE, the White Paper remains a crucial document for establishing the Department of Education’s definition of the problems facing higher education and of its vision, goals and principles for its subsequent solutions. The White Paper is quoted at some length as it remains the best source for understanding the value assumptions that underpin subsequent policy documents, including those dealing with quality assurance. Firstly, it outlines the Ministry of Education’s vision for a transformed, democratic, non-racial and non-sexist system of higher education that will

- promote equity and fair chances of success …
- meet, through well-planned and coordinated teaching, learning and research programmes, national development needs, …
- support a democratic ethos and a culture of human rights …
- contribute to the advancement of all forms of knowledge and scholarship, and in particular address the diverse problems and demands of the local, national, southern African and African contexts, and uphold rigorous standards of academic quality. Department of Education, 1997: 1.14)

The key needs and challenges or the ‘problems’ that the new government’s transformation agenda is intended to address are set out by the White Paper (text in brackets is inserted).

- The need to address the ‘gross discrepancies in the participation rates of students from different population groups, indefensible imbalances in the ratios of black and female staff compared to whites and males, and equally untenable disparities between historically black and historically white institutions in terms of facilities and capacities (social justice, access, equity and redress);
• The challenge of addressing the ‘chronic mismatch between the output of higher education and the needs of a modernizing economy (relevance and efficiency);
• The obligation ‘to help lay the foundation of a critical civil society, with a culture of public debate and tolerance which accommodates differences and competing interests’ (democracy and tolerance);
• The need to correct ‘teaching and research policies which favour academic insularity and closed-system disciplinary programmes’ with approaches that address ‘pressing local, regional and national needs of the South African society and to the problems and challenges of the broader African context’ (responsiveness and relevance);
• The challenge of transforming a governance system that ‘is characterized by fragmentation, inefficiency and ineffectiveness, with too little coordination, few common goals and negligible systemic planning’ (governance, coherence and efficiency). (Department of Education, 1997, 1.4)

The White Paper then lists a set of principles that are intended to guide the process of transformation and underpin the Department’s ‘steering mechanisms’ for the transformation of the system. These principles include equity and redress, democratization, development, quality, effectiveness and efficiency, academic freedom, institutional autonomy and public accountability. These principles are quoted in full as they have a bearing on later debates that take place around the content and processes involved in establishing a national quality assurance system.

**Democratisation:** The principle of democratisation requires that governance of the system of HE and of individual institutions should be democratic, representative and participatory and characterized by mutual respect, tolerance and the maintenance of a well-ordered and peaceful community life. Structures and procedures should ensure that those affected by decisions have a say in making them, (italics added) either directly or through elected representatives. It requires that decision-making processes at the systemic, institutional and departmental levels are transparent, and that those taking and implementing decisions are accountable for the manner in which they perform their duties and use resources. (Department of Education, 1997: 1.19)

The Department has set high standards for itself with respect to democratic processes. Data gathered for this study suggest that many stakeholders do not consider the Department to be adequately consultative.

**Development:** The principle of development means that conditions must be created to facilitate the transformation of the HE system to enable it to contribute to the common good of society through the production, acquisition and application of knowledge, the building of human capacity, and the provision of lifelong learning opportunities. (Department of Education, 1997: 1.20)

Note the ends-means argument here, the Department adopts an instrumental view of higher education and is committed to its transformation in order to serve these ends.

**Quality:** The pursuit of the principle of quality means maintaining and applying academic and educational standards, both in the sense of specific expectations and requirements that should be complied with, and in the sense of ideals of excellence that should be aimed at. These expectations and ideals may differ from context to context, partly depending on the specific purposes pursued. Applying the principle of quality entails evaluating services and
This paragraph contains the germ of a tension which returned to haunt the work of the HEQC, namely the need for a common set standards to be applied across the system regardless of context (accountability or Habermas’ ‘facts’) and a differentiated, context-dependent approach in which different ‘ideals of excellence’ are pursued as ‘norms’ for improvement.

**Academic Freedom:** The principle of academic freedom implies the absence of outside interference, censure or obstacle in the pursuit of academic work. It is a precondition for critical, experimental and creative thought and therefore for the advancement of intellectual inquiry and knowledge. Academic freedom and scientific inquiry are fundamental rights protected by the Constitution. (Department of Education, 1997:1.23)

It is important to note that for the first time in the history of South Africa, the right of academic freedom and scientific inquiry for academics is explicitly entrenched in law. In this study, this notion of academic freedom is employed by some academics in their objection to perceived ‘outside interference’ from the national quality assurance system (see Chapter 8). The difficult tension between assuring the accountability of academics for the public money spent on higher education and their need for ‘freedom from outside interference’ to pursue the ‘epistemic interest’ was discussed in Chapter 2. It is suggested that maintaining this balance remains an on-going challenge for external quality assurance agencies.

**Institutional autonomy:** The principle of institutional autonomy refers to a high degree of self-regulation and administrative independence with respect to student admissions, curriculum, methods of teaching and assessment, research, establishment of academic regulations and the internal management of resources generated from private and public sources. Such autonomy is a condition of effective government. However, there is no moral basis for using the principle of institutional autonomy as a pretext for resisting democratic change or in defense of mismanagement. Institutional autonomy is therefore inextricably linked to the demands of public accountability. (Department of Education, 1997:1.24)

The understanding of institutional autonomy presented in White Paper 3 foreshadows the HEQC’s conceptualization of quality which includes both a ‘fitness for purpose’ and a ‘fitness of purpose definition’. In other words, institutions’ need for a degree of self-regulation and the state’s need to ensure compliance with ‘democratic change’ became principles that underlie the development of the national quality assurance system.

**Public Accountability:** The principle of public accountability implies that institutions are answerable for their actions and decisions not only to their own governing bodies (councils) and the institutional community (senates) but also to the broader society. Firstly, it requires that institutions receiving public funds should be able to report how, and how well, money has been spent. Secondly, it requires that institutions should demonstrate how they have met national policy goals and priorities. (Department of Education, 1997:1.25)

This definition of public accountability is interesting in that it equates accountability to ‘the broader society’ with meeting ‘national policy goals and priorities’. This suggests a strong democratic state that can confidently assert itself as acting in the interests of society at large.
The understandings of quality, academic freedom, institutional autonomy and public accountability outlined in the White Paper are important for this study for they form the values and principles framework that underpinned the HEQC’s policy development process.

As part of its intention to ensure greater public accountability on the part of public higher education institutions, the White Paper provides for the establishment of a national quality assurance system for higher education. It contends that ‘primary responsibility for quality assurance rests with HE institutions’ (the principle of self-regulation), but that there is an important role for ‘an umbrella national authority responsible for quality promotion and assurance throughout the system’ (Department of Education, 1997:2.69). The White paper proposes the establishment of a Higher Education Quality Committee (HEQC) as a permanent committee of the CHE with the following functions: ‘programme accreditation, institutional auditing and quality promotion’ (Department of Education, 1997:2.70, 2.71). The White Paper then repeats the framework for the HEQC’s operating as outlined by the NCHE above. In 3.28, the White Paper again insists that the CHE is to operate within SAQA’s policy framework and to seek delegated authority from SAQA to be responsible for quality assurance in higher education.

The recommendations of the White Paper with respect to the establishment of a Higher Education Quality Committee (HEQC) under the Council on Higher Education (CHE) are legislated in the Higher Education Act of 1997. The Act makes provision for the establishment of a CHE to advise the Minister of Education on all aspects of higher education. Statutory responsibility for quality assurance is assigned to the CHE to be conducted through a permanent sub-committee, the HEQC. The HEQC’s three functions spelt out above are confirmed but the conditions under which it may operate are elaborated as follows. The HEQC, as the umbrella Education and Training Quality Assurance body (ETQA) for higher education must comply with the South African Qualifications Authority (SAQA)’s policies and criteria as spelt out under the SAQA Act (Act No.58 of 1995) and in particular in the SAQA Regulations of 1998 (Government Gazette No.19231). Furthermore, the HEQC may delegate or assign any quality promotion or quality assurance function to other appropriate bodies under certain conditions. In a later amendment to the Higher Education Act, the HEQC was recognized as the central ETQA for higher education within the SAQA framework, giving it greater independence from SAQA (CHE, 2004c).

To sum up, the policy developments that led up to the formation of the HEQC have been traced. The problems that the new South African state identified with regard to higher education were that it was fragmented and characterized by very poor and uneven quality and weak management. Whilst some pockets of the system were regarded as elitist, overall it was
regarded as irrelevant and unresponsive to the needs of a developing economy in a global market. The third major problem identified was that the higher education system was unjust so the state positioned itself to promote and protect the rights of black and women students in particular, to decent education opportunities. These were the key problems that defined the state’s solution; namely the need to completely transform higher education. The next stage of the policy story describes how the state set about this task.

In June 2000 the CHE’s Shape and Size of Higher Education Task Team released its report ‘Towards a New Higher Education Landscape: Meeting the Equity, Quality and Social Development Imperatives of South Africa in the 21st Century’. Although its recommendations on restructuring institutions were not taken up by the Department of Education, its analysis of the crisis in higher education and many of its suggestions for transformation targets were taken up in the Department’s response to the report, the ‘National Plan for Higher Education’ (Department of Education) (see below). The CHE’s Task Team sets out a long list of premises that informed its report. These include a description of the type of higher education system that the Task Team would consider to be a ‘public good’.

An adequately funded public HE system that is committed to excellence and equity and is responsive to societal needs is vital to South Africa’s future development. Such a HE system is a public good. (CHE, 2000:10)

On the basis of serious short-comings of the system, the Shape and Size Task Team makes a strong case for government intervention in the higher education system.

A number of fundamental problems and weaknesses afflict the HE system. The task Team is united in the view that these problems and weaknesses should not be tolerated any longer. They constitute a serious drain on national resources and undermine government’s ability to achieve its set national goals. They also impact negatively on the possibilities for democratic consolidation in the country through not realizing the social benefits of HE for the development of society as a whole, … No public institution should believe that it is exempt from the imperative of system-wide reconfiguration, from the need to change fundamentally, and from contributing to the achievement of a new HE landscape. No HE institution can assume that its track record with respect to equity, quality, social responsiveness and effectiveness and efficiency is beyond dispute and self-evident…. (The Task Team) is convinced that the problems and weaknesses of the HE system will not disappear on their own or be overcome by institutions on their own. They must be confronted and resolved in a systemic way. This will require the reconfiguration of the present system and the creation of a new HE landscape. It will entail extensive, integrated, iterative processes of national planning as well as multiple coordinated interventions and initiatives. It will also require political will, sustained commitment and the courage to change at system and institutional levels. (CHE, 2000:7)

The subsequent amendments of the Higher Education Act have given the Minister the powers to intervene in the system in order to create a new institutional landscape.

In its diagnosis of key problems in the higher education system, the Task Team notes that
the absence of well-established and optimally functioning accreditation and quality assurance mechanisms creates major concerns about the quality of teaching and learning. (CHE, 2000:11)

Linked to this is its concern to improve the efficiency of the system.

Efficiency challenges are often closely tied to quality measures as well as sound planning measures both at institutional and system levels. For example, appropriate quality mechanisms will have to be put in place to reduce repeater, drop-out and failure rates of students so that institutions can discharge their education and training missions and responsibilities. (CHE, 2000:14)

The Task Team makes a cause and effect assumption here that the establishment of ‘appropriate quality mechanisms’ and ‘sound planning’ will automatically improve the efficiency of the system.

Finally, the Task Team’s conceptualization of equity has implications for improving teaching and learning. It identifies equity as its ‘defining imperative’ and links this to the importance of improving the quality of teaching and learning in the system.

The achievement of equity is compromised by inefficiencies, lack of effectiveness and shortcomings in quality. … Equity should mean more than access into HE. It must incorporate equity of opportunity-environments in which learners, through academic support, excellent teaching and mentoring and other initiatives - genuinely have every chance of succeeding. Equity, to be meaningful, is also ensuring that learners have access to quality education, and graduate with the relevant knowledge, competencies, skills and attributes that are required for any occupation and profession. (CHE, 2000:6)

The Task Team’s linking of quality assurance mechanisms as a means of attaining the Department’s two central goals, namely efficiency and equity, is significant. It suggests that quality teaching and learning is the key mechanism that will enable historically disadvantaged students in particular, to succeed academically and graduate with high levels of employability.

Given that the HEQC is a permanent sub-committee of the CHE, this understanding of the role of quality assurance in the larger transformation project no doubt informed the views of key policymakers in the HEQC.

In February 2001 - after what was widely referred to as the ‘implementation vacuum’ that followed the White Paper - the Department of Education responded to the CHE’s proposals for restructuring higher education and released the National Plan for Higher Education (NPHE). It claims that the National Plan provides ‘the framework and mechanisms for implementing and realizing the policy goals of the White Paper’ and a ‘strategic framework for re-engineering the higher education system in the twenty-first century’ (Department of Education).

It was noted above that Hall et al. (2002) view the issuing of the NPHE as a key shift in governance policy from loose, indirect state steering to a tighter form of state control in which institutions enjoy conditional rather than full institutional autonomy. They also note that this
shift is in keeping with global trends but that in the South African case, higher education is expected to meet national development as well as social justice needs via increased access and equity. But Fataar (2003) argues that during this period the policy discourse of efficiency, linked to the goal of economic development, started to dominate at the expense of the second primary policy goal, equity and redress. He claims that from 2001 higher education policy discourse became aligned with the now dominant neo-liberal macro-economic policy discourse and back-grounded equity, especially institutional redress. He notes that historically black institutions were re-described from needing redress and assistance to being perceived as ‘policy problems’. The solution to this problem was the undertaking of a massive restructuring exercise (see below). As noted above, Badat (2004b) characterizes this second period as one of hard policy choices in which the state took on a stronger interventionist role. But Badat insists that higher education policy must continue to balance both policy objectives-efficiency and quality with equity.

In issuing the NPHE, the Department of Education declared that the extended consultation process on how to transform the higher education system had been brought to a close and that the implementation phase must now begin (Department of Education, 2001a: 1.6). In his justification for the NPHE, the Minister of Education states

the people of our country deserve nothing less than a quality HE system, which responds to the equity and development challenges that are crucial to improving the quality of life of all our people. (Kader Asmal, Department of Education, 2001a: Forward)

In its Introduction, the NPHE poses the problems that the Department is seeking to address.

The overall effectiveness and efficiency of the system is in doubt, as evidenced by a range of systemic problems. These include the overall quantity and quality of graduate and research outputs; management, leadership and governance failures; lack of representative staff profiles; institutional cultures that have not transcended the racial divides of the past; and increased competition between institutions which threatens and fragments further the HE system. (Department of Education, 2001a:1.1)

Presumably it is the first ‘systemic problem’, ‘the overall quantity and quality of graduate … outputs’ that the accreditation of programmes and improving the quality of teaching and learning is intended to remedy, whilst institutional audits are presumably intended to address the problem of management, leadership and governance failures.

The primary purposes of the National Plan are to ensure that

- The higher education system achieves the transformation objectives set out in the White Paper and is responsive to societal interests and needs.
- There is coherence with regard to the provision of higher education at the national level.
- Limited resources are used efficiently and there is accountability for the expenditure of public funds.
• The quality of academic programmes, including teaching and research, is improved across the system. (Department of Education, 2001a: 1.1)

Again, it is particularly the last of these goals that quality assurance is expected to achieve.

In the NPHE, the Department of Education sets out national output benchmarks\(^\text{104}\) for the system which are to be monitored through its planning processes (interestingly, quality assurance is not mentioned in this regard.) The Department also introduced a New Funding Framework (2001) (released as a discussion document shortly after the NPHE) in which institutions are to be rewarded or sanctioned via prospective and incentive funding and for approved outputs. The Department places the need to improve the efficiency of the system in the short- to medium-term at the center of the National Plan. The NPHE notes that on average approximately 25% of first-time entering students and 20% of all undergraduate and postgraduate students drop-out of the system each year, whilst in 1998 institutional graduation rates ranged from 6% to 24%\(^\text{105}\). The NPHE states

> these poor retention rates and high drop-out rates are unacceptable and represent a huge waste of resources, both human and financial. (Department of Education, 2001a: 2.1.3)

And further that

> higher education institutions have a moral and educational responsibility to ensure that they have effective programmes in place to meet the teaching and learning needs of the students they admit. (Department of Education, 2001a: 2.3.)

In order to establish measurable goals for system improvement, the Department sets out the following national output benchmarks for the public higher education system.

• Size: An increase in the overall participation rate of the 20-24 age group in HE to 20% (from currently approximately 15%) within 10-15 years (Department of Education, 2001a: 2.2)

• Shape: Enrolment distribution should be 40% in the Humanities, 30% in Science, Engineering and Technology and 30% Business and Commerce within 5-10 years (the current distribution is approx. 50%; 25%; 25%) (Department of Education, 2001a: 2.6)

• Equity of Access: The HE system is to move towards race and gender representivity in enrolment across the system; address (racially) skewed representation in Science, Engineering and Technology, Business and Commerce and in postgraduate programmes in particular (Department of Education, 2001a: 3.2)

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\(^{104}\) After considerable debate before writing the first drafts of the Improving Teaching & Learning Resources, the Working Group decided to try to make the Department’s national benchmarks applicable at institutional and the programme level in a reasonable and open-ended manner.

\(^{105}\) An efficient system would have a graduation rate of about 30% per annum.
• Equity of outcomes: The system must address the disproportionately high black failure and drop-out rates and ensure that representivity in enrolment leads to representivity in graduate output (Department of Education, 2001a: 3.2)

• Efficiency: Graduation rates are to be improved significantly over next 5-10 years to 25% of total enrolment in the case of three-year degree and diploma programmes (similar benchmarks given for other undergraduate and postgraduate programmes) (Department of Education, 2001a:2.3)

• Broadening the social base of students: HE institutions are to increase the intake of ‘non-traditional’ students, that is, workers, mature learners and the disabled (Department of Education, 2001a:2.4)

• Quality of graduate output: General government commitment to maintaining or raising quality and standards (Department of Education, 2001a:2.3.3); the cognitive skills of graduates are to be enhanced; graduates must have the ‘skills and competencies required … in the modern world’ (Department of Education, 2001a:2.7) and postgraduate enrolment is to be increased to build research capacity (Department of Education, 2001a:5.3).

Furthermore, the Department is quick to emphasize that

the focus on efficiency improvements cannot and must not be at the expense of the quality of academic outputs. The principle of quality (as defined in the White paper) must underpin any efficiency strategy. In fact, quality is central to redress and equity. (Department of Education, 2001a: 2.3.3)\(^\text{106}\)

With respect to quality assurance, the Ministry notes with approval the establishment of the HEQC as complementing its planning and funding mechanisms and as a means of ensuring consistency of provision and effective management. However, it reminds its readers that this ‘does not absolve higher education institutions from establishing and developing their own internal quality assurance mechanisms’. The NPHE suggests that both internal and external quality assurance is necessary for the transformation of the system (Department of Education, 2001a:2.3.3). Furthermore, with respect to assuring quality, the HEQC is explicitly requested

\(^{106}\) Note the influence of the CHE Task Team’s report in the formulation here, particularly in the linking of equity and quality.
to investigate the effectiveness of distance education programmes run by contact HE institutions and to investigate the quality of postgraduate programmes.\textsuperscript{107}

The attainment of the NPHE’s policy goals obviously requires system-wide improvement in the quality of teaching and learning in the HE system, but exactly how this is to be achieved remains unexplored in the plan and is assumed to be the responsibility of the HEQC and providing institutions. The Executive Director of the HEQC sums up the challenge that the NPHE poses for her organization thus,

\begin{quote}
The HEQC will have to work towards an effective coordination of its own initiatives with those of the Department of Education to ensure that HE institutions are not crippled by multiple accountability demands and to obtain optimal quality benefit for teaching and learning processes in cost and energy-efficient ways. (Singh 2000: 5)\end{quote}

The effective implementation of the Department’s National Plan raises a number of difficulties, ambiguities and tensions: Firstly, the application of several system-wide goals such as increasing participation rates, improving enrolment distribution, and representivity in access and outputs, to individual institutions and programmes is not clear. Assuming that it should do so, this lack of clarity makes the HEQC’s task of working these policy goals into its audit and programme accreditation criteria very difficult.

Secondly, as suggested above, the “how to” questions—such as curriculum development, delivery and assessment implications of implementing the plan—are not considered (and perhaps appropriately so).

The next policy document to be released into the post-1994 HE policy environment was the Department of Education’s discussion document entitled A New Academic Policy for Programmes and Qualifications in Higher Education (NAP) (January, 2002). This is a set of policy proposals for academic planning researched by a CHE Task Team. Its purpose is to rationalize the national academic planning and approval system for a single coordinated higher education system and to align it with SAQA’s requirements for the registration of qualifications on the National Qualifications Framework (NQF) and with the pending HEQC requirements for the accreditation of programmes. The New Academic Policy Discussion Document wrestles with the problems posed for higher education by SAQA’s over-specified standard-setting system. Instead it proposes the use of a ‘nested approach’ to the setting of

\begin{footnotes}
107 Later, in consultation with the HEQC, it was agreed that the HEQC should undertake a national review of all MBA programmes in order to judge their re-accreditation status.

108 It could be argued that the HEQC’s production and dissemination of the Improving Teaching & Learning Resources is one attempt to assist institutions in this area.
\end{footnotes}
standards for higher education qualifications whereby national policy sets the more generic standards such as level descriptors and qualification types, but leaves to providers the design of the actual qualifications offered, on condition that they can be ‘nested’ within, that is, conform to, the generic standards (Department of Education, 2002b).

The Department of Education has recently released a draft Higher Education Qualifications Framework (July 2004) which is intended to finalize the NAP’s proposals. It consolidates many of the NAP proposals including the nested approach to standard-setting. Its finalization will provide a long-awaited academic policy for the HEQC’s accreditation process, particularly at the candidacy stage, where the design of programmes is scrutinized.

The NPHE suggested that, in order to restructure the institutional landscape, the Minister of Education would have to exercise the full regulatory powers at his disposal in terms of the Higher Education Act 109, namely to enforce institutional mergers. As a result, the Minister appointed a National Working Group to make recommendations on what form the mergers should take. The National Working Group issued its report The Restructuring of the Higher Education System in South Africa in December 2001; the Minister’s merger plan, A New Institutional Landscape for Higher Education in South Africa was presented to Cabinet in May 2002 and a revised version was finally approved in December 2002. The merging of institutions on a regional basis will result in 22 institutions (12 universities, 6 technikons, 4 ‘comprehensives’ plus two proposed National Institutes for Higher Education) from the 36 inherited from the previous government (21 universities and 15 technikons) Department of Education 2001b). The merger plan also provides for the incorporation of colleges of nursing and agriculture into the HE system (teacher training colleges have already been incorporated).

The merger process is already causing great upheaval in the system and will continue for some time to place great strain on the system. The fact that the HEQC is introducing its external quality assurance system during the same period means that the adoption and implementation of its policies is likely to be more difficult and contested than would otherwise be the case.

A final factor which contributes to the ‘problem’ of needing to quality assure teaching and learning in higher education is that of the proliferation of foreign and local private provision which has emerged since the Higher Education Act legalized private higher education provision. The Higher Education Act states that private providers have to be registered with

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109 The Higher Education Act of 1997 has been amended in 1999, 2000 and 2001 and these amendments have given the Minister the right to intervene directly in an institution’s internal affairs in times of crisis.
the Department of Education and accredited to offer specific programmes by the HEQC. This adds to the HEQC’s considerable mandate, but further discussion of the quality assurance in the private sector is beyond the scope of this study.

This brings to a close the description of higher education policy emanating from the Ministry and Department of Education and the CHE during the period 1994-2004. To sum up, it is suggested that the suite of policies introduced by the Department during this period have increasingly strengthened state control and state intervention in the public system, as the state’s quest to transform the system becomes more urgent. The following values underpin the Department’s policy discourse:

- A commitment to national reconstruction through social and economic development in which the state is positioned as a key instrument of modernization in a global economy; which for higher education means that it should become more responsive, more relevant, more efficient and more effective in its delivery.

- A commitment to social justice through equity and representivity; which for HE means that it should widen access and that the composition of its enrolments, graduations and staff should become representative.

- A commitment to innovation, creativity and diversity; which for HE means that academic freedom and (conditional) institutional autonomy should be preserved as the conditions for these qualities to develop.

These values are operationalised into policy goals and plans for the higher education system by a state which ‘steers’ the system through indirect means. The state now seeks to control outputs as well as funding inputs, and to ensure through planning and quality assurance that its goals and values are ascribed to and achieved. In this sense, quality assurance is understood as a means or mechanism of the state for achieving its policy goals. However, quality per se is also used to signify a desirable goal for higher education itself, which serves as a justification for the restructuring and transformation of higher education to ensure quality teaching and learning opportunities for all students, that is equal educational opportunities for all (Sayed, 2001:262).

\[110\] It is important to note that this notion of social justice and equity is now primarily located in the discourse of uniformity and standardization in which all students, staff, etc. are treated in the same manner. Increasingly the discourse of redress, which requires historical rectification and therefore different treatment for the previously disadvantaged, has been phased out of government discourse probably due to the lack of resources to realize this.
These three sets of value assumptions and the associated understanding of quality and quality assurance described above are well illustrated in the Minister of Education’s opening address at the launch of the HEQC in May 2001. With respect to the first and the second value set, the Minister had the following to say.

In the early phase of social reconstruction that we find ourselves in South Africa, the success of higher education must be judged in terms of its contribution to the achievement of social and economic goals to which we all aspire. … For its substantial investment in HE, government expects the HE system to contribute to national reconstruction through producing an increasing representative flow of successful graduates with the necessary knowledge and competencies to meet the human resource development needs of our society. … Inefficient, poorly governed and managed institutions which squander public resources and retard the life chances of students cannot yield high quality graduates and excellence in scholarship. … The quality improvement sought by the HEQC in the domains of teaching, learning, research and community will have to dovetail with the efficiency drive which my department has already initiated through the three year rolling plan process. (Asmal, 2001:6-7)

Asmal concluded his address by re-emphasizing the first two sets of values again and by suggesting that he views the HEQC is a mechanism for attaining these goals.

With the launch of the HEQC, a fundamental component of the regulatory framework for HE is now in place. The issue of high quality education is not an indulgence for the advantaged sector of the HE system or an add-on to our existing planning initiatives. It is a critical part of the transformation trajectory in HE—a goal as well as and developmental instrument for the achievement of social justice and economic well-being in our country. (Asmal, 2001)

With respect to the second set of values listed above, the Minister explicitly links quality with equity.

The legacy of discrimination and exclusion has given us a HE system in which high quality and excellence is not uniform. The HEQC must uncouple the link (real or imagined) between excellence and privilege and foster a commitment to high quality as a common and binding value for all higher education institutions. … Access with quality must be a non-negotiable in the work of the HEQC. (Asmal, 2001:6)

With respect to the third set of values, the Minister indicates his recognition of the tensions between the three sets of values and thus difficult task which the HEQC faces.

Definitions of quality and quality outcomes do not need to be tied to some abstract gold standard but to stipulated missions and purposes, which are appropriate and achievable. The HEQC will have to ensure that HE institutions achieve acceptable levels of operationality required of all institutions while striving to be the best that they can be in relation to their chosen missions. … In our drive to develop benchmarks, performance indicators, level descriptors and the like, we must be careful not to let a justified demand for accountability descend into a soul destroying over-regulation and over-stipulation of what can and cannot be done. … We want a quality assurance system which guarantees at least some minimum standards but which also creates a climate for the pursuit of creativity and excellence in a way that allow for divers mission identities … and the development of an innovation mindset as well as the values of free intellectual enquiry. I will watch with great interest the HEQC’s attempt to construct a quality assurance system that is necessary without being excessive or regimental. (Asmal, 2001: 6-7)
As typified by the Minister’s statements, the Department of Education’s policy framework fails to interrogate the real tensions for implementation (predicted in the NEPI Report, 1992) between the goals of development and efficiency and of social justice (equity, access and representivity). In practice, it is obvious that admitting large numbers of ‘under-prepared’ or ‘educationally disadvantaged’ students into the system, and to SET programmes in particular, is likely to make the system less efficient. This can only be turned around by careful provision for curriculum enrichment, an extended curriculum and substantial student support, all of which require additional time and human and financial resources. And even then, success (efficiency) is not guaranteed. Ultimately, this unresolved policy tension places additional pressure on those who teach. Badat recognizes the challenge that this tension poses for implementation, but believes that both goals must be held in balance.

For political and social reasons it is crucial to pursue both equity and development goals. The way to resolve the equity-development paradox is to recognise the competing, yet important, claims of both equity (redress of social structural inequalities) and development (socio-economic, political ... and human resource development to effect this). Further, the challenge for HE is to find policies and strategies which, in the context of existing conditions, can satisfy both imperatives and can balance equality goals and development goals. (Badat, 1999:4)

A recent CHE report re-emphasizes that higher education and the HEQC have to manage the tension between equity and quality and interestingly points out the need for a more differentiated approach as a possible solution for dealing with it. It states

(equity without quality is meaningless, while quality cannot be pursued in isolation from the goal of equity in higher education. A second challenge is to develop in a differentiated system, a variety of standards appropriate to specialized educational objectives and purposes. (CHE, 2004c: 241)

A second tension in Department of Education policy discourse that is raised in the National Plan is that between institutional autonomy and public accountability. The Department appears to be mindful of the fact that its Plan may be interpreted by the academic community as a threat to institutional autonomy. In order to preempt such ‘misunderstandings’ it quotes from the Higher Education Act, 1997.

It is desirable for HE institutions to enjoy freedom and autonomy in their relationships with the state within the context of public accountability and the national need for advanced skills and scientific knowledge.

It continues to make the point more strongly.

The Ministry is acutely aware of the delicate balance that must be maintained between institutional autonomy and public accountability. It is committed to maintaining this

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111 It is noted that since this chapter was written the Department of Education has made a certain amount of funding (15% of the cost of the total first-year intake) available for foundation programmes.
balance. The Ministry believes that the solution to finding the appropriate balance must be determined in the context of our history and our future needs. This Ministry will not however, allow institutional autonomy to be used as a weapon\textsuperscript{112} to prevent change and transformation. (Department of Education, 2001a:1.5.1)

Despite these assurances, Jansen warns that particularly since 2001 quietly but steadily, the state has made significant incursions into the arena of institutional autonomy which fundamentally redefine the long-held understandings of institutional identity and autonomy. (Jansen, 2004:6)

The CHE itself recognizes the tension between public accountability versus institutional autonomy and academic freedom and recognizes the latter as ‘necessary conditions’ for academic productivity.

The role of the state should be based on principles of institutional autonomy and academic freedom as necessary conditions for optimizing the contribution of higher education to economic and social development. This is so, notwithstanding the concomitant necessity for public accountability on the part of higher education institutions. Optimally, the state’s role should constitute a mode of involvement that is thoughtful and supervisory, creating an enabling higher education policy framework that includes appropriate substantive policies, predictability of policy and adequate public funding. (CHE, 2004c: 242)

The playing out of this second tension, public accountability versus institutional autonomy and academic freedom is a theme that is rehearsed throughout this study. These unresolved tensions in the policy discourse can be traced back to the four problems identified by Dale (1989) that face the capitalist state. Castells (2001) illustrates how these problems become contradictory functions for institutions of higher education. In the South African context, in a time of intensified political and social transition, these contradictions seem to be heightened as the new state requires all four functions from higher education simultaneously.

The three sets of values identified above are embedded in a dominant order of discourse. The narrative of this discourse is recounted as follows.

Apartheid and its unjust discriminatory ideology of racism was wrong. A strong centrist, modernizing state will put right the wrongs of the past by ensuring economic and social reconstruction and building a united, democratic state. All other interests should be subservient to this national imperative.

As an agency of the state, the HEQC’s work is naturally framed by this grand narrative. For example, the HEQC’s intervention is often justified in terms of protecting the rights and furthering the interests of students, and particularly disadvantaged African students, (who are presented as victims of apartheid, for example those who attend historically weak inefficient black institutions or currently exploitative low quality private institutions), so that all students have access to quality educational provision and a fair chance of educational success. Given the dominance of this discourse, the analysis suggests that the third value set related to

\textsuperscript{112} Note the strong use of modality (must be maintained, must be determined, will not allow) and the combative metaphor (weapon – perhaps a left-over from the struggle era?).
institutional autonomy and academic freedom is subordinated to the first two which have become linked (although the tension between them is sometimes recognized). In fact the meaning of being publicly accountable in this discourse has come to mean that institutions must serve the national development and equity agenda simultaneously.

The analysis suggests that all three value sets sit in tension with each other and that it requires a difficult balancing act to observe all three simultaneously. This suggests that different interest groups in higher education are likely to prioritize one or other of these sets of values at the expense of the other(s). It also suggests that the establishment of a national quality assurance system poses an intellectual and practical challenge which, if it is to honour all three value sets, is not easily solved.

6.3.2 The South African Qualifications Authority

We now turn to the second policy trajectory in post-apartheid South African education in which issues of quality and quality assurance are located, namely that initiated by the South African Qualifications Authority (SAQA). SAQA was established by the Departments of Labour and Education through the South African Qualifications Authority Act, (Act No.58 of 1995) to overseen the development and implementation of a National Qualifications Framework (NQF). The NQF is intended to transform education and training in South Africa by creating a single, integrated, national framework for learning achievements which integrates education and training; by facilitating access to, and mobility and progression within education and training career paths; by enhancing the quality of education and training; by accelerating the redress of past unfair discrimination in education and training and thereby contributing to the full personal development of learners and the social and economic development of the nation. The values underpinning SAQA’s mission and goals are very similar to those of the Department of Education, namely that the interests of the country will best be served by a single unitary system and the need for education and training to serve national reconstruction and social and economic development and to contribute to social justice.

The NQF is essentially a quality assurance system in which the development, registration and quality control of standards and qualifications is carried out by Standards Generating Bodies (SGB’s) reporting to National Standards Bodies (NSB’s) whilst the quality assurance of provision (which is intended to meet the registered standards) is overseen by Education and Training Quality Assurance bodies (ETQAs) that carry out their function in co-operation with providers and moderating bodies. In SAQA’s original policy formulation these two functions (standard-setting and quality assurance) were deliberately kept separate.
A notable feature of the SAQA Act was that the NQF was to be brought into being as an evolutionary project under the guidance of SAQA, working co-operatively with relevant stakeholders. This means that, apart from the SAQA Act, legal requirements are laid down by the Authority as Regulations from time to time. The first set of important regulations laid down by SAQA was the Regulations for NSBs issued in March, 1998 (Government Gazette No.18787). These regulations deal with standard-setting and specify the requirements that must be met for SAQA to recognize and register a qualification on the NQF. SAQA’s specifications for qualifications embrace the outcomes-based method of curriculum design, thus forcing the whole education and training system (including HE) to adopt this method. This means that all HE qualifications must be ‘NQF-aligned’ (that is, registered at a particular level and in a particular field(s) and comprising a certain number of credits on the NQF), must have purpose statements and specified learning outcomes (both discipline or field-specific and ‘critical cross-field’ or generic) and they must be assessed validly according to assessment criteria which serve the purpose of the qualification. SAQA also insists that the Recognition of Prior Learning (RPL) must be explicitly provided for in the description of qualifications to be registered.

A second set of SAQA Regulations, the ETQA Regulations were published under the SAQA Act in September 1998 (Government Gazette No.19231). These laid down the regulations governing the establishment and accreditation of ETQAs. The key functions of ETQAs are spelt out as follows: ETQAs are accountable to SAQA for the standards of learning achievements and provision in their area of responsibility. They are to do this by accrediting providers to offer specific standards or qualifications registered on the NQF; by monitoring providers, registering assessors and evaluating providers’ assessment and moderation systems. SAQA requires providers to be accountable to their ETQA for the management and delivery of the learning programmes for which they are accredited, responsible for ensuring the quality of the learning experience according to the requirements of the registered qualifications; responsible for recording and reporting the outcomes and impact of their learning programmes and services. As the umbrella ETQA for HE, the HEQC has been obliged, via a lengthy, bureaucratic process (see SAQA’s Criteria and Guidelines for ETQAs (2001b)), to become accredited with SAQA. An Addendum to the Criteria and Guidelines for ETQAs states that the CHE, through the HEQC, must perform a coordinating function to enable the required partnerships with other ETQAs in the higher education system by establishing a series of cooperation agreements with the other ETQAs that SAQA has accredited to function in higher education. The HEQC has found this task very difficult and to date no such agreements have been signed. The HEQC’s task in this respect has been further
complicated by the Department of Labour’s Skills Development Act (Act No.97 of 1998) which seeks to promote an integrated approach to the development of work-related skills. This Act makes provision for the establishment of Sectoral Education and Training Authorities (SETAs) to coordinate and implement skills development strategies in various economic sectors by means of registering qualifications through SAQA’s SGBs and NSBs and quality assuring their delivery and outcomes. Some SETAs have an interest in overseeing HE qualifications and providers as part of their skills development strategies and SAQA recognizes them as ETQAs in HE for this purpose. Furthermore, SAQA has also accredited many professional councils to function as ETQAs in the higher education system.

This complex and over-regulated SAQA system has greatly burdened the HEQC in its efforts to establish a quality assurance system that is acceptable to higher education practitioners, user-friendly and simple to operate. The Executive Director of the HEQC has noted that

the HEQC faces a barrage of complex demands as it seeks to respond simultaneously to a number of regulatory instruments and transformation initiatives. (Singh, 2000:3)

In 2002 the Departments of Education and Labour set up a Study Team to review SAQA’s work. In its Report of the Study Team on the Implementation of the National Qualifications Framework (April 2002), the Study Team recognizes that whilst the SAQA legislation is appropriate for training, some aspects of the SAQA regulatory framework are not appropriate for HE. The Study Team makes several recommendations that would loosen SAQA’s control over higher education and over the HEQC in particular, allowing it to establish a quality assurance system more appropriate to the needs and culture of higher education. For example, the Study Team proposes that standard-setting and quality assurance should be the responsibility of single bodies and specifically that standard-setting for higher education should be transferred from SAQA’s NSBs and SGBs to the CHE. This would enable the CHE to establish a less bureaucratic standard-setting system for higher education, (perhaps along the lines of the ‘nested approach’ proposed in the New Academic Policy). The Study Team also recommends that assessors employed at accredited institutions should not be required to register as individual assessors with SAQA. The Study Team also recommends that a moratorium be placed on any further accreditation of ETQAs by SAQA and that ETQA status should be limited to bodies established by statute Report of the Study Team on the Implementation of the National Qualifications Framework, (2001: v-vii). Obviously, this

\[113\] SAQA’s requirement that all assessors (i.e. academics), should be registered with one of its ETQAs, under certain strict conditions which are inappropriate for higher education, has been contested by the sector. See Appendix 3 for a document written as part of the work of the Improving Teaching and Learning Project to clarify the HEQC’s position on this requirement.
recommendation would greatly simplify the HEQC’s operations in having to set up agreements with multiple ETQAs for higher education. However, despite the CHE and HEQC’s support for these recommendations, (see CHE’s Response to the Report of the Study Team on the Implementation of the National Qualifications Framework, July, 2002), the response of the Departments of Education and Labour is still awaited and as yet not implementation of the Study Team’s recommendations has occurred.)

This description of the relationship between SAQA and the higher education sector suggests a contested, difficult relationship in which policies and regulations located within a training discourse have been inappropriately imposed on the sector (see discussion in Chapter 3).

6.4 Conclusion

The purpose of this analysis has been to understand how the ‘problems’ in the higher education system, which the HEQC as external quality assurance agency is meant to address, have been named and framed; in other words, how the problems have been socially and discursively constructed. It has been shown that the cause of the ‘problems’ has been largely located in the unjust and dysfunctional apartheid education system. Just as the old state is blamed for the ‘problems’, so the new state is positioned to ‘solve’ them. The reliance on the agency of the state means that heavy state steering and intervention is justified and often claims the high moral ground. This discourse about the dire need for state-driven transformation of higher education both makes possible and constrains what ‘solutions’ and courses of action are proposed to ‘solve’ the ‘problems’ identified.

This analysis has aimed to make explicit the rationalities and orders of discourse that constitute the policy agenda for post-1994 South African higher education. A Foucaultian approach (see Flyvbjerg, 2001:123) suggests that power and rationality are intertwined in discourse and that power produces its own rationality, knowledge and truth. As indicated in the policy texts above, the HEQC has been established to exercise bureaucratic power authorized by law. However, in order to get its policies and regulations implemented and institutionalized, it needs to win acceptance, legitimacy and build sufficient consensus around its authority and policies in the higher education community. One means of doing so is to produce policy documents which can argue the case and persuade their audiences to accept and give their consent to the dominant discourse on the need for transformation (as defined) and hence to the HEQC’s exercise of power. As we have seen, in policy discourse, the ‘problem’ and its ‘solution’ are often rolled into one. In other words, acceptance of the ‘problem’ (in this case, the need for transformation of higher education) is often elided with acceptance of the state’s ‘solution’ (in this case, the need for a rigorous national quality
system). The assumption that external quality assurance can and will in fact alleviate problems of efficiency and effectiveness (such as low through-put rates, under-prepared students etc.) is neither made explicit nor questioned. As (Parsons, 1995): 152 argues, policy setting is a process of argumentation and the key to power is the struggle to set the discourse in which a problem is framed, which in turn frames and structures the policy instruments and implementation process (the solutions). A point made by Hoppe (1993) is pertinent here.

Policymaking becomes the capacity to define the nature of shared meanings; it is a never-ending series of communications and strategic moves by which various policy actors in loosely coupled forums of public deliberations, construct inter-subjective meanings. These meanings are continually translated into collective projects, plans, actions and artifacts, which become an issue in the next cycle of political judgment and meaning construction. (quoted in Parsons, 1995:151)

In conclusion, in 2002, the HEQC was poised to take on the daunting task of developing and implementing a quality assurance system that would further the transformation objectives of the Department of Education and win acceptance and legitimacy with the academic community. Its original mandate from the Department of Education and its own commitment to transformation and the protection of weak students meant that from the outset, it was going to have to balance accountability and improvement, compliance and institutional autonomy and an understanding of quality the encompasses transformation and equity. In addition, the HEQC began its work as the Department of Education was embarking on a massive social engineering project. The Executive Director of the HEQC signaled her awareness of the challenges that the HEQC faces.

The entry of the HEQC into HE at this particular juncture in our transition holds the prospect of it being enriched by as well as enriching the politics of restructuring in HE. Alternatively, it could end up being weak and ineffectual precisely because of the turbulence and volatility of the restructuring, the magnitude of the demands being made upon it and the paucity of resources available for its tasks. Strategic steering of the HEQC and appropriate support for its work will be critical to its success. (Singh, 2000:11)

The chapters that follow seek to understand how the HEQC managed to ‘strategically steer’ itself in this difficult context.
7.1 The Policy Development Process

Brief descriptions of the process of developing the HEQC’s Improving Teaching & Learning Resources have already been recounted in the introductory chapter and can also be found in the Introduction to the Resources (Appendix 2.0). A more detailed chronological description is provided below based on the researcher’s participant observation field-notes and project documentation. The ‘story’ of the policy development process is interrupted at certain points to insert stakeholders’ opinions and responses that were gathered at that juncture. In some cases this evaluative data was used to inform the next stage of the policy development process and so helps explain why the ‘story’ unfolded as it did. The evaluation data was gathered by the researcher using formal HEQC stakeholder feedback processes, for example through participant observation at the Improving Teaching & Learning Project’s Consultative Panels and regional workshops. In addition, formal feedback on the ‘Guides to Good Practice’ was requested by the HEQC from the Reference Group and from the HEQC Board. For the purposes of this study, the researcher also conducted interviews with selected senior HEQC officials in mid-2003 and during the regional workshops at the end of 2003. Data from all these sources are used to build and explain the ‘story’ of developing the HEQC’s Improving Teaching & Learning Resources that is described and analysed below.

7.1.1 Rationale for a Teaching and Learning Focus

From the outset the HEQC, and its Executive Director in particular, was concerned to make teaching and learning the central focus of its quality assurance endeavours. The reasons for this are captured in the Improving Teaching & Learning Project’s Proposal (Appendix 1, p.1-2). Here the HEQC states its belief that ‘the quality of the student learning experience’ and ‘the effectiveness of (an institution’s) teaching and research practices’ are the key issues for a national quality assurance system to investigate.

The HEQC believes that direct engagement with the quality of teaching and learning is one of most urgent and substantive issues that it should tackle and that this should be done by employing both accountability and improvement measures.\(^{114}\) (Appendix 1, Improving Teaching & Learning Project Proposal, 2002:2)

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\(^{114}\) It is interesting to note that even at this early stage in the policy development process, the HEQC’s ‘integrated’ position was evident.

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Secondly the HEQC states its belief that, in the South African context of historical inequality and disadvantage, the state should ensure that ‘all students, at whatever higher education institutions they attend, enjoy a minimum quality threshold of educational provision and a fair chance to succeed’. It continues, ‘this means taking quality improvement measures right down to the level of what happens in the classroom’ (Appendix 1, Improving Teaching & Learning Project Proposal, 2002:1-2).

The Project Proposal then goes on to justify the HEQC’s focus on teaching and learning in terms of the wider policy context. It mentions the Department of Education’s concern to improve the efficiency of the higher education system in terms of improved retention and through-put rates and that this should not be done at the expense of ‘the quality of academic outputs’ (Appendix 1). Other contextual factors that it mentions, requiring institutional managers pay attention to academic planning and curriculum design, include the pending institutional mergers, the South African Qualification Authority’s (SAQA) requirements for standard-setting and for the use of an outcomes-based form of curriculum design and the introduction of a new academic policy. The HEQC argues that these policy demands will place a burden on higher education institutions and will require capacity development in the area of teaching and learning practice.

The attainment of the National Plan’s policy goals obviously requires an improvement in the quality of teaching and learning in the higher education system, but exactly how this is to be achieved remains unexplored in the National Plan and is assumed to be the responsibility of providing higher education institutions. However, it is well known that few higher education institutions have the internal capacity to make the changes required, and that it is typically those higher education institutions that most require the transformation of teaching and learning practices that are least able to effect them. (Appendix 1, Improving Teaching & Learning Project Proposal, 2002:3)

Finally, in a passage supportive of the pedagogic project in higher education, the HEQC argues for the need for professional development of educators in higher education.

Teaching in higher education has traditionally been carried out on a common sense basis premised on an implicit apprenticeship model of learning with no requirement for professional training of academic staff to teach and limited accountability requirements checked through peer review. These ‘cottage industry’ practices generally sufficed in an elite, relatively autonomous system with high staff: student ratios and well-prepared students. Clearly conditions in higher education in the 21st Century have changed making this model obsolete. The globalisation of the world economy and governments’ calls for high-skilled ‘knowledge workers’, the ICT revolution, the massification of higher education and the call to lifelong learning, and in the South African context in particular, the call for equity and redress and the diversification of the student body, mean that old teaching assumptions, practices and methods are no longer adequate. Instead a professional, theory-driven approach to teaching and learning is now required. (Appendix 1, Improving Teaching & Learning Project Proposal, 2002 :6)

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115 This was later re-worked by the Department of Education as the ‘Higher Education Qualifications Framework’ (Draft 2004).
7.1.2 The Establishment of the Improving Teaching & Learning Project

At the beginning of 2002, in order to address its concern around teaching and learning in higher education, the HEQC established a project for the improvement of teaching and learning in its Directorate of Quality Promotion and Capacity Development. The first phase of the Improving Teaching & Learning Project was financed from donor funding raised by the HEQC from the Carnegie Foundation. This enabled the HEQC to employ a part-time Project Manager to run the project on a consultancy basis and to assign a Project Administrator to the project, both of whom reported to the Director of Quality Promotion and Capacity Development. The first tasks of the project’s director and manager were to develop a proposal and to appoint a Working Group to carry out the project’s objectives. The appointment of the project’s Working Group was a contested issue. One position was that the Working Group should be small and expert-driven, that is, made up of teaching and learning experts who were known to be competent researchers and writers and who could be relied upon to produce the Improving Teaching & Learning Resources within the required timeframes. This position argued that the need for representation could be catered for in the Project’s Reference Group. The problem with this position was that all of the four people nominated were white and were employed at historically white institutions. This difficulty was recognized by one of the interviewees who was also a Working Group member

I think the expertise to pick up the development work is in the academic development movement. I suspect and sadly I think it’s only in the historically white institutions, there probably aren’t many institutions that can pick up that quality promotion work. If the HEQC’s got funding or got the capacity to advise on who to give that work to, it’s not likely to come to the people who could actually do it because of political considerations. It might well go to private providers or to consultants. So I think it’s bound to be politically fraught. (QAM 6 30/10/2003)

The other position objected to having a ‘whites-only’ group on principle and also argued that the Working Group needed to be representative of all institutional types and groups in the South African higher education system so as to ensure that these different contexts were catered for in the development of the Resources (Field-notes 7/12/2001). In the end the second position prevailed and eleven people were appointed to the Working Group from across the spectrum of institutions in the South African system. This made the Working Group large and difficult to manage. ¹¹⁶

¹¹⁶For example, the project manager had to appoint people to write the Resources in pairs, trying to match strong members with weak members for each focus area (Field-notes 30/1/2002). Inevitably this meant that the stronger member ended up doing more work than the weaker member or that the editor had to re-write certain Resources where two weak members insisted on a particular area. The HEQC allocated a fixed amount of money per Resource and divided this out equally amongst the Working
A Reference Group for the Project was later appointed by the HEQC comprised of international quality assurance experts and a representative from each of the following key stakeholder organizations: the HEQC Board, the SAUVCA and the CTP. The Reference Group never met, but members were consulted individually by e-mail and asked to comment on early drafts of the Resources. Two international experts, Prof. D’Andrea and Prof. Gosling, assisted in the research undertaken for the needs analysis and another, Prof. Webb gave the keynote address at the project’s seminar for Deputy Vice-Chancellors (Academic). All three overseas experts met with the Working Group and, as will become evident below, contributed in critical ways to its deliberations (Minutes of Working Group Meetings, 10/05/2002, 22/05/2002 and 15/08/2002).

7.1.3 Project Aims

The HEQC’s aims for the project were firstly that it would generate evaluation criteria for good teaching and learning practice and secondly that it would conduct capacity development activities to enable higher education institutions to understand and implement them. The criteria were to be developed in consultation with the academic community. The purposes of the Improving Teaching & Learning Project are captured in the Project Proposal as follows:

1. To develop for the HEQC criteria and guides to good practice on teaching and learning to inform the HEQC’s institutional audit and programme accreditation systems and procedures, with the aim of ensuring that these contribute to the enhancement and valid evaluation of teaching and learning.

2. To engage the academic community in discussion on the suitability of the proposed criteria, suggested indicators and guides to good practice and to take the academic perspective into account in their development.

3. To operationalise the HEQC’s Directorate of Quality Promotion and Capacity Development’s commitment to promoting and enhancing effective teaching and learning practice in the higher education system. (Improving Teaching & Learning Project Proposal, Appendix 1, 2002:5)

A set of short-term project objectives relating to the areas that the quality criteria were to cover is also specified in the Project Proposal (these were in fact achieved through the production of the set of Resources, see Appendix 2). The Introduction to the Resources explains the purpose of these documents and their intended audience.

The purpose of this Resource pack on the quality assurance of teaching and learning is to provide a set of resources for higher education institutions to use when developing their internal quality systems for self-evaluation. The Resource pack aims to set out ‘ideal types’ or models of ‘good practice’ for the management and quality assurance of teaching

Group members involved in developing each Resource. This arrangement caused tensions between some members of the Working Group (Field-notes 25/9/2002).
and learning which are heuristic, illuminating and illustrative\textsuperscript{117}, providing common reference points or starting points for institutions to use in developing and refining their own self-evaluation instruments. Their primary audience is therefore intended to be senior and middle managers, programme directors (or equivalent) and expert personnel such as those who work in quality assurance, staff development or academic development units. The Resources are also intended to be used by academics, but we suggest that selections from the pack should be mediated to academics as and when relevant to their needs. (Appendix 2.0, p.3)

For the purposes of this study the project outcomes for Phase 1 of the Project have been re-stated in a tighter and more limited manner that closely follows the first two aims quoted in the original Project Proposal above\textsuperscript{118}:

1. A set of Improving Teaching & Learning Resources on key teaching and learning issues will have been developed and published.

2. The Improving Teaching & Learning Resources will have informed the HEQC’s criteria for audit and programme accreditation in a way that contributes to the valid evaluation and improvement of teaching and learning in higher education.

3. The Improving Teaching & Learning Resources will have been considered acceptable and potentially useful by the academic community, particularly for the development of internal quality systems for self-evaluation.

The target group for the project was initially academics (described as ‘the key agents of quality in teaching and learning’ (Improving Teaching & Learning Project Proposal, 2002:6), senior and middle academic managers and academic support staff. However, as the project developed the role and response of academics remained ambivalent throughout. As a result the intended audience for the Resources shifted from academics to academic managers, quality and staff development personnel who could ‘mediate’ the HEQC’s demands to them.\textsuperscript{119}

The HEQC’s concern that it gain legitimacy with the academic community through the Improving Teaching & Learning Project was stressed by the Executive Director in her first meeting with the project’s Working Group.

\textsuperscript{117} It is noteworthy that this introduction was written after the Resources had been used to achieve their first purpose, namely to contribute to the development of the HEQC’s criteria for audit and accreditation. By this stage the writer wanted to emphasise the internal use of the Resources for self-evaluation and to stress their hermeneutic, communicative nature.

\textsuperscript{118} These re-stated project outcomes are later used for evaluating the Improving Teaching & Learning Resources.

\textsuperscript{119} Note for example in the quote from the Introduction to the Resources, the concern that they should be ‘mediated’ to academics.
The HEQC wants to directly address and acknowledge the academic community - the Improving Teaching & Learning Project is the only project that will do this. (Minutes, Improving Teaching & Learning Project Working Group meeting, 21/02/2002)

Students were understood to be the indirect beneficiaries of the project. It was understood that the project’s activities would not address them directly, but that they would be the ultimate beneficiaries of improved teaching and learning practices in higher education.

An account of the Improving Teaching & Learning Project’s Working Group’s activities during 2002 follows. These were focused largely on the production and legitimation of the Improving Teaching & Learning Resources.

### 7.1.4 Needs Analysis

Early on in the project, two Working Group members and two overseas experts from the Reference Group conducted a needs analysis to alert the HEQC and the Working Group to key capacity development needs perceived by higher education institutions. The aim of the needs analysis was to ‘assess needs, priorities and existing capacity in relation to improving higher education teaching and learning in South Africa, with particular reference to what needs to be done in higher education institutions to meet emerging quality assurance requirements relating to teaching and learning’ (D’Andrea *et al.*, Report on Needs Analysis Institutional Visits, 2002). The method adopted by the needs analysis team was to undertake twelve site-visit consultations at higher education institutions across the country. The visits were set up as focus-group interviews arranged with DVCs (Academic) who invited to the meeting colleagues with institutional responsibility for teaching and learning. Those who attended the meetings included DVCs (Academic), Academic Registrars, Deans, Quality Managers, and Academic Development and Staff Development personnel. A set of interview questions was sent to DVCs (Academic) beforehand, although the interviews were not highly structured. Given that the questionnaire was not piloted and that the sample was purposive rather than representative, the authors of the report suggest that the field-work undertaken should be understood as a consultative process rather than a formal or reliable research process. It was, on the other hand, a highly systematic consultative process. (D'Andrea *et al.*, 2002)

Key findings of the needs analysis include the following points:

- Higher education institutions valued the consultation, especially the fact that it was face-to-face. They felt listened to. Many want to see the results of this process.
- Staff in higher education institutions are under stress as a result of transformation overload and the turbulent and continuously changing higher education policy environment.
- There is confusion about the HEQC and about the meanings of (and relationships between) audit, accreditation and quality promotion. The HEQC needs to send a clear
message to higher education institutions on exactly what will be required, what kinds of support will be available from the HEQC and what they should do on their own.

- Higher education institutions want guidance and sensitivity from the HEQC but not prescription, especially in communication between the HEQC and the institutions.
- Higher education institutions want recognition for what they are already achieving and also recognition of the diversity of their missions.
- There are tensions between policy goals, e.g. equity vs. efficiency, and leadership on resolving or balancing these tensions is needed at national level.
- A key challenge for national planning and co-ordination is to ensure that the institutions contribute collectively to meeting the output goals for the sector as a whole. (D'Andrea et al., 2002)

With regard to the criteria and standards that the HEQC was to develop for audit, the needs analysis team reported that academic managers believed that no institution would be likely to meet a comprehensive range of criteria with demanding standards, and that this would be problematic if the audits were linked to ‘high-stakes outcomes’ such as self-accreditation status.

In terms of capacity development needs that higher education institutions hoped the HEQC might address the following four areas were identified:

The transition from school to higher education -- There is uncoordinated articulation between the schooling and higher education sectors. Higher education institutions currently manage this by running bridging and foundation programmes, but these are not funded by the government, nor are they properly recognized, accredited or standardized in the system; there is a need for quality standards for these programmes.

Curriculum development -- Creative, educationally informed curriculum development usually only occurs in bridging and foundation programmes; it needs to become ‘mainstreamed’. Limited progress has been made in the sector with respect to embedding the outcomes-based approach in curriculum and assessment practices. Attention needs to be given to the integration of key skills into the curriculum and also to increasing flexibility in the timing and pacing of the curriculum.

Language, numeracy and higher level cognitive development -- ‘Language development is arguably the biggest challenge facing higher education institutions in order to improve equity of outcomes and overall efficiency’ (D’Andrea et al., 2002:17). The report notes that this includes academic literacy and also numeracy skills. There is also a need for professional development for staff to undertake this work.

Professional development relating to quality and teaching -- ‘Professional development of higher education staff tends to be ad hoc and unsystematic’ (D’Andrea et al., 2002:18).
‘Many considered the need for staff to change their approach to teaching to be an ‘urgent’ need’ (D’Andrea et al., 2002:12).

The needs analysis report states the need for a long-term plan to professionalise teaching in higher education and proposes that this should include quality standards for the professional development of higher education teaching staff. The report also points out the need for the reward and recognition of teaching excellence and regional and national networking to promote staff development. It was noted that academic staff need motivation and ‘safe spaces’ to undertake teaching and learning development work. In addition, methods for the evaluation of teaching were undeveloped and not linked to systematic feedback from students.

These findings were used to inform the Working Group’s deliberations about the content and approach to be taken in the Improving Teaching & Learning Resources. The needs analysis team also reported that whilst the academic community would welcome capacity development initiatives from the HEQC, it did not want ‘interference’ or ‘didactic workshops’ (D’Andrea et al., 2002:15). This finding influenced the Working Group’s decision to first complete the Resources and then, as a second stage of the project, to undertake regional workshops that would provide participants with opportunities to discuss how they might use the Resources in their institutional contexts, without prescribing to them how they should do it. The initial idea to run ‘how to’ workshops and at the same time to introduce participants to the HEQC’s requirements was dropped.

7.1.5 Project Activities

Concurrent with the conducting of the needs analysis, the project manager conducted a literature review and a scoping exercise with the aim of determining which areas of teaching and learning the project should focus on. The results of both the scoping exercise and the needs analysis were combined and resulted in the following list of ‘focus areas’: (a Resource was to be produced for each)

- Institutional Teaching & Learning Strategies
- Programme Planning, Design & Management
- Programme & Course Review
- Access & Admissions

120 In the end the person responsible for the first Resource did not manage to deliver it and instead the editor incorporated key ideas on institutional teaching and learning strategies into the Introduction. (see Appendix 2.0)
• Student Development & Support -- to include models for language development
• The Assessment of Student Learning -- to include the role of external examiners
• Staff Development-to include the self -- evaluation of teaching
• Postgraduate Research and Supervision. (Minutes of Working Group Meeting 13/03/2002)

Examples of the Australian McKinnon Benchmarks (2000) and the English QAA’s Codes of Practice were circulated to Working Group members as exemplars of how the Resources might be designed.

The Working Group met regularly to plan its activities and in particular to plan the development of the Resources; in all it met seven times during 2002. The Working Group also set up a list-server to enable members to communicate with each other easily during the writing process. A review of the minutes of the Working Group’s meetings, list-server discussions and of the researcher’s field-notes taken during this period suggests that three issues dominated the discussions of members of the Working Group:

1. Indecision and debate on the part of the HEQC and the Working Group on how the HEQC should carry out its capacity development responsibility.
2. The purpose of the Resources, exactly how they were to be used by the HEQC and therefore what format they should take.
3. Role and identity tensions experienced by members of the group as they sought to reconcile their own pedagogic identities with the demands being made on them by the HEC’s accountability mandate.

These issues are dealt with in turn.

At the start of the project, Working Group members were informed by the HEQC that their role would be to develop criteria for the quality assurance of teaching and learning and to run capacity development workshops on these for the academic community. However, early on in the project, the HEQC and some members of the Working Group, influenced by the two overseas consultants from the Reference Group, began to question the effectiveness of this strategy. In February, the Executive Director reported to the Working Group on a discussion held at the HEQC Board.

The HEQC Board is concerned that the Improving Teaching & Learning Project is proposing to get involved with capacity development at the meso- and micro-levels and

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121 During 2002 they were still called ‘Guides to Good Practice’.
questioned whether this is not rather the responsibility of the higher education institutions and of bodies such as the SAUVCA and the CTP. The HEQC thinks that the project should rather be about testing out recommendations for the quality assurance of teaching and learning and that capacity development should be a secondary concern carried out at a later stage in a more focused manner. (Working Group Minutes 21/02/200, p.12)

Other HEQC officials at the same meeting stressed the HEQC’s urgent need for the development of criteria for audit and accreditation and suggested that the Improving Teaching & Learning Project focus solely on this in the first phase of its work. Although most members of the Working Group were committed to capacity development in the sector and this was where their expertise lay, it was agreed that the project was trying to do too much too soon and so the planned capacity development activities would be postponed until 2003, apart from an initial ‘launch workshop’ to be held to introduce the project to all DVCs (Academic). This meant that the work of the project for 2002 would involve the development of criteria for the quality assurance of teaching and learning to be written up in the form of ‘Guides to Good Practice’ (the Resources) in consultation with the academic community. The HEQC hoped that this consultation process would win acceptance and legitimation for the criteria by the academic community (Working Group minutes 21/02/2002, p.2). Capacity development to assist higher education institutions to meet these criteria was postponed to a later phase in the project. Some members of the Working Group were disappointed at this decision and questioned whether the HEQC was honouring its commitment to capacity development in the first phase of its work, as stated in its Founding Document (2002) (Field-notes, Working Group meeting, 21/02/2002). Other members supported the decision suggesting that the project’s initial plans had been based on a naïve theory of change. For example, one member asked

what theories and assumptions about institutional change inform the HEQC’s approach to capacity development? And what assessment have we made about our capacity for change management and leadership across the higher education sector? (Field-notes 21/02/2002)

It was argued that changing teaching and learning practices in institutions was a long-term project that would require considerable ingenuity, energy and funding linked to changes in institutional cultures and values. The HEQC argued that this was not necessarily its role and that the HEQC’s future role in capacity development would need to be more tightly focused around the funding and capacitating of specific improvement plans in the wake of audits (Field-notes Working Group meeting, 21/02/2002).

Over a year later, an HEQC official indicated that the HEQC was still grappling with this issue, along similar lines,

We’re busy working on a (policy?) document for quality promotion. A very important component will be a partnership model, we will give national leadership and facilitate and support, but we can only do a small amount of actual capacity development, so we will need to set up partnerships to help build internal quality management systems. We are not
planning on bringing in consultants but rather involving the regional consortiums, the SAUVCA and the CTP and the Quality Assurance Managers’ Forum. HEQC officials will explain the criteria around say the audit framework and people must then decide how to take these into their internal systems. We will see this as helping higher education institutions prepare for audit, the Improving Teaching & Learning Resources will be held up as a resource to use in this process. So we want a model of engagement and partnerships. (Appendix 9.7 HEQC 4)

The study now turns to discussions relating to the purpose, use and format of the Resources. Initially the Working Group understood its brief from the HEQC to be the development of ‘Guides to Good Practice’ which would be used to guide institutions on how to institutionalize the HEQC’s requirements and to develop their self-evaluation systems. Early early on in the project the HEQC had asked the Working Group to also develop and include in the documents a set of ‘good practice descriptors’ that could be used as audit criteria and a set of ‘threshold descriptors’ that could be used as minimum standards for programme accreditation. At this stage, the format agreed to for writing the Resources was as follows: focus area, evaluative questions, good practice descriptors, threshold descriptors, suggested data sources, glossary of terms and references. Two further sections, rationale and discussion were added later in an attempt to make the Resources more discursive and deliberative (see Appendix 2.0, p.6-7 for more detail). The Working Group struggled with the shift in their brief from the HEQC and found the writing of the descriptors to be a very demanding task; members struggled in particular with developing coherent and justifiable minimum standards.  

122 One member asked

What do we mean by ‘criteria’ or ‘benchmarks’ or ‘minimum standards’? How should quantitative and qualitative criteria be used? How will we write criteria that can distinguish between honest and best-face-forward accounts? (Paper placed on list-serve by the Institutional Teaching & Learning Strategies Subgroup, 2002, not dated)

With respect to the minimum thresholds, members of the Working Group debated the extent to which objective criteria and standards could be specified and justified for all contexts, especially in the light of the great diversity of the South African higher education system. Some members stated that they found it impossible to specify these in an abstract, decontextualised manner and wanted to request funding from the HEQC to research what these might mean for different institutional contexts. Others suggested that criteria and standards should be derived from case studies that members should write up. One member suggested having a developmental set of graded descriptors ranging from excellent to satisfactory to minimum, (but this idea proved very difficult to implement). Another member

122 With hindsight, this is understandable, given that the Working Group was being asked to produce guidelines for both improvement and for accountability, and given the fact that their work experience related only to the former.
reminded the group about the importance of not being prescriptive in its approach and of the importance of being consultative in the process of developing the criteria and standards (Field-notes Working Group meeting 12/03/2002). Over a year later, a senior HEQC official explained in an interview that a shift in the HEQC’s thinking had occurred during this period. This may have added to the Working Group’s confusion.

Their (the Resources’) shortcomings were a result of earlier problems because there was no clarity on their purpose. The Improving Teaching & Learning Project got confused about what was the HEQC’s purpose. In the early days we were informed by reading and the international literature when we initially set up the project with you to work on the improvement trajectory. It was only when the reality of the system started confronting us that suddenly we realized that we had to re-think our earlier positions, so the debate was shifting. I was working on the accreditation of privates and I warned the HEQC against taking a warm fuzzy developmental approach. (HEQC3 5/6/2003)

The first drafts of the Resources were presented to the HEQC Board for approval on 6 August 2002. Feedback from the Board was mixed. They thought that the quality of the Resources was very uneven: some were good and others needed to be re-written. A general criticism was that many of the descriptors were too vague and abstract - they were not written in a way that was amenable to measurement. At this stage the editor of the Resources was required to re-work the unsatisfactory Resources and re-submit them within two weeks for re-approval by the HEQC Executive Committee (Field-notes telephone conversation with Director 7/08/2002). Eventually all the Resources were approved for consultation, that is, for use at the proposed Consultative Panels, but not for distribution.

The Working Group next met with senior HEQC officials and an overseas consultant on 15 August 2002 after the launch of the project and the seminar for Deputy Vice-Chancellors (Academic) on the 14 August 2002 (see below). At this meeting, the overseas expert gave feedback on the revised Resources. He suggested that the Resources were compromised by having to serve two purposes: accountability and improvement. He believed that they would be more effective as improvement-focused documents to be used directly by providers for their internal review processes. He therefore recommended deleting the ‘threshold descriptors’ but retaining the ‘good practice descriptors’ as norms for good practice. He suggested that the Resources should be appendices in the HEQC’s audit manual. After much discussion it was agreed to follow this advice and to publish the Resources as developmental resources in their own right. It was agreed that the HEQC would, in a second step of the process, take the Working Group’s ‘Guides to Good Practice’ and from these generate the criteria and standards for audit and accreditation. It was also agreed that only once the HEQC had developed its criteria and standards, would the second phase of the Improving Teaching & Learning Project recommence. In other words, the HEQC’s capacity development work would resume only when the audit and accreditation criteria were written, and the focus of
this work would be on introducing the academic community to the HEQC’s requirements and on assisting people to meet them. Later, in an interview a member of Working Group remembered this debate in a very negative light.

Ja, the whole project has been fraught with politics. Remember when whichever hotel we were in, when they launched the project at 9 o’clock one morning and canned it the next morning. It was just so fraught with politics. And isn’t that the issue, you know, what future does quality have when it’s so fraught with HEQC politics? (Appendix 9.9 QAM 6)

In the meantime it was agreed that the Working Group should continue to run the planned Consultative Panels in order to get comments from the academic community on the Guides for their revision and legitimation (Minutes of Working Group 15/08/2002). This concludes the account of the rather messy production process.

With regard to the third theme on role and identity tensions experienced by members of the Working Group, some of the problems relating to the writing of the threshold descriptors or minimum standards already discussed were related to this matter. Most members of the Working Group were firmly committed to the pedagogic project and wanted the HEQC to adopt an exclusively facilitative approach to the quality assurance of teaching and learning.123 This meant that some found it difficult, at a personal level, to take responsibility for writing quality standards for accountability purposes, or to take an accountability approach to quality assurance at all, whilst most did not have the necessary experience and expertise to do so. These tensions were expressed by members of the Working Group.

Initially it was agreed that the work would reflect the concerns and values of the pedagogic and facilitative rationalities.

It was agreed that our work should primarily support the ‘fitness for purpose’ definition of quality. (Minutes of Working Group meeting 10/02/2002, p.2)

But already, tensions were evident between this position and the collegial rationality of academics.

We noted the tension and conflicting loyalties between wanting to protect academics from the negative experiences of quality assurance such as that in the UK and from the turbulence of the policy environment and also wanting to improve the quality of teaching and learning in the system. (Minutes of Working Group meeting 10/02/2002, p.4)

Later, when the group was asked to take on an accountability role as well, some members expressed anxiety.

Is it feasible for the Improving Teaching & Learning Project to operate both in the policeman role (accountability) and also in the social worker role (improvement)? And if so how? If the HEQC and the Working Group have different views on this, how can they be reconciled? (Field-notes Working Group meeting, 21/02/2002)

123 These commitments usually remained implicit.
We are concerned that this workshop (the seminar for DVCs (Academic)), now foregrounding the accountability agenda more explicitly, may act as a ‘lightning rod’ for perceptions and anxieties generated by both the current policy environment as well as our history. (Paper placed on list-serve by the Institutional Teaching & Learning Strategies Subgroup, 2002, not dated, p.1).

What will be the consequences of the HEQC audits? How will the HEQC respond to institutional weaknesses that are exposed in the process? What resources will be available to assist with improvement and how will we combat the undesirable effects of the consequences of audits? (Paper placed on list-serve by the Institutional Teaching & Learning Strategies Subgroup, 2002, not dated, p.2)

Finally, a related matter, of how to deal with the SAQA requirements in the Resources, which many Working Group members believed to be overly bureaucratic, was eventually resolved in the following way.

It was agreed that we should promote the OBE approach from within an interpretivist rather than positivist paradigm. We should not promote the SAQA ideology and discourse uncritically. (Minutes of Working Group meeting 16 - 17/07/2002, p.1)

In fact this position was hotly contested between university and technikon members, but in the end the university position won the day (Field-notes Working Group meeting 17/07/2002).

It remains to report briefly on two major activities undertaken by the Improving Teaching & Learning Project in 2002. Firstly the project ran a seminar for all DVCs (Academic) on the 14 August 2002 and secondly it ran a series of Consultative Panels during August and September 2002 in order to get feedback on the Resources from the academic community.

**Seminar for Deputy Vice-Chancellors (Academic)**

The first aim of the seminar was to introduce senior management to future quality assurance requirements by the HEQC and in particular to its plans to focus the first round of institutional audits on the planning and improvement of teaching and learning. Secondly the seminar aimed to assist senior managers in preparing their institutions for the first round of audits. Thirdly it aimed to introduce them to the work being done by the Improving Teaching & Learning Project, hoping to gain their support for the pending Consultative Panel process. The seminar was entitled ‘Managing the Quality of Teaching and Learning’ and was addressed by the Executive Director of the HEQC and by Prof. Webb, an overseas consultant who was also a member of the Reference Group.

In her address to the DVCs (Academic), the Executive Director of the HEQC made the following points that are pertinent to the Improving Teaching & Learning Project’s work: she stated that the HEQC understands teaching and learning to be at the heart of the purpose of higher education institutions but that it was in danger of being side-lined as policy imperatives forced senior managers to focus elsewhere. She noted the ‘acute tensions’
between improvement and accountability and between accountability and institutional autonomy in the HEQC’s work. She explained that due to its responsibility for both these aspects and lack of capacity to run two systems, the HEQC was currently attempting to integrate audit and accreditation into one system, despite being warned not to mix the two. The Executive Director emphasized the HEQC’s determination to build a single quality assurance system based on common minimum quality standards for all, in order to protect students from poor provision. She mentioned that capacity development to meet the HEQC’s requirements would have to be a joint responsibility undertaken by partnerships between institutions, the HEQC and other stakeholders such as the SAUVCA and the CTP. She insisted, (despite the fears of the Improving Teaching & Learning Project’s Working Group), that development or improvement concerns were not being discounted by the HEQC, but rather that the HEQC had realized that capacity development could not be an open-ended agenda and would have to be linked to the attainment of specific minimum standards. She also made the first public announcement of the HEQC’s intention to grant self-accreditation status from 2006 (after the first cycle of audits) to those institutions that could demonstrate to the HEQC that they had well functioning quality management systems in place. The granting of self-accreditation status to all higher education institutions would be the HEQC’s long-term goal, leading to a ‘light touch’ approach to quality assurance (Field-notes 14/08/2002).

Points made by the overseas consultant pertinent to this study include the following. Firstly, that the Australasian model, based on a ‘fitness for purpose’ definition of quality that takes an institution’s own mission as the starting point for audit, was the model most likely to result in genuine improvement. He noted with concern that the HEQC was adding to this model the idea of common criteria and standards across the system, accreditation at programme level and the integration of audit and accreditation. He warned that accountability demands may dominate such a system. Webb suggested that the HEQC should rather aim to achieve accountability without taking direct control and that this is possible through developing trust and partnerships with higher education institutions. He also encouraged the HEQC to focus on adding value to higher education institutions through quality assurance. He then presented a model for establishing an institutional quality assurance system based on regular review cycles and premised on a facilitative rationality and a ‘fitness for purpose’ model of quality assurance. For example, he suggested that evaluation questions or criteria should be designed by the individual units concerned (Field-notes DVC seminar 14/08/2002). Predictably, Working Group members tended to support the views of the overseas expert and were concerned about what they perceived to be the HEQC’s ‘slide to an accountability model of quality assurance’ (Field-notes 15/08/2002).
Consultative Panels

During August and September 2002, the HEQC, through the Improving Teaching & Learning Project, invited senior managers, senior academics with expertise in the area concerned and a few postgraduate students to sit on Consultative Panels in order to comment on each of the then named ‘Guides to Good Practice’. Panelists were deliberately selected from across the spectrum of higher education institutions, including the private sector, but it was made clear that they were to serve in their individual capacity as experts and not as representatives of any institution or organization (letter of invitation 7 August 2002). In the letter of invitation the HEQC asked people to read documentation before the panels met, to spend one day at a panel meeting and to comment on a revised draft thereafter. A total of 34 panelists attended seven panel meetings, one for each of the Guides, each of which were also attended by the Director of Quality Promotion, the manager of the project and two or three members of the Working Group. The programme for each Consultative Panel meeting involved a presentation of the Guide by one of the Working Group members responsible for writing it, a discussion chaired by the Director or the project manager based on a set of questions circulated beforehand.

The following set of questions was formulated by the researcher to guide the panelists’ preparation for the consultative panel meetings:

1. Is the design of the Guides fit for its purpose?
2. Is the Focus Area clearly defined?
3. Is the Rationale convincing? Has relevant policy been taken into account?
4. Do the Evaluative Questions capture the key variables/appropriate criteria for evaluating this area? Omissions? Redundancies?
5. Do the Good Practice Descriptors adequately capture good practice in this area, and are they attainable?
6. Do the Threshold Descriptors adequately capture threshold standards for this area? Are they reasonable and fair, for all higher education contexts? Could they be written more simply and clearly?
7. Are the suggestions for Sources of Data and Comments\(^\text{124}\) helpful?
8. Could you use the Guides to assist you to frame an internal review in your institution? What adjustments would be required for you to do so?
9. To what extent are the Guides likely to be acceptable and useful to members of the higher education teaching staff? What would make them more so? How could they be used to assist in the improvement of teaching and learning?
10. To what extent are the Guides likely to serve the interests of students in the higher education system? Should students be more involved in their generation? How? (Notes to Consultative Panel members, August 2002, p.3)

\(^{124}\) The Comment section was later expanded into the Discussion section, see penultimate version in Appendix 2.
The ‘Notes for Consultative Panel Members’ asked members to ‘act as sounding boards and to share their expertise’ with the HEQC and also to comment on ‘the feasibility, practicality and reasonableness’ of the Guides ‘from the point of view of academics and academic middle managers’ (Notes for Consultative Panel Members, Improving Teaching & Learning Project 2002 p.1). In effect, panelists were being asked to act in two of Ulrich’s social roles (see Chapter 5), that of ‘expert’ and also that of ‘witness to the affected’. As a participant observer, the researcher noted that, probably because of the weight of the questions, both managers and academics tended to participate in the panels in the ‘expert’ role and it was only when the chairperson drew their attention to question 9 and possibly 10, that some of them switched roles and spoke as ‘witnesses to the affected’.

During this consultative process on early drafts of the Improving Teaching & Learning Resources at the end of 2002, comments were also requested by the HEQC from Reference Group members and HEQC Board members. In general, the comments received from HEQC Board members suggest that Board members’ approach to quality assurance is based on a more bureaucratic rationality than that adopted by their writers. Specific comments on the texts of the Guides are not reported here as these were, as far as possible, incorporated into the revised versions of the documents. However, Consultative Panel, Reference Group and HEQC Board members also made more general comments on the Resources that can be used as data for their evaluation, (bearing in mind that these comments were made in late 2002 on early versions of the Resources). Comments are organised according to themes that emerged from the data itself.\textsuperscript{125}

In the data from Consultative Panel and Reference Group members a dominant theme was their concern with the purpose of the documents. Concern was expressed at the dual purpose of the Resources, namely improvement and accountability. Some Panel members suggested that the two purposes should be dealt with in separate documents and that the Codes are overly complex because they were simultaneously trying to serve two incompatible purposes. The problem around the purpose(s) of the documents also led to discussion around their name, their design and format, their audience and their use.

The ‘good practice descriptors’ will be used for audit and the ‘threshold descriptors’ for accreditation. I think it’s problematic to have two purposes in one instrument. (Consultative Panel member 28/8/2002)

\textsuperscript{125} When reporting on the comments, no distinction is made between spoken comments that were noted by the researcher during the Consultative Panel meetings and written comments that were sent by e-mail to the researcher after the meetings. All comments by Reference Group and HEQC Board members were sent by e-mail.
The dual purpose of the Guides-for both accountability and development is cumbersome and awkward. The two purposes would be better served by separate documents. (Reference Group member 12/10/2002)

The Guides should be split into two separate documents: 1. Guides for institutional quality promotion -- with reference to the international literature on teaching and learning. 2. Guides for the HEQC auditors and evaluators-which only focus on core issues. (Consultative Panel member 29/8/2002)

The Guides address two different audiences: 1) The HEQC and its auditors and evaluators by providing them with benchmarks-they serve this purpose well and will be useful for guiding auditors in decision-making. 2) Providers by providing benchmarks for internal review-they do this too, but in this sense they are too prescriptive (and should not pretend to be only descriptive). Therefore they should not be called ‘Guides to Good Practice-they won’t help providers with ‘how to’ questions. (2 Reference Group members 19/11/2002)

A different but related point is made here.

The documents are confusing because they are trying to operate at institutional and programme levels at the same time. The Guides should be based on good international practice. They should be practical and detailed and set clear benchmarks. They should be comprehensive and based on a moral rather than legal argument. Then it is up to the higher education institutions to decide how to implement them. (Consultative Panel member 3/9/2002)

Confusion around purpose led to debate around the name.

The title Codes is preferred-it might be to the detriment of some institutions to be misled by the openness of the word ‘guide’. (Consultative Panel member 21/10/2002)

They should not be called ‘Guides to Good Practice’-they won’t help providers with ‘how to’ questions. (Reference Group member 15/11/2002)

Of all components of the Guides, greatest unhappiness was expressed around the ‘Threshold Descriptors’. They were criticized for being too vague (for example, the use of discretionary terms such as ‘satisfactory’, ‘adequate’, ‘some’); simply truncations of the ‘Good Practice Descriptors’; not quantitatively and qualitatively measurable; not sufficiently distinct from the ‘Good Practice Descriptors’. Some panelists thought the ‘Threshold Descriptors’ altogether inappropriate for a ‘Guide to Good Practice’ and suggested that they should be simply dropped. (Field-notes 27/8/2003-12/9/2003)

The ‘threshold descriptors’ don’t work; they’re too similar to the ‘good practice descriptors’. (Consultative Panel member 28/8/2002)

The ‘threshold descriptors’ are just truncated versions of the ‘good practice descriptors’. (Consultative Panel member 5/9/2002).

They need more work, they need to be quantitatively and qualitatively more specific. (Consultative Panel member 28/8/2002)

Other panelists suggested that acceptable definitions of the ‘Threshold Descriptors’ would not be possible without empirical work in higher education institutions to ascertain what the thresholds should be and what people on the ground would find acceptable. (Field-notes 5/9/2003)
Members of the HEQC Board were also unhappy with the Guides, but mostly because they thought they were inadequate as instruments for accountability.

The Guides should be more prescriptive in the areas which will be the focus of HEQC audits and be clear what the mandatory areas of focus and standards are-words like may, could, should etc. should be removed from these areas. (HEQC Board member 21/10/2002)

These Guides need to be field tested with the right target market - the market that really needs the guidance will not get help from these documents. Maybe you should publish these as broad policy and then publish a set of short, sharp clear expectations on what must be delivered. (HEQC Board member 18/10/2002)

A joint industry-sector practical bench-marking exercise needs to be carried out in order to determine precise criteria and standards. (HEQC Board member 19/10/2002)

Private providers will battle to apply and interpret these documents. They will not want to have to wade through a whole lot of academic theory and still have to try to figure out exactly what we are looking for and how to ensure that their system meets our minimum expectations. A less academic approach will be more successful. Private providers need plain and simple quantified guidelines on what equals acceptable levels of provision e.g. How many books are sufficient for a resource center, what type, how old, what subjects, etc.? (HEQC Board member 23/10/2002)

Providers need a road map on appropriate processes to achieve the stated outcomes. (HEQC Board member 23/10/2002)

It was as a result of several such negative comments on the ‘Threshold Descriptors’ that these were dropped from the next version of the Guides.

Some members of the Consultative Panels agreed with the Board members and wanted to keep the ‘Thresholds’, expressing the belief that the system needs a ‘bottom line’.

You need a cut-off point, higher education managers have to realize that the allocation of resources is dependent on meeting a bottom-line. (Consultative Panel member 28/8/2002)

Something has been lost with the dropping of the Threshold descriptors… there are substantial differences between institutions and these differences might not be adequately accounted for in the current version with only one set of descriptors. (Consultative Panel member 20/10/2002)

Concern was also expressed that the HEQC was demanding too much of higher education institutions:

We can’t expect higher education institutions to prepare for all seven areas at once (Consultative Panel member 3/9)

The requirements for the external evaluation/ validation of programmes are beyond the capacity and resources of the system. The HEQC should focus on only Guides 1 and 2 initially. This in itself will pose a challenge to higher education institutions. (Consultative Panel member 31/10)

The number of Suggested Data Sources totals 130 in all (although there may be some overlap). This preparation poses a formidable task for higher education institutions. (Consultative Panel member 23/10/2002)

With respect to the role of being ‘witnesses to the affected’, Consultative Panel members made a few positive comments about the likely responses of their academic colleagues.
The fact that people have been consulted is very important; it will help make it acceptable. (Consultative Panel member 5/9/2002)

They will be relieved to know the unknown, i.e. what the HEQC expects. (Consultative Panel member 27/8/2002)

However, the majority of comments were uncertain or negative.

Will quality assurance actually contribute to the capacity of academics to deliver high quality provision? (Consultative Panel member 28/8/2002)

Will academics have the capacity to understand these issues? (Consultative Panel member 28/8/2002)

We need to be sensitive to the quality of life of academics at the center of all this. (Consultative Panel member 28/8/2002)

Academics will ask ‘what are the academic incentives of doing all of this; what’s in it for me?’ (Consultative Panel member 3/9/2002)

For individual academics the Rationale section is key. We will have to provide evidence to show why their current practices are not considered quality practice. (Consultative Panel member 3/9/2002)

Higher education institutions should provide safe places for academics to self-evaluate their teaching formatively. This space should not be compromised by HEQC requirements. (Consultative Panel member 12/9/2002)

It will be impossible to enforce these good practice descriptors because academics assume that they are already professionals. (Consultative Panel member 12/9/2002)

The shift to a programmes-based approach to curriculum and the new approach to assessment is very demanding and time-consuming for academic staff. The HEQC must be realistic in its expectations and in the scope of its expectations. (Consultative Panel member 8/10/2002)

Academics have been subjected to intensive and extensive demands on their time, both personal and research, the last couple of years, what with SAQA demands and all the rest. It is, therefore, not surprising that the research output of universities has dropped. It is now imperative that productive staff members are given the opportunity to get back to their core business (research) without incessant demands, which they often perceive as trivial, on their time. It is equally necessary that all the academic passengers are given the message that it is time they started pulling their weight. (Consultative Panel member 10/10/2002)

Quality assurance will become yet another burden on academics, especially on black academics in under-resourced higher education institutions, there will be bad buy-in from them. (Consultative Panel member 3/9/2002)

Student evaluation is based on a neo-liberal assumption that students are our clients, younger academics may buy into this but the older ones, especially the good researchers won’t. (Consultative Panel member 3/9/2002)

These requirements will need a strong advocacy programme-most academics are hoping that all of this will just go away. (Consultative Panel member 12/9/2002)

Don’t kill academics’ initiative at HBIs by making the good practice descriptors unobtainable. (Consultative Panel member 27/8/2002)

Academics at my institution will ask ‘Who the hell do the HEQC think they are?’ (Consultative Panel member 12/9/2002)

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126 Historically black institutions
However, HEQC Board members expressed the wish to take a stronger accountability line with academics.

   At some point in these Guides, should we not suggest the writing into employment contracts of institution staff the issue of quality of assurance? (HEQC Board member 15/10/2002)

   The evaluation of teaching cannot be viewed as only voluntary. (HEQC Board member 23/10/2002)

Postgraduate students attended four of the seven Consultative Panel meetings. However, they contributed very little to the discussions (as these were probably too removed from their experience). When they did contribute, they spoke anecdotally about their own experiences (Field-notes 28/8/2002, 3/9/2002, 12/9/2002). Regarding the role of students in the development of the Guides, Consultative Panel members expressed very different opinions.

   It is the total student experience that really counts. The Guides should be used by student organizations to form student charters in which the promises and obligations between students and providers are made explicit. (Consultative Panel member 27/8/2002)

   These Guides certainly serve the interests of students but I’m not sure how they can be involved in their development. (Consultative Panel member 3/9/2002)

   We need to examine this from a legal point of view to ensure that students don’t use these in a litigatious way; we need to ensure that we haven’t potentially opened ourselves up to serious lawsuits. (Consultative Panel member 5/9/2002)

On the basis of the discussions at the consultative panels, the project manager edited each of the Guides and conducted a further cycle of consultation with panel members and the HEQC Board via e-mail. It was at this stage in the process that the ‘threshold descriptors’, that is, minimum standards, were dropped, in response to the largely negative comments received on these. This was in keeping with the advice noted previously given by the overseas consultant in August. The final version of the Guides for 2002 was submitted to an HEQC Board meeting for approval on 4 December 2002. This time the Guides were approved by the Board but for internal use only. This would allow the HEQC to use them in the development of its criteria for audit and accreditation.

7.1.6 Response by the HEQC

During June 2003 six senior HEQC officials were interviewed by the researcher. One of the research questions for this study was pursued with those who had read and worked with the ‘Improving Teaching & Learning Resources’; namely, ‘to what extent do you think the Resources have been useful for the formulation of the HEQC’s audit and accreditation criteria?’ (Appendix 9.2) The responses of the HEQC officials to the Improving Teaching & Learning Resources were varied.
Firstly, one HEQC official spoke about that role the Guides/Resources had and would play in promoting teaching and learning. This comment indicates the HEQC’s commitment to bringing the pedagogic project into its quality assurance activities.

You know I think (the Resources have been) enormously useful. They gave us a chance to give substance to the very early HEQC commitment to wanting the core activities of higher education - teaching, learning and research - to be at the heart of our quality assurance process. So you know this project, the teaching and learning project, (and the research project that we are busy with at the moment) have been the substance of the HEQC’s commitment, as it were, to the issues of teaching and learning. (...) So in a sense because this is an area of responsibility which doesn’t have this formal pressure, as it were, it’s taken longer than it should have. But I’m really very pleased that it’s back on the agenda because we still think that it is and should remain a flagship project for the HEQC. (Appendix 9.7 HEQC 2)

A second official supported this position and linked it to the role the Resources might play in audit.

With regard to the context of South Africa in terms of transformation around teaching and learning issues it is raising a national conversation and so I think they’ve been extremely useful to us at the HEQC. How we hope they will be used by higher education institutions is really with a view to establishing this national conversation and understandings nationally around teaching and learning. So that when we do go into institutions for audits for example we have an understanding of how they are approaching teaching and the Resources will also inform our own work. They will also be part of steering the quality of the institutions, steering in terms of raising questions about practice. (Appendix 9.7 HEQC 5)

A third official mentioned their role in developing the HEQC’s understanding of teaching and learning and of assisting institutions to develop self-evaluation instruments.

The Improving Teaching & Learning Resources have been very important in the development of the (HEQC’s) system. Firstly they have contributed to a growth of the HEQC’s understanding of what quality is, and so the discourse around the content of quality has become richer. Secondly, they are a tool for institutions to use to build their internal quality systems and to refine their self-evaluation instruments in line with the HEQC requirements. Thirdly they will impact on actual quality itself, leading to better designed programmes, assessment systems, etc. (...) I would hope that they will help build bridges between managers and academics leading to more effective interaction between them leading to the development of institutional cultures of quality. They can also be used as a checklist that people can use to spot the gaps in their policies and practices - they may find whole areas that are undeveloped through looking at the Resources. I also think that they are particularly important for self-evaluation, they should help people refine their instruments e.g. for the development and review of programmes and for staff development. (Appendix 9.7 HEQC 4)

With respect to the development of criteria, HEQC officials claimed that the Resources had played an important role.

I think they were very useful and we basically worked from those criteria. I don’t think without the Guides it would have been possible to produce the audit criteria because it had to be done in a very short period of time. And it was an excellent source of information because you can always refine it, you can always say, ok, this isn’t useful. But I think in general it was a very important source of information. (...) As I said, most of the content of the Guides has now been built into the audit and especially accreditation criteria. So
their purpose to develop criteria was achieved. But if the Guides could also advise on implementation then they would remain useful to institutions. (HEQC6 3/6/2003)

A similar position was taken with respect to the development of the accreditation criteria, despite the lack of ‘threshold descriptors’ in the Guides.

Yes, they were useful, X and Y both drew on them extensively in writing the criteria. They gave us a stock of material and parameters to work from. They gave us a framework and a starting point. We had to work out what were the permutations to get minimum thresholds from good practice descriptors. Although the Improving Teaching & Learning Project was driven by university types, the products are not necessarily linked to that context, they are applicable across the board. (Appendix 9.7 HEQC 3)

Much of what is in the Guides has now been taken up in the accreditation criteria. But there remains a big area where you tell people how to put them into practice. This is the key, you are saying to higher education institutions here are generic benchmarks and also this is how to implement them practically. (Appendix 9.7 HEQC 6)

A quality manager who had assisted the HEQC in the production of the criteria mentioned tensions around different approaches to quality assurance and again the challenge in developing minimum standards from the Resources.

It’s interesting, initially the first discussion that was right at the beginning, the feeling of the HEQC circles was that that’s another Directorate, that’s the Capacity Development Directorate, so let them do their thing. We in the Accreditation Directorate, we’re going to do the actual thing with the criteria and we’ll do it on our own. That was how I came into it at that stage. But then when we actually began working on it, it was obvious that we had it right there - so why should we go and reinvent the wheel? So both and I and X talked about it and we decided to use the Resources. In the section that I did, which was about 70% - 80% of the criteria (the broader document Y wrote). In terms of the criteria itself, it was a bit of a rearrangement. I didn’t use the exact categories of the Resources but I would say it actually was the basis for the criteria. It was used as the basis for the criteria. It was interpreted and it was toned down and it needs much, much more toning down. There was still too much of the good practice level that ended up in criteria, but that was a purposeful decision. So let me put that on record - that was a purposeful decision. We didn’t want to go in and make the first move on too low a minimum. (…) So there was a strong direct link between the Resources and the development of the program accreditation criteria. Although we also used other sources, there was a whole stack of literature from different places and different institutions which we also referred to, the same with the MBA criteria. So we purposely looked at good practice elsewhere and systems elsewhere. (Appendix 9.9 QAM 5)

In response to the researcher’s question that perhaps the accreditation criteria were too close to the ‘good practice descriptors’, the same respondent highlighted the ‘home-grown’ nature of the Resources,

I don’t think it was a problem that it was too close to the Resources. I think it was indeed close to the Resources, but that was fine, the Resources were good. And it was South African - it was a product of South Africa, why couldn’t it be close to that it’s a whole team of South African people who have worked on that? I couldn’t care less about the in-fighting between the two Directorates in the HEQC, to my mind it was South African people, it was a team of good people who understood the South African context, and to use that as a basis to develop the criteria made perfect sense to me. (Appendix 9.9 QAM 5)
With regard to the criteria that were developed during 2002, for the re-accreditation of all MBA programmes (see Chapter 8), the link between the Resources and the criteria appears to have been much more tenuous.

So I set the criteria for the Review for the MBA. They (the HEQC) then took that back into their internal system and I have an impression that X may have worked on it again and revised the criteria that I set probably based on the work that the Improving Teaching & Learning Project was doing at the time. (...) So they did eventually sent out a very detailed document and I know they used the early work of the Teaching & Learning Project to add meat to my criteria. (...) But essentially they added things to the criteria related to diversity and access and redress, which were obviously not part of the foreign criteria, and then checked them against the Teaching & Learning Project’s Guides to Good Practice. (Appendix 9.11 MBA 8)

Despite the positive response by HEQC officials and consultants to the Resources and their usefulness in developing the criteria (and therefore fulfilling one of the project’s original purposes), some members of the Working Group felt that their contribution had not been adequately acknowledged, as expressed by this ex-member of the Working Group.

I think it was a big ‘shlenter’… I think it was about trying to get credibility for the audit criteria and the programme criteria. I mean we wrote those best practice and threshold criteria and then you know they basically just vomited them out as the audit and accreditation criteria. I think we were conned. They had to keep us in the background because they had the wrong group, I mean they had a largely white-led group and then they brought in a few token people but those people didn’t really have the capacity to do the work and it was very difficult… (Appendix 9.9 QAM 6)

7.1.7 Regional Workshops

By September 2003 the HEQC had completed the first drafts of its audit and accreditation criteria documents and placed these in the public domain for comment. It now continued the process of developing the Improving Teaching & Learning Resources for quality promotion and capacity development in the institutions. In mid-2003 a new Acting Director was appointed to run the Quality Promotion and Capacity Development Directorate and the Improving Teaching & Learning Project was revived. The main activity undertaken by the project in the second half of 2003 was to run regional workshops across the country to introduce the academic community to the Improving Teaching & Learning Resources and to begin capacity development work around the improvement of teaching and learning. The aims of the workshops were stated as follows:

1. To introduce the draft Resources to the higher education institutions for use, adaptation and further development, and to get feedback on how the HEQC should improve and develop them further
2. To engage managers and academics in discussion, analysis and planning around the improvement of teaching and learning. (Workshop hand-out, September, 2003)

Prior to the Improving Teaching & Learning Project’s regional workshops, the HEQC sent out invitations to all higher education institutions asking them to send representatives to
attend a particular workshop. Public higher education institutions were asked to send four senior academic managers, four academics and one student, whilst private providers were invited to send one or two representatives, depending on their size. This meant that each workshop was attended by 30-40 participants. Each workshop was hosted by one of the participating public higher education institutions.

Some of the issues raised by participants during the workshops are reported below. These are based on direct quotes by participants, captured through participant observation and written up in the researcher’s Facilitator’s Feedback Report (2003) to the HEQC (Appendix 7).

Examples of comments made by participants with regard to institutional strategies for the improvement of teaching and learning are listed below. (Each individual comment is separated by a semi-colon).

Improvements in teaching and learning will need a strategy and support at senior management level; innovation must be properly resourced to be sustained—finance, human capacity and infrastructure; incentives and rewards, promotion, status and recognition are key issues if teaching is to be promoted; improvements in teaching and learning require changes in the identities of academics and also in institutional culture, this takes time; research into teaching needs to be made respectable and public, it should be the basis for policies and management frameworks on improving teaching and learning. (Appendix 7: 9)

In discussion on this issue one HEQC official responded, supporting the sentiments expressed by participants quoted above.

The HEQC is trying to send signals to senior management that institutional transformation includes the transformation of teaching and learning. We want the foot-soldiers to be supported in this. (Workshop No.4, 8/10/2003 Appendix 7:9)

And with regard to the funding of improvement in teaching and learning, an HEQC official responded, as follows.

The HEQC hopes to raise a considerable amount of soft funding for development projects which will be based on partnerships with higher education institutions. (Workshop No.7, 15/10/2003 Appendix 7:10)

At Workshop No. 5, one participant complained to the HEQC about the tensions involved in meeting the requirements for equity and efficiency simultaneously.

How can we achieve equity and efficiency simultaneously? This requires systemic and structural issues to be addressed, a curriculum space must be provided in which deep learning and foundational competences can be acquired. These need to be integrated with the mainstream curriculum. Institutions need to be informed about students’ prior learning levels and to be accountable for through-put rates. All of this is resource intensive, efficient through-puts cost money. We don’t feel supported by the DoE\textsuperscript{127} or the HEQC in this AD\textsuperscript{128} work. (Workshop No.5, 13/10/Appendix 7:10)

\textsuperscript{127} Department of Education

\textsuperscript{128} Academic development
A HEQC official responded sympathetically.

The HEQC is aware of the challenges and difficulties that arise from our environment. The HEQC wants to integrate the steering instruments, i.e. planning, funding and quality assurance. It wants to link quality to transformation and avoid bureaucratic overkill. It is aware that both quality management systems and quality per se need to be improved and that there are capacity and resource constraints to this happening. (Workshop No.5, 13/10/2003, Appendix 7:10)

During the same discussion, another participant complained about the lack of policy alignment stating that ‘policymakers in Pretoria do not seem to know what other policymakers are doing’. The HEQC response suggests that the HEQC may see itself in an intermediary role between the Department of Education and institutions.

The HEQC operates within the requirements of the PQM\textsuperscript{129} exercise. We don’t have control over funding and registration. Programmes first go to the DoE and then to the HEQC. There are national policy objectives which the CHE\textsuperscript{130} supports. The whole point of the restructuring is to clean up the size and shape of the system. Higher education institutions are unhappy with the inflexible way that the DoE has handled the PQM exercise. We meet regularly with the DoE and try to address these issues by keeping our advice and quality assurance functions together. Likewise the HEQC has to take into account the DoE’s throughput rate benchmarks although we recognize that this is a simplistic way of looking at throughput rates. We will look at the evidence holistically and will look at both quantitative and qualitative data. (Workshop No.5, 13/10/2003, Appendix 7:10)

At another workshop a participant challenged the HEQC official present on the issue of how the HEQC will deal with the diversity of institutions.

How will the HEQC deal with differences between different types of provider? For example Technikons get less subsidy and privates get none. Our approaches to learning are different, e.g. the emphasis on experiential learning in the Technikons and training for employment by privates. (Workshop No. 7 16/10/Appendix 7:10)

An HEQC official responded by linking the diversity of institutions to its capacity development initiatives.

We have a single set of quality requirements but we want to balance these with the differences. Your strategies will be different, but we want the same quality of output e.g. the quality of a Diploma should be same irrespective of where it is offered. The reality is that different higher education institutions are in different places with respect to quality. This is why the HEQC is undertaking capacity development - we believe that it is our responsibility to ensure that higher education institutions have assistance to meet our quality requirements. The production and dissemination of these Resources is one example of the HEQC working at this responsibility. We also understand the costs of quality and when we visit higher education institutions we always ask about the relationship between quality assurance, planning and resource allocation. Further, the HEQC is hoping to negotiate access to a substantial amount of money to use for capacity development. We may be able to use this to resource higher education institutions to implement improvement plans. (Workshop No. 7 16/10/Appendix 7:10)

\textsuperscript{129} Programmes and Qualifications Mix - a planning document that must be produced by institutions and approved by the Department of Education as a condition of funding academic programmes.

\textsuperscript{130} Council on Higher Education
At Workshop No. 5 a student representative asked the HEQC how should students get involved in the quality assurance of teaching and learning? All higher education students should be alerted to the existence of the Resources on the web, how should we take this forward? (Workshop No.5, 13/10/2003, Appendix 7:10)

The HEQC official responded in a way that indicated his awareness of wanting to locate the HEQC in a transformative definition of quality,

The HEQC has planned to work with student organizations and with the Graduate Development Association. We are discussing the development of a student charter based on these Resources so that students can be more explicit in their demands on providers. We want to make students aware of the questions they should be asking their institutions. However, we also do not want them to operate only as clients and customers but also as co-learners. (Workshop No.5, 13/10/2003, Appendix 7:10)

Finally, many of the participants were confused about the relationship between the different HEQC policy instruments.

We would like to take the Resource pack and use it for improvement, selectively. It has a developmental approach which we like. We would rather go slowly and do a good job than ‘spot’ to impress an external body. The problem is that we now also have the audit and accreditation criteria, which in our opinion go into too much depth. What would happen if we just took assessment for example and used this Resource to roll out an improvement strategy? Would we get hit in an audit for focusing only on this area? What is the status of the Resources and what is their relationship to the other two sets of criteria? What is the degree of discretion that the HEQC will allow us as professional academics to make our own judgment about what are the key areas for us to focus on with respect to quality assurance? (Workshop No. 13, 3/11/Appendix 7:11)

The HEQC official present responded by reminding the audience that the HEQC’s strategy is to first ensure that all higher education institutions achieve a prescribed set of minimum standards, after which it plans to move towards greater self-regulation.

We cannot give the Resource pack official status in the preparation for audit. This would be problematic as the audit criteria do this. The Resources are there simply to assist you in your own self-development. The audit criteria are currently being refined and reduced. Remember it is an evidence-based audit. Auditors will be trained to start with an HEI’s self-evaluation portfolio which is limited to 70 pages. Your self-evaluation should be linked to your planning and your improvement plan will be taken seriously by the auditors. This is also where the Resources can help. But the plan will be critiqued by them and subject to peer review. These peers may also be obliged to ask questions about other areas of practice which you have not attended to. In general the HEQC wants to move towards a paradigm of self-regulation, but first it must raise awareness and set out minimum standards. (Workshop No. 13, 3/11/Appendix 7:11)

Participant evaluations of the workshops were mixed; a small sample of typical responses to the HEQC evaluation sheets handed out at the end of the workshops follows. These comments are supplemented by more detailed comments made by participants interviewed by the researcher after the workshops. Positive comments included the following.

We would like the HEQC to continue to provide a forum where higher education institutions can exchange ideas and share good practice.

We are grateful to the HEQC for creating these linkages between privates and publics. The HEQC should continue to encourage the development of partnerships.
These positive comments were endorsed in the interviews by one of the academics who attended a workshop.

I found the workshop helpful. It was an opportunity to give feedback to the HEQC and to make a contribution. This helps buy-in from academics. It also helped us to contextualize the Improving Teaching & Learning Resources, and I think these will be useful.

It helped to show me where the national quality assurance system is at. It also helped foster discussion on the distinction between the Criteria and Standards and the Improving Teaching & Learning Resources. It helped one to get an idea of the work that still has to be done. These workshops also help to stimulate debate inside higher education institutions on quality assurance, it helps us to see that the HEQC and quality assurance are for real and not something abstract that will go away. (Appendix 9.10 A1)

Negative comments suggested that the HEQC had pitched the workshop design at too low a level for busy, high-powered participants. This meant that many senior managers who were supposed to attend either stayed away or came only for a short period (Field-notes 13/10/2003). The design of the workshops also assumed that all institutions were in need of change and of capacity development. This assumption clearly irritated some of the participants and again emphasized the difficulty in taking a common approach in a very diverse system. Negative comments included the following:

The wrong people attended the workshop— it was about the management of teaching at a system level. For this you need senior management to attend. But the design of the workshop was far too low and insufficiently challenging for them.

The HEQC should have been more specific about which areas are to be tackled in the workshops. They could add value in that they provide a space for authentic institutional work to occur, but this requires the right people to be here. We value learning from other institutions, but we should all be working on the same area.

The following responses are reminiscent of comments gathered much earlier during the project’s needs analysis when institutional representatives indicated that they did not want ‘interference’ or ‘didactic workshops’ from the HEQC.

The workshops assumed that we want/need to change teaching-learning practice in our institutions and that we are in a position (at least collectively) to do so. In our case, neither of these assumptions held.

We already have many innovations in place. We don’t want to change anything yet. The university has done well to put the right things in place. We rather want to know how well things are working and to have them evaluated. We think our current systems are good, they may just need tweaking. We are more concerned with the lack of policy alignment in our external environment—e.g. the DoE is not supporting teaching, but rather research.

This criticism of the workshops was taken up very strongly by one of the interviewees from a strong research-based institution.

I think that the credibility of the HEQC fell through the B workshop. We had an A-rated researcher sitting there for two days, Y. It was very frustrating. So I think with the workshops the target audience and the purpose of all that wasn’t thought through thoroughly enough. (…) The credibility of those working in Quality Assurance and Staff Development at our institution was compromised by these workshops. (…) And I think it’s primarily because the wrong people were targeted. I think what they should’ve done was workshop it (the Resources) through the quality assurance people who’re actually doing
the job and perhaps a few Registrars or so and then leave it to the institutional units to disseminate it and workshop it through the institutions. Instead of the HEQC trying to come in from the outside and do the work for the institutions. Capacity building doesn’t work like that. You have to work with the people in the institution who know the situation. (Appendix 9.9 QAM 5)

The researcher’s assessment of the workshops was summed up in this comment in the Facilitator’s Feedback Report to the HEQC (Appendix 7).

From my observations during the five workshops I attended, the first objective of the workshops (to introduce the Resources to participants and to get their feedback on how to develop them further) was successfully met. Overall there was a positive response to the Resources from participants who generally engaged enthusiastically with how they could adapt and interpret the Resources for use in their own institutions. Participants also provided useful feedback and criticisms of the Resources which the HEQC can use for their improvement and further development. Some of the criticisms and suggestions can be addressed in the short-term in a final round of editing; this is particularly the case for the detailed comments on specific Resources. Improvement in lay-out and presentation can also be addressed in the short-term. Other more fundamental issues that were raised such as major gaps that require new Resources to be written, the need for examples and case studies, web-site development and the inappropriateness of the Resources for particular institutional types will require further development and investment by the HEQC and are likely to be addressed only in the medium-term depending on the HEQC’s priorities and resources.

It is also apparent that most of those who attended the workshops found them a useful exercise, not only to engage with the Resources and to discuss improvement plans with their colleagues, but engagement with HEQC officials and other institutions was clearly also appreciated. The idea of putting merger partners into the same workshops was also found to be beneficial by most participants concerned.

In my opinion, the data captured in this report suggest that the second workshop objective (to engage managers and academics in discussing institutional improvement strategies for teaching and learning) was only partially achieved. The main reason for this was that very few senior managers attended the workshops and those who did generally did not stay throughout. (I noted that 70 - 80% of the workshop participants were women and many of these were junior members of staff). This meant that plans for improving the management of teaching and learning made during the workshops were generally made by practitioners from academic development, staff development or quality assurance units. These people have the expertise to formulate such plans but lack the power to effect them in their institutional contexts. This led to some frustration on the part of participants, for without the presence of senior managers, their efforts failed to be authentic and may or may not ‘go anywhere’ once they return to their institutions. The HEQC’s intention to initiate a dialogue about improving teaching and learning management between staff at different levels within institutions was perhaps over-ambitious. The programme, which lasted one-and-a-half to two days and which was structured as a gradual learning process was, in my opinion, too basic, too long, too slow and too prescriptive to attract senior managers (at all or for long). In addition there are other factors beyond the control of those who conceptualized the workshops, such as the fact that teaching and learning remains a ‘Cinderella’ low status area in higher education, and senior managers are over-stretched, especially those involved in re-structuring processes. The workshops were also held rather late in the academic year when people are generally tired and pressured. A two-pronged strategy—one for practitioners using this workshop design and another briefer, more targeted approach for senior management—may have worked better. (Appendix 7)
The general low levels of interest and participation in the Improving Teaching & Learning Project’s workshops by senior and middle level academics reinforces the analysis proposed in this study; that the majority of academics are driven by a collegial rationality that does not accord teaching a high status. The low level of participation by academics in this policy development process and their failure to engage seriously with the HEQC meant that, in Ulrich’s terms, the voice of ‘the affected’ was not heard directly in this policy development process. Instead, the HEQC’s and the Project’s efforts at consultation had to depend largely on the indirect reporting of the likely responses of academics by those representing the pedagogic rationality, such as staff and academic development and some quality promotion personnel.

However, for the purposes of this study, the participants’ responses to the Improving Teaching & Learning Resources are more important than their evaluation of the Project’s workshops. As discussed in Chapter 5 the researcher used the regional workshops as an opportunity to gather more data from different groups of stakeholders on their opinions on the HEQC’s policy instruments, and on the Resources in particular. The data gathered on workshop participants’ responses to the Improving Teaching & Learning Resources using participant observation (at five of the workshops) and interviews of participants during breaks at the workshops are reported below. It is noteworthy that of the eleven academics approached by the researcher for interviews, only three were prepared to grant interviews (one did so by e-mail). Some said they did not have time, but the majority refused on the grounds that they had not yet read the HEQC’s policy documents and were not sufficiently familiar with the issues to be discussed.

Comments by workshop participants on the Improving Teaching & Learning Resources were gathered via participant observation and recorded in field-notes during the five regional Improving Teaching & Learning Project’s workshops attended by the researcher. These comments were made on the 2003 version of the Resources from which the minimum ‘Threshold Descriptors’ had been dropped. This version was published only for the purpose of the workshops and circulated to participants beforehand. The responses were gathered from the report-back sessions held after participants had engaged in small group discussion on how to use the Resources in their institutions. Also inserted are comments that other Facilitators captured and reported on to the HEQC in their Facilitator’s Reports that were required by the HEQC after the facilitation of a workshop. Some of these comments have been included to demonstrate that there appears to be a consistency in issues raised by participants across the workshops. Comments that were not captured by the researcher are referenced as ‘Facilitator’s Report’. A third set of comments were provided by those participants whom the
researcher interviewed on the margins of the workshops. These more in-depth comments are also included.

There were many positive responses about the role that the Improving Teaching and Learning Resources could play in terms of providing information, definitions and guidance to practitioners.

We found the Resource pack informative and we liked the clear definitions. It helped put our concerns into perspective. It is well-researched and evidence-based and so re-assured us. (Field-notes, Workshop No.7, 15/10/2003)

The documentation I think it’s really thorough and unlike what we had previously we didn’t have this kind of documentation. We simply had the evaluation instrument, in terms of which departments were evaluated. But we didn’t have this kind of Resource pack that HEQC has produced. (Appendix 9.9 QAM 8)

I was part of an audit - it was a self-evaluation exercise in 1998 at the X Faculty of Theology. I was part of that with Y in those days. There was a lot of thumb-sucking - there was a lot of wondering what we should put on the table. There were no external guidelines - there were no procedures in place. They distilled from our experience some guidelines. It was in the early days of auditing and I think this is now one big step forward! This could be the manual, the guide, the Bible as it were. (Appendix 9.9 QAM 9)

Some participants, who share the Improving Teaching and Learning Working Group’s pedagogic rationality, commented positively on the use of the Resources for staff development.

The Resources spell out clearly the need for change in teaching practices. We like the emphasis on teaching being accorded the same status as research. We also support the idea of reflective teaching using self and peer evaluation. (Field-notes, Workshop No.7, 15/10/2003)

We like the Improving Teaching & Learning Resources, we have already started using them in our staff training programme where they are finding them very useful. (Appendix 9.8 AM 2)

In an interview another participant commented on the need for the professionalization of teaching staff, especially in the South African context.

You see I don’t want to see the HEQC only as auditors or accreditors because both processes will make demands on practitioners. I feel that something else should be provided for practitioners in higher education in terms of professionalizing them and making available best practice in the various disciplines. (...) And also I think there’s a great eagerness on the part of practitioners to be better equipped professionally. They are equipped in terms of their disciplines; that’s fine, but I think professionally they are yearning for assistance and capacity. I would include senior academics in this as well. Especially those old professors who think they don’t need to teach as much and to leave students to their own devices. Our student population is too diverse and too under-prepared to adopt that kind of attitude. We can’t let people read for their degrees like the old Oxford terminology, they can’t even read! You’ve got to help them to read! And I think the old folk would be more resistant to it but somewhere they need to fall in line. Surely if I were the HEQC I would insist on that. (Appendix 9.9 QAM 8)

Several people commented positively on the approach taken by the Working Group in writing the Resources. Participants were generally encouraged by their developmental approach, their
adoption of a facilitative (and perhaps to a lesser extent) pedagogic rationality and many read them as ‘communicative action’ on the part of the HEQC.

We would like to take this document and use it for improvement, selectively. It has a developmental approach which we like. (Field-notes, Workshop No.13, 3/11/2002)

For the first time the HEQC is taking a developmental rather than top-down approach and attempting to enthuse us about quality. (Workshop No.10, 29/10/2003)

The Improving Teaching & Learning Resources do challenge traditional notions of teaching from within a reflective paradigm. We liked the Rationale and Discussion sections and the way they take national imperatives and debates as the starting points. (Field-notes, Workshop No.5, 13/10/2003)

This workshop and the Improving Teaching & Learning Resources have softened the hard edge of accountability. The Resources give us a very useful tool for critical-thinking about our self-evaluation. The HEQC is moving us to focus on good practice rather than minimum standards. The HEQC should have sent out this Resource first to prepare the way for the Programme Accreditation document. If is far more valuable to look at the seven areas of the Resources than to be confronted with the 39 criteria of the accreditation document. (Field-notes, Workshop No.10, 29/10/2003)

Others were pleased that they allow some discretion to practitioners in implementation processes.

We found the evaluative questions very useful as they are open to interpretation for each department or situation. (Field-notes, Workshop No.10, 29/10/2003)

We like the evaluative questions, they are flexible, comprehensive and allow us to use our discretion. They also provide us with common benchmarks. (Field-notes, Workshop No.7, 15/10/2003)

We like the evaluative questions, good practice descriptors because they are measurable and tangible. We like the framing and strategic direction given by the Resources. Also the value placed on educational research. (Field-notes, Workshop No.7, 15/10/2003)

One participant noted the deliberative nature of teaching and commended the Resources for reflecting this.

You know it’s not that simple, teaching learning, designing a curriculum, assessing students’ work - it’s not formulaic it’s problematic and this does come through in the Teaching and Learning Resources. It’s not that easy, it’s problematic. (Appendix 9.9 QAM 6)

In an interview, one quality assurance manager not only noted the value of the Resources, but praised the Discussion and Evaluative Questions sections in particular for the way in which they grapple with the complexity of achieving institutional change. He also implied that at top-down social engineering approach would not work and that the tentative approach of Resources in which local discretion is encouraged was appropriate for institutions of higher education and for the management of teaching and learning in particular.

Although I was involved with the whole process putting the Resources together and saw a lot of the earlier first drafts, it was really only when I saw the finished product assembled together in a booklet with an introduction and a consistent pattern going all the way through and with consistent quality going all the way through, that I actually began to sense what a valuable Resource we’ve actually got here. And it’s a systematic coverage of a whole range of absolutely critical academic practices associated with teaching and
learning. And for each one of those areas there’s a nuanced discussion up front which immediately introduces one to the complexity of achieving institutional change and the difficulty of trying to engineer this. So I thought that was hugely helpful and the Evaluative Questions I thought set up a very, very valuable framework for understanding the management of teaching and learning. (Appendix 9.9 QAM 3)

However, not all participants were positive about the interpretive and pedagogic approach adopted in the Resources.

The Resources favour certain theoretical and philosophical frameworks, e.g. constructivism. The HEQC should not blatantly take such a stance, it should remain neutral. (Facilitator’s Report, Workshop No.8 27/10/2003)

But other participants wanted more explicit theory.

The Resources are too focused on systems and could become very mechanical, they need to focus on philosophical and educational theoretical underpinnings as well. (Facilitator’s Report, Workshop No.14 3/11/2003)

In the end the HEQC opted to include theoretical issues in the Discussion section, but to acknowledge that many of the issues are contested. It also distanced itself from any particular position taken by inserting the following disclaimer in the Introduction to a later version of the Resources: ‘This Resource pack is intended to stimulate discussion and does not necessarily reflect the views of the HEQC secretariat or Board on teaching and learning policies and practices’ (see Appendix 2.0, p.3).

Other negative comments regarding the approach taken in the Resources suggest that they do not provide adequate information on processes and on issues of ‘how’ to improve teaching and learning as opposed to outlining ‘what’ is desirable.

The Resource pack needs to be complemented by examples of good practice. (Facilitator’s Report, Workshop No.11 31/10/2003)

The Resources tend to give us end-points but not pathways. They need more on the ‘how’ not only on the ‘what’. (Field-notes, Workshop No.13, 3/11/2003)

They tend to be a checklist for outputs and don’t give us enough on inputs and processes. (Field-notes, Workshop No.7, 15/10/2003)

Linked to these critiques of the conceptualization of the Resources was a criticism by a senior manager, who understood students as co-participants in the learning process as opposed to customers or clients. His point contests the HEQC’s representation of students as victims in need of protection from unscrupulous providers.

The other comment is about substance. I think there is a missing section and that it leaves the document incomplete not only the document but also the conceptual framework. I was left with the impression that quality in teaching and learning is almost exclusively the responsibility of the institution, the curriculum and the teachers. There is hardly a word about the learners and what their contribution needs to be. This is something that has been on my mind for sometime. We now have a situation for example in which non-attendance at lectures is almost becoming an accepted norm. I’m not suggesting that mass lectures are the best teaching tool but the reason for the non-attendance is certainly not because of the
poor quality of the lectures. The same is true for small groups of tutorials where these are not compulsory with registers etc. The assumption that our students arrive at university burning with a desire to learn is simply naïve. Although our modules are designed and based on the idea of notional study hours, hardly any students devote the time to study that we assign them. The idea of reading a book, or visiting a library to find one, is becoming increasingly foreign, at least to Humanities students who only want to know which precise pages they must learn for a test. My view is that we cannot simply ignore the kind of learning ethos that prevails at most universities today. We may not be able to do much about this but we need to recognize it, especially in dealing with quality assurance. What I’m suggesting then is that there needs to be a section dealing with expectations of students, what they are required to invest in the learning situation perhaps the old idea of a ‘learning contract’. (Appendix 9.8 AM 7)

Another set of positive responses had to do with the uses of the Resources. In sum, participants thought that they would be useful for self-evaluation, for informing the formulation of institutional policy and academic planning and for providing guidance a departmental level for Heads of Departments.

They are a useful resource for self-evaluation, especially for senior management in planning quality assurance and improving teaching and learning. (Facilitator’s Report, Workshop No.11, 30/11/2003)

They will be useful in our programme reviews both for designing them beforehand and afterwards for follow-up. They can be used to diagnose traditional practice. (Field-notes, Workshop No.4, 8/10/2003)

One academic described how he would like to use them for self-evaluation and linked this to the need for staff development in teaching and learning in the South African context.

I would use the Improving Teaching & Learning Resource pack to evaluate my own practice, but always within the resource constraints and time constraints that I work in. I couldn’t meet all the criteria listed there, due to resource constraints. The document should be understood as something to aspire to; we can’t do all of the criteria 100%. We also have to deal with other policy implementation issues. We also have to deal with a diverse student group which means that things like our throughput rates and the quality of our students’ research proposals are not acceptable. It is dawning only now on some academics that we will have to do things differently. (Appendix 9.10 A 1)

The comments below are typical of many gathered regarding the usefulness of the Resources for policy-making and as guides to good practice.

The Resources will be useful at institutional level for policy formulation, plans and as a check for self-evaluation. This will especially be useful for merging higher education institutions who are re-making all their policies. (Field-notes, Workshop No. 10, 29/10/2003)

They will be useful at Faculty and Department level for guidelines for good practice. (Field-notes, Workshop No. 13, 3/11/2003)

It is interesting that very few participants mentioned their usefulness to students, despite the HEQC’s position that students are to be the main beneficiaries of its policies. Perhaps this is linked to the inaccessibility of the Resources. However, two comments were received on the potential of the Resources for student empowerment.
Organized student bodies should have access to these Resources. They would give them an idea of what quality is and of how to benchmark provision. (Field-notes, Workshop No.13, 3/11/2003)

We are pleased that the HEQC has put out the Resources because learners need protection from raw deals. (Field-notes, Workshop No.10, 29/10/2003)

Another set of concerns about the Resources had to do with strategies about how they should be used. Many of the participant stakeholders were concerned that they should be mediated and contextualized by development personnel such as staff developers or quality assurance managers. Many did not think that it would be appropriate to distribute them as they stood to ordinary academics.

These are the first purely South African resource for teaching and learning that we have seen. The HEQC should be congratulated on producing it. However we are worried that having the HEQC name on it will make people take it too literally. (Field-notes, Workshop No.5, 13/10/2003)

As a future University of Technology we felt that the Evaluative Questions were appropriate for our needs. We found the principles in the Resources general but relevant. They still need to be customized for specific contexts - people must interpret them for themselves. We will have to explain to people how to use them. If they just landed on your desk they could be understood to be prescriptive. (Field-notes, Workshop No. 10, 29/10/2003)

We would not want to use them directly, rather ‘chunk’ them up and in particular give the evaluative questions and data sources for prioritized areas to academic staff. (Field-notes, Workshop No.13, 3/11/2003)

There is a danger that these Resources will be sent to everybody. Rather they need to be mediated and inserted into existing ways of working and existing practices. We will rather repackage them into our friendly institutional documents and introduce them at critical moments when people are ready to engage. This will make them empowering rather than debilitating. (Field-notes, Workshop No.5, 13/10/2003)

Translation of this document at departmental level will require contextualisation and customization. The same applies for programme level. It is least useful for course level because it doesn’t show you how to do it. But there are aspects which are relevant to self-evaluation for an individual lecturer, provided this was contextualised by the HoD or quality assurance manager. (Field-notes, Workshop No.10, 29/10/2003)

A senior manager was positive about the Resources, but qualified this with the need for strategic thinking about how they should be used in institutions.

I have the sense that they’re being extremely useful. Yes I’ve been going through them and it’s again how they will be used. There has been a tendency just to treat them as checklists, however hard we, in particular - you’ve tried to avoid that. But even so you know there are some good things to check there if you can get people thinking about those things. I actually used them and I found them extremely useful in my particular session at the auditor training workshops because they brought things to life. We doctored them a little bit for the workshop and I found that people related to them well. I mean the danger of course is going to be that they are overwhelmed by this stuff. We shouldn’t just dump them on an innocent public and expect them to be used properly. The role of the internal development people is to use them judiciously. And with the right groupings including HODs, programme conveners and other middle management people one could build up knowledge and expertise where it is most needed. (AM1 8/10/2003)
These criticisms about strategy are linked to concerns about the Resources’ intended audience and also to their style and accessibility.

The document is not reader friendly for academics and students, it will require interpretation. (Facilitator’ Report, Workshop No.8, 27/10/2003)

The Resources assume familiarity with educational jargon, who is the audience? (Field-notes, Workshop No.5, 13/10/2003)

They are not directly useable for academic staff; they are more for teaching-literate middle management. The audience for the Resources is staff developers, quality assurance Managers etc., it should be made clear in the introduction that they need to be mediated to academic staff and that their primary use is to support self-evaluation. (Field-notes, Workshop No.4, 8/10/2003)

The first comment is about the form of the document. It may sound trivial but I do think that the form is important. As it stands it is a very forbidding-looking document. Although there are separate sections I think the document would look more inviting if presented differently. On a less decorative note, I think an attempt must be made to somehow minimize the new-speak bureaucratic jargon. I wonder if it isn’t possible to set out all the bureaucratic stuff, the relationships between the various bodies etc. in a separate section that could be used for reference but could also be avoided by those who find this stuff intimidating - in the sense that they don’t want to read it. (AM7 14/10/2003)

A further criticism relating to the style of the Resources is that they are too biased in favour of the universities as opposed to technikons. This reflects the production process of the Resources in which, as noted above, university staff developers tended to dominate the writing process.

Well, as I say, I think it’s very very useful stuff. I think when I read it I had the impression that it was university-related and written by a university person. I had the feeling that areas, for example work-based learning and professional programmes did not get adequate attention because of the university context. So in the audit criteria we build in some criteria for those. (Appendix 9.7 HEQC 6)

Other criticisms of the Resources related to institutions’ lack of capacity and resources to implement them.

Recommendations were also made to the HEQC about gaps and omissions. Omissions in the Resources that were mentioned include support services, distance education, e-learning, management information systems, experiential learning and vocational training, community engagement and the recognition of prior learning.\(^\text{131}\)

Finally, given the difficult process of their development, an ex-member of the Working Group expressed surprise that the Resources had reached this level of development at all!

I think that given the process we went through to get them developed, as you well know, it was long, contested, difficult, fraught with uneven capacity and was a political project, I think it’s a miracle that we got them to where they are. (Appendix 9.9 QAM 6)

\(^{131}\) The HEQC is currently engaging consultant experts to develop Resources in some of these areas.
On the basis of the researcher’s field-notes and report to the HEQC and a composite report on the workshops compiled by the HEQC, the researcher undertook a final and fourth edit of the Resources early in 2004. It is this version of the Resources that is presented in Appendix 2. The HEQC then undertook its own final edit and lay-out of the Resources and is due to publish them on its web-site in early 2005. This concludes the account of the Improving Teaching & Learning Project’s work during 2002 and 2003 and the development of the HEQC’s Improving Teaching and Learning Resources during that period.

7.2 An Evaluation of the ‘Improving Teaching & Learning Resources’ Contribution to Policy Formulation and Quality Promotion and Capacity Development

In order to evaluate the Improving Teaching & Learning Resources’ contribution, the two research questions posed at the beginning of the study are answered in relation to the Resources. Question 2a) asked

To what extent did the Improving Teaching and Learning Resources provide the HEQC’s internal policymaking process with a valid, acceptable and feasible set of norms for good teaching and learning practice to guide its development of policy instruments for institutional audit and programme accreditation?

And question 2b) asked

To what extent do different stakeholder groups of the higher education community believe the HEQC’s set of policy instruments for quality assuring teaching and learning are valid, acceptable, feasible and potentially effective?

But before weighing up the evidence presented in 7.1, a deeper analysis of ‘what was going on’ during the policy development process is provided. The analysis is supported by selections of interview data and by excerpts from the texts of the Resources themselves.

7.2.1 Pedagogic Rationality

In the conclusion to Chapter 2, it was noted that in theory it is possible to develop a national system for the quality assurance of teaching and learning that is located in Quadrant 3, underpinned primarily by a ‘facilitative rationality’ and thus allowing quality to become, in Barnett (2003)’s terms, a ‘virtuous ideology’. Although articulated less eloquently, this was certainly the aim of the Improving Teaching & Learning Project’s Working Group, as it began its task of developing the ‘Guides to Good Practice’ for the HEQC early in 2002. As a group of mostly staff developers, members were committed to promoting the pedagogic project132, that is, members subscribed to the goal of improving and professionalising teaching

132 In fact, as the bearers and agents of the pedagogic project in their own institutions, the pedagogic rationality was so much a part of the identities and world-view of Working Group members that this
and learning in higher education. The Working Group presumed that it could influence the HEQC to adopt a facilitative rationality supportive of the pedagogic project, and so develop a model of quality assurance that would be located in Quadrant 3. The assumption that one could use a facilitative external national quality assurance agency as a means of promoting the goals of the pedagogic project became the unstated collective goal in the Working Group. Furthermore, the Working Group hoped to operate within the grain of the ‘new collegialism’ (Harvey and Knight, 1996), but at the same time, to use quality assurance to introduce a greater engagement with educational knowledge and a greater concern with teaching and learning on the part of academics and their managers. There was an implicit agreement amongst Working Group members that they should aim to steer the HEQC away from quality assurance models based on bureaucratic and managerial rationalities, thus avoiding the dangers of quality assurance leading to compliance and cynicism on the part of academics. In sum, the Working Group hoped that its work would contribute to the professionalisation of educators in higher education, that it would be accepted by academics, supported by academic managers and that the group would be sufficiently influential to persuade the HEQC to build a national quality assurance system located in Quadrant 3 as opposed to Quadrant 4.

Evidence of the pedagogic rationality abounds in the texts of the Improving Teaching & Learning Resources written by the Working Group. Some obvious examples are quoted below. Firstly, regarding the approach to quality assurance, the Introduction to the Improving Teaching & Learning Resources (Appendix 2.0, p.5), aims to place ‘the quality of student learning’ at the centre of the quality assurance endeavour and suggests that it is the promotion of ‘transformative learning’ that should be the goal of the quality assurance system (Appendix 2.0, p.7, Harvey and Knight, 1996). It also suggests that the tension between improvement and accountability can be resolved by focusing on the improvement of student learning and that if this were done, accountability would follow (Harvey and Knight 1996, Bowden and Marton, 1998). The implication being that the reverse does not necessarily follow, at least not in the long-term. Following this line of argument, the Improving Teaching & Learning Resources suggest that the overall aim of an external quality assurance system should be improvement, the control of which should be delegated down the system to those who teach. Evaluation should be an integral part of this process, in order to provide diagnosis and an evidence base for improvement. The focus of improvement should be the student learning experience and this should be informed by teaching and learning theory.
This position clearly differs from the HEQC’s mandate and from its position that improvement and accountability should be given equal weight. For example the Improving Teaching & Learning Project’s Proposal (based on the Founding Document, 2002) states

In its Founding Document, the HEQC emphasizes that its understanding of quality and quality assurance encompasses both the accountability and the improvement aspects of quality assurance, and that it is possible to work with both aspects simultaneously and in creative tension. (...) The HEQC believes that direct engagement with the quality of teaching and learning is one of the most urgent and substantive issues that it should tackle and that this should be done by employing both accountability and improvement measures.’ (Appendix 1, Improving Teaching & Learning Project Proposal 2002:2)

With regard to an approach to teaching and learning, in the Discussion section of the Introduction (see Appendix 2.0, p.7), the Resources promote a view of learning as complicated, unpredictable and disputed, suggesting that any neat generalizations about human learning are suspect and likely to have limited power (Harvey and Knight, 1996:120). They state that although the purpose of teaching is to facilitate learning, the relationship between teaching and learning is ‘problematic, uncertain and relative’, and that teaching itself is ‘context-related, uncertain and always improvable’ (Ramsden, 1992:102). This view of teaching and learning and of the relationship between educational theory and practice is expanded in the Discussion in Resource No.6 on Staff Development.

If the link between teaching and learning is uncertain and unpredictable, then it follows that any attempt to define good teaching will be limited; good teaching practice cannot be reduced to a formula or set of generalisable laws. If this were the case, then professional development would mean simply the handing over of a body of rigorous theoretical knowledge to future practitioners that they could then apply instrumentally to well-formed problems in the field. However, educational theory is never ‘pure’ in the classical scientific sense and it can only be validated in specific educational practices. The ‘classroom’ with its unpredictable human subjects and any number of uncontrollable variables is the educational ‘laboratory’; there is no other. The advancement of educational knowledge therefore depends on linking the findings of research (theory) with its effectiveness in action (practice), and on building theory from effective practice; it is therefore always bound up in specific contexts and contingent here-and-now judgments. Thus educators can never be sure of ‘getting it right’ beforehand because the exercise of professional expertise is always more than the routine application of established theory. The application of educational knowledge to practice always entails self-conscious analysis and interpretation of a specific situation. The practitioner must re-interpret his/her professional expertise in each new situation. Educational knowledge is therefore developed within and alongside professional practice. (Schon, 1983, 1987) (Appendix 2.6, p.3-4)

This understanding of teaching and learning deliberately locates the Resources in a hermeneutic (or interpretive) understanding of curriculum-as-practice associated with the pedagogic and facilitative rationalities (see Chapter 3). And it was this understanding of teaching and learning that led members of the Working Group to agree that, despite the request from the HEQC to do so, they should not attempt to write a Resource on how to teach, or to define in any detail what would count as ‘good teaching practice’ (see Appendix 2.0, Scope p.6 and 2.6, Discussion p.3-4). The Working Group believed that not only would such
a task be bound to fail, but that it might be used inappropriately to impose a prescriptive and limited view of ‘good teaching’ on a diversity of teaching contexts (see Appendix 2.6, p.4). Instead, a list of principles for ‘good teaching practice’ was provided (see Appendix 2.0, p.8-9) in the hope that ‘reflective practitioners’ might be able to interpret and adapt these to their own disciplines and teaching contexts where relevant.

7.2.2 Legitimation and the politics of policy making

One can infer from the description of the policy development process given in 7.1., that whilst the Working Group was hoping to use the HEQC to promote their vision of furthering the pedagogic project in the higher education system, the HEQC, for its part, was hoping to use the educational expertise of the Working Group to further its own purposes, namely to get criteria for audit and accreditation produced as quickly as possible, but at the same time, to get these legitimated by the academic community through the consultative efforts of the Improving Teaching & Learning Project. However, the power relations between the two were far from equal. As individuals, Working Group members were employed as consultants to the HEQC placing them in a structurally weak position. In addition, the relative powerlessness of the pedagogic and facilitative rationalities in higher education and the weak institutional positions in which most staff developers are located meant that the Working Group was largely dependent on the HEQC for furthering its project nationally (and within institutions dependent on the authorization of institutional senior management). According to Badat, such unequal power relations are not atypical of the policymaking process.

Social actors engage in policy-making in cooperation and or conflict, with varying degrees of consensus on values, principle and social goals, on what are the social problems and on what constitutes social reality. Social actors also participate in policy-making having differential access to power, knowledge, information and resources. (Badat, 2004a:5).

The Working Group’s dependence on bureaucratic and managerial power meant that the Group found itself obliged to compromise its facilitative position and, initially, to attempt to write the Resources as prototypes for the criteria for both audit and accreditation. In writing the Resources, the Working Group also had to take into account the bureaucratic power of other stakeholders, such as the regulations and frameworks imposed on the education and training system by SAQA. The Working Group was also obliged to consider how institutions might meet the Department of Education’s efficiency and equity benchmarks for the system, as specified in the National Plan for Higher Education (2001). Furthermore, given that quality assurance is a tool of management, the Working Group was bound to emphasize the management of teaching and learning as much a good teaching and learning practice per se. Thus, in working for a national quality assurance agency, the Working Group found itself
obliged to promote the interests of the bureaucratic and managerial rationalities, as well as its own.

The influence of these different pulls and tensions in the policy development process meant, that inevitably, the product, the Resources, would be a hybrid, compromised document that tried to incorporate the aims and values of both the facilitative and the bureaucratic (and managerial) rationalities. The data presented above shows that this duality of purpose in the Resources was noted and critiqued by several members of the Consultative Panels and the Reference Group. One respondent in the interviews, who had also been a member of the Working Group, went further and suggested that, in the production of the Resources, there had been a willing alliance between the Working Group and managerialism.

It’s the manager’s gaze. It’s the attempt by us, educational developers and institutional managers, at various different levels to try and bring complex social practice under control. I suppose that’s reflecting the modernist part of our souls. We’re wanting to bring things under control and we assume that management is possible and that through management we can improve things. That’s the dream that we’re enacting and that we have codified it in this whole set of Resources. It’s the ‘gospel of educational developers’ being laid out in a systematic way. I think that some amongst us were probably irritated by the complexifying discussions that happened in your Discussion Sections at the beginning of each chapter, others would’ve wanted a much stronger foot-stomping set of requirements, e.g. “you will do this, and it will be done in this particular way. (Appendix 9.9 QAM 3)

Not only did the Resources represent a compromise, but the policy development process itself resulted in a number of ‘trade-offs’ between the Working Group and the HEQC. For example, the Working Group failed to deliver to the HEQC the minimum thresholds that it needed for its accreditation criteria. From the HEQC’s viewpoint, the Working Group probably made things more difficult and complex than was necessary, slowing up the policy production process. On the other hand, whilst the HEQC gave its support to the pedagogic project, the Working Group failed to get the HEQC to adopt a facilitative approach to quality assurance. In fact, data from an interview with one official suggests that the HEQC had quite deliberately shifted its position (away from a facilitative and towards a bureaucratic approach) early on in 2002.

Their shortcomings (the Resources) were a result of earlier problems because there was no clarity on their purpose. The Improving Teaching & Learning Project got confused about what was the HEQC’s purpose. In the early days we were informed by reading and the international literature when we initially set up the project with you to work on the improvement trajectory. It was only when the reality of the system started confronting us that suddenly we realized that we had to re-think our earlier positions, so the debate was shifting. I was working on the accreditation of privates and I warned the HEQC against taking a warm fuzzy developmental approach. (Appendix 9.7 HEQC 3)

It would appear that, at the time, the Working Group did not fully understand this shift that was occurring within the HEQC, and clearly, it was powerless to resist it. The same
respondent continues his critique of the Working Group’s pedagogic and facilitative approach.

We had originally wanted a developmental, audit-type approach and this was latched onto by the quality assurance types, including the Improving Teaching & Learning Project’s Working Group. But we had to change this. I opposed this approach arguing that we couldn’t go on indefinitely trying to improve the system. So while these changes were happening internally in the HEQC, the Improving Teaching & Learning Project was working with AD and Staff Development types who have a voluntarist notion of change, who want to win over people gradually through an evolutionist approach. I saw the original proposal with case studies, action research and grounded practice approaches. I thought this was all airy-fairy stuff and that it wouldn’t work. The group was too scared to generalize, they should have been bolder and stated up front what are the good teaching theories. They should have been bolder on good teaching practice and minimum standards. The philosophy of the Improving Teaching & Learning Project’s Working Group was causing fuzziness within the HEQC. (HEQC3 5/6/2003)

Given these tensions in the production process, it is unsurprising that there is evidence of compromise and ambivalence in the texts themselves. This is illustrated in the actual texts of the Resources.

For example, the HEQC specifically requested the Working Group to refer in the Resources to the Department’s recently published National Plan for Higher Education’s (2001) efficiency and effectiveness benchmarks. The National Plan sets out performance indicators for the higher education system as a whole for example:

- an increase in the overall participation in higher education to 20% of the 20-24 age group within the next 10-15 years (NPHE 2.2);
- enrolment to be 40% Humanities, 30% Science, Engineering and Technology (SET) and 30% Business and Commerce in 10-15 years;
- equity of access, that is race and gender representivity in enrolment particularly in SET, Business and Commerce and postgraduate programmes (NPHE 3.2);
- equity of outcomes, that is representivity in graduate output and in particular measures to address the disproportionately high black failure and drop-out rate (NPHE 3.2) and improved efficiency, that is graduation rates to be 25% for three-year programmes, (NPHE 2.3).

However, the National Plan does not spell out what these system-wide performance indicators mean for individual institutions and programmes, the units of evaluation in the HEQC system. The Working Group deliberately resisted a literal interpretation of the National Plan’s indicators at institution and programme level and instead, where relevant, mentioned its requirements at system level in the Rationales for the Resources and proposed a ‘weak interpretation’ of them at institutional and programme levels in the Suggested Good Practice
Descriptors. In this sense the Resources attempt to mediate between institutions and the bureaucratic requirements of the Department of Education. The HEQC supported this approach. Examples of the Resources’ weak interpretation of the National Plan follow:

With respect to efficiency, that is, graduation and retention rates, Resource No. 2 on Programme and Course Review makes the following suggestion in a Suggested Good Practice Descriptor.

Taking the nature of their student intake into account, programme managers have developed plans and strategies for enabling the programme to meet the Department of Education’s graduation and retention benchmarks in the medium-term (e.g. graduation rates for 3 year programmes should be 25% of the programme’s total enrolment, NPHE, 2001:2.3). (Appendix 2, No.2 p.13)

And with respect to equity, that is representivity in graduation output, another Suggested Good Practice Descriptor states:

The programme can justify its race and gender profile in relation to the historical profile of its field and in relation to institutional equity targets. There is evidence to show increasing representivity on the programme and that the composition of the qualifying class increasingly resembles that of the entering class, (i.e. increased representivity in intake leads to increased representivity in graduate output). (Appendix 2, No.2 p.14)

With respect to access and admissions policies, Resource No. 3 on Access and Admissions attempts to soften the Department’s demands, taking contextual factors into account:

Whilst enrolment statistics for individual institutions are unlikely to be able to mirror the Department of Education’s national system targets, institutions are expected to set their own enrolment targets, which include equity targets and take national enrolment targets into account. (…) However, institutional enrolment targets and results will be affected by a range of factors over which institutions do not always exercise control; examples include historical, geographical and socio-economic contexts, supply and demand factors, competition from other institutions, institutional missions and approved ‘Programme and Qualification Mix’ plans. (Appendix 2, No.3 p.1)

These extracts illustrate the hybrid nature of the Resources as they attempt to marry the pedagogic and collegial concerns of their writers and audience with the bureaucratic demands of the state.

A second example of the compromised nature of the Resources relates to the role of peer review and external examiners represented in the Resources. In a quality assurance system, external peer review is the link between self-evaluation and external accountability. In this role academic peers are often expected to address both internal and external constituencies, to address both the improvement and accountability purposes of the system and in doing so, to give legitimacy to both. The extent to which this is achievable is debated in the literature. Peer review is therefore a key mechanism in any quality assurance system because it addresses both the political problem of governments’ need for accountability as well as credibility with academics, and the academic profession’s need to maintain a degree of control over its
practices. The extent to which peer review achieves this depends on issues of control and ownership (that is, where it sits along the horizontal axis in the conceptual framework presented in Chapter 2). The key issue to explore then is ‘what is the extent of the authority and discretion of academic peers in peer review?’ If they can make independent professional judgments based on the norms and values of the discipline, then peer review can serve to sustain collegial values within the quality assurance system. However, if the peers are appointed, trained and obliged to make judgments strictly in terms of an external quality assurance agency’s criteria, then peer review is unlikely to serve collegial interests and becomes ‘co-opted’ to serve the bureaucratic interests of the external body, which includes earning it legitimacy in the academic community.

But, from the point of view of external stakeholders, judgments by disciplinary peers are often perceived to be low on reliability and too narrow in focus, and therefore unable to deliver on accountability. In order to avoid this, external quality assurance agencies usually define ‘peer’ more broadly to include other higher education stakeholders such as employers, professionals, senior academic managers, students, and government officials. The problem with such an elastic concept of ‘peer’ is that the ‘peers’ no longer share implicit understandings of the quality of the practice under review. These now have to be made explicit through the development of criteria that the peer review panel can refer to in making their judgments. But, even with explicit criteria, the task of peer review panels remains difficult because objective criteria don’t exist and any criteria developed inevitably require considerable interpretation. Furthermore, because peer panels are composed of people from different stakeholder groups with different perspectives, interests and values, the issue of whose rationalities prevail and whose interests are ultimately served through external quality assurance systems is often contested at the level of the ‘peer’ review panel.

A related but different form of peer review is that of external examining. The practice of external examining - using disciplinary peers to check and validate the marking of students’ work - is common practice in all British Commonwealth countries. It is widely practiced in South Africa, particularly in institutions with a British colonial history. In a report to the Open University on the use of external examiners by the institutions accredited by the Open University Validation Services, Silver and Williams (1994) concluded that the practice had great potential for use in a quality assurance system, provided the role of external examiners was redefined to be more comprehensive, explicit and rigorous. In a further report commissioned by the English Higher Education Quality Council, to investigate the role of the

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133 See Chapter 9.4 for discussion on the assumption that panelists will share interpretations.
external examiner system nationally, Silver, Stenett and Williams (1995) found that the English external examining system was suffering from institutional neglect and was not adequately catering for the changes in student intake, teaching, learning and assessment. Since then, the Quality Assurance Agency (2000) in the UK has established a Code of Good Practice for external examining that aims to regulate and professionalise the practice as part of a national quality assurance system. This Code of Practice was used as a source for the development of the position on external examining taken in the Resources. (Appendix 2.2 & 2.5)

With regard to the issue of peer review, the Resources follow the QAA example by attempting to make the functions and procedures for external examining more explicit. In doing so, the Resources seek to bolster the weight of academic peers, particularly in their role as external examiners for both internal and external review. They seek to reform the external examining system from its traditional collegial mode, into a more professional and rigorous pedagogical mode that could be trusted by external stakeholders, but maintaining control of this practice in the hands of academics.

However, because the HEQC is obliged to operate as an Education and Training Quality Assurance body (ETQA) within the SAQA framework, it is required to meet the SAQA requirements for its ETQAs. This includes a rigorous bureaucratic system of moderation. The Working Group was requested by the HEQC to prepare a prior document entitled ‘A Proposal for HEQC Policy on the Registration and Training of Assessors and the Moderation of Assessment’ (see Appendix 3). This document investigates SAQA’s regulations for assessment and moderation and, in particular, an issue that was causing great consternation in the higher education community at the time. SAQA was insisting that all ‘assessors’ be registered with their ETQA, a condition of which was that assessors (academics) first obtain credit for SAQA’s ‘generic assessor standard’. In the Working Group’s document it was argued that SAQA’s regulations were *ultra vires* and should not prevail over the Higher Education Act of 1997, which places authority for the assessment of students with the Senates of public higher education institutions. The document aimed to show how inappropriate SAQA’s requirements were for academics and how alien its technical approach would be to academic culture. It argued that SAQA’s unit standards for accrediting assessment

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134 This was accepted by the HEQC’s Policy Development Committee as an ‘interim assessment policy’ on 4 December 2002

135 This advice was supported at the time (but not for the same reasons) by the recently released ‘Report of the Study Team on the Implementation of the NQF (April 2002) which recommended that SAQA’s requirement for the registration of assessors should not apply to employees of accredited institutions.
competence were designed for an industrial training context and therefore quite unsuitable for academics. Instead it promoted a professionalized external examining system as a far more suitable mechanism for assuring the quality of assessment in higher education.

Higher education has traditionally sought to quality assure the consistency and reliability of its assessment practices through a system of external examining (moderation) based on peer review. We suggest that, if professionalised, regulated and overseen by the HEQC, this system is far more likely to be acceptable to the academic community and to guarantee both the reliability and the validity of the higher education assessment system. Furthermore, the establishment and oversight of a more professionalised external examining system by the HEQC, in cooperation with higher education institutions, could be the means by which the HEQC meets SAQA’s requirements for evaluating assessment and facilitating moderation among both public and private constituent providers and for ensuring the maintenance and integrity of the certification and awards processes of its constituent providers. (Appendix 3, p.5)

A similar position is taken in Resource No.2 on Programme and Course Review.

Judgments about student achievement, the attainment of learning outcomes and curriculum alignment are difficult to make and require professional judgment. They are usually best conducted by suitably qualified and experienced expert peers, familiar with the discipline(s) or profession, context and educational practices involved. Thus, course and programme review should be based on self-evaluation but validated by external peer review. Traditionally this has been done through a system of internal moderation and external examination. The HEQC supports this tradition of peer review, but believes that if it is to avoid operating as a reproductive and conservative influence and to serve as means of quality assurance and enhancement, it needs to become more rigorous, explicit, systematic and professional. (Appendix 2.2, p.3)

Generally, the Resources promote a widening of the scope of the external examiner’s role to include pedagogic functions such as engagement and dialogue with academic peers about their curriculum and assessment practice. For example, in Resource No. 2 and 5, it is suggested that external examiners of undergraduate courses should not only approve the final marks list (the traditional function), but also to comment on:

- The validity of the assessment instruments in relation to the specified learning outcomes, (ideally prior to their implementation);
- The quality of student learning and the standard of student attainment across the spectrum of results;
- The reliability of the marking process
- The quality of feedback given to students;
- Any concerns or irregularities with respect to the observation of institutional/professional regulations. (Appendix 2, No.2 p.10)

However, in order to demonstrate to SAQA that the HEQC is meeting its requirements for ETQAs, the ‘Suggested Good Practice Descriptors’ for moderation, uses SAQA’s rather complicated set of categories - ‘assessor’, ‘internal moderator’, ‘external moderator’ and ‘verifier’ and imposes them on the traditional external examining system. (Appendix 2, No.5 p.5-7) Unsurprisingly, some of the comments from respondents on the Resources complained
that these Suggested Good Practice Descriptors for moderation and external examining were too prescriptive.

The debate has now blown over and this awkward terminology forgotten in higher education at least. Government has endorsed the CHE/HEQC’s jurisdiction over higher education and SAQA’s influence has waned. However, this debate over the role of peer review illustrates the turf wars and compromises that are played out in policy development; and in this case an attempt by pedagogic rationality to accommodate bureaucratic demands.

7.2.3 Assessment of Outcomes

In order to sum up this analysis of the Improving Teaching & Learning Resources, the study evaluates the extent to which the project met its outcomes. The first project outcome states that ‘A set of Improving Teaching & Learning Resources on key teaching and learning issues will have been developed and published’. Clearly this output was achieved by the Working Group and the HEQC. However, because of the dual purpose that they had to serve initially and the rather muddled production process, their production took far longer than was anticipated. (The Resources are due for public dissemination at the time of writing, early in 2005). However, the production of the Resources is strictly an output rather than an outcome of the project. It is only once the Resources are adopted, adapted and used in internal quality assurance and teaching and learning systems that their benefits (outcomes and impact) will become evident.

The second project outcome states that ‘The Improving Teaching & Learning Resources will have informed the HEQC’s criteria for audit and programme accreditation in such a way that these contribute to the valid evaluation and improvement of teaching and learning in higher education’. The third project outcome states that ‘The Improving Teaching & Learning Resources will have been considered acceptable and potentially useful by the academic community, particularly for the development of internal quality systems for self-evaluation’.

In evaluating the second project outcome, the data presented above, and in particular the comments from HEQC officials tasked with writing the criteria, suggest that the Working Group did provide the HEQC with the teaching and learning expertise it needed and that this expertise, as captured in the Resources, directly assisted the HEQC in its production of its audit and accreditation criteria. HEQC officials were also positive about the potential contribution of the Resources to internal quality management systems and to the improvement of teaching and learning practice.
However, one must question the extent to which the Resources provided the HEQC with a valid means of evaluating teaching and learning. With regard to the development of minimum standards for accreditation, the Working Group failed to develop adequate ‘Threshold Descriptors’ in the Resources, arguing that this would require more time and possibly empirical research into South African contexts. This meant that, given its tight time-frames, the HEQC had to develop a second process under the Accreditation Directorate to produce the accreditation criteria. The ‘Suggested Good Practice Descriptors’ for teaching and learning were used as one source, (the South African source) in the development of minimum standards for accreditation. As will become evident in Chapter 8, many stakeholders believe that the HEQC’s minimum requirements are too demanding and too comprehensive. If this is the case, it may well be the result of the fact that the teaching and learning criteria were adopted too directly from instruments designed for improvement rather than accountability. This problem was less evident in the development of the audit criteria, although some stakeholders believe that these too are set too high.

With regard to the third project outcome, once the ‘Threshold Descriptors’ had been dropped from the Resources and the HEQC agreed that their final form should serve a primarily developmental purpose, they were edited to with a view to contributing to the development of institutional self-evaluation systems. Feedback opinion on the Resources suggests that the majority of stakeholders who engaged in the policy development process believe that the Resources do provide valid norms for teaching and learning and will be useful for developing internal self-evaluation systems. Many stakeholders found the facilitative, interpretive approach of the Resources acceptable and apparently appreciate their deliberative tone, particularly as expressed in the Discussion and Evaluative Questions sections. Many workshop participants suggested that the Resources would be useful improving the management of teaching and learning in particular. In sum, the role of the Resources in contributing to improvement was generally assessed as positive, with some qualifications (see below). This position was generally supported by senior managers, quality assurance managers and staff developers rather than by academics.

However, the data suggest that many respondents had reservations about the extent to which the Resources, on their own, without mediation, would be acceptable, accessible and useful to academics. Many expressed concern that academics would find them too demanding, overwhelming and too far removed from academics’ common sense assumptions about teaching and learning. Many suggested that sections of the Resources would need to be carefully selected and mediated to academics by staff developers and quality management staff. Others expressed fears that academics would not be willing to ‘buy into’ the pedagogic
project promoted by the Resources. In other words, there was uncertainty expressed in some of the data about whether those academics committed to a collegial rationality would subscribe to the values of the pedagogic rationality and so take the Resources seriously. There was also a concern expressed in the data that the system is not providing adequate change mechanisms to persuade academics to re-think their views and change their teaching practices. As noted above, these concerns were reinforced during the research process itself. Despite the efforts of the HEQC’s Improving Teaching & Learning Project, very few academics appeared to be willing or able to engage with teaching and learning and quality assurance issues. However, as the HEQC moves into full implementation mode, this is likely to change.

Some respondents suggested that the Improving Teaching & Learning Resources are too prescriptive. The ‘Good Practice Descriptors’ are probably unnecessarily detailed and too prescriptive for the stronger institutions that have the capacity to develop their own context-appropriate self-evaluation criteria and systems. However, data from other respondents seems to suggest that this level of specificity may be helpful to weaker institutions, especially in the more recently established private sector.

Perhaps the most serious critique of the Resources and the work of the Improving Teaching & Learning Project’s Working Group is its failure to provide the HEQC with greater conceptual clarity on how different purposes of quality assurance require different models of evaluation. The Resources have dealt with the problem of how to evaluate teaching and learning. They make a clear distinction between the evaluation of teaching (improvement-orientated evaluation) and the evaluation of programmes and courses (judgment-orientated evaluation). Resource No. 6b on the self-evaluation of teaching advocates cordonning off the evaluation of teaching into ‘safe spaces’ where academics can evaluate their own teaching practice strictly for formative, improvement purposes. On the other hand, in Resource No.2, it is advocated that the review of programme and courses be based on a pragmatic, goal-based model of evaluation linked to the instrumental technicist model of outcomes-based curriculum design, but with an attempt to protect the evaluation of courses (or modules) from direct scrutiny by external agencies. The Resources thus advocate two different models for evaluating teaching and learning -- the self-evaluation of teaching which is compatible with the pedagogic and facilitative rationalities located in Quadrant 3 and programme and course review which is compatible with the bureaucratic and managerial rationalities located in Quadrant 4. This point is illustrated by examples from the relevant Resources.

Resource No.6b on the ‘Self-Evaluation of Teaching’ promotes the idea of the ‘reflective practitioner’ linked to the action research method in which individual professionals critically
reflect on and improve their own (teaching) practice through cycles of action research leading to continuous professional development. This Resource thus promotes the self-evaluation of teaching as a means of staff development, putting the quality assurance of teaching ‘at the service of ‘reflective practitioner’ development’ (Appendix 2.6, p.5). This Resource recommends that the evaluation process should be ‘owned by academics’ and that it should have no threats or sanctions attached to it. It emphasizes the importance of a safe environment in which teachers can openly and honestly observe, reflect and deliberate on their practice within an informed group (Appendix 2.6, p.12). The Resource does attempt to make self-evaluation more rigorous by insisting on the triangulation of data sources. It also suggests that, in a quality management system, the self-evaluation of teaching can feed into a formative staff appraisal system. It further suggests that the self-evaluation of teaching be recognized as a legitimate form of research through publication and teaching portfolios.

The strength of this model is its focus on self-improvement and communicative action with the evaluatees. Where it is taken up, its potential for improvement is promising. However, the discussion presented in Chapter 4 suggests that interpretive, constructivist approaches such as that proposed in Resource No.6b, typically display certain weaknesses. Firstly the model over-emphasizes subjectivity, assuming that stakeholders are fully rational, autonomous and committed to self-development. Secondly, the findings of constructivist evaluation are always only context-specific and efforts at self-improvement may be limited by institutional and cultural constraints that individual reflective practitioners cannot, on their own, overcome. Furthermore, this model is critiqued for being naïve about the effects of power and social structures on society. From the HEQC’s point of view, this model is clearly not appropriate for an external quality assurance agency mandated to conduct judgment-orientated evaluations at programme level for accreditation purposes. However, a facilitative quality assurance agency could recognize it as a means of attaining genuine improvement at the local level (course or module level) and thus protect and encourage this approach in internal quality management systems. By publishing and promoting the Improving Teaching & Learning Resources, the HEQC does this. However, as argued in subsequent chapters, the evaluation instruments that it has designed for audit and accreditation are based on the pragmatic outcomes-based model and may undermine this approach.

Resource No.2 on Programme and Course Review proposes a pragmatic, outcomes-based model for internal and external review in which external peers judge whether a programme’s goals (outcomes) have been attained. However, it also shows evidence of the writer’s efforts to pull this model into a facilitative frame that meets the concerns of a pedagogic rationality. For example, it is concerned that ‘the system and criteria set up by the HEQC for summative
external evaluation will have a ‘wash-back’ effect on the internal systems and criteria that institutions establish for themselves’ (Appendix 2.2, p.1). In order to counter this, it argues that the review system should be meaningful to academics, the key agents of improving teaching and learning. It goes on to recommend a facilitative approach that would involve ‘ring-fencing improvement-orientated review at the level of the course’ (Appendix 2.2, p.4), and giving academic staff the space to design their own course-specific evaluative questions for course review. It suggests that the key findings from formative course reviews can be ‘collated, sanitized and aggregated up’ (Appendix 2.2, p.4) to contribute to a comprehensive programme review. In the Discussion section, the pragmatic approach is infused with pedagogic concerns; for example this extract picks up the staff development concern and even hints at a theory-based approach:

> (I)n a programme review, it is essential that the voice of those who designed and taught the programme and its courses is heard, particularly their rationale for teaching as they did. If the goal of continuous quality improvement is to be met, then programme review should be seen as a learning opportunity for academic staff to understand and reflect on their teaching practice and its consequences for learning. Teaching staff should be afforded an opportunity to articulate the educational rationale and theory of learning that underpins their practice, to observe the impact of their teaching on learning and to reflect on what the findings may mean for the improvement of their own practice. (Appendix 2.2, p.3)

Resource No.2 also supports the use of academic peers as critical to making professional judgments about the quality of the curriculum and of student achievement. However, in the Suggested Good Practice Descriptor for the first Evaluative Question for Programme Review (p.13), this concern to have disciplinary peers making judgments about the quality of learning achieved by students is linked to bureaucratic concerns to assure that the complexity of learning achieved also meets the requirements of standards registered on the NQF. Furthermore, for both programme and course review, Resource No.2 promotes the concept of ‘curriculum alignment’ that stipulates that all other aspects of the curriculum (for example, content, teaching and learning methods and assessment) provide a web of consistency, enabling students to have a fair chance of attaining the specified learning outcomes. This approach to curriculum design is typical of the pedagogic rationality and at the same time lends support to the outcomes-based method of curriculum design. For many academics, who still operate within the collegial rationality’s disciplinary content approach, the outcomes-based approach remains alien. This analysis of Resource No.2 suggests that although it promotes a pragmatic model of evaluation, it attempts to present it in such a way that it takes into account the interests and concerns of the pedagogic and facilitative rationalities.

As noted in Chapter 4, the advantage of a pragmatic, goal-based model of evaluation of teaching and learning that assumes a technical model of curriculum (for example the outcomes-based method), is that it promises the possibility of measuring educational
achievement (and quality) across contexts. The belief that learning outcomes can be pre-specified and then checked (by peer evaluators) against generic standards (for example against qualification standards specified on a NQF), allows evaluators and quality assurance agencies to assume that they can make reliable judgments about learning achievement across educational contexts. (Although in the cases of Resource No.2 and of the HEQC’s models of accreditation and audit, this is balanced by the use of contextualized professional judgment.) Nevertheless, there is a danger that this approach may lead to the assumption that if certain pre-specified inputs and processes are adhered to, they are guaranteed to lead to (to cause) certain outputs and outcomes. It is a short step from using the outcomes-based method of curriculum design to assuming that standardized quality criteria and indicators (for teaching and learning) can be pre-specified and used to measure performance (effectiveness and efficiency) reliably across a system. Although the Resources attempt to promote a weak, nuanced form of outcomes-based education, their advocacy of this approach linked to a goal-based model of evaluation for programme and courses may have encouraged the HEQC to adopt this model for both audit and accreditation.

It is not surprising that the HEQC, with its statutory obligation to audit institutions and accredit programmes, saw the interpretive, constructivist approach advocated in the Resources for the evaluation of teaching, as appropriate only for institutional self-evaluation. Instead the HEQC adopted the pragmatic, judgment-orientated approach for the development of both its instruments, but with a ‘lighter touch’ for institutional audit. It should be noted that the goal-based input-process-output model with prescribed criteria and indicators that the HEQC eventually adopted for accreditation is common practice. However, with regard to institutional audit, the Working Group had hoped that the HEQC would adopt a more facilitative, developmental approach that would allow institutions to develop their own self-evaluation criteria. Instead the HEQC’s audit model assumes that detailed, generic audit criteria for the management of teaching and learning can be adequately pre-specified and then measured through peer review. Whilst this one-size-fits-all model may suffice in the first round of audits in order to ensure that basic quality management systems and procedures are in place in institutions, it is unlikely to add-value and have the diagnostic reach to lead to continuous improvement in the long-term.

It is suggested then that a weakness in the research undertaken by the Working Group and thus in its product, the Resources, was the failure to provide the HEQC with alternative models of evaluation that could have met the HEQC’s need for both improvement and judgment-orientated models of evaluation.
One possibility, reviewed in Chapter 4, that has potential as a model of evaluation for audit and for self-evaluation, is the use of theory-based, knowledge-generating evaluation. It is argued that this model should have been explored by the Working Group as a method for the self-evaluation of teaching and learning. This approach focuses on mechanisms of change and asks ‘how does a programme or institution cause change?’ It can be applied to both micro- and macro-levels. This model would first require academics (supported by staff developers) to articulate the learning theories\textsuperscript{136} on which their programmes and courses are based. Having done this, the evaluation of teaching and learning would then focus on finding out how well these theories work in practice (under what conditions and for whom?) The evaluation criteria (or evaluation questions) would be developed primarily to test the evaluatees’ learning theory. It is likely that this approach would assist teachers to be clearer about why they do what they do in the classroom, and about what outcomes they expect from their teaching. Furthermore, it would enable teachers to achieve better alignment between their teaching-learning activities and those outcomes. This model of evaluation could provide a basis for making judgments about performance as well as providing detailed diagnostic feedback for improvement. It could meet requirements for ‘measuring’ the efficiency and effectiveness of teaching by asking whether the teaching-learning activities (and the assumptions about learning on which they were based) did in fact result in the students attaining the levels of cognitive development intended (learning outcomes). What this model adds to the pragmatic, goal-based model is a concern to understand the assumptions made about causality in a course or programme and to test these theories of learning in a manner that sweeps in context rather than seeing it as an ‘interfering variable’ to be ignored. A theory-based model of evaluation could serve to promote educational research and the scholarship of teaching (and possibly also research on academic management)\textsuperscript{137}.

At a macro-level this model should be explored for use in audit. This application would involve asking senior managers to articulate their management theories and goals (again these would be common sense theories in the beginning). The audit process could then involve evaluation research to ascertain the extent to which their theories are working and being effective. The focus of audit would be a lot sharper than the generic criteria of the pragmatic model. Likewise, the audit findings would be closely related to management’s concerns and problems. They may therefore be more instructive and more likely to result in improvement than the rather bland, other-defined findings that the pragmatic model typically produces.

\textsuperscript{136} Initially these would have to be common sense theories.

\textsuperscript{137} According to Pawson and Tilley (1977), this model of evaluation can be used cumulatively to build middle range (as opposed to generalisable) theories.
In sum, the theory-based model of evaluation should have been explored by the Working Group as an alternative to the constructivist and pragmatic models. It has been argued that this model holds out promise for undertaking rigorous judgment-orientated evaluation, whilst at the same time promoting the scholarship of teaching and creating opportunities for staff development. It has also been argued that the theory-based model should have been explored for institutional audit because it offers the possibility of evidence-based judgments that contribute to the development of management capacity.

This concludes the analysis of the Improving Teaching & Learning Resources and their contribution to the development of the HEQC’s policy instruments for audit and accreditation. In the next chapter I turn to answering the second research question which involves an analysis of the opinions of different stakeholder groups on the validity, acceptability, feasibility and potential effectiveness of the HEQC’s policy instruments.
This chapter describes and analyses the responses of a range of different stakeholders in the public sector to the Higher Education Quality Committee’s (HEQC) suite of policy instruments. The responses were gathered during 2003, the comment phase of the policy formulation process (except for the Re-accreditation of MBAs which was already in full implementation phase).

In Chapter 1 policy adoption was defined as, ‘the development of support for a specific policy proposal so that the policy can be authorized or legitimated’ (Anderson, 1997). This suggests that policy adoption involves both formal adoption and authorization by legislative bodies and acceptance and legitimation by stakeholders. This chapter deals only with the second meaning of adoption. The first form of adoption was accomplished through the Higher Education Act of 1997 which authorized the CHE to establish a HEQC which in turn was mandated to audit institutions and accredit programmes in higher education.

Given the importance of policy acceptance and legitimation for successful implementation, this study gives detailed attention to the opinions and concerns of a range of stakeholders in the public higher education system. Methodologically, it follows Ulrich’s critical systems heuristics (discussed in Chapter 5), which is particularly concerned to discover whether policies are normatively acceptable to those affected by them. Thus the focus of this chapter is on the content of stakeholder opinion on the HEQC’s proposed suite of policies with a particular concern to capture the voices of those affected by the policies. However, some attention is also given to the process that the HEQC undertook to consult and develop legitimacy for its policy proposals. For ‘given the nature of policy choices and the question of their legitimacy, the process by which they are arrived at may be as, if not more important than the directional criteria which define and delimit the options to be taken’ (Weiler, 1978: 190 quoted in Badat, S. 2004a: 6).

Chapter 8 is structured as follows. Section 8.1 summarizes stakeholder comment on the different policy instruments themselves: the proposals for audit criteria, the proposals for accreditation criteria and the final instrument (and site-visits) for the re-accreditation of MBAs. In this section data are used largely descriptively as sources of information and the language is understood as a ‘resource’, that is, to understand more about an issue. As

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138 It was noted above that Ulrich (1996) claims that only the voluntary consent of those affected can legitimate a policy.
discussed in Chapter 5 data for this section was gathered using a range of research methods: participation observation at the two SAUVCA National Quality Assurance Forum’s (SNQAF) workshops, the findings of the SAUVCA survey questionnaires, the formal SAUVCA-CTP response documents to the HEQC and interviews with stakeholders conducted at the HEQC’s regional workshops late in 2003. Some data on the re-accreditation of the MBA were also gathered through the interviews linked to the regional workshops. More in-depth data on the MBA were gathered through nine interviews conducted at three institutions deliberately set up to capture academics’ opinions in the wake of the HEQC’s site-visits to re-accredit MBA programmes.

Section 8.2 describes the interview data in more depth, using categories developed from my adaptation of Ulrich’s ‘principle concerns’ and ‘key problems’ for the different groups of stakeholders. Patterns in the different responses made by different stakeholder groups are noted. Section 8.3 moves from description to analysis and uses the interview data also as ‘sources of interpretation’ where the language used is understood as ‘topic’. In other words, the nature of the language used is also analyzed as instances of discursive practice. This section reports on the patterns and relationships between the data sets. Here the focus is specifically on patterns of relationships between the views of stakeholder groups and the five rationalities and their different approaches to quality assurance, identified in the conceptual framework presented in Chapter 2.

8.1 Stakeholder Opinion on Policy Instruments

8.1.1 The Draft Criteria for Institutional Audit

The HEQC’s Proposals for Audit Criteria


In the Introduction, the HEQC is at pains to point out that it is constrained by the wider policy environment

Important to note is the reality that an audit system for South African higher education will have to take broader transformation imperatives into account. Audit criteria will have to deal with how higher education institutions are engaging with the legacies of inequity, lack of opportunity and poor quality provision in many parts of the system. They will also have to address the adaptability, responsiveness and innovativeness of institutions in relation to new knowledge and skills requirements and new modalities of provision. Ultimately, they will have to enable or encourage an institution to demonstrate that it is improving continuously as a teaching, research and social institution and that it is socially responsive without compromising its intellectual identity as a higher education institution. (Appendix 8.1, HEQC, 2003d:3)
CHAPTER EIGHT

POLICY ADOPTION

The assertion that the Department’s transformation agenda for higher education is a given ‘reality’ invites the reader to accept this position as ‘common sense’. The repeated use of strong modality (‘will have to’) in the grammatical structure suggests that the HEQC believes it has no option but to impose a strong accountability audit model in order to ensure that the listed policy imperatives are met. This position is made more explicit later in the document where the audit criteria themselves are presented as instruments of transformation.

National policy relating to higher education provides not only the broad conceptual and legislative context for the HEQC’s work, but also have (sic) clear implications for the development of the HEQC’s audit (and accreditation) criteria. The criteria have to be consonant with national policy documents on issues such as the purposes of higher education, … etc. The criteria are, in fact, one of the main vehicles for giving practical effect to these policies. (Appendix 8.1, p.6)

The HEQC makes the assumption that quality assurance is an instrument for change and that it can be used to further the policy goals of the Department of Education. Later in the Introduction, the HEQC attempts to explain its use of quality as both ‘fitness for purpose’ and ‘fitness of purpose’

The mission and goals of an institution provide the overarching context within which its core educational activities ought to take place (“fitness for purpose”). Institutional missions and goals have themselves to be determined in relation to the needs of the local and national context within which the institution finds itself (“fitness of purpose”). One of the functions of the audit criteria would be to evaluate the quality dimension of this link between mission and goals and an institution’s local and national context. … In addition to the above, institutional missions and goals have to be congruent with the purposes of higher education in general. They should also be appropriately responsive to international developments and trends in higher education. (Appendix 8.1, HEQC, 2003d: 9)

This approach in which ‘fitness for purpose’ has to be located within ‘fitness of purpose’ judgments is captured in the first criterion for audit

**SUB-AREA: FITNESS OF THE MISSION OF INSTITUTIONS IN RELATION TO LOCAL NATIONAL AND INTERNATIONAL CONTEXTS (INCLUDING TRANSFORMATION ISSUES)**

**CRITERION 1:** The institution has a clearly stated mission and purpose with goals and priorities which are fit for its local, national and international context and which adequately provide for transformational issues. There are effective strategies for the realisation of these goals and priorities. Human, financial and infra-structural resources are available to give effect to these goals and priorities.

In order to meet this criterion, the following are examples of what would be expected:

i) Engagement with local, regional, national and international imperatives (including national policy frameworks and objectives) in order to establish the fitness of the mission of the institution. Involvement of internal and external stakeholders in this process

ii) Adequate attention to transformational issues in the mission of the institution. (Appendix 8.1, HEQC 2003d:19)

The careful wording of this formulation and in particular the listing of indicators only as ‘examples of what would be expected’, suggests that the HEQC will insist that institutions address the national transformation agenda and consult external stakeholders in the process,
but that the final product, that is, the form and content of the mission statement will be left to institutional discretion.

The HEQC defines the nature of audit according to the accepted meaning in quality assurance discourse, namely that its purpose will not be to judge quality per se, but rather to evaluate the nature and effectiveness of the quality management system in place at an institution on the basis of evidence provided by the institution. Quoting from its draft ‘Institutional Audit Framework’ (2002f), the HEQC reminds its readers of its objectives for audit:

1. To enable a higher education institution to assure itself, its stakeholders and the HEQC that its policies, systems and processes for the development, maintenance and enhancement of quality in all its educational offerings are functioning effectively.
2. To enable providers and the HEQC to identify areas of strength and excellence as well as areas in need of focused attention for improvement in the short, medium and long term.
3. To provide for consistency in quality management across the higher education sector and generate a national picture of the role of quality management in the transformation of higher education. It will also enable the HEQC to make a judgment on the overall status of quality management in higher education and monitor system level improvement. (Appendix 8.1, HEQC, 2003d:1)

The first objective is in keeping with the stated definition of audit. The second suggests that the HEQC will also judge the actual quality of provision but with developmental intent. The third set of objectives is bureaucratic concerns that the HEQC is obliged to meet.

The HEQC states that through its specification of audit criteria it intends to

Signal clearly to the HE community the institutional areas in need of systematic attention in order to ensure an acceptable level of quality provision and to indicate key areas for in depth attention’ (Appendix 8, HEQC, 2003d:ii).

This statement suggests that the HEQC intends controlling the audits (by defining the criteria) and that the audits are to serve its agenda rather than that of the institutions themselves. In an awkward conflation of the improvement and accountability functions of quality assurance, the HEQC suggests that

The criteria should be useful for institutions in developing and enhancing the quality of provision in a way that advances the achievement of national goals and priorities in higher education in South Africa. (Appendix 8.1, HEQC, 2003d:1)

The HEQC makes it clear that its standardized criteria are to be, in the first cycle at least, applicable to all institutions across the system

Criteria should be developed for the HE sector as a whole in line with the vision of a single, coordinated HE system (Appendix 8.1, HEQC, 2003d:1).

The Department of Education’s vision for a single higher education system, which incorporates both the public and private sectors, is presented here as a given. However, the
HEQC does add a rider by stating that a ‘measure of flexibility’ should be built into the criteria to allow for diversity.

Despite this concession to the diverse nature of the higher education system, this, and the developmental intentions of the first two audit objectives quoted above, appear to be undermined by the comprehensiveness and specificity of the 39 criteria contained in the rest of the document. In its proposals, the HEQC presents ‘general’ criteria at Levels 1 and 2 for ascertaining the quality of institutional quality management systems and more specific ‘in depth’ criteria at Level 3 for assessing the quality of provision per se. However, as mentioned above, the format it uses for specifying performance indicators (as descriptors of good or acceptable practice), suggests that the HEQC is concerned to avoid being overly prescriptive. The HEQC also brings the idea of ‘audit trails’ into the audit process. These are intended to assess ‘actual quality’ in order to test the effectiveness of the institution’s internal quality management system (hence the need for the Level 3 criteria for ‘in-depth scrutiny’).

The HEQC plans to appoint and train its own audit panelists and programme evaluators who will report directly to it. The outcomes of its proposed audits are to take the form of a summative judgment using a normative scale: good, satisfactory or not satisfactory. The HEQC rationale for this form of judgment is ‘for reasons of transparency’ and also ‘as an instrument for institutional development within the framework of the HEQC’s formative approach to quality management’ (Appendix 8.1, HEQC, 2003d:39). The consequences of these audit judgments are not made entirely clear in the document. It is suggested that they will be used to both encourage improvement by institutions and for summative decisions about the ‘eventual’ granting of self-accreditation status. The HEQC presents the possibility of a more differentiated approach in the second cycle of audit in which a ‘lighter touch’ will be possible for some institutions, depending on the findings of the first cycle (and presumable depending on whether or not self-accreditation status is granted).

139 The wording used is ‘examples of what would be expected’.
140 These are largely summaries of the ‘Suggested Good Practice Descriptors’ taken from the then ‘Guides to Good Practice’.
141 This is similar to the audit model used by the QAA since 2002 in the UK where ‘audit trails’ are used during audit to verify claims made about quality management systems and to test their effectiveness (see Chapter 2).
142 Possibly on the basis of the SAUVCA-CTP Response, the HEQC removed this graded scale from its final policy instruments. Its audit report will now make only commendations and recommendations related to each audit criteria and ‘provide an assessment of the adequacy and effectiveness of the internal quality arrangements of the institution’ (Framework for Institutional Audits, HEQC, June 2004).
Stakeholder Comment on the Proposed Audit Criteria

As described in Chapter 5, in order to prepare its response to the HEQC’s proposals for audit criteria, the South African Universities’ Vice-Chancellors’ Association’s National Quality Assurance Forum (SNQAF) held a workshop on the 10-11 April 2003. The Committee of Technikon Principals was also invited to send representatives. Prior to the workshop SAUVCA circulated a survey questionnaire to all quality assurance managers in both universities and technikons. The key issues and concerns raised by workshop participants are presented. These are linked to relevant extracts from the SAUVCA and CTP ‘Response to Proposed Criteria for the HEQC’s First Cycle of Audits: 2004-2009’ document (see Appendix 6.1), that was compiled after the workshop as a joint response to the HEQC from the sector.

Given that it is invariably the opinions of the more confident, articulate and well-informed participants that dominate in a group situation, it is important to balance the data gathered via participant observation at the SNQAF workshop with the more detailed findings of the survey questionnaire, particularly to establish the extent of support for the opinions expressed. A full report of the survey findings on the audit proposals can be found in Appendix 5.1. In most cases the workshop participants and the questionnaire respondents were the same people, quality assurance managers or equivalent, sent to the workshop as institutional representatives. The following summary of key issues is based on data captured in the researcher’s field-notes during the workshop (10/04/2003 and 11/04/2003), which in turn were used to feed into the SAUVCA-CTP document.

The SNQAF workshop was opened by its Convenor with the following comments:

We are all supporters of QA and of the HEQC. (...) It is in our own interests to make this work, we need to attain international QA norms. (...) We must engage with the HEQC because it has statutory power. (...) Our approach should be one of constructive criticism.

(Field-notes 10/4/2003)

The programme began with an address by a senior HEQC official who used the opportunity to justify the audit proposals on the following grounds. Firstly he suggested that participants should not view the document only from their institution’s point of view. He explained that the HEQC, as a national body, has to serve the whole system and is committed to the government’s vision of building a single, coordinated, national higher education system. He explained that of the government’s three instruments for transforming the higher education system (planning, funding and quality assurance), quality assurance is the only one that regulates the private sector and hence the HEQC has to take its responsibilities very seriously. He went on to discuss the HEQC’s concerns about the increasing privatization and internationalization of higher education and the threat that this poses to higher education as a public good. He then described the conditions and needs of the private sector (in 2003, 118
institutions in all), comparing it to ‘Bantu Education’ and stating that ‘poor working class kids are trapped there’\textsuperscript{143}. For these reasons, he explained that the HEQC had decided to make audit ‘evidence-led’ and to ‘give it more teeth’, ‘combining a ‘fitness for’ and ‘fitness of’ approach and expanding its scope beyond the original idea of a focus only on teaching and learning. In answering a question on the former, he explained that the HEQC had made a conscious shift from a ‘fitness for’ to a ‘fitness of and for’ approach to audit. The reason for this was the need to ensure the transformation of the sector. But he stressed that the HEQC does not understand transformation in a narrow sense to mean only ‘equity and redress’; it also understands it as ‘personal empowerment’. He explained that a further reason for this rigorous approach to audit was that the HEQC wanted to be able to use audit findings as a source of evidence for making judgments about the granting of self-accreditation status to institutions. He warned quality assurance managers that preparing for audit would require a good management information system to be in place. The official closed his address by asking why people were complaining about the demands of the proposals and why institutions are not yet ready for audit, when the government’s intentions with regard to quality assurance had been made clear ten years ago\textsuperscript{144}.

The issues that caused most consternation amongst workshop participants were the HEQC’s approach to audit and its perceived shift from a developmental to an accountability-driven model. Participants were concerned about how this would change the purpose of audit and affect institutions’ readiness for audit. This was reported in the SAUVCA-CTP Response document as follows

As the emphasis shifts from fitness for purpose to fitness of purpose it also shifts from a developmental mode to one of increased accountability. There is widespread opinion that the HEQC has ‘lost the development agenda’ that was promised in its Founding Document. Development and capacity building are much needed. (Appendix 6.1, p.4)

Responses to Question 1e) of the survey showed that 57% of respondents believed that the audit proposals ‘hardly’ capture the principle that the HEQC’s quality assurance system should be based on improvement rather than accountability. The following represent the comments\textsuperscript{145} offered in support of this position.

\textsuperscript{143} This comment is puzzling as the fees for private institutions are usually higher than those for public institutions. Furthermore only students admitted to the latter are eligible for government bursaries and student loans.

\textsuperscript{144} This must be an exaggeration: most institutions would have been alerted to the government’s plans for quality assurance by the Higher Education Act of 1997 and perhaps by the recommendations of the NCHE (1996).

\textsuperscript{145} Comments are presented in quotations, with individual comments separated by full-stops.
The criteria represent a shift away from an improvement/development approach towards an accountability-orientated system. The concept of ‘fitness for purpose’ is largely subsumed by ‘fitness of purpose’. The developmental agenda has been lost. (Appendix 5.1, A1)

Responses to an open-ended question on whether the HEQC’s proposals for audit would result in improvement and protect the interests of students (in the short-term) included the following:


In the long-term, one respondent suggested that it would increase the gap between the strong and weak institutions and another questioned whether the intention to protect students will in fact be realized (Appendix 5.1, B2).

However, a minority believed that the proposals would have a positive impact. For example, in the short-term some believed that the HEQC’s audit would:

Focus attention in neglected areas. Result in policy development and in the development of internal quality management systems. (In the long-term) result in the creation of a culture of accountability. (Appendix 5.1, B2)

More generally, concerns were expressed at the workshop that the ‘hard-nosed HEQC approach’ would result in compliance rather than improvement, undermining institutions’ ability to conduct meaningful, honest self-evaluations. There was a mixed response to this issue in the open-ended questions. For example, one respondent stated that:

The criteria are not over-prescriptive. There is sufficient space for a QMS based on self-evaluation.

Whilst another complained that:

The HEQC should have allowed HEIs more space to identify their own priorities and take their own initiatives. (Appendix 5.1, B12)

Some participants warned that academics would be likely to resist this approach, leading to ‘passive resistance’. These participants called on the HEQC to remember the link between acceptability and implementation, particularly because ‘teaching is a matter of heart and soul’ (Field-notes 10/4/2003). There were many open-ended comments in the questionnaire responses on the anticipated impact that the proposals would have on teaching staff. These included:

Staff are change-fatigued, already over-stretched, over-worked. One should expect a negative attitude, grumbling and resistance. It will be resisted on grounds of academic freedom. They will need convincing. It will be seen as a managerial tool, an imposition, an administrative burden. It will have little impact. They lack support and capacity to implement it. (Appendix 5.1, B7)

But others thought that the audit proposals would be
A wake-up call for some. They will appreciate that the criteria are academically valid. (Appendix 5.1, B7)

Responses to a question on the likely unintended consequences and side-effects of the proposals were all negative. Comments included

Developing a quality management system that lacks coherence and rootedness in institutional culture. Focusing on the wrong things, too many things. A loss of creativity, collegiality and dedication that has always characterized academic life. (Appendix 5.1, B3)

At the workshop, certain participants went further and suggested that the HEQC’s approach to audit was ‘conceptually unsound’ and ‘inappropriate for audit’. This debate was captured in the Response document

The change from a ‘fitness for purpose’ to a ‘fitness of purpose’ approach raised considerable debate. The point was made that the audit criteria document contains both approaches but there are serious doubts within the QA fraternity as to whether this is possible or desirable. The fear was expressed that if ‘purpose’ or ‘mission’ is to be approved by the HEQC and its audit panels then it becomes centrally driven and institutional autonomy is compromised. (Appendix 6.1, p.4)

But this position was in fact undermined by the findings for Question 3 which aimed to elicit the extent of support for the HEQC’s predominantly ‘fitness of purpose’ model of audit in order to promote national policy goals. In contrast to the findings for 1e) quoted above, 76% of respondents supported the HEQC’s approach to audit, elaborating that

The criteria are sufficiently general to allow room for manoeuvre. The criteria are needed to ensure consistency of judgment across HEIs. (Appendix 5.1, A3)

Question 11 also related to the ‘fitness of purpose’ emphasis in the HEQC’s proposals. Here, consistent with the findings of Question 3, 75% of respondents agreed that ‘it is appropriate for the HEQC to judge the fitness of a HEI’s mission in terms of the ‘transformational agenda’, with some comments indicating these respondents felt that the HEQC had left sufficient room for institutional discretion (Appendix 5.1, A11).

Negative comments made by the 24% who did not support the HEQC’s approach to audit mostly had to do with concerns about academic freedom and institutional autonomy - a minority opinion that was expressed loudly at the workshop (see extract from SAUVCA Response document quoted above).

146 I think that this terminology (the dichotomising of fitness for and fitness of purpose) is misplaced because it is legitimate to combine the two, that is to check on the purpose of an institution or programme and then to check whether that purpose is being effectively carried out. In SNQAF discourse these terms were used to refer to an accountability approach (fitness of purpose) as opposed to an improvement approach (fitness for purpose).
Survey Question 2 also pertained to the HEQC’s approach to audit and asked respondents whether they supported the HEQC’s proposals for ‘a common minimum set of key quality requirements’ against which to judge the management of an institution and the effectiveness of its quality management system. There was a high degree of support (81%) for the HEQC’s decision to pre-specify audit criteria across the system. Reasons given in support of this position were

HEIs requested minimum criteria, they need guidance; the SA HE landscape is so diverse; the link between audit and accreditation means that the HEQC is bound to stipulate a minimum set of requirements. (Appendix 5.1, A2)

Those who disagreed did so for reasons that were also expressed strongly at the workshop

The HEQC has gone too far in determining ‘fitness of purpose’, an HEI’s mission should be taken into account; there comes a point where institutional autonomy is threatened. (Appendix 5.1, A2)

Question 6 probed deeper on opinions about the HEQC’s format for the criteria. 81% of respondents supported this format, suggesting a consistency of positions as expressed in Question 2, namely support for general criteria across the system, with more detailed indicators provided as examples.

But some participants at the workshop expressed the concern that the HEQC was missing the purpose of audit as internationally understood and accepted. One participant stated that the HEQC’s proposals, particularly the detailed criteria for Level 3, involved judging quality *per se*, whilst the purpose of audit should be to judge an institution’s quality management system. The HEQC official present responded to this point by explaining that during audit, the HEQC would use the idea of conducting ‘audit trails’ at programme level using the Level 3 micro-criteria, not to judge quality *per se*, and ‘not to be intrusive’, but to verify claims made by an institution in its audit portfolio. However, the concern remained and was captured in the Response document as follows

The HEQC has consistently stated that the first round of institutional audits will focus on quality management systems; that the intention is not to assess quality *per se*. The general consensus of opinion is that criteria at Levels 1 and 2 do assess policy and systems but that some Level 3 criterion statements judge outcomes and therefore quality. In the words of a technikon representative, the HEQC should decide whether this is a ‘system’ audit or a ‘product’ audit. Assuming that it is not the intention of the HEQC to assess quality directly then several of the questions asked in level 3 will need to be rephrased. (Appendix 6.1,p.4)

Regarding the question of preparedness for audit, participants at the workshop insisted that the issue was not that institutions were not ready for audit (as had been suggested by the HEQC official), but that they were not ready for this type of audit. They argued that had a
more developmental agenda prevailed with a less comprehensive scope, they would have been prepared. This was reinforced in the Response document:

Both in the pre-workshop questionnaire and in discussion at the workshop the readiness of institutions for audit was queried. In the opinion of QA managers, nearly all institutions would be ready to face a development based audit, as originally conceived, by January 2004. When asked when institutions will be ready to face an audit on three levels as described in the HEQC’s audit criteria document, only 20% said that they would be ready in the first two years of the audit cycle. A clear majority expect to need 3 years and more. (Appendix 6.1, p.9)

This expressed lack of readiness is supported by the questionnaire data. The findings for Question 10 suggested that only 47% of respondents believed that the HEQC has provided ‘sufficient information, guidance and impetus for systematic implementation of QA to begin at my higher education institution’. The majority were concerned that institutions need

More time. Training. Capacity development. The finalization of other policy instruments (including the ‘Guides to Good Practice’) (Appendix 5.1 A10)

before they could begin systematic implementation. Responses to open-ended questions on the issue of preparedness and capacity suggested that there is still much to be done before institutions will manage the HEQC’s requirements. Items mentioned include policy development, the establishment of quality management and management information systems, more staff and resources and the need for training. Factors mentioned as likely to impede implementation included

The impact of the mergers. System overload. Lack of external capacity, for example in the HEQC, Lack of resources. Lack of time. Lack of trained QA staff. Resistance from academics. Low staff morale. Internal politics and financial constraints. (Appendix 5.1,B 11)

Responses to Question 13 showed that 66.5% of respondents believed that the HEQC’s expectations that institutions ‘should be using benchmarking and comprehensive user surveys as data for QA processes by the first round of audits’ was not realistic. Negative comments highlighted concerns around the difficulties of operationalizing the Department of Education’s national benchmarks. This position is supported by the findings on Question 29 where 47.5% of respondents disagreed with the application of the Department’s benchmarks at programme level.

Regarding the scope of the audit, responses to Question 14 showed that 81% of respondents agreed that ‘(t)he HEQC’s identification of the management of teaching and learning, research and service learning as the core functions of HE and therefore as key areas for ‘general scrutiny’ in the first round of its audits is appropriate’147. However, there was less

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147 Although there was concern about the meaning of service learning and it was suggested that this be replaced by the more comprehensive term, ‘community engagement’.

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support for the more detailed criteria proposed at Level 3. At the workshop many participants expressed the opinion that these criteria were too comprehensive and demanding. This is summarized in the Response document as follows:

Enlarging the scope of audit by adding new target areas for the first audits has considerably enlarged the task of preparing for audit. There is widespread opinion that the first audit cycle is now too ambitious and that institutions are being asked to do too much too soon. The increased emphasis on accountability calls for much more detail in terms of institutional self-evaluation. In an ‘evidence-led’ self-evaluation, the level 3 criteria call for a vast amount of documentation and the readiness of institutions for audit is called into question. (Appendix 6.1, p.9)

Participants were agreed that the solution to this problem would be for the HEQC to drop some or all of the requirements specified for Level 3 of the HEQC’s proposals. It was agreed that a focus on an institution’s policies, planning and quality management system, as captured by Levels 1 and 2 in the HEQC proposals would be a reasonable scope for the first cycle of audits. This was reported as a recommendation in the Response document:

The scope of audit as currently conceived should be reduced for the first audit cycle. It is suggested that Levels 1 and 2 remain largely as is but that in-depth scrutiny at Level 3 be limited to core policies on teaching and learning and student assessment with an implementation focus only on the planning and design of programmes and assessment. (Appendix 6.1, p.10)

Workshop participants also expressed unhappiness about the HEQC’s proposed ‘scale of judgment’ for the outcomes of audit—‘good’, ‘satisfactory’ or ‘not satisfactory’. Responses to Question 9 of the questionnaire suggest that 33.5% of respondents were unhappy about the model proposed for grading audit outcomes. More negative comments were offered against this proposal than for it.

Another concern raised at the workshop had to do with the diversity of institutions in the system. When asked by a quality assurance manager from a historically black institution about the fairness of using the same criteria for all institutions, regardless of their historical legacies, the HEQC official was unsympathetic. He responded by saying, ‘but privates will use the same argument against us’. He explained that the same audit instrument can be used for all institutional types because the HEQC has not laid down minimum standards for audit. Instead, the proposals stipulate broad criteria to be met and then give ‘examples of what would be expected’ to meet them.

A related concern was that an HEQC veto of institutional missions would result in a reduction of diversity amongst institutions. However, the results of Question 7 which asked whether the proposed criteria were ‘sufficiently general and flexible to cater to the diversity of the South African higher education system’ showed that 70% of respondents believed that they are. Negative comments from the 30% who disagreed, suggested that the proposals did not
adequately accommodate large distance institutions, under-resourced historically
disadvantaged institutions or merging institutions.

Minor issues raised at the workshop included the unstable policy environment, incomplete
policy frameworks and documents and confusion over how to interpret the Department of
Education’s national benchmarks. Concerns were also expressed about the lack of detail from
the HEQC on the requirements and timing for the first audit cycle and for self-accreditation
status.

Finally, in answer to an open-ended question on the adequacy of the HEQC’s consultation
process, there was a mixed response, with the majority responding negatively. Some
acknowledged the time constraints under which the HEQC was obliged to operate, whilst
another thought that ‘the HEQC is better than other educational authorities’. However, others
expressed the opinion that ‘much more could have been done’ and many questioned the extent
to which the HEQC takes the input from stakeholders seriously (see Appendix 5.1, B4).

A ‘critical incident’ developed on the last afternoon of the workshop, once the HEQC official
had left, which is worth reporting because it highlights how wider ideological and political
issues ‘get into’ quality assurance debates. Some participants, all white from historically
white institutions, questioned the HEQC’s deliberate linking of audit criteria with the
transformation agenda, stating that it undermined all sense of ownership of the audits by
institutions. One participant suggested that the HEQC should not be carrying out an
accountability exercise on the Department of Education’s transformation agenda. Another
participant from the same group went so far as to suggest that this could be a sufficient reason
to close the HEQC down. Others were supportive, suggesting that this was interfering with
and undermining the meaning of audit and the meaning of quality academic provision. At this
point the debate became quite heated. A participant, sitting amongst a group of young African
males at the back of the room, all from historically disadvantaged institutions, who had not
participated much in the discussions thus far, challenged this position by stating that he was
unhappy with the tone of the criticisms of the HEQC. Another member of this group called on
the workshop to ‘remember the history of South African education’ and the need for ‘radical
transformation’ to ensure the ‘provision of quality education for the majority of students, who
are black’. Members of this group argued that the HEQC should be supported in its
commitment to transformation of the higher education system. This argument put the first
group of white quality assurance managers on the defensive. They immediately insisted that
they supported the transformation agenda, explaining that what they had meant was that
institutions should take responsibility for their own institutional transformation and be granted
the discretion (through a developmental, more open-ended approach to audit), to determine
how they would respond to national transformation goals. The black group responded by saying that because it would be historically advantaged institutions that would gain self-accreditation status first, this approach would allow them to be ‘left alone’ and to ‘be exonerated from the past’. One participant from an historically advantaged institution suggested that it was all very well for those with ‘little implementation experience’ to support the HEQC’s demands for political reasons, when ‘their institutions did not even have functioning quality management systems’ and ‘have little idea of the practical implications of the HEQC’s requirements’. At this point the Chairperson intervened and closed down the debate. He emphasized that SAUVCA’s position was that ‘all publicly funded institutions should be held accountable for their use of public funds’. The debate was about how this should be done. He also warned of the dangers of looking at the issues ideologically and reminded participants that the group was committed to constructive criticism and to looking at issues from the point of view of making the policies work in all institutions. He also reminded participants of the SNQAF’s commitment to capacity development in quality assurance practice (Field-notes 11/04/2003).

A summary of the opinions expressed at the SNQAF workshop and through the SNQAF questionnaire suggests that overall there was a mixed response to the HEQC’s proposed audit criteria. Three-quarters of respondents supported the HEQC’s setting of specified criteria for audit and its ‘fitness of purpose’ approach; that is they supported the right of the HEQC to ascertain that institutional missions were aligned with the state’s transformation agenda. However, more than half of the respondents were unhappy with the shift to an accountability-led model and many thought that the detailed Level 3 criteria should be dropped. More than half of respondents said that their institutions were not ready for such comprehensive audits and that they would not manage to undertake benchmarking and user surveys. Strong opinions were expressed that the HEQC’s approach to audit was conceptually unsound and would lead to compliance rather than improvement. Other concerns were that academics would not find the criteria acceptable and that the diversity of institutions was not adequately taken into account. The critical incident at the workshop demonstrated the highly politically charged environment in which the debates take place.

**Analysis of Stakeholder Comment on the Proposed Audit Criteria**

The data gathered on the HEQC’s proposals for audit criteria suggest that generally Quality Assurance Managers (and those they represented) were concerned about the HEQC’s shift away from communicative action to strategic action (see Chapter 2) and from an improvement-orientated approach to a more accountability-driven approach to audit. The majority of respondents were agreed on the lack of preparedness of institutions to cope with
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POLICY ADOPTION

this approach to audit. Many of the respondents also expressed concern that academics would not find the HEQC’s requirements acceptable.

However, on other issues, and in particular, on the issue of whether the HEQC should use quality assurance to further the government’s ‘transformation agenda’, the quality assurance community was divided, with the majority supporting the HEQC’s position. Data from the survey questionnaire suggest that the minority position (that is critical of the HEQC’s identification of quality with the transformation agenda), is supported mostly by respondents from the historically English-medium universities, with one or two respondents from Afrikaans-medium universities sometimes taking this position, but less stridently. The Quality Assurance Managers who work at this group of universities tend to be experienced, well-informed and some publish in the quality assurance field. Furthermore, it was this small group that tended to be most vocal at the SNQAF workshop, and that was involved in the ‘critical incident’ recounted above. Due to their experience and knowledge of the field, these Quality Assurance Managers speak with authority at the SNQAF, and are often called upon to assist with presentation, capacity development, etc. However, the data indicate that although their opinions were quite strongly taken up in the SNQAF Response document, they in fact represent a minority position. Solid support for the HEQC on the transformation issue and other issues such as the HEQC’s approach to audit tends to come from the historically Afrikaans-medium universities, the historically black universities and from the Technikon sector.

This tentative analysis is supported by Hall et al.’s (2002) analysis of the changing nature of the state-higher education relationship (see Chapter 6). The latter analysis suggests that it is particularly those institutions that enjoyed a surprising degree of institutional autonomy and academic freedom during the apartheid era and that have a tradition and culture of state opposition and critical engagement; (namely, the historically liberal English-medium universities), that are likely under the current government to express concerns about encroachments on institutional autonomy by the state. Whilst those institutions that historically never enjoyed such privileges, and/ or historically have a culture of compliance, are more likely to accept state control as legitimate (and in this case the HEQC’s proposals). This position was in fact supported by one Quality Assurance Manager from a historically Afrikaans-medium university.

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148 Given that I do not have permission to name institutions and persons in this study, it is not possible to provide detailed evidence for this claim.
You know the old story of the English-speaking Universities in the old system they didn’t listen to the government and they still don’t. And in the old system the Afrikaans people listened very carefully to the Apartheid government and did everything expected from them and they still do so in the new system. So there is a cultural expectation that we will do these things at this university. (…) So I think it’s part of this kind of institutional culture that we will do it, we’re going to hate it, but we’ll do it. (Appendix 9.9 QAM 5)

Another crude analysis of the findings suggests that it is primarily those institutions reputed to be ‘weak’ that tend to support the HEQC’s tough approach. Criticism of the HEQC tends to come from those institutions reputed to be ‘strong’ (and most strongly from the historically English-medium universities and those with strong research reputations). Perhaps this is to be expected, as Quality Assurance Managers from the supposedly ‘strong’ institutions may feel more confident to criticize a state agency. They may also assume that an external check on their academic and management practices is not necessary. On the other hand, the data suggest that respondents from supposedly ‘weak’ institutions welcome external intervention.

Although these analyses are very tentative and cannot be supported directly by evidence, if they are correct, they highlight the very different histories and cultures and the great disparity in institutional capacities (euphemistically termed ‘diversity’) in the South African higher education system. During an interview, one Quality Assurance Manager commented on this disparity of quality between institutions in South Africa.

I mean if I think back to X, they didn’t need a stick they needed a bomb! You get some institutions where people are selling mark changes on the computer system and issuing fake degrees. If you’ve got that level of academic corruption and if you’ve got people who don’t bother to go to their lectures, if you’ve got people like I witnessed who pick up a script from an enormous pile and says this sounds like a 67 to me and puts 67 on the paper without opening the script. There were practices that I witnessed that need a tough regime to go in and say ‘this cannot continue.’ But the trouble is then you’ve got other more thoughtful places which aren’t all good but still have an integrity about them and you’ve got to be careful that you don’t destroy that integrity and that thoughtfulness. (…) So implementing a rational QA system is an impossible task because of the disparity and diversity in the system. But then politically can you have anything other than a one size fits all approach? (Appendix 9.9 QAM 6)

Although the mergers are intended to overcome the worst extremes of this phenomenon, these disparities will not be leveled overnight and those institutions that have been spared the merger process will enjoy an unfair advantage over the others for some time to come. This suggests that the HEQC’s model of audit, in which a common set of criteria are imposed

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149 Given that there has been no system-wide quality assurance agency in South Africa in the past, the classifications ‘weak’ and ‘strong’ are based only on reputation and hearsay and so cannot provide a basis for serious analysis. For example, the results of the HEQC’s MBA Review provide grounds for questioning any analysis based on reputation.
across a very diverse system\textsuperscript{150}, may not be sustainable in the long-term. This situation emphasizes the importance of the HEQC’s proposals for the granting of self-accreditation status during the second cycle of audit. These proposals would allow those institutions that have proved themselves ‘strong’ against the HEQC’s criteria to manage their own quality assurance systems with minimal interference from the HEQC. This appears to be a good solution to the dilemma posed by vast disparities between institutions, and would allow the HEQC to focus on those ‘weak’ institutions from whom it wishes to protect students. However, this ‘solution’ may cause political tensions as it is likely that historically advantaged institutions would be the first to attain self-accreditation status, once again leaving the others behind and creating perceptions of a two-tier system.

The HEQC’s response to the comments on its audit proposals (see below) suggests that (for political reasons) it believes that it first has to impose a common regime across the system, in order to promote the state’s transformation project and to be seen to be fair and transparent. For this reason, self-accreditation status will be granted only after the first cycle of audits is completed.

\textit{The HEQC’s Response to Stakeholder Comment}

This section analyses the HEQC’s formal response to comments submitted by institutions and sectoral organizations on the audit criteria. The HEQC’s response was circulated in a document entitled ‘HEQC Communique to Higher Education Institutions and Other Stakeholders’ (June 2003) (see Appendix 8.3). In order to provide deeper insight into the process surrounding this policy adoption process, extracts from interviews with HEQC officials conducted during the same month as the Communique was issued, are also presented. These extracts give some indication of how opinions of the external decision-makers differed from those of some of the experts at the time.

In its Communique, the HEQC explained to its stakeholders that the audit criteria would be finalized on the basis of the comments received and also on the basis of what it learnt from its pilot audits, to be conducted later in 2003. The HEQC assured stakeholders that

\text{The HEQC has given serious attention and due consideration to the comments provided by the stakeholders and the substantive issues that have been raised. (Appendix 8.3, p.7)}

Stakeholders were also given the assurance that the HEQC secretariat would ‘revise the criteria in view of the comments submitted’ (Appendix 8.3, HEQC, 2003a:8).

\textsuperscript{150} It is important to note that this analysis highlights the disparities that exist within the public higher education sector. The disparities between institutions would be even more pronounced if private providers had been included in the analysis.
The HEQC framed its response in terms of its commitment to use quality (assurance) as a ‘policy driver to steer the system’ towards ‘a single coordinated high quality system’ (Appendix 8.3, p.7). It justified its policies on the basis of its difficult context, highlighting the problems posed to it by the emerging private sector and by the disparities in the public sector.

One of the key challenges is how the HEQC should implement this policy driver within a young and often inexperienced private higher education system, increasing international calls for free trade in higher education, an ever expanding transnational provision of “cherry picked programmes” in business and IT and a historically fragmented public higher education system of uneven quality in South Africa. (Appendix 8.3, HEQC, 2003a:7)

In the Communique, the HEQC, noted the two major critiques of its audit proposals raised above.

The comments indicate that there is broad support for the indicated purpose and approach to audit of the HEQC. However, there is concern about an appropriate balance between a developmental and an accountability-oriented approach in the first cycle of audits. Many comments refer to a perceived shift towards an accountability-driven approach on the part of the HEQC. This is linked to concerns about infringement on academic freedom and institutional autonomy. A second area of concern, on which there was divided opinion, is on the balance between “fitness for purpose” and “fitness of purpose”. (Appendix 8.3, HEQC, 2003a:8)

The HEQC’s response to the first issue was significant, as it signals the first public statement of what was to become its ‘integrated’ model of quality assurance in which it proposes combining both accountability and improvement-orientated approaches to quality assurance.

The HEQC Board considered the implications of promoting only a developmentally orientated audit. However, the consequence of such an approach would be that there would be no possibility of meeting other policy obligations (…) and granting self-accreditation status to institutions on the basis of meeting explicit quality criteria. On the other hand, the HEQC has to ensure that HEI autonomy and responsibility for developing quality management systems that are appropriate to their contexts are not undermined. The Board concluded that it was unhelpful to juxtapose accountability and development and they should not be seen as mutually exclusive, but rather as two necessary and important imperatives that must be pursued simultaneously and kept in balance. (Appendix 8.3, HEQC, 2003a:8)

One HEQC official interviewed on this matter seems to suggest that the prescribing of a comprehensive range of criteria is in fact developmental.

Our impression is that the criteria are relatively comprehensive but in terms of running an audit we will have to be creative about the ways we use the criteria and possibly collapse some of the criteria. We will aim to reduce the number of criteria to make the audit more manageable in the long term. But remember that it’s a developmental process and therefore you don’t want to eliminate too many of the criteria in the beginning because of the potential benefits to the higher education sector as a result of giving institutions the opportunity to interact with the criteria in a formalised manner. (Appendix 9.7, HEQC 5)
This comment appears to be out of touch with quality assurance managers’ fears that institutions do not have the capacity to engage with all of the HEQC’s criteria at once in the first cycle of audits.

Regarding the concern of some stakeholders that the HEQC intends to scrutinize institutional missions in terms of the transformation agenda, the HEQC attempted to allay their fears.

The HEQC is of the opinion that the national audit process cannot ignore national transformation goals, as these have implications for enhancing and/or jeopardising quality in HEIs. Audits should, therefore, consider both fitness for and fitness of purpose. The HEQC’s emphasis on fitness of purpose with relation to institutional mission, does not imply that it expects an uncritical conformity in the manner in which institutional mission statements respond to national policy goals. Moreover, the HEQC respects the institution’s autonomy to develop its own mission. Among other institutionally determined imperatives, the mission statement should also reflect institutions’ engagement with the challenges of the national policy environment in a manner which is appropriate to the context and nature of each institution. (Appendix 8.3, HEQC, 2003a:8)

This statement suggests that the HEQC will be reasonable in its approach to judging institutional missions and will grant some discretion to institutions. However, the HEQC did not draw back from its insistence on conflating the idea of quality with the idea of transformation.

With regard to the scope of audit, the HEQC acknowledges the ‘serious misgivings’ about the Level 3 criteria and concerns about the ‘ambitiousness of the criteria in general’ (Appendix 8.3, 2003a:9).

The HEQC publicly justified its comprehensive scope in the following manner.

The HEQC is of the opinion that it should signal clearly to HEIs its expectations concerning the extent of the arrangements that should be in place in a properly functioning internal quality management system, and should give an indication of problematic areas in the higher education sector. (Appendix 8.3, HEQC, 2003a:9)

However, one interviewee, who worked as a consultant for the HEQC during this period, suggested that the putting out of demanding proposals for comment was a deliberate strategy on the part of the HEQC.

So I think doing it like that, you begin comprehensive, you test it, you pilot, you talk and when people give feedback that it’s too demanding, you reduce the number of criteria. This can help with the buy-in. So I think in terms of strategy this is what the HEQC are planning. (Appendix 9.9, QAM5)

The HEQC also argued that this degree of scrutiny is necessary if it is to grant self-accreditation status after the first cycle of audits. This position was confirmed in the interviews.

Well, I think the HEQC’s response is that they don’t agree with all the comments and all the criticisms. I think as far as Level 3 is concerned, they might want to look at the reformulation of some of the criteria, but I think they regard this level as quite important that there should be a Level 3, especially with a view to self-accreditation, because a
substantial part of that decision will depend on the audits, together with programme 
information. So, if one scaled down the Level 3 criteria our information source for self- 
accreditation judgments becomes weak. So, I don’t think there will be substantial 
changes151. (Appendix 9.7, HEQC 6)

With regard to readiness, the HEQC sought to placate stakeholder concerns by assuring 
readers of its Communique that it had prioritized institutional capacity development 
programmes152 and that merging institutions would be audited only in the second cycle (that is 
from 2007). But the following statement suggests that some HEQC officials may be out of 
touch with institutional realities and with the implications of the HEQC’s requirements.

The response to the audit documents is that they think we’re a bit ambitious in the depth 
and the scope, even though we’ve limited the scope to teaching programme development 
and review and assessment and research. Yet within that we’re still too ambitious. We may 
well slim those down. So that’s quite an interesting response. I hadn’t foreseen that 
because I thought already it’s leaving out very large areas of institutional functions. 
(Appendix 9.7, HEQC 4)

The HEQC concludes its Communique by reminding its stakeholders of its commitment to a 
facilitative approach to quality assurance. It also reminds its readers of the extent to which its ‘hands are tied’ by national policy and competing interests.

The HEQC is committed to a higher education system that is in large measure self- 
regulatory and where institutions take major responsibility for quality. However it must be 
stressed that the HEQC itself operates within diverse national policy and regulatory 
frameworks and is itself accountable to a range of stakeholders. The HEQC must therefore 
give due attention to a spectrum of often competing interests and innovate policies, 
frameworks and systems that provide for both accountability and continuous improvement 
and development of quality. (Appendix 8.3, HEQC, 2003a:11)

The HEQC also commits itself to communicative action (but with strategic intent).

The HEQC commits itself to continue to work purposefully and consultatively in the 
interest of improving the quality of higher education, and through this, contributing to the 
economic, social, cultural and intellectual development of our society. (Appendix 8.3, 
HEQC, 2003a:11)

It reminds its readers of its ambitious goals.

The audit and programme accreditation processes are intended to benefit not only higher 
education, but also to have an impact on the reconstruction of South Africa at large. 
(Appendix 8.3, p.10-11)

In conclusion, this analysis of the HEQC’s response to stakeholder opinion of its audit criteria 
proposals is important for future developments because it signals quite strongly the final

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151 In fact, in the final audit instrument, the HEQC dropped the idea of levels altogether and abbreviated 
many of the requirements of this level into exemplar indicators for a consolidated set of criteria.

152 As far as the researcher knows, the only system-wide capacity development programme run by the 
HEQC to date has been the Improving Teaching & Learning Project’s regional workshops. Auditor 
training workshops have also been run, but these serve the HEQC’s needs rather than institutions’.
direction of policy choices that the HEQC took. Whilst, in response to stakeholder comment, the HEQC did withdraw the levels and to a lesser extent, the comprehensiveness of its criteria for audit, it refused to back down on its approach to audit and on its commitment to using quality assurance as a ‘driver’ for transformation. The Communique document is important because it indicates quite transparently the HEQC’s decision to adopt from this point onwards, an ‘integrated model’ of quality assurance that combines the accountability and improvement motivations for quality assurance in one system.

Finally one should note that the HEQC did make a serious effort at consultation. This was confirmed by an interviewee.

I’m pretty satisfied with the policy development process, I have been privy to internal HEQC discussions, but this is my personal perspective. The HEQC has been pretty good about consultations with QA Managers. There have been feedback sessions and discussions three times a year at the QA Managers’ Forums. These have been very useful and QA Managers have been kept in the loop. Some may feel that they should have been consulted more on policy development and choices, but to really make a substantial contribution one needs to be in a regular consultative process, or to work as a consultant. To me there seems to be bursts of activity in which we are invited to participate (as consultants) and then it does quiet for a while and we are no longer in the loop. But overall I’m happy with the HEQC’s attempts at consultation. (Appendix 9.9 QAM 2)

However, this Quality Assurance Manager later qualified his position by suggesting that the HEQC was only prepared to negotiate its policy choices to a limited degree.

The real question is has the HEQC heard our comments and feedback? I think we are heard from a defensive position. The HEQC has already made certain ideological commitments, (for example a ‘fitness of purpose’ position), which is non-negotiable. They will receive a range of comments, but they aren’t going to budge from this position anyway. So I’m not sure that our comments are really heard some are, but others are ignored. So what I’m saying is that the HEQC does call for comments but in many cases they are unable or unwilling to change, not everything is up for grabs, in the end they feel that their position is defensible and they have to take a certain line. In some cases they have taken a heavy-handed approach, for example on accreditation and this is a given.

Others suggested that the process was flawed because the HEQC did not allow institutions adequate time to inform and consult with ‘the affected’ (academics). Some thought that the HEQC’s process of consultation was not entirely transparent.

I don’t think the consultative process is adequate. They do contact experts and that is good because then you’re not floundering around reinventing the wheel and someone puts something good on the table. Then there’s some form of consultation with institutions, but you never see the results. Now why is that? There is no transparent feedback. So now we have the framework documents hanging in the air and never finalized. Ja we are told that the criteria that are sub judice so what’s going on? So I think there’s this lip service to consultation. But let me give praise where it’s due, they’re much more consultative than anyone else. I mean SAQA’s much worse. The DoE never consults at all. (Appendix 9.9 QAM 4)
In sum the HEQC did make serious efforts to consult with its stakeholder communities and, as noted by one respondent, is exceptional in this regard when compared with other government bodies. Unfortunately it was often running behind on its own schedules and so cut down on the time allocated to institutions to respond. This did not allow proper consultations to take place at bodies such as Senates and Faculty Boards, where the academic voice may have been heard. Instead it appears that most institutions had to make do with a response formulated by experts (quality assurance managers, sometimes with their Deputy-Vice Chancellors (Academic)). This probably protected the HEQC from more resistant responses. The HEQC’s response to institutional comments suggests that it did what it could to accommodate these, certainly at the level of detail. However, it was not prepared to re-negotiate its commitment to an accountability-driven approach to quality assurance and nor was it in a position to back down from linking quality assurance to the promotion of the Department of Education’s transformation ‘imperatives’.

8.1.2 The Draft Criteria for Programme Accreditation

The HEQC’s Proposals for Accreditation Criteria

At the end of September 2003, the HEQC released its ‘Proposed Criteria for the HEQC’s Programme Accreditation Cycle: 2004-2009’. Below a brief summary of the key points in the document is presented (see Appendix 8.2).

The accreditation proposals build on the earlier draft Programme Accreditation Framework document (HEQC, 2002c) which defines programme accreditation.

Programme accreditation entails the evaluation of higher education academic programmes in accordance with the HEQC’s programme accreditation criteria, which stipulate the minimum requirements for programme input, process, output and impact and review. (Appendix, 8.2, HEQC, 2002e: 3)

In its proposal document, the HEQC explains that it has opted for ‘specific criteria’ for programme accreditation in order to make its requirements as explicit as possible. The accreditation criteria proposals thus specify criteria and indicators of minimum requirements for each of the four stages of programme development identified in its definition above. Each of the 30 criteria is followed by this statement, ‘In order to meet the criterion, the following is required at minimum …’ and a list of indicators is specified.

Regarding the use of the instrument, the HEQC hopes that the criteria will serve both as ‘evaluative instruments’ (judgment-orientated evaluation) and as ‘broad benchmarks to guide the production of self-evaluation reports’ (improvement-orientated evaluation) (Appendix 8.2, p.1). The document suggests that accreditation criteria will be used by ‘members of the public, and in particular students, as indicators of the standards that the HEQC sets for
programme quality and educational effectiveness’ (Appendix 8.2, HEQC, 2003e:1). It states that its model ‘assumes strong accountability’ and ‘requires the observance of minimum standards and requirements’ ‘within the context of a developmental trajectory’ (Appendix 8.2, HEQC, 2003e:8). The HEQC justifies its strong accountability model as necessary to ‘protect students from poor quality programmes’ and to ‘safeguard the credibility of qualifications’ (Appendix 8.2, HEQC, 2003e:8). In the draft Framework document this is linked to transformation.

The HEQC is committed to ensuring that improved and sustainable quality is part of the transformation objectives of higher education institutions. (HEQC, 2002c, ii)

However, the HEQC does show some sensitivity to the needs of higher education institutions.

With respect to the intended scope and depth of scrutiny of the HEQC’s programme accreditation system, the real danger of system overload has to be borne in mind and the amount of scrutiny that institutions are able to handle needs to be carefully balanced with the requirements and legal obligations of the HEQC’. (Appendix 8.2, HEQC 2003e:2-3)

The HEQC also notes the disparities between higher education institutions in both levels of quality and in the preparedness of their quality management systems. As a concession to institutions and their need to prepare to meet the HEQC’s requirements, the HEQC proposes a phased in approach to both audit and accreditation. The HEQC’s model of accreditation focuses on ensuring the quality of new programmes entering the system. It thus makes a distinction between new and old programmes and also between professional and non-professional programmes. During Phase A (2004-2006), only new programmes and national reviews of selected existing programmes are to be accredited or re-accredited by the HEQC. Apart from those selected for national reviews, existing non-professional programmes will not be re-accredited during this period and nor will self-accreditation status be granted. In Phase B (2007-2009), unless an institution performs poorly in audit, the HEQC will still not re-accredit existing programmes. However, the process for applying for self-accreditation status will begin. Only from 2010 will it become mandatory for existing non-professional programmes to be re-accredited, either by self-accredited institutions or by the HEQC where programmes have not been covered by the national reviews and where institutions have not yet earned self-accreditation status. Thus the HEQC’s phased in approach allows both the HEQC and institutions time to prepare for the massive task of re-accrediting all existing programmes.153

The ‘developmental trajectory’ mentioned above is explained by the HEQC to be inherent in the three phases that a new programme must go through in order to obtain full accreditation...

153 Some of the largest public institutions offer over 1000 programmes.
status: candidacy, a mid-term check and full accreditation. The HEQC suggests that the first two phases provide opportunities for development.

In the case of new programmes, the emphasis is on accountability through evaluation activities that are mainly external. There is also a strong improvement trajectory which is facilitated by a gradual build-up towards the accreditation phase through the candidacy and mid-term check phases, which provide opportunities for incremental development and improvement. (Appendix 8.2, HEQC 2003e:9)

For re-accreditation, old programmes are required to go through only the third stage - that is accreditation. The candidacy stage requires that a programme meet only the criteria for the input stage of programme development, whilst full accreditation or re-accreditation requires that criteria for all four stages are met; for input, process, output and impact and review.

The method involved is typical of accreditation models used for higher education internationally. First a self-evaluation report is produced, using the HEQC’s criteria, (with the concession that institutions may add their own criteria). External evaluation of the report, with the option of a site-visit, is conducted by HEQC appointed expert peers. Peer review panels are to evaluate programmes against each of the individual criteria set out by the HEQC. An external evaluation report is submitted to the HEQC Accreditation Committee and then to the HEQC Board. This process is to occur for each of the three accreditation phases\(^\text{154}\) and at least one site-visit is mandatory in this process. If the candidacy application is successful, provisional accreditation is granted. The mid-term check requires a compliance report and evidence of implementation progress. In the 2003 proposals, the HEQC suggests classifying its programme accreditation outcomes as good (accreditation granted), satisfactory (accreditation granted conditionally) and not satisfactory (accreditation not granted)\(^\text{155}\). Summaries of the external evaluation reports are to be published on the HEQC web-site.

**Stakeholder Comment on the Proposed Accreditation Criteria**

This section summarises the issues that arose in the data gathered through the survey questionnaire completed at the SAUVCA National Quality Assurance Forum’s (SNQAF) workshop held on 6 November 2003 (see Appendix 5.2). These data provided evidence for the SAUVCA ‘Response to the Proposed Criteria for the HEQC’s Programme Accreditation Cycle 2004-2009’ document (see Appendix 6.2). Where relevant, comments that were made about the accreditation criteria during the interviews are also inserted. The process relating to

\(^{154}\) In the final programme accreditation criteria document the HEQC collapses the candidacy and mid-term check into one phase.

\(^{155}\) In its final criteria document, these were changed to ‘commended’ (accreditation granted), meets minimum standards (accreditation granted), ‘needs improvement (accreditation granted with conditions) and ‘does not comply’ (accreditation not granted).
the questionnaire and the workshop is summarized in the SAUVCA response document as follows.

In order to facilitate a sectoral response to the HEQC’s programme accreditation criteria, SAUVCA’s national quality assurance forum—which since January 2003 has included representatives of the Technikons—held a workshop on 6 November 2003, attended by 24 quality assurance managers representing 21 institutions. Prior to the workshop a set of questions relating to the programme accreditation criteria (see Appendix A) was distributed to public higher education institutions (HEI’s) and quality assurance managers were requested, as far as possible, to bring institutional rather than personal views to the workshop. In addition, several institutions sent in copies of their responses to the programme accreditation criteria as submitted to the HEQC. Discussion at the workshop first focused on the more general issues addressed by the set of questions and then turned to discussion of each criterion and its minimum requirements. At the conclusion of the workshop, institutional representatives responded to a questionnaire relating to the accreditation criteria (see Appendix B). Copies of the questionnaire were also sent via e-mail to all institutions not represented at the workshop in an attempt to gain the fullest possible response. Analysis of the questionnaire responses provided additional material for this report. A draft report was first distributed to all institutional quality assurance managers for comment before the document was finalised for submission.

Field-notes taken during participant observation of the workshop are not referred to directly here because they do not add any new information to the data captured in the questionnaire responses.

The HEQC’s proposals for a phased-in approach to programme accreditation, as explained in both its draft ‘Framework for Programme Accreditation’ document and in its accreditation criteria proposals, were supported by two-thirds of respondents, with some reservations. One comment summed up the majority attitude to the proposed approach.

Broad support for the model but significant changes in number and prescriptiveness of the criteria is needed to allow high levels of interpretive discretion for HEIs and accreditation teams. (Appendix 5.2, p.1)

The minority’s concerns about the approach included the following comments.

The model will be demanding financially and time-consuming. There is a danger of system overload. We have reservations about the number and complexity of the criteria. (Appendix 5.2, p.2)

But the HEQC’s input, process, output and impact and review model with 30 criteria in all was supported by only 47% of respondents. Those who supported it felt that it was ‘thorough’ and ‘deep’. The SAUVCA Response document suggests that it is a ‘sound working document’ (Appendix 6.2, p.5). The majority opposed the model for the following reasons.

156 Note, at this workshop only universities were represented. Technikon representatives were unable to attend, although two Technikon quality assurance managers came in their own capacity.

157 This may be because the questionnaires were completed at the end of the workshop, immediately after the workshop discussions.
The splitting of criteria into input-process-output-review categories is of limited practical use and may serve only to increase the jargon overload. The scope is broad, but over-specified. Just the criteria without the minimum requirements would suffice. Too many areas all given same weight, no prioritization. Too much during this developmental phase of implementation. The scope is too great for the capability of both the HEQC and institutions. (Appendix 5.2, p.3)

However, when interviewed, a quality assurance manager who had worked as a consultant for the HEQC on the development of the accreditation criteria proposals suggested that this comprehensiveness may have been a deliberate strategy on the part of the HEQC.

I mean in the Accreditation Framework, which I was very involved in as well as the Accreditation Criteria, I made a purposeful decision to do as comprehensive a job as possible, knowing quite well that not all of it is feasible. But rather put a good thing on the table for discussion and then tone it down. (...) What we can do now with the accreditation, we started with about 60 criteria on the first document and by the time it was circulated for comment it was down to 30. And when we’re done, I would be surprised if there were more than 20 left. (Appendix 9.9, QAM 5)

In fact, only 13% of respondents thought that ‘the HEQC has achieved the right level of specificity in its criterion statements and indicators’. The criteria were described by respondents as ‘too prescriptive’, ‘over-specified’, ‘over-burdensome’ and ‘stultifying’. Three respondents stated

This leaves little room for interpretation and use in different institutional contexts and militates against flexibility, innovation and our attempts to build a culture of continuous quality improvement. This specificity taken to the nth degree fails to recognize the importance of the context of a particular HEI. In some cases the criteria take academic freedom away. (Appendix 5.2, p.5)

Others complained about the overlap of the accreditation criteria with the audit criteria.

There is duplication and redundancy with the audit criteria, many (as much of 30%) of the requirements / minimum standards are already dealt with in the audit criteria and should be deleted from the programme accreditation criteria. (Appendix 5.2, p.3)

One respondent complained about the lack of distinction between internal and external evaluation.

There is confusion between internal self-evaluation and external evaluation, the former requires more detailed criteria or guides whilst the latter requires far fewer; detail should be scaled down for external review, an external panel can’t look at all this. (Appendix 5.2, p.3)

Only 20% of respondents thought that the criteria were appropriate as minimum standards for the higher education system, whilst 73% thought that they were appropriate as benchmarks for internal self-evaluation\(^{158}\). Generally the comments suggest that respondents considered the levels expected by the criteria to be too high for minimum thresholds.

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\(^{158}\) The HEQC claims that its criteria should be used both as ‘evaluative tools’ for accountability and as ‘benchmarks’ for internal self-evaluation and improvement, again holding together the accountability and improvement functions.
The criteria need to be simplified and cut down to a more limited range of minimum standards, they could be cut down by 50%. Each on its own seems reasonable, but when put together it is a daunting list. The criteria are far too prescriptive and all-encompassing. Were they to be strictly applied, very few programmes would be accreditable nationally. Three-quarters of the programmes of a top HEI would not meet these criteria. We need a simpler document, this is too much work, too much cost and will it improve quality? (Appendix 5.2, p.4)

On the other hand, respondents were generally happy with the criteria as ‘good practice benchmarks’ for internal review.

They are fully comprehensive and exhaustive for self-evaluation. These criteria could stand as good practice benchmarks, provided we are given the discretion to use, select and interpret them as we see fit, within our own internal systems of review. (Appendix 5.2, p.4)

The over-demanding nature of the criteria was generally thought to be due to the fact that they had been directly derived from the ‘Improving Teaching & Learning Resources’ which had been written as descriptors for good practice159.

The confusion between good practice benchmarks and minimum standards is at the heart of the problem. There is too much carryover from the Improving Teaching & Learning Resources, making the level too high. The HEQC’s misappropriation of the Improving Teaching & Learning Guides or Resources is essentially what confuses the issue. (Appendix 5.2, p.4)

This point was also emphasized in the SAUVCA Response document.

The general consensus of opinion of QA managers at the workshop is that in an attempt to provide a fully comprehensive set of criteria and minimum standards, the HEQC has moved very close to a description of ‘best practice’. (…) There seems to be little or no gap between minimum standards and best practice and the minimum standards seem to have been drawn too directly from the good practice descriptors of the Improving Teaching and Learning Resources. (Appendix 6.2, p.5) (…)

This supports the analysis presented in Chapter 7 where it was suggested that the HEQC, in its haste to produce policy instruments, tried to use the Improving Teaching & Learning Resources as the basis for both its accountability and improvement orientated instruments.

The SAUVCA Response document continues

The influence of the Improving Teaching and Learning Resources is understandable but it has led to minimum standards being set too high. To a large extent, best practice has become the minimum standard. The programme accreditation system proposed by the HEQC is certainly something to strive for, but in its present form, it presents a goal which is too far from current reality. (Appendix 6.2, p.14) (…)

More than 90% of questionnaire respondents state that there is a need to reduce the number of criteria as well as the number of minimum requirements and to create a greater space between true minima and good practice. Creating this space would also leave more to the discretion of those responsible for accreditation decisions. (Appendix 6.2, p.5-6)

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159 This workshop was conducted in November 2003, after the release of the draft Improving Teaching and Learning resources in September 2003 for the regional workshops, see Chapter 7.
This comment on the importance of creating greater space between minimum requirements (facts) and good practice (norms) is supported by Habermas’ theory of law summarized in Chapter 2.

This analysis of the criteria was confirmed in an interview with the consultant who worked for the HEQC in developing the accreditation criteria proposals, and who did not see this criticism as particularly problematic.

Yes, the criteria are set too high and they are too close to the Resources. That was a purposeful decision to set them high and then to tone them down later. (...) I don’t think it was a problem that it was too close to the Resources. I think it was indeed close to the Resources, but that was fine, the Resources were good. And it was South African it was a product of South Africa, why couldn’t it be close to that, it’s a whole team of South African people who have worked on that? (...) to my mind it was South African people, it was a team of good people who understood the South African context, and to use that as a basis to develop the criteria made perfect sense to me. The initial criteria are perhaps too comprehensive and too demanding but we can tone it down. (Appendix 9.9, QAM 5)

Regarding the readiness of institutions to meet the HEQC’s accreditation requirements for new programmes from 2004, 73% of respondents stated that their institutions would not be ready. The same percentage stated that they would not be ready to re-accredit existing non-professional programmes from 2010. The reasons given for this state of unreadiness were the costs and work-load involved, time needed for development work, merger problems and the unsettled policy environment. An extreme comment pointed out that,

It will take at least one person one week (full-time) to complete the paperwork for one programme. Some HEIs have over 1000 programmes. (Appendix 5.2, p.6)

In an interview, one Vice-Chancellor went into greater detail on the cost implications for both institutions and for the HEQC.

If you look at resourcing seriously - take the University of A - they have over 2 000 programmes, what are the resource implications of this? A place like B has only 500 programmes and we reckon that it will take 2 full-time weeks per programme to prepare to go through the currently proposed accreditation hoops. If you have 5 full-time people in a QA unit, it would take them 5 years to get through all the programmes at B assuming that they have nothing else to do! We also haven’t costed carefully the external reviews that are required. No single VC has a realistic estimate of what the costs of this QA system are likely to be. The HEQC took the example of C and worked out that they will need 88 site visits to accredit their programmes which will also require visits from ETQAs other than the HEQC. At a modest R30000 per visit for air fares and accommodation (no fees or honoraria) this comes to R2.64 million. The internal costs of preparing for these visits are hard to calculate but the exercise will require a huge input in terms of person-power and tons of paper. From my personal experience of preparing for external reviews, the costs of preparing for review far exceed the costs of a site visit. In my opinion, the costs of programme accreditation are going to be major. (Appendix 9.8 AM 3)
When asked in an open-ended question about how they thought academics would respond to the proposals for accreditation criteria, most quality assurance managers gave responses in the negative. These included the following.

Academics are complaining constantly about the encroachment of these exercises on their time to conduct their core business …. We are convinced that academics will see these criteria as an infringement on their autonomy and creativity. Most will see the criteria as too bureaucratic and stifling. This list of criteria will paralyse academics. They will be dismayed and respond with compliance and resentment. Some academics will revolt. They will see it as an unnecessary exercise and will try to ignore it and leave it to others to sort out. The detail and comprehensiveness of these criteria show a lack of trust on the part of the HEQC in our academics. (Appendix 5.2, p.8-9)

One quality assurance manager explained how she thought the criteria would undermine internal review at her institution

At this level the focus should be on practice and not on rules and policies, we don’t want a template driven process of programme review, we want academics to think for themselves about how they will improve their teaching situations. We already have the Improving Teaching & Learning Resources for guidance, but these should not have become criteria. People need space for interpretation and to make the criteria meaningful to their own teaching contexts. This is the job of academic leadership. The HEQC cannot do it for them in a generic way. (Appendix 5.2, p.8)

This is a particularly perceptive comment for it points to a conceptualization of improvement as self-generated and highlights the importance of agency in the improvement of practice. The HEQC’s approach is rejected as ‘template driven’ and ‘generic’. This comment highlights the conflict between agency-driven reform (reform driven from within requiring self-reflection, space for interpretation and meaningfulness) and reform that is driven from without by a system or structure that imposes requirements that are often perceived as meaningless.

Added to this disillusion with the HEQC’s approach was a concern about the lack of credibility of external agencies.

We have a problem in our HEI in maintaining the academics’ confidence in external bodies. Our academics are losing faith in external processes. There are more and more hoops to jump through and we get pathetic feedback. We are also worried about who will be the peer evaluators and we worry that they will not gain credibility with our academics. (Appendix 5.2, p.8)

However, when asked how academic managers (as opposed to academics) might respond, some suggested that there would be a positive response.

Heads of departments, ‘programme’ coordinators, registrars, academic planners and quality managers should welcome the requirement that proposals are standardized and conform to minimum thresholds of quality. A sensible set of criteria would assist academic managers to achieve consistency in the internal approval process. The information required by the HEQC will become essential for making internal decisions about new programmes, and will provide a sound basis on which to conduct self-evaluations and gather evidence for future audit and accreditation exercises and help to build an institutional picture. (Appendix 5.2, p.9-10)
But other quality assurance managers thought that academic managers would struggle to mediate between the demands of the HEQC and the academic community.

Managers will have to be convinced of the benefits of this new model. They will have great difficulty selling these criteria. Their roles will become increasingly unpopular. (Appendix 5.2, p.10)

This position was confirmed by a Deputy-Vice Chancellor in an interview.

We didn’t think that the programme accreditation criteria were implementable. They didn’t reflect our programme self-evaluation framework. We shared this with the HEQC and they did take note of it, so we expect some improvements in the final version. (Appendix 9.8, AM2)

Some respondents even suggested that, given the burden of re-accreditation of programmes, managers would not necessarily buy into the HEQC’s idea of aiming for self-accreditation status.

Some HEIs are wondering whether they want to aim for and apply for self-accreditation status - it may be too burdensome and not worth alienating our academics for, rather let’s wait and see if the HEQC will have the capacity to come and re-accredit all our non-professional programmes. Our managers don’t want self-accreditation status unless we can design our own system. (Appendix 5.2, p.10)

When asked about the overall coherence of the national quality assurance system being developed by the HEQC, some were cautiously optimistic.

It should eventually result in a coherent national QA system for HE. The HEQC is attempting to develop a coherent system but this is not yet achieved. This is a fair attempt but there needs to be a developmental system alongside the accountability system. This is a step towards a coherent national system with huge additional burdens on HEIs. Despite strong reservations about the desirability and achievability of combining quality improvement with accountability, I believe the HEQC is making a sincere and concerted effort to develop a coherent national system for HE - however, being a developing system has advantages as well as disadvantages: one can learn from mistakes made in other systems, but at the same time, one is tempted to gather the best from all systems and try to attain comprehensiveness and perfection-as our HEQC is trying to do. (Appendix 5.2, p.11-12)

Others expressed concerns about the general shift towards accountability taken by the HEQC in recent months.

The shift away from the development focus on quality improvement means that the system is no longer coherent in terms of the HEQC’s original principles. It is not so much that these criteria are wrong, it is that they should be good practice benchmarks developmentally introduced in a system which promotes ownership of quality. A missing piece is a framework for development or improvement. The HEQC has no coherent strategy for improvement or theory of development, this has allowed accountability concerns to dominate. People now see the development agenda just as lip-service, no one believes in it anymore, a compliance mentality has become dominant and the development agenda has been lost. (Appendix 5.2, p.12)

Two respondents critiqued the HEQC’s integrated model of quality assurance.

Ironically the linking of audit criteria with programme accreditation criteria is creating problems, rather than leading to synergy. This may be due largely to an over-the-top emphasis on centralized control, taking initiative away from academics to the extent that
doubt is cast on their ability to make a professional input. The linking of audit and accreditation has be-devilled the system. Because of the self-accreditation status judgment linked to audit, audit has also become accountability driven and non-developmental. (Appendix 5.2, p.12)

These views were reinforced by negative comments on the likely consequences of implementing the proposed accreditation system.

The relationship between quality assurance and quality may be prejudiced in this whole exercise. A consequence of the over-determining nature of the proposed system could be counter-productive compliance mode responses and a diminishment of the credibility of the HEQC in the eyes of academics. These proposals are problematic if we’re aiming for improvement, we need rather to maximize local interpretive discretion. This system seems to be designed to catch people out. It will kill innovation, frustrate academics and create burgeoning internal bureaucracies. The possibility of a quality culture will be compromised, institutions will ‘play the game’, they will employ support staff and consultants to do the work. (Appendix 5.2, p.11)

Only two respondents thought that the consequences of the system might be beneficial for the higher education system as a whole.

It could lead to continuous improvement of the quality of teaching and learning. This system could improve accountability of the system if it is followed with integrity. (Appendix 5.2, 10-11)

The overwhelmingly negative mood of the quality assurance managers was summed up as a warning to the HEQC in the SAUVCA Response document.

It is vitally important that the work of the HEQC contributes to the growth of a quality culture-one where institutions and individuals wish to take ownership of quality. If a system such as programme accreditation is too onerous and the compliance requirements too prescriptive, there exists a real danger that the opposite will occur. Instead of developing a quality culture, academics and institutions may simply learn to ‘play the game’ i.e. employ consultants and develop standard templates to produce submissions. Quality is more important than quality assurance; if the HEQC is perceived as being too prescriptive and unrealistic in its expectations, its credibility and the quality of educational programmes will suffer. (Appendix 6.2, p.9)

But these views were contradicted by a senior HEQC official who, in an interview, defended the strong accountability approach adopted by the HEQC in terms of the needs of the private sector. He also pointed out that the HEQC has to operate on behalf of a range of higher education stakeholders. He suggested that because of the HEQC’s incorporation of the idea of transformation and equity into its idea of quality, even the strong institutions would fall short of the HEQC’s criteria.

Our programme accreditation criteria will be very important for really getting to grips with quality at the chalk-face. Here we have stated what are the essential ingredients, the minimum standards, what is absolute for guaranteeing quality. We have 63 criteria, we tried to trim them down, we will try to bring them down to about 40. Yet the distance education people wanted us to add more and at our staff meeting, after complaining about the length, people added 5 more! From our experience of working with private providers, I know that we have to be very explicit about the basis for our judgments on quality, they want to know the bottom-line and won’t hesitate to take us to court. So we have to spell out in the basics in tangibles. Private providers will apply our criteria literally and if we don’t specify something, they won’t do it.
With respect to specifying good practice, I don’t believe that context is king, this leads to relativism. We now have a massified HE system and we need a reasonable way to deal with it. We don’t want over-regulation and we can’t have laissez-faire. The regulatory framework must be linked to the basic purposes of HE, i.e. good teaching and learning and research and community service. There is a consensus on these, if you have all 3 you must do them properly. We will use peer review, both academics and people from the labour market. Remember that academics are not the only stakeholders in HE, there are also students, the market, employers and society. We have to act on their behalf as well.

We therefore need a strong accountability regime. Even in our very good universities, not all the requirements are met, because we have defined quality as having academic standards and as promoting equity. These institutions often fail to satisfy the ‘fitness of purpose’ criterion. So again quality becomes a policy driver. So from an accountability point of view both our strongest and our weakest HEIs don’t deliver on our construct of quality. (Appendix 9.7 HEQC 3)

In sum, apart from supporting the phased-in approach to programme accreditation, the majority of quality assurance managers did not support the key features of the HEQC’s proposals for programme accreditation. The overall response to the proposals was generally negative and more critical than those given on the audit criteria proposals.

Analysis of Stakeholder Comment on the Proposed Accreditation Criteria

The general picture of quality assurance managers’ responses to the HEQC’s programme accreditation proposals, as captured in the SAUVCA survey questionnaire and response document, was overwhelmingly negative. It is clear that the majority believe the proposals to be set too high, too onerous, too comprehensive, too prescriptive and too accountability-driven.

An analysis of ‘who said what’ supports the tentative analysis of the responses to the audit criteria given in Chapter 8.1.1.3. The historically English-medium universities were uniformly negative in their reception of the proposals for accreditation criteria. Minority support for the proposals came from the historically black universities and in some cases from one or other historically Afrikaans-medium university. In terms of preparedness, with only two exceptions, it was only the quality assurance managers from the historically Afrikaans-medium universities that claimed that they were ready to meet the HEQC’s requirements within the HEQC’s time-frames.

An explanation for these patterns can only be tentative. As suggested above, the historically English-medium universities have a liberal tradition that includes critique and opposition to the government of the day. It is also these universities that are most likely to take the ideas of academic freedom and institutional autonomy seriously. They also tend to have appointed well-informed, experienced, quality assurance managers. These factors suggest that these universities may have a predisposition to be critical of the HEQC’s proposals. The data suggests that the historically Afrikaans-medium universities are the best organized and best
prepared to meet the HEQC’s requirements. Despite this, most representatives from these universities did not support the HEQC’s accreditation proposals. With one exception, quality assurance managers from the historically black or disadvantaged universities stated that they were not ready to meet the HEQC’s requirements. Yet strongest support for the HEQC’s proposals came from this group of universities. Another possible explanation for the common acceptance of the HEQC’s proposals from some historically Afrikaans-medium universities and all the historically black universities is that they share more authoritarian institutional cultures.

However, vague statements such as, ‘We need these changes to ensure that imbalances and injustices are addressed’ (Appendix 5.2, p.12) suggest that some from the historically black universities support the HEQC for its claims about how quality assurance will contribute to the transformation of the system, rather than on the basis of the details of its proposals. What is perhaps most significant in this analysis is the divided response and how neatly it followed institutional type, histories and cultures.

**The HEQC’s Response to Stakeholder Comment**

The HEQC did not release a public document in response to the sectoral and institutional responses to its proposals for programme accreditation. Instead, its officials gave verbal feedback at various forums such as the HEQC’s Quality Assurance Managers Forum. The feedback seems to have focused on re-assuring the sector that the HEQC would cut back the number of criteria in order to render its requirements less demanding (personal communication, Field-notes, 24/03/2004).

In September 2004, the HEQC released the final version of its programme accreditation criteria. It is significant to note that of the 21 points made on specific criteria in the SAUVCA response document (see Appendix 6.2, p.10-13), 15 of these suggestions were in fact accepted by the HEQC and built into its final instrument. However, as demonstrated in Chapter 9, the HEQC attended to details within its basic framework which did not change. This suggests that the HEQC was not prepared to negotiate the pragmatic, goal-based model of evaluation that it had adopted for accreditation, (typical of managerial and bureaucratic approaches to quality assurance). However, within that frame, it was responsive to stakeholder opinion. For example, it trimmed the number of criteria from 30 to 19 and attempted to accommodate

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160 Apart from Fort Hare that grew out of a mission school, the early ‘tribal college’ black universities were established in the early 1960s by Verwoerd. The later ‘bantustan colleges’ were established in the 1970s as part of the policy of separate development. The apartheid government placed authoritarian Afrikaans-speaking managers in charge of these universities. It is possible that this history of authoritarianism makes respondents from these institutions more amenable to state intervention.
institutions’ (and possibly its own) lack of capacity and preparedness through a phased-in approach (see Chapter 9 for an analysis of the HEQC’s final ‘Criteria for Programme Accreditation, September 2004).

8.1.3 The Re-accreditation of MBA Programmes

The re-accreditation of all MBA programmes in South Africa by the HEQC was the first of a series of what the HEQC now terms ‘national reviews’ of existing programmes in selected professional or disciplinary areas. The HEQC sees national reviews as an important part of the assessment of actual quality at programme level. In a statement laden with assumptions, the HEQC claims that its reviews ‘combine an accreditation objective with the improvement imperatives that are part of the transformation agenda for higher education in South Africa (CHE, 2004b:1). National reviews are the third prong of the HEQC’s quality assurance strategy and the findings of reviews are to be used (alongside those from audit and the accreditation of new programmes) to inform the HEQC’s decisions on the granting of self-accreditation status.

In its criteria document entitled ‘Re-accreditation of MBAs’ (2003f), the HEQC defines re-accreditation as entailing, ‘examination by the HEQC of the institution’s ability to maintain and improve existing programme quality above minimum standards’ (HEQC, 2003f: 7). The same document explains that the MBA programme was selected for national review because in the National Plan for Higher Education (2001) the Minister of Education had requested the HEQC to review postgraduate programmes. The MBA was selected as the first postgraduate programme to be reviewed because of its high profile and concerns about the recent proliferation of MBAs in South Africa (HEQC, 2003f: 7).

The HEQC conducts its re-accreditation exercises against a set of specified criteria that are based on its general programme accreditation criteria, but further developed and refined by expert peers from the profession or discipline concerned161. The re-accreditation of MBA programmes was based on 13 criteria, each with an attached set of minimum standards and a list of expected documentation. The criteria covered the following areas-organizational setting (external); mission, goals and objectives; organizational setting (internal); governance;

161 In the case of the MBA review, the specific criteria were in fact developed and finalised in advance of the development of the generic programme accreditation criteria. Those developing the MBA criteria drew on international examples especially those of Equis (European Quality Improvement System) and AMBA (the UK Association of MBAs), and also on the Improving Teaching & Learning Resources (see interview data, Appendix 9.11 MBA 8).
resources; human resources; student recruitment; diversity, access, redress and equity; learning programme, teaching and learning; assessment; research and external environment.

In terms of process, the HEQC required a substantial self-evaluation report to be compiled by MBA providers consisting of a descriptive account of a unit’s performance against each of the criteria, a SWOT analysis against each criterion, self-assessment in relation to the minimum standards set for each criterion and an improvement plan. Self-evaluation reports were submitted to the HEQC in May 2003 and site-visits by panels of HEQC officials and expert peers were conducted during June, July and August of 2003. According to the HEQC,

Panelists and evaluators were well received by institutions. Most of the providers and other experts participating in the process felt that it was rigorous and professional. (CHE News, 2004a:7)

The HEQC released the results to institutions for comment in December 2003 and released the results publicly in May 2004. A total of 37 MBA programmes were reviewed, six institutions were granted full accreditation, twelve were granted conditional accreditation and ten were not accredited. The consequences of re-accreditation reviews are serious. If accreditation is withdrawn, the programme may not be offered and funding is withdrawn from public institutions by the Department of Education. If conditional accreditation is granted, the programme may continue on condition that certain recommendations are met within a stipulated timeframe. Full accreditation may be earned if an institution proves to the HEQC that it has met its conditions. Even when full accreditation is granted, a programme may be compelled to meet certain requirements.

In October 2004 the CHE released its report, ‘The State of the Provision of the MBA in South Africa’, in which a full analysis of the review findings and of future developments related to MBA programmes in South Africa is presented. In an effort to encourage improvement and innovation, the report also includes an Appendix of case studies on best South African practice (CHE, 2004b).

Stakeholder Comment on the Re-accreditation of MBAs

This section discusses academics’ and heads of departments’ or programme directors’ opinions on the HEQC’s re-accreditation of Masters of Business Administration programmes. The interviews were conducted around the ‘critical incident’ of the HEQC’s site-visits to the campuses concerned. Interviewees were selected from four different MBA programmes offered by three universities representing a cross-section of South African public universities. Of these, one programme was accredited by the HEQC, one was granted conditional

162 The numbers don’t tally because some institutions offer more than one programme.
accreditation and two were not accredited (after the interviews had taken place). Where relevant, the final accreditation status granted by the HEQC to each of the programmes is stated when quoting from the interview data. In this section a comprehensive, in-depth analysis of the MBA re-accreditation process is not attempted. Instead it is used as a ‘critical incident’ that allowed the researcher to gather opinion from the affected on HEQC activities and policies.

The most positive comments obtained on the MBA Accreditation Criteria and on the need for the re-accreditation exercise were made by the Programme Director and the ex-Programme Director of an MBA that was later awarded full accreditation. This suggests that these interviewees were well apprised of the HEQC’s requirements and that they felt confident about meeting them.

I think the strength of the MBA re-accreditation instrument is that it is a very comprehensive look at the programme and its context. And for those who stand up to that scrutiny I think would be able to say with confidence that they are providing quality MBA programmes that are properly resourced. And for those who don’t, it sets the benchmark. (…)

So I also think that the policy instrument is credible and based on adequate expertise. And that’s not just because I was involved with it, but I think that it is based on well-researched criteria from a number of different sources. (ex-Programme Director, Appendix 9.11 MBA 8)

The HEQC’s re-accreditation instrument was also supported by interviewees from a historically black university that was eventually granted conditional accreditation.

The HEQC had done an international study, you know, to benchmark the accreditation process here with international best practice. Looking at the way they started with national imperatives you know, and emphasizing transformation, starting from that which is the local imperative and then doing an international benchmark. Then they came up with the initial criteria, I think there were over 30 at the time. Over 30 criteria, which were then reduced to 13. We then gave some feedback. But looking at international and national imperatives at international benchmarking and then contextualizing this within the South African environment and then thinking of having a national benchmark and then institutionalizing the whole process of self-evaluation, I could resonate with that. (Appendix 9.11 MBA 4)

Reservations were expressed about the contextualization of the criteria, but it is noteworthy that the interviewee blamed the MBA provider community for this and not the HEQC. She was also supportive of the HEQC’s standardized criteria for political reasons.

Has it been sufficiently locally contextualized? I don’t think so. I think the local consultation process could have been more comprehensive. But then one has to look at the willingness of the local MBA provider community to participate in that. (…)

But you know the reality is that MBAs are an international product and so a good MBA should be scrutinized in terms of international criteria - that’s my belief. (…)

163 Two follow-up interviews were conducted telephonically after the release of the results.
But I think politically they [the HEQC] would’ve had a huge problem with that in South Africa. Here they have to make everybody jump through the same hoop. (Appendix 9.11 MBA 8)

The current Programme Director of the same programme expressed her belief that, in general, the re-accreditation of MBAs in South Africa was necessary for the following reasons.

On the MBA a lot of people will say ‘Well the market will decide, you know, we don’t actually need the government to intervene’. And I think, for the students on our programme, whether the Council for Higher Education in South Africa accredits us or not isn’t an issue, they’re more concerned about how the world feels about us. But I think the naivety of the South African market and the plethora of MBA programmes being offered - I think it became important that somebody takes charge. You know so many people in this country think ‘MBA, we’ll do it’ they want tickets to promotion - they don’t really care about the programme. So I think our market is naive enough that we needed some kind of intervention. So I think it’s the right thing to do. (Appendix 9.11 MBA 7)

This view was supported by the ex-Programme Director quoted above who also noted that even the strong institutions were beginning to take the exercise seriously.

The top end of the institutions are of the view that it was a necessary evil and didn’t take it too seriously. But I think once the process started rolling out and they got to grips with the nature of the instrument and the amount of work it was going to take to respond to it, and then there was a sharpening up. Certainly here and I think it’s being taken very seriously. (Appendix 9.11 MBA 8)

Other academics and academic managers made positive but more qualified statements about the MBA criteria. A Head of School, who in an earlier interview had complained that the criteria were too ‘pernickety’, expressed the opinion that they were basically sound. (The fact that he was in the presence of another academic may have influenced this response).

I think the instrument is fundamentally sound enough, but I think it needs to be worked on, there’s lot’s of repetition. It’s not as clear as it might be, but I think the basic fundamentals are right. I mean you can’t argue if you looking at the 13 main principles. As principles you can’t argue that they’re not relevant to the concerns of an MBA service provider. Whether that process will lead to the establishment of acceptable provision or standards or service provider standards for the purpose of customer protection, if you want to call it that, is a bit hard to tell. I think much will depend on how the HEQC decides to interpret these criteria. And just what they regard as sufficient to achieve compliance. (Appendix 9.11 MBA 3)

Another programme director acknowledged that the process of preparing for the review had had some positive effects.

I think from an internal perspective, the process will lead to better QA policies and procedures being put in place. (…)

I think from an internal perspective, being a new programme, a lot of the supporting documentation, that I knew was around but had never really consulted and, having been forced to find it, I read a few things that I didn’t know existed!

But then she qualified this position by adding

But I don’t think they’re things that affect the programme quality. (Appendix 9.11 MBA 1.1)
A similar point about the review resulting in the production of policies and documentation was made by a Deputy-Vice Chancellor\textsuperscript{164}

With respect to the MBA re-accreditation, people felt that the HEQC submission required too much documentation. But people are now realizing, ‘OK we need to have this stuff in place in any case’. In older universities many things that are done are not documented or structured, there are a lot of loose things that are not tied up neatly in policy documents. This dawned on us in the MBA process, we realized that procedures are followed, but not written down, processes are tacit, but not on paper. We felt relatively happy with the HEQC team, with their attitude and approach.

However, in the data there are many negative comments expressed by stakeholders on the MBA re-accreditation criteria and on the demanding nature of the process required to meet them. Problematic issues identified in the stakeholders responses to the criteria included their approach to quality assurance and their model of evaluation, the application of generic criteria to all contexts, the amount of detail and the extent of the documentation required leading to over-prescription and a large work-load. In addition, and perhaps more seriously, some academics also expressed a lack of faith in the HEQC and in some cases it was clear that a meaningful self-evaluation prior to the site-visit had not taken place.

The following comment was expressed by an interviewee from a historically disadvantaged institution that was eventually granted conditional accreditation. This academic complained about the HEQC’s strong accountability approach and its lack of sensitivity to the history of institutions. It is interesting to note that here the ‘transformation agenda’ is used against the HEQC, despite the HEQC’s constant assertions that it promotes this agenda.

Now while we believed that the HEQC with its Founding Document that we’re going to have a ‘light touch’ approach and a developmental approach but the way they have now approached the MBA is tick-box, evidence based. The message is going to go out that these guys like accountability more than improvement and development. You know they don’t realize that we have come from the Apartheid era and everything is not equal, you know they’re using the same criteria for the publics and the privates, which I think is very problematic. With the privates you can have this big stick approach but I think with public providers they must be more sensitive. And I mean this exercise to me was that they were not sensitive to where we came from and the transformation agenda. (Appendix 9.11 MBA 4)

Another negative opinion was expressed by a Head of School who ran a programme that failed to gain accreditation. He expressed irritation with the detailed documentation required by the MBA re-accreditation criteria.

Well, my initial response is that I think it’s a little pernickety, to be quite frank about it, if that’s the right word, I think it ‘nit picks’ a lot of things, I think it identifies a lot of stuff which doesn’t really have an impact on the quality of the process. I mean, I think whether

\textsuperscript{164} This was in the context of a post-Improving Teaching & Learning Project workshop interview.
or not you’ve got formalized policies in place, for example, on issues like examinations, it
doesn’t mean that the examinations don’t run successfully, it just means you don’t have a
written document to drive them. The argument that they would run better if you had the
written document is clearly fallacious. So that’s the one side of it. I think it’s a little bit
pernickety. (Appendix 9.11 MBA 2.1)

This comment makes a similar point to that made by the DVC (Academic) quoted above, but
indicates a negative response to the HEQC’s insistence on policy documentation being in
place. A quality assurance manager from the same institution was very negative about the
MBA criteria, but for reasons that relate to the HEQC’s approach to quality and its model of
evaluation.

The document is badly put together it’s uneven and drawn from different sources with
different levels of complexity. It is reminiscent of SERTEC\(^\text{165}\), i.e. specifying each of the
criteria which cause one to lose the picture of the whole. I prefer Woodhouse\(^\text{166}\)’s
approach - it is more integrated and analytical and based on the expertise and professional
judgment of the panels to find out where the problem is. The HEQC’s document is too
prescriptive, you end up supplying information, finding the right documents and giving
descriptions rather than processing it. It precludes an open and honest assessment of where
you are really are. We want to be transparent but the style doesn’t encourage this. (…) We
are going the same way as the UK, base-rooms full of colour-coded documents, two copies
of all sets of minutes, it’s a complete nightmare, it’s accountability gone mad! In terms of
validity, the theoretical underpinning is very mixed, it is outwardly developmental, but in
practice, the opposite, I think it has got confused. (Appendix 9.9 QAM 1)

The same quality assurance manager went on to complain about the amount of work required
by the HEQC for the self-evaluation report.

The volume is just ridiculous. We supplied them with all the appendices they wanted - two
volumes plus the report of 80-90 pages. For example each of our MBAs required 3
volumes of data and the HEQC requires 5 copies of each, we had to courier off about 20
volumes of stuff! I hope they will realize that they can’t process all of this stuff and will
try to hone it down to actually get what they want. The MBA Re-accreditation manual is
58 pages with 13 different areas to supply information for and a SWOT analysis for each.
(…)

In terms of time (…) it took 3 people working for 4 weeks to put it all together. One good
thing is we will know where to find the documents in the future. (Appendix 9.9 QAM 1)

This complaint was echoed by an academic who pointed out the opportunity costs involved.

A and B and all the other staff at the MBA unit did all that work on the submission. It was
huge. If we actually had to put personnel hours together it would be quite frightening. And
the problem there is it’s going to take away time from the teaching, research and
everything else you should be doing - when you could be doing something else -
something constructive. (Appendix 9.11 MBA 6)

Another concern expressed by stakeholders was a lack of faith in the HEQC and its quality
assurance processes. A Programme Director of a programme that did not gain accreditation
expressed this as follows.

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\(^{165}\) SERTEC is the quality assurance agency that existed for Technikons before the establishment of the
HEQC.

\(^{166}\) David Woodhouse heads the Australian Universities Quality Agency.
I have my reservations about how it is going to be used and to what extent the HEQC is in a position to be able to say, ‘that is good quality and that is not’; on the basis of our own submissions. To a large extent, I think that when you submit a narrative, how good you are in writing the narrative will determine the extent to which that is perceived as quality. And I don’t think that has anything to do with the actual quality of the programme itself. (Appendix 9.11 MBA 1.1)

There is also evidence in the data that in several cases academics on the programmes concerned were too pressured and unprepared to use the preparation for the HEQC review as an opportunity for conducting a meaningful self-evaluation. When asked about this, an academic who teaches on a programme that was not accredited admitted it was just a scurry to get ready and didn’t serve our purposes at all. (Appendix 9.11 MBA 6)

A quality assurance manager commented on the attitude of academics to the MBA review and on how this militated against a constructive internal process occurring.

They just regarded the MBA re-accreditation as a pure irritating compliance thing rather than taking the opportunity of a self-evaluation. (…) But they weren’t particularly impressed by the arrangements the HEQC put in place prior to the review. A lot of that we had to buffer to protect the HEQC. So the bad process was part of what be-devilled the value of the review. But also internally there wasn’t a quality cycle in place and so we didn’t get the value that we could’ve got out of it in terms of self-evaluation. (Appendix 9.9 QAM 4)

Finally, regarding the use of the criteria, one academic, who served as a panelist, noted the difficulty in applying standardized criteria across contexts, but in principle was supportive of the HEQC’s position on this.

I felt at times that the criteria were a bit fuzzy, so I wasn’t comfortable all along the way. We had to feel our way to some extent. But they had to come up with a common set of criteria that could relate across all institutions, although this was difficult and there wasn’t always a good match of criteria to a specific programme context. (Appendix 9.11 MBA 9)

The data on the process of the site-visits conducted by the HEQC panels are summarized below. There were positive comments about the process from all three institutions, although comments were less positive from those programmes that were eventually not accredited.

The HEQC was commended by stakeholders on the thoroughness, relevance, professionalism and fairness of the site-visit process. The Programme Director of the programme that gained full accreditation was very complimentary about the HEQC’s process.

So it was very encompassing, I must say I was impressed at the depth to which they wanted to go. And I think it actually took the academics at this institution by surprise when they were suddenly questioned at the site-visit as to their involvement. (…) As a recipient I was impressed by the detail that had gone into analyzing the documentation that was submitted. I was very impressed by the HEQC because they did the first analysis and alerted the panel to what they should focus on. And I thought that was very impressive the detail to which they’d gone to. (…)
In terms of X I think they focused on the right things … they didn’t get bogged down in the wrong aspects. (…) So it was a big focus on quality assurance and the actual delivery. They asked me a lot about feedback from the students, and what I do with it. There was quite a lot about the performance management of academics. So they actually picked up correctly what the issues were at this Business School, I think. (Appendix 9.11 MBA 7)

Academics at the institution that gained conditional accreditation were also impressed by the HEQC’s thoroughness, professionalism and fairness.

I thought the process was fair because really it was based on what we had submitted. You know in terms of being thorough and fair and sticking to what was submitted. (…) So you know I think they were fair. (…)

During the site-visit the panel asked questions, which are relevant but also to interrogate and find out the accuracy of the information in the submission. So they kept saying ‘according to page so and so of the submission, it says here’ and they would read and then ask follow up questions to that. So it was quite a detailed check that the evidence was valid. (Appendix 9.11 MBA 4)

Even academics from programmes that were not accredited commented positively on the site-visit, but with one qualification.

I think commenting generally, my experience was actually - I wouldn’t say positive, but it wasn’t negative. I thought the panel with the staff was fairly open-minded and it went fairly well. (Appendix 9.11 MBA 6)

Regarding professionalism: the HEQC official was very thorough, she had certainly gone through our document carefully and cross-checked documents, etc. Most of the panelists seemed to have had adequate training, they knew what they were talking about and looking for, although they played a minor role, the HEQC woman dominated. So overall I felt that the information was adequately processed. But it was the manner or attitude problem that really upset me - it was really the HEQC official that upset me. She was very aggressive - a few of us felt this. The rest of the panel members were OK. (Appendix 9.11 MBA 1.2)

Negative comments on the MBA review site-visit process were most strongly expressed by those on programmes that were subsequently not accredited. It would seem that these academics sensed that the HEQC was on the attack and, some felt threatened, particularly it seems, by the HEQC official concerned. Negative comments around the site-visits dealt largely with affective matters and centred on how people felt they had been treated the HEQC. This included the manner, style and attitudes of the HEQC officials and the panelists and the fact that people did not feel adequately acknowledged or appreciated by the HEQC. More substantive criticisms of the process related to a lack of credibility of the HEQC and panelists by academics. This is a serious matter because peer review is an essential element in the HEQC’s evaluation method. If well-founded, this criticism could undermine the credibility of the HEQC’s judgments and thus the whole (re-) accreditation exercise. For example, one Head of School commented after the site-visit

I think the HEQC are too bureaucratic, but it’s hard to tell. We haven’t seen the report, we don’t really know…but it would appear so. For example it does not fill me with delight
that the CHE representatives spoke more than any other panelist, asked more questions than any other panelist, that shouldn’t be the case. If this is generally meant to be a peer review, she is not one of our peers - the CHE is not one of our peers. (Appendix 9.11 MBA 3)

A Head of School from another programme expressed unhappiness at the conduct of the HEQC panel and outrage at the conduct of one HEQC official.

I think from the outset you might say their (the HEQC’s) hallmark was one of arrogance. They started with the first letter that arrived … ‘lunch will be served’, you know, the whole attitude. I mean you would never do that in business. (…) D and I both put a lot into our presentations and I did my presentation during which, by the way, one of the panel members, the Chairman in fact, actually nodded off and slept. I’m very worried. What really upset me was the representative from the Council for Higher Education, in fact D had just started her presentation and she just cut her straight off. D had put in an incredible amount of work into it. (…) That is unacceptable. There were no questions and answers or anything for D in that session. Then on the second day they cancelled the lunch and we had all been invited to a lunch with them. It had all been set up and it was cancelled, sorry! That’s unacceptable! It is actually pure bad manners; you can happily quote me, and the way it was done. I found here again the CHE representative - she was almost on a mission as far as D was concerned, she was just aiming question after question at her … It was a witch hunt! And I don’t know what or where she was coming from. It was as though D was in the dock, her and me, we were in the dock, on a criminal trial and she was the prosecuting council, (I was there on the lesser charge). It was a very unpleasant experience… I’ve never experienced anything like that in my entire working life. Maybe it will only happen when you work for the government. I’m sorry to say I can’t see it happening anywhere in the private sector. (Appendix 9.11 MBA 6)

Concern about the manner of the HEQC panel was also expressed by an academic from another institution.

But some of the support staff who had been there felt that they had been through a meat grinder and I don’t think that was actually fair because the HEQC should realize that the GSB is just part of their responsibilities. Their tone and style were inappropriate. (Appendix 9.11 MBA 4)

Some academics and quality assurance managers expressed the opinion that they had not been adequately acknowledged by the HEQC.

Let me just comment on this…there were 40 minutes set aside in the evaluation and there were eight to ten academics teaching on the programme we were all in one session, which I think says something about the weighting given in the process. They spent far more time going through management structure and documentation and a lot of the questions that they posed to the academics were again relating to things like meetings and schedules. (Appendix 9.11 MBA 6)

The other thing is also the Quality Assurance Managers, we are asked to facilitate and make sure that everything’s going OK but we just get notices you know ‘you do this and you do that’. I mean we weren’t given any briefing on the MBA programme re-accreditation process. So we have been used as scapegoats. They come in here and they expect us to do everything, you know they have set ad.1 the schedules and everything, why don’t they debrief with the QA Managers, get some input from us? Because they don’t realize what we go through, there’s a lot of constraints that we’ve got to deal with. I think they take a lot for granted as well. (Appendix 9.11 MBA 4)
Perhaps the most serious issue raised by academics on the HEQC site-visits had to do with a perceived lack of credibility of the HEQC and of the panelists. Regarding the panelists, criticisms were not about peer review in principle, but rather about the way in which the HEQC had implemented it.

Really to be honest we felt that the panel, in terms of status, was relatively weak, weak in the sense that none of them represented a major institution. (...) So we felt in fact the panel was lightweight, which indicates to us that they probably didn’t expect to find anything particularly untoward over here. It may not have been so, but that was the conclusion we drew. (Appendix 9.11 MBA 3)

In the comment below on the weakness of the panels, a Programme Director offers an explanation for why, in the South African context, the HEQC may be obliged to appoint ‘light-weight’ panelists.

Another weakness is that they are relying on a volunteer base of peers for the panels. I’ve worked on the panels and some of the panelists couldn’t use the instrument properly. They had difficulties interpreting the questions and making decisions. (...)

In my opinion some of the HEQC panelists were very lightweight and just not credible. Some of them reminded me of SAQA’s SGBs, they were just there to earn brownie points for themselves, opportunists. But I think the HEQC’s hands were tied politically...politically because I think they had to be representative, so again they were driven by politics. I mean my view is that the people who should be on this panel should be people who have a track record of teaching on credible MBA programmes and directing and that the Chairs of the panels should have been people who direct MBA programmes or people who have been Directors of substantial Business Schools. But then the HEQC would have problems because they would all be white males. (Appendix 9.11 MBA 8)

Two of the academics interviewed, who had also acted as panelists admitted to some weaknesses in the HEQC’s training of panelists, although the one excused the HEQC on the grounds of a lack of resources.

Well we did have training, we went to a workshop, but it wasn’t really adequate. I mean EQUIS obviously has the resources that the HEQC hasn’t; it’s a financial problem. You know if you are going to do this properly, you actually need a panel of experts who’re going to be experts in QA and MBAs. I mean they just don’t have the resources to do that so that’s why they depend on inexperienced peers. (Appendix 9.11 MBA 7)

I think that our training was possibly a little inadequate. We needed more time and the panels were shifting populations, there were last minute changes and not everyone was on board. So we had to feel our way along, it could have been better. (Appendix 9.11 MBA 9)

In sum, the negative comments expressed by academics involved in and affected by the HEQC’s MBA re-accreditation exercise suggests that what most upset them was a sense of not being treated with sufficient dignity and courtesy. This opinion was expressed most strongly by academics on programmes that were eventually not accredited. This may well be linked to a clash of value systems and to academics’ feelings that their identities as academics or professionals were in some way undermined by the process. This position is related to the second issue raised - that of a lack of credibility of the HEQC and its panelists. It is
noteworthy that this criticism was made by all respondents (those that gained re-accreditation and those that did not) expect for those from the historically black university. These criticisms of the HEQC are serious and may undermine the successful adoption and implementation of the HEQC’s policies by the academic community.

Towards the end of the interviews, academics were asked whether they thought the HEQC’s MBA reviews would be effective in assuring and improving the quality of MBA programmes across the country. The data contain many positive responses to this issue of policy effectiveness.

Firstly there was general support for the HEQC’s re-accreditation process.

I think that the HEQC have done a remarkable job, given the financial constraints they have and the fact that this is probably the first time they’ve done anything in quite such detail. And that they’re dealing with public and private institutions that are completely different. (…) I think I salute the HEQC. I think it’s great, I think it’s a very important process and I hope that it will make even the top institutions jack themselves up and stop being complacent. But it was a very big task. (Appendix 9.11 MBA 7)

A Vice-Chancellor described how he imagined the effectiveness of the policy to work

If I was running the HEQC I would use good classroom sense and pick on the biggest bully in the class. This sends a message to everyone else and means that you can do a few reviews well. For example, it was clever to pick on the MBAs for re-accreditation. This was a high profile exercise and by all accounts they did it very thoroughly. I just hope they will be tough and stick to their guns on the outcomes, even if threatened with legal action. If the HEQC goes to prestigious University X and says ‘your MBA stinks’, this will work and get people scurrying across the system, the impact will be huge. (Appendix 9.8 AM3)

Secondly there was support for the MBA reviews because interviewees believed that it would protect learners from poor provision and enhance the status of providers who gained accreditation.

Well the motivation for the whole process was ostensibly to protect the South African public from fly-by-night institutions and MBAs in particular. I believe that this was the case and they did it thoroughly, very thoroughly. I think that they went beyond their brief to some extent. I think that the motivation was to take a firmer grip, firmer control of the institutions concerned. But in the end I think that the HEQC achieved their purpose. And they now have the tools that they need to address the weaknesses identified in particular institutions. (Appendix 9.11 MBA 9)

I think the other positive spin-off of this re-accreditation is we all know and we are all aware that there are certain MBA programmes that really don’t match up. And I think by painting a broad brush across privates and publics I think this exercise will address that. I know that there are MBA programmes offered from houses, I mean just you and I in a cottage set up two weeks ago. This exercise will identify and close down those and give conditional accreditation to certain programmes. And I think those people who are really committed and have pushed their resources; they will be coming out at the top. I think this exercise will definitely protect the learner. Once our MBA programme is reviewed (…) we have been approved and accredited we will have a rubber stamp. We should all be proud and market it. (Appendix 9.11 MBA4)
Thirdly, some interviewees indicated that they had been able to use external quality assurance intervention to their own advantage. For example this Head of School was able to use it to persuade his institutional management to grant his programme better resources.

But for me it’s also an instrument for advocacy because I’ve always talked about our deficiencies in terms of our staffing and you know a whole range of other things, so suddenly now you’ve got the CHE coming up with an instrument that basically prescribes what are the minimum standards, which management buys into. So when I formulate my strategy along the different criteria, it’s not like I’m coming with my own ideas because actually, according to these minimum standards, this is where we fall short. So we actually use that as a checklist, as a minimum, ‘we need to be at this level’. (...) So I have tended to look at it positively. (Appendix 9.11 MBA4)

A quality assurance manager commented on how the HEQC’s intervention forced people in his institution to take quality assurance seriously, possibly strengthening his own position within the institution.

From the QA side, people now saw that the HEQC is serious and people started looking at us in a rather more serious light, also realizing that the quality audit is coming. I spoke to the Deans at the Deans meeting and told them what are some of the serious implications and it seems that people are now really concerned about quality. So it was a good experience that somebody from the outside came in because there were a lot of documents floating around, there was a lot of talk and I think this exercise really made people aware that the HEQC is serious, whether they did a good job or not, but I think for the first time there was outside scrutiny into academic work. (Appendix 9.11 MBA4)

This programme director explained how the process empowered support staff and strengthened her position vis-à-vis other academics who taught on the programme.

The fact that the government was asking us to be accountable was fantastic, it was a real wake up for the academics and the admin staff had a wonderful time talking about their difficulties and they loved it, because they said it openly with me sitting there. And I just thought ‘Well that’s great because they’re often in the firing line’. (...) They spoke about the difficulties they have with not having any kind of power and yet the students think they’re in between the students and the academics. The call to our academics is that there’s a constant need for looking at what we’re doing and asking ‘is what we’re doing the right thing?’ (...) So this is my position basically as someone who’s trying to manage a programme you know it’s difficult to get academics to support what you’re trying to do. (Appendix 9.11 MBA7)

Finally, in only a few cases, respondents believed that the process had encouraged improvement and reflection on practice. This academic from a programme that was not re-accredited made this admission.

I think to be honest, I thing there was one positive aspect. Just a reminder that we do templates, we set certain criteria and sometimes, year after year, I think it’s just a reminder that possibly we don’t reflect enough on the courses we teach. (Appendix 9.11 MBA 6)

One Head of School from an historically black institution expressed gratitude to the HEQC for its facilitative approach and its encouragement of improvement.

I think it’s a massive investment in getting the international best practice, in getting people trained and also in being able to enforce compliance with certain quality requirements. But more than that, it’s not punitive, you know. I think the message all along has been that ‘we want to inculcate a culture of self-evaluations and a culture of quality within the
institutions, so we will do the initial benchmarking, we will tell you where you are and then we will tell you what you need to do. (Appendix 9.11 MBA4)

The data gathered on the MBA review included many negative comments in which academics expressed their beliefs that the HEQC’s re-accreditation exercise was not effective. These data cluster into the following issues; the MBA review was viewed as unhelpful for improvement, it was viewed as being overly bureaucratic and it was viewed as politically or ideologically motivated and therefore as lacking credibility.

Regarding the first issue, when asked what he had learnt from the review, one academic responded

Nothing! In fact I would say rather than being constructive it was destructive. It’s actually done damage!

His colleague agreed and added

we didn’t get any useful feedback from the panel either. It was a pity because apart from the lady from the CHE I think everyone else certainly in terms of their CVs and all their experience were appropriate on the panel and could have given us useful feedback. Also there was no post visit review, from their side of from ours. (Appendix 9.11 MBA 6)

Some of the academics interviewed saw the re-accreditation exercise as a bureaucratic interference that undermined their autonomy and freedom. A Head of School expressed this concern

but there are certain concerns and maybe they’re more like perceptions. (...) You know there’s a feeling that now things are going to be very bureaucratic because you need to conform to certain minimum standards and to do that you have to do a lot of paper work. So now we’re going to be spending a lot more time on bureaucratic aspects that relate to quality when what we as academics would like to do is spend more time in the library to read and so on. That’s one perception. Then the second one is the standardization of knowledge, knowledge and programme delivery. You know academics feel that now everything is going to be standardized. (...) Are we accountable to the HEQC or accountable to students, the School or the institution itself? All this accountability can be a threat to academics’ freedom and autonomy. (Appendix 9.11 MBA 5)

Similarly another academic objected to the HEQC’s imposition of a standardized design for the MBA. This academic also viewed this as a threat to academic freedom.

I have a major problem with the idea of an external body that is, in my perception, largely driven by bureaucracy and having the power to decide what is or what is not a suitable programme. So if it was a case of ‘let us review the MBAs and either give them our stamp of approval or not’ so that they can advertise that they have been passed or not that would be one thing, but if it’s a case of them coming in and telling the University that their MBA programme doesn’t conform to what the bureaucrats think an MBA programme should look like, I think that challenges academic freedom, I think challenges innovation. They don’t necessarily know what’s best, so if it’s a case of enforcing a template and saying ‘this is what an MBA must look like’ then I think that there’s a problem. (Appendix 9.11 MBA 6)

This perception was shared by his colleague.
I am very worried about the rank interference with our programmes and programme content. And it’s just becoming more and more controlling. Kader Asmal lost the plot, lost the script. And I really believe it’s very serious, I mean everything from the ground to postgraduate is being interfered with, and it’s very worrying for anyone in education. I do believe that there’s just rank interference. (Appendix 9.11 MBA 6)

Below the academic quoted previously makes a plea for a facilitative, as opposed to a bureaucratic approach by the HEQC.

I would like to make a concluding comment. It would be that these bodies SAQA, the HEQC could be supporting bodies. They could say ‘you have an important job to do as the university’, ‘we are here to facilitate’, and ‘here to help people’. But we get the converse that they are here to police you, they are the enemy and if they catch you out they’re going to hit you with a big stick. And that is the dynamic that is evolving as opposed to what it should be. I think that really sums up for me exactly what it’s all about. (Appendix 9.11 MBA 6)

Several of the academics interviewed expressed distrust in the HEQC’s process, believing that their judgments would be politically motivated. Whether accurate or not, these perceptions undoubtedly militate against the results being taken seriously and leading to genuine efforts at improvement.

One quality assurance manager from a historically black institution suggested that the motivation behind the MBA review as to Department of Education’s desire to curb the proliferation of MBAs in the country.

So if you look at the entire MBA re-accreditation exercise and the rationale to have these exercises, some official of the DoE are taking the decisions without realizing that we’re doing this exercise for improvement and the improvement of the quality of education in higher education. That’s not even their criteria; they’ve got other criteria and other agendas. The HEQC’s doing this from a quality perspective, but not to improve quality not to improve what is happening in education. They’re doing the DoE’s dirty work for them, because the DoE thinks there are too many MBAs in the country. (Appendix 9.11 MBA 4)

A similar sentiment was expressed by a Head of School whose programme was not accredited.

I thought that the CHE was ideologically skewed and they weren’t clever enough to hide it, or maybe they deliberately exposed it I’m not quite sure. Either way they didn’t do it very cleverly. And so that’s the other concern - is that this process is driven by ideology and I made it clear to everyone and if you had seen what has taken place in the last week or two you would have seen that the process was horribly hamstrung ideologically. (Appendix 9.11 MBA 2.1)

In a second interview conducted after the release of the results the same Head of School reinforced his opinion that the exercise was politically motivated.

I attended several HEQC meetings before the re-accreditation process and we all had the impression that there was already a pre-agenda to the exercise. For example last March (an HEQC official) almost threatened us, saying ‘some of you are not going to survive this process’. I questioned him then on how he could make such statements and then claim that it was an independent process. So there was definitely a pre-agenda, perhaps even a witch-hunt planned. Some believe that (…) the HEQC or DoE were determined to close us down anyway. They feel it’s been a political triumph for those in power. (Appendix 9.11 MBA 2.2)
A programme director expressed her concern that the Department of Education’s merger process was interfering with the fairness of the HEQC’s processes.

My major fear as a result of the visit is that the pending merger may cloud their decision. The merger came up often in the questions - they were concerned about our different models and different MBAs with the same names in an institution about to be merged. We said this would be sorted out via an internal process. They seemed to have a re-structuring motive - they were talking as though they had a brief from the DoE to rationalize our programmes. This shouldn’t be the HEQC’s brief - they should rather be measuring our quality against set standards and criteria. (Appendix 9.11 MBA 1.2)

On learning that her programme was not re-accredited, the same interviewee reinforced her position.

Many feel that the whole HEQC process has been politically loaded and that the result was politically determined. Fortunately most are part-time so there won’t be any job losses in the immediate future, but they will lose income. The judgment has inevitably escalated the internal politics relating to the merger. (...) In the short-term we will have to live with the political fall-out of this judgment which we don’t feel has been a fair one. (Appendix 9.11 MBA 1.3)

The perception that the process and findings were neither fair not helpful seemed to be shared by those whose programmes were not re-accredited. For example a Head of School made the following comments.

It was a sloppy and amateurish report. (...) The feedback was also cursory, it doesn’t help use to know where we went wrong. (...) So I can’t say that I felt the process was fair. It was alienating and baffling, but then this could be seen as sour grapes. (Appendix 9.11 MBA 2.2)

However, in a telephonic conversation with the same interviewee soon after the MBA re-accreditation results had been released, he acknowledged the ‘HEQC’s clout’ and admitted that their report in the media had done huge damage to his school and institution’s reputations. He described how students had been phoning in querying the validity of their degrees and wanting their money back. He was concerned that it would take years to recover and undo the damage. (Personal communication, 26/05/2004).

This description of stakeholder opinion on the MBA review concludes with a remark by an MBA programme director that serves to put the HEQC’s review in a wider perspective and locates it as only one factor in a ‘market-driven’ assessment of MBA programmes.

I think my other piece of advice to the HEQC is that they need to lighten up on their attitude towards business education and try to understand it in its context and on its terms. You know they’re very resistant to hearing that MBAs are different and Business Schools are different. (And in a way I agree with them that we can play the differences to the point where you can’t apply any uniform standards, and I don’t agree with that). But I think one of the things that the HEQC really needs to get to grips with is that there is a market and that the market has power and they cannot legislate the market away. The market will judge - and their accreditation will become only one factor in that market. It will be an important one, especially at the bottom end, because it will be their only accreditation. At the top end it’s not so important - if you’ve got EQUIS or AMBA accreditation to have the HEQC accreditation is just a legal requirement. So then it’s about your standing in the
market. And I think they need to just accept that and accept it graciously and live in the global world of business education. (Appendix 9.11 MBA 8)

This position is supported by a recent and stronger critique of the HEQC’s MBA reviews. Blackmur (2005) critiques the HEQC’s accreditation instrument for being ‘conceptually and structurally flawed’ and for imposing a single model of the MBA across the country. He criticizes the HEQC for not taking market opinion surveys into account (Blackmur, 2005), noting a disjuncture between the HEQC’s judgments and those of graduates and employers. He suggests that the HEQC criteria were far too prescriptive, particularly in their expectation that ‘South African’ MBAs were to be offered that took into account the government’s ‘development agenda’ and a highly prescriptive notion of the meaning of research. He concludes his assessment with this scathing comment.

Stakeholders in South African MBA programmes will be seriously misled if they rely on the result of the CHE MBA review to make MBA programme choices, to reach recruitment, remuneration and promotion decisions or to formulate public policy. (2005: 100).

This recently published critique of the HEQC’s MBA review appears to support many of the criticisms raised by stakeholders at the time of the site-visits.

**Analysis of Stakeholder Comment on the Re-accreditation of MBAs**

In this section a summary of stakeholder comments on the HEQC’s MBA re-accreditation is provided. However, it must be borne in mind that because of the very small number of interviewees and institutions covered any conclusions trends identified are very tentative and not necessarily generalizable.

Firstly, the need for a review and the re-accreditation of MBAs was supported by most interviewees and most strongly by those from institutions that were eventually accredited or conditionally accredited. In response to questions about the overall effectiveness of the review policy, many interviewees were positive about its ability to protect students from weak provision, to maintain standards and some thought it would enhance the status of those who succeeded in gaining accreditation status. It was notable that in the historically black university, where resources may have been scarce in the past, the Head of School had been able to use the review to argue his case for better resourcing and support from senior management. However all interviewees were tentative and uncertain about the extent to which the review would lead to improvements in teaching practice.

There was widespread negative comment on the instrument itself as being overly prescriptive and therefore requiring a preparation process that was demanding and onerous. This opinion was most strongly expressed by academics from those programmes that were not accredited.
With regard to the site-visits, the HEQC was commended on its thoroughness and professionalism by those on programmes that were accredited or conditionally accredited. In stark contrast, those who were not accredited found the attitude of the HEQC to be disrespectful and even threatening. All interviewees except those from the historically black university expressed the opinion that the some of the HEQC’s panelists lacked credibility. For some of those who were not accredited the whole exercise lacked credibility because it was perceived to be politically or ideologically motivated.

This summary suggests that opinion on the HEQC and its policies is diverse and divided in the academic community. Factors that appear to have influenced people’s responses to the HEQC’s MBA review include the extent of their own preparedness for an external quality assurance intervention and their preferred model or approach to quality assurance. For example, it is clear that those adopting a managerial approach to quality assurance did not experience the clash of values and world views that was evident in the data from those who adopted a more traditional, collegial approach. These two factors may have influenced the final outcome of the review; that is, it appears that those who were well prepared and who approached the exercise from a managerial rationality gained full or conditional accreditation; whilst those who adopted a collegial approach to quality assurance seemed ill-prepared and ill-equipped and failed to gain accreditation. This suggests that regarding attitudes to policy adoption, the evaluatees’ approach to quality assurance and relatedly their degree of preparedness may have greater explanatory power than other variables such as race classification and institutional type, history and culture. For example, the opinions of academics from historically English-speaking universities were divided, with those who did gain accreditation expressing general support for the HEQC’s policy and process before the results were out (with the exception of the lack of credibility of its panelists). Whereas academics from the same institutional type and racial and cultural background, whose programme did not gain accreditation, expressed strong resistance to and criticism of the HEQC, before the results were known. It could be argued that further support for this explanation is provided by the fact that, despite its historical disadvantage, the programme in the historically black university earned conditional accreditation. This could be due to the fact that the Head of School adopted a managerial approach to quality assurance and took the re-accreditation process very seriously.

However, there is some indication that historical and cultural factors may still have explanatory power. Some interviewees, who were strongly disaffected by the HEQC’s review and its results, went so far as to suggest that the HEQC’s findings were not credible because they were politically or ideologically motivated. The data also suggest that those from the
historically black university were most supportive of the HEQC’s ideological positioning. This may explain why they did not question the credibility of the HEQC’s panelists (whose selection was apparently based on representation as well as expertise criteria).

8.1.4 Summary of Stakeholder Opinion on Policy Instruments

This section summarizes the findings of stakeholder opinion on the three HEQC policy instruments for institutional audit, programme accreditation and for the re-accreditation of MBA programmes. There was widespread agreement amongst stakeholders on the need for some form of quality assurance in South African public higher education. Historically black institutions in particular supported the idea that students need protection from weak provision and that quality assurance by the HEQC would be a means of achieving this. Institutions that are reputed to be ‘weak’ tended to support intervention by an external quality assurance agency as a means of ‘catching out’ those who perform badly and of enhancing the status of those institutions that gained accreditation. There is also evidence that some stakeholders had used or intended to use the HEQC’s intervention as a means of promoting their own interests in their institutional contexts.

Generally, there was widespread support for the HEQC’s phased-in approach to implementation. Stakeholders were appreciative of the HEQC’s acknowledgement of the lack of preparedness of institutions and also of the stress placed on many by the mergers. The data suggest that, where institutions were well-prepared, the HEQC’s intervention could be used to encourage reflection and improve practice. With regard to implementation of the MBA review, some respondents complimented the HEQC on its thoroughness, professionalism and fairness. Respondents also appreciated the HEQC’s efforts to consult the academic community. Although there was some concern that the process was too rushed and not entirely transparent.

However, stakeholder opinion was divided on several crucial issues, for example on whether the HEQC should take an improvement or accountability-driven approach to quality assurance. Widespread concern was expressed, especially by those from historically English-medium and to a lesser extent from Afrikaans-medium institutions that the HEQC’s draft policy instruments were more accountability-driven than improvement-orientated and motivated by strategic rather than by communicative intent. This was linked to perceptions that the HEQC’s draft instruments were too demanding, comprehensive and prescriptive. As a result, some quality assurance managers warned that academics may resist the HEQC’s interventions. For its part, the HEQC justified its position as a deliberate shift in approach in order to first set a base-line of quality provision, prior to granting self-accreditation status to
qualifying institutions. It promised that once this was achieved it would be in a position to adopt a ‘lighter touch’.

Stakeholder opinion was also divided on whether the HEQC should use quality assurance to promote the Department of Education’s ‘transformation agenda’. The HEQC’s tendency to view the idea of transformation as part of the idea of quality in higher education appears to be most strongly supported by those from historically black institutions, whilst those from historically Afrikaans-medium institutions and technikons seemed to be content to comply. It was particularly those from historically English-medium universities who perceived the HEQC’s interventions to be potentially threatening to institutional autonomy and academic freedom. This perception was most strongly expressed by academics from historically English-medium universities that did not gain MBA re-accreditation status. This example highlights the danger that the HEQC’s strong identification with the state’s transformation agenda may mean that its policies and activities are perceived to be ideologically and politically motivated by some groupings in the academic community. This in turn could mean that the HEQC’s judgments are rejected as unfair and as lacking in credibility, ruling out the possibility that the HEQC’s interventions lead to genuine efforts at improvement.

Whether they accepted the HEQC’s position or not, with one exception, all quality assurance managers from black and historically English-medium institutions indicated that institutional quality management systems were not yet ready to meet the HEQC’s requirements. Generally historically Afrikaans-medium institutions indicated a greater readiness for implementation that other institutional types.

In sum, support for the HEQC was most evident from two different groupings. Firstly the HEQC was supported by those who generally share its world-view and political position. Secondly, it was supported by those who consider their institutions to be well-managed and who therefore felt prepared for audit or accreditation and perhaps viewed this as an opportunity to prove their strengths. Furthermore it appears that those who adopted a managerial approach to quality assurance found the HEQC’s approach more acceptable than those who adopted a traditional, collegial approach. The latter expressed disappointment that the HEQC had not adopted a more facilitative ‘hands off’ approach, in keeping with academic culture and values. Those adopting a collegial approach to quality assurance tended to view the HEQC’s policies as overly bureaucratic and prescriptive. The latter tentative conclusion is investigated more thoroughly in Chapter 8.3 below.

The findings point to the great ‘diversity’ and disparities between institutions in the South African higher education system in terms of both the quality of provision and capacity to establish quality management systems. The findings also highlight the politically charged
context in which the practice of quality assurance operates in South Africa. They illustrate how quality assurance gets entangled in larger power plays, in this case the dramatic power shifts currently occurring in South African society.

Finally, these observations raise some questions about Ulrich’s critical systems heuristics method. In critical systems heuristics, the four social roles are defined in a one-dimensional manner that assumes homogeneity within a social role. This assumption is not borne out by the data which suggest that the historical fractures in South African society may work within and across the social roles. For example, with regard to the expert role as enacted by quality assurance managers, the data suggest that there are degrees of expertise within this role and that this enables some experts to speak with more authority and more critically than others. In South Africa, where high levels of expertise tend to correlate with historical privilege, race and class, one cannot work with a pure and uncontested notion of ‘expertise’ and the data showed how tensions can develop within expert groups. Furthermore, the analysis suggests that those in expert roles who lack expertise may attempt to hide this behind ‘political correctness’, thus undermining the conditions for ‘deliberative democracy’, weakening civil society and ceding unwarranted power to a strong centralizing state. However, in keeping with a critical approach to policy analysis, the research undertaken for this study also suggests that expertise does not necessarily translate into power and that the opinions of experts are not necessarily ‘heard’ or given their due weight in a policy development process.

### 8.2 Stakeholder Opinion on ‘Principle Concerns’ and ‘Key Problems’

The presentation of data in Chapter 8.2 is organised according to the four social roles identified by Ulrich (1994, 1996) for his ‘critical systems heuristics’ method; that is, data gathered on the principle concerns and key problems for experts, decision-makers, clients and the affected. For each category of issues opinions were gathered predominantly from those in the social role concerned. For example, on the issue of policy expertise (‘Does the policy rely on adequate expertise?’ and ‘What is the guarantee that the policy will work?’), it is the opinions of Quality Assurance Managers that dominates. However, for each category of issues, actors from other social roles also expressed their opinions. Where these additional opinions are different or add value to the analysis, they are also included. Note that due to the inaccessibility of student opinion, the data collection and analysis for the client role depends on the opinions of those from other social roles.
8.2.1 The Expert Role: Opinion of the adequacy of policy expertise

In the critical systems heuristics method, the questions to be asked of experts in a policymaking process are ‘Does the policy rely on adequate expertise?’ and ‘What is the guarantee that the policy will be implemented and will work?’ In response to the first question, most Quality Assurance Managers indicated satisfaction; many acknowledged that the HEQC had consulted widely both locally and internationally in its policy development process. However, some reservations were expressed. For example, this Quality Assurance Manager qualified his support for the policies by questioning whether they had been sufficiently contextualized to suit South African conditions.

I think the HEQC has consulted widely in terms of other QA systems, for example for audit we looked at the UK, Australian and New Zealand systems, plus others. So for both audit and accreditation the HEQC has looked carefully at lessons learnt from elsewhere, so I think the documents are based on adequate expertise. But I’m not sure that the HEQC has given enough thought to the problem of contextualization and how to adapt international frameworks to South African conditions, to our specific circumstances and context. I think that the HEQC may be taking established good practice from elsewhere and being too ambitious in thinking that our HE sector is sufficiently sophisticated and has sufficient expertise to handle this at this stage of its development. My second concern is that there are very few in South Africa who have adequate expertise in how to design and implement a national QA system. In a sense this is inevitable, so we have to accept that we are all on a steep learning curve. (…) This is evident in the rather messy way the documents have been developed. (Appendix 9.9 QAM 2)

However, another Quality Assurance Manager did question the adequacy of expertise on which the HEQC’s policy instrument were based. She also expressed unhappiness at the way in which local expertise was used by the HEQC.

It (the policy) seems to be so derivative of other countries’ bad examples, the HEQC documents are far from the realities of institutional life. Therefore I would question their expertise. They did consult and they have gone through formal processes so I can’t fault them on that, but they didn’t listen to us. For example I was on the audit team, we were a team from ten universities, technikons and privates and we were all of a mind about how audit should be done. But it came out completely different, as an accountability framework which is not what we wanted. It got edited badly and now has got so mixed up with the Accreditation Group that we wouldn’t put our names to it, it just wasn’t recognizable. We didn’t want criteria at all. So one must ask to what extent we’ve actually been listened to? (Appendix 9.9 QAM 1)

Several Academic Managers with expertise in quality assurance also commented on the policy development process and the adequacy of the expertise on which the policies were based. This Academic Manager from a historically black technikon expressed his satisfaction that the HEQC had adequately taken academic culture and concerns into account.

I think the policy instruments of the HEQC are based on reasonably adequate expertise. If one looks at the capacity within the HEQC there is no way in which they can do it all by themselves. They will have to rely on their peers in the higher education sector. And I
think that the policy documents that have been developed and that will be developed in future should give the practitioners in education a fair idea of what is required. And I think so far so good. (…) I think the HEQC has a fair understanding of what quality is in an academic sense. I’m not always happy with our own quality process because I think there’s a strong industrial link, they use ISO 9000 and those kinds of things, which I’m not fully familiar with. But I think as far as teaching and learning and research are concerned you need a special touch and a special feeling for you to be able to assess the real quality of these practices. And I think the best people to assess the quality of academic work are academics themselves and people who have gone through the mill. So what I’m saying is that I think the HEQC is fairly on the ball as far as that is concerned. And the simple reason is because they have used academics to develop of their documents. Quality managers sometimes come from a different angle and they don’t always seem to bring the two together. (Appendix 9.9 AM 8)

What is significant is the extent to which stakeholders’ opinions are dependent on their previous experiences and expectations of quality assurance. In the case of this stakeholder, in comparison to the industrial models he had already been exposed to, the HEQC’s policies were surprisingly in keeping with academic norms.

By way of contrast, this Academic Manager from a historically English-medium university expressed concern that the policies were too prescriptive.

Generally I think that I found the documents quite reasonably well thought out. (…) But I must say so far I’ve been impressed with their willingness to consult and generally their stuff has been well produced. (…) I wonder if there’s a tendency to be over prescriptive, which comes from, I suspect the lack of experience of the people who are involved. They seem unable to leave things open and I think that is a difficulty, it shows an insecurity on the part of well, the likes of all of us, really. And I do think that is a little bit troubling and we see it in reflected in many of the documents. So perhaps an over rigidity which comes from a system that isn’t mature. It hasn’t had the knocks yet. So I’m concerned about that. (Appendix 9.8 AM 1)

A Vice-Chancellor also from a historically English-medium university was even more critical.

The HEQC has drawn widely on international expertise and consultants. They have accessed the best local knowledge and consulted widely with HEIs and QA Managers. But my worry is that they have not always taken the good advice that they have been given. Sometimes, in my experience, they have been given good advice, but haven’t taken it. (Appendix 9.8 AM 3)

This and the comment by the second Quality Assurance Manager quoted above suggest that the HEQC may not have taken the advice given to it by experts from historically English-medium universities.

Only one academic expressed an opinion on the expertise and sources of knowledge on which the HEQC’s policies were based. Typically he approached the matter as a researcher.

The HEQC should lead from research-based expertise. This will help to ensure that we don’t repeat international mistakes. The HEQC should be reflective on what has gone wrong elsewhere. To show that their proposals have scientific rigour will help to bolster their legitimacy. (Appendix 9.10 A 1)
Following the ‘critical systems heuristics method’, the key problem with which experts in a policymaking process should engage is ‘what is the guarantee that the policy will be implemented and will work?’ This is understood to refer to the theoretical and the practical adequacy of the policy. The data suggests that many Quality Assurance Managers and several Academic Managers were concerned that the HEQC’s policies would not work. Most criticisms were related to the fact that the HEQC’s pragmatic methods of evaluation would be dependent upon the academic community for implementation—both for internal self-evaluation and the subsequent external peer review. Due to their comprehensiveness and strong accountability thrust, many experts were concerned that the policy instruments would not be acceptable to the academics who must implement them. Many experts highlighted the need for the HEQC to work within academic culture norms and culture and to develop credibility within the academic community. Experts were concerned that the HEQC had not paid sufficient attention to this matter. A Quality Assurance Manager from a university with a strong research tradition expressed his concerns about the HEQC’s limited credibility.

The HEQC are only going to have limited credibility at the most senior levels of the institutions. I think the rest of the institution barely knows who they are and is either disinterested or hostile. I don’t think there are going to be any academics on the ground who will be seeing the HEQC as a necessary instrument, certainly not in an institution like this one, a kind of institution that is reasonably well managed. What academics want is to be left alone to carry on doing their work. But I do think at the most senior levels at our institution the HEQC is increasingly being taken seriously. And I think strategies like bringing in key institutional figures to be part of the auditor training helps enormously in helping to build that credibility and helping people understand that the HEQC is serious about what they’re doing. It’s absolutely crucial that what the HEQC does and how it actually does it wins credibility. For example, if the audit exercises are screwed up and if the HEQC comes in with unwarranted attacks on reasonably high status institutions they will undermine their credibility. (Appendix 9.9 3)

An Academic Manager from the same institution expressed concern that Deans and Heads of Departments had not adequately engaged in the HEQC’s consultation process.

I think that a layer of people that have not been dealt with is the Deans … and to some extent the HOD level. These are absolutely critical levels for implementing policy, for understanding it, for getting on board and I think that by in large we’ve seen people at the DVC sort of level, we’ve found a lot of those involved and then you know people who are interested in the process lower down like QA and AD type people or other professionals. By in large we haven’t seen large numbers of Deans or HOD’s consulted and I think they are still very much out of the loop. They play a crucial role at institutions like this and that I think is one of the big issues that we will have to deal with. (Appendix 9.8 1)

The same person also expressed concern over the possibility that the audits would lack credibility due to the limitations of the peer auditors themselves.167

167 This concern did in fact materialize in case of some of the MBA re-accreditation site visits (see Chapter 8.1.3.)
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The second issue relating to credibility is the audit process itself. So it is the nature of the audit process and the capacity of the auditors themselves (and you’ll see I’m strongly influenced by my experience in the auditor training workshops that we had). We have got to get that right! I think it’s probably not overstressing things to say that the way things work out is going to depend very largely on the quality of the auditors and their preparation, i.e. the way they use the criteria, for example. (…) I think my experience of the auditor preparation workshops was that we have a long way to go in preparing people. There’s just no maturity, there’s no depth, or very little depth that is available to us at this point.

He went on to make an important point about the importance of having confidence that the HEQC and its panelists, suggesting that it is the perceived as much as the actual credibility of expertise that matters.

In this country you’ve got a supporting metaphor, one that often sits in my mind here when I think about in my own work really too, when you’ve got a team game which is really what we’re all about - there are certain roles and positions that are not in the public eye very much, you don’t see the function of a particular kind of player I’m thinking of rugby now a prop forward or something...their role is not obvious except to the people who really know the game. And if you are a player and you do not have confidence in your selectors who, then you are not going to play your proper role as a prop forward you won’t be content with it, you’ll try to play to the gallery etcetera to get noticed. Whereas in fact, if you have confidence in your selectors you will be free to fulfill your own role in it’s most intrinsically correct valuable way. (…) You’ve got to have confidence in the system. And I think that for me, that is strongly the case with our audit teams and the whole audit process. We have got to rapidly develop a situation that we can have confidence in, where institutions will be able to trust that genuinely good work is genuinely understood. But often it’s nuanced it takes time, we’re not looking for quick-fix solutions or papering over cracks and so on. That is going to be the biggest job. (Appendix 9.8.1)

Another Academic Manager, also from a historically English-medium institution was adamant that academics would not ‘buy-in’ to the HEQC’s proposals for accreditation, thereby forcing a compliance approach.

In terms of the HEQC’s policies, if the audit is designed to dependent largely on QA Managers, which it seems to be, then I’m reasonably happy with it. However, programme accreditation is dependent on academics, they have to do the job. If programme accreditation is going to work, then academics will have to buy-in to it. If I ask myself what is the level of academic buy-in, I would say it’s very low. Most academics would reject the current accreditation proposals. From those I’ve spoken to I would say that if they water the proposals down to about 25% of the current volume, then about 20% of academics might support them. So it’s going to have to become a compliance process which is what we had all hoped to avoid. (Appendix 9.8 AM 3)

However, this Quality Assurance Manager from a historically-Afrikaans medium university suggested that universities are inherently conservative and secondly that academics’ experiences of and responses to quality assurance would not be homogeneous. He expressed cautious optimism that the HEQC’s policies would eventually succeed through reluctant compliance on the part of academics.

I’m not sure that we’re at a point of explicit clashes due to the fact that we’re at the beginning of the stage and many academics are only now beginning to think about it and
confronted with it. So the views that they have on much of this stuff is still unreflective and ignorant. Ja. It’s ignorance and they haven’t thought about it. They like the old traditions and the old ways of doing things and ask ‘what is this new thing?’ The idea of the HEQC that institutions and academics themselves should take the primary responsibility for this is good. The idea that there should be system of checking, checking, checking that’s a bit foreign in some disciplines but again there they differ. The medics, the professionals, the engineers they’re used to that. The formative fields hate it and they’ve never been involved in that. This is where there will be a culture clash. I think deeper down academics, in general, are not necessarily convinced of the critique of higher education being too ivory tower and not producing the human resources that we need… If you talk to academics they think ‘We’re OK, we produce the stuff’. But there is a gap. If you talk to employers, you hear a different voice, many employers say ‘No, there must be a closer link to what we need.’ Again it differs from discipline to discipline. There are those who are well-informed but not all of them. What academics, like most professional people, want is to be left alone as far as possible. So the idea of somebody checking under your fingernails everyday, everyone hates it. I think the best way to summarize it is what I heard from a colleague recently, he said ‘I know we have to do this, I know it’s extremely important, we will indeed do it, but let me tell you up front that I’m not looking forward to it. In fact when I think about it it’s like a farmer on a farm staring out over the drought, the dry fields saying ‘How will I ever get through this drought?’ but he knows he must.’ (Appendix 9.9 QAM 5)

The concern that the HEQC policy proposals would work only through forcing compliance was repeated by many experts from across the spectrum of institutions as evidenced by the following quotations, one by a Deputy Vice-Chancellor of a historically Afrikaans medium university and a second by a Quality Assurance Manager from a technikon.

Academics will respond by doing what we ask and what we say the HEQC requires. They see the HEQC as a stick. But this is not what we want. The QA regime is not properly understood by academics. (Appendix 9.8 AM 2)

The policy instruments are implementable, i.e. they are sufficiently developed to allow for implementation. But therein lies for me the problem and perhaps I might comment on it. I think because the policy instruments are so detailed they will tend to become templates. And because they’re templates I think people will respond to them as templates. So they will try and address the template rather than reflect on practice. In that sense I don’t think the implementation will be successful. I think again, at least in technikons, it goes straight down the old compliance way that we already are familiar with. (Appendix 9.9 QAM 7)

Some experts suggested that the concerns and negativity of their colleagues around the expected resistance by academics might be misplaced, particularly in those institutions where quality assurance was already institutionalized. For example the same Quality Assurance Manager from a technikon suggested

(there will be) horror and complaints at first at what seems like a thick volume of new stuff, but I think in the end common sense will prevail and people will feel that there are things that are just absolutely necessary. Already I can hear people talking ‘Ja it’s a good thing’. ‘It’s about time someone’s pulling these things up by their socks’. So ja I think there are many academics that are welcoming the criteria and standards even if I think in the long term it’s not a good idea. (Appendix 9.9 QAM 7)
This opinion seems to have been confirmed by the pragmatic response of one Head of School involved in the MBA Re-accreditation exercise.

I think in terms of a general response my approach would be: I’m very happy to take the best out of this and use it to improve the management capacity and the competence of the School. I think some of it is a bit silly, I think some of it is a little misdirected, but I think there are some things in it that are worth asking, ‘How good is your programme?’ ‘Does it make sense?’ ‘Does it have policies that support it?’ ‘Does it have the support of the institution?’ I mean these are valid questions. So my approach is a pragmatic one, ‘I’ve got to take the best out of it’. I think any other approach is going to invite the authorities to do things that we might not want them to do. (Appendix 9.11 MBA 2.1)

A second opinion of an academic on the issue of academic ‘buy-in’ is included because he makes the important point that one should expect a negative reaction from academics to quality assurance. He also went on to propose a model of quality assurance based on ‘critical self-evaluation’, in keeping with academic culture.

The ground for growing QA will always be difficult. Some academics say ‘I do my work well, so I’m not changing’. Others will wind on principle. So it’s difficult to know where the complaints are coming from and how seriously to weight them. We should expect a negative reaction, no one likes to be evaluated and external evaluation is always threatening. (…) They should focus on QA through critical self-evaluation. This model is closest to what good academics know and focus on this would help address the perception of over-load. The HEQC should show academics that they are already doing a lot of good things and that good academics already use the self-evaluation cycle. We should focus on self-improvement -- this would be the best way to do QA.

This view supports the concerns expressed by the experts in the data that the HEQC’s policies are likely to result in some resistance. However, it also points to a more serious matter; namely that the model of evaluation proposed by the HEQC is not in keeping with collegial rationality. There was general agreement across stakeholder groups that an approach based on expert peer review, communicative action and a facilitative rationality would be more acceptable to academics and therefore a better guarantee that the policies would work. However, these perceptions by quality assurance experts and academics were clearly not shared by some HEQC officials.

The strength of the HEQC has been that we have been careful to do two things. One is to consult widely with the sectors, to engage people and to engage the different stakeholders of the sector. Secondly the HEQC has attempted to have a sufficiently intelligent philosophical and epistemological basis on which to found its quality assurance system. One that avoids being too technicist or too mechanical or too bureaucratic and with a deep appreciation for the complexities and challenges faced by higher education institutions. At the same time we’re trying to raise the bar generally with regard to quality assurance. (Appendix 9.7 HEQC 5)

This comment suggests that this HEQC official was sufficiently satisfied with the policy proposals to close down debate. The gap in perceptions between different stakeholders does not bode well for successful implementation of the policies. In fact, one Academic Manager made precisely the opposite point, expressing concern that the HEQC’s instruments were based on a pragmatic evaluation methodology that lacked rigour.
Because they are trying to do too much - trying to deal with thirty-five criteria is completely impossible - you’ll end up with a ridiculously superficial approach. And all along this has struck me this is so much like assessment, good assessment theory applies here. Somebody said once the problem with quality stuff is that it sometimes looks horribly like a research project with a very poor methodology. Superficial and simply an inappropriate methodology that is designed to get superficial poor findings out of it. And we’ve got to be very, very careful, it is research, it’s about assessing, and we need to avoid all the assessment traps of just assessing the superficial, assessing the accessible the readily assessable. We have to avoid all those assessment traps.

In summarizing this section on expert opinion on the theoretical adequacy of the HEQC’s policies and the guarantee that they will work, one can conclude that the data suggests a mixed response to the former question with most quality assurance experts prepared to accept the expertise on which the HEQC’s policies were based, with some qualifications. These included questioning whether the model for institutional audit should have common specified criteria at all, whether the proposals included adequately rigorous methods of evaluation and the suggestion from an academic that an evaluation method of critical self-evaluation based on peer review would work best. The lack of serious theoretical and methodological debate around the HEQC’s proposals suggests widespread acceptance of the pragmatic model even amongst those considered to be quality assurance experts in South Africa.

Regarding the guarantee that the proposals would work, experts were less optimistic and supportive. Many expressed concern that a lack of acceptance by academics and a lack of credibility of the HEQC in the academic community would hinder effective implementation. The most common reason given for this lack of academic acceptance was the HEQC’s accountability-driven approach which was considered to be out of keeping with academic culture and norms, particularly in the case of universities and especially in the research-led and historically English-medium universities. However, others suggested that, although unlikely to achieve self-improvement, the HEQC’s policies would eventually be accepted and implemented by academics, but in compliance mode.

It is suggested that stronger resistance and opposition to the HEQC’s policies came from those Quality Assurance Managers who adopted a facilitative approach (or supported a collegial approach) to quality assurance. People adopting this position tend to be found in the research-led and/or historically English-medium universities. Conversely strongest support for the HEQC came from those adopting a managerial approach. People adopting this position tended to come from technikons and historically Afrikaans-medium institutions. There is a paucity of data on experts from the historically black institutions. In several cases, those approached said they were not qualified to be interviewed and had not yet studied the documents adequately.
8.2.2 The Decision-maker Role: Opinion on control over resources and conditions of success

In the critical systems heuristics method, the questions to be asked of decision-makers in a policymaking process are ‘what resources and other conditions of success are controlled by the decision-makers and what are not?’ This section reports on decision-makers’ opinions on the resources and conditions necessary for successful implementation, with a particular focus on those resources and conditions which are beyond their control. Opinion was gathered from two sets of decision-makers, HEQC officials and Academic Managers. Where relevant, the opinions of Quality Assurance Managers have also been included.

HEQC officials mentioned the following issues beyond their control as potential obstacles to the successful implantation of their policies. Firstly, internal to the HEQC as an organization they mentioned their own lack of control over the budget, staffing, staff capacity and the need for a high quality management information system. For example, one official noted

> for the HEQC internally clearly it’s making sure we have a budget that will enable us to implement the system but also you know the staff capacity development issues have to be taken on board as well. We must have the staff and staff capacity to do this. (…) Also the development of reliable management information systems because we are not going to get very far both internally and externally unless we have this capacity. We won’t be able to judge improvement and progress without reliable information. And we all know it’s not just about the gathering of data it’s about the sensible gathering of data and the sensible use of data. How to use the things that you gather and not just accumulate a lot of data. Because we won’t be able to make judgments and we won’t be able to judge improvement unless we have reliable information…So I think that’s going to be very critical. (Appendix 9.7 HEQC 2)

Some HEQC officials acknowledged that other powerful policy actors and their lack of control over their actions complicated the HEQC’s implementation task.

> And then I think just ensuring that all the complications around the mergers and the restructuring don’t delay the QA process. And also that they are also separated as issues that come from the DoE and not from the HEQC and the CHE. You know we sometimes get caught up in some of the complications around other national agencies and other national actors. And I’m not sure that we can completely avoid this - it’s simply that we need to be very visible as the HEQC, we need to be very clear about what our objectives are and how they link to the objectives of other players but how they are also sometimes separate and distinct. So you know it’s these kinds of things which I think are going to be quite difficult. (Appendix 9.7 HEQC 2)

I don’t think the HEQC has control over everything. I mean, between HEQC and SAQA and the DoE it’s clear that there are some conflicting things. I think that this shows that it hasn’t got the final control. And I don’t think the Department would ever give the HEQC control because it’s their responsibility. But I think the HEQC has some control over its specific area - it should have that and it should exercise that in a wise way. (Appendix 9.7 HEQC 6)
Understandably, HEQC officials did not reveal much on internal difficulties (if there are any). The most transparent account of a possible lack of capacity on the part of the HEQC was given by a Quality Assurance Manager who had worked for the HEQC as a consultant.

I’m concerned about the HEQC’s capacity to pull it off. I won’t be surprised if some of the wheels fall off when the audit system starts. The HEQC has very few officials who can really do the job, they will find it difficult to implement their own system, and will probably have to use consultants. The lack of expertise and capacity in the HEQC may lead to a credibility crisis in the development of a national QA system. (Appendix 9.9 QAM 20)

With regard to resources and conditions for the success of the policies beyond their control, HEQC officials appeared more concerned about system-wide issues within institutions. For example, they mentioned the need for better leadership of the management of quality assurance, the need for quality assurance expertise amongst middle management in particular, the need for student empowerment on quality assurance matters and the need to win over academics.

With respect to capacity, our problem is not intellectual capacity, it is middle management for QA, we have no Masters programmes on QA, we have had to build the system and grow the people. We recognize that this middle management level is the engine room -- these are the people who will make the system happen. These capacities are lacking across our society. (Appendix 9.7 HEQC 1)

Another HEQC official noted

one condition is that we win over the academics and the institutions so that they see the value of doing QA and they understand the value of consciously planning for quality improvement. (Appendix 9.7 HEQC 4)

This official continued, showing a good understanding of the conditions necessary for the success of the policies-despite his conflation of transformation and quality. However, exactly how the HEQC will create this environment remains unclear.

(Leadership and building the capacity of leaders is very important. We need to provide the environment, conditions and resources for them to take transformation forward. We must create an environment in which they can institutionalize good teaching and learning practice. We are also going to start a student literacy project on quality. We want to empower students to understand what they can expect from their institutions in terms of quality. We also want to engage practitioners. So both top-down and bottom-up strategies are required. (Appendix 9.7 HEQC 4)

These comments from a senior HEQC official hint at the difficulties of the HEQC’s task and the complexity of the environment in which it has to operate. This includes an ambitious agenda handed down from the Department of Education, other policy actors over whom they have little or no control and a dependency for implementation on actors within institutions over whom they can wield only the powers of persuasion and, as a last resort, bureaucratic power.
The second group of decision-makers, senior academic managers, mentioned the following resources and conditions as requirements for the successful implementation of the HEQC’s policies-human and financial resources, time, human commitment and energy, internal quality assurance expertise and capacity and the need to overcome academics’ resistance to quality assurance and the professionalization of teaching and learning. Data are selected in order to indicate where managers expressed anxiety over their lack of control over these matters.

One Deputy Vice-Chancellor noted the resource implications of the HEQC’s policies and the fact that she needed to balance these with the demands of other ‘policy imperatives’.

The resource implications are huge, we need a phased in approach. (...) We are still understanding the implications of the HEQC’s requirements. The Faculties feel that resources, human resources and capacity are all limitations. We have big human resource constraints at the centre. We don’t have enough support for people at faculty and department levels. The other policy imperatives are putting huge pressure on the system, for example we are now a parallel medium institution, we have to increase our research output, we have a great diversity of students now and we have doubled student numbers in 3 years! So how will we overcome all this? I’m trying to make the things already in place useful and I’m also having to prioritize what we can do. (Appendix 9.8 AM 2)

This Quality Assurance Manager expressed concern over about the time needed for implementation, a concern echoed by several academic managers as well.

They (the HEQC’s policies) are largely implementable and contain what needs to be in place eventually. But the HEQC must understand that this is a process and it will take time to get these things in place. Setting up a QMS is a long-term project, every year we put a new aspect in place, for example we now have a postgraduate policy and an electronic student feedback system but these take time, hard work and money. The trick is how you sell implementation in your institution. I don’t use the big HEQC stick approach but rather ask how can we be an internationally respectable institution that can fulfill its legitimate place? (...) So overall I’m quite positive about the process, but we need a few more years to get there. (Appendix 9.9 QAM 2)

This Deputy Vice-Chancellor expressed his concern over the increased work-loads being imposed on academic managers.

So you know with all our restructuring I think to put it bluntly people are tired. Now I keep on saying ‘if I think of what Deans have got to do now compared to what the Deans used to do it’s a frightful job’ and so is a Head of School as opposed to a Head of Department. And we’ve got to be realistic at the institution saying we can’t continue asking these people for more and more and more. (Appendix 9.8 AM 4)

The problem of time and the encroachment on academics’ time was also noted by a Quality Assurance Manager.

The most serious problems we’ll experience will be people complaining about the bureaucratic nature of it: more work, more work, more work. The challenge will be, or let me put it this way, the best system would be the one in which you get optimal results for the minimum of time. So the less time you spend on this thing, the better the system is, while getting more results. (Appendix 9.9 QAM 5)
This Vice-Chancellor shared his concerns about the large discrepancies in quality assurance management and capacity in the higher education system.

Implementability varies considerably across the range of HEIs because institutional capacity varies greatly. Some of the HEIs are served by capable people who have been in the game for a long time, whereas other HEIs have only in the last 6 months appointed their first QA Manager. Some have appointed people at professorial level to represent QA whilst others have appointed junior people who haven’t a clue what to do. So the bottom line is that there is a huge human capacity and expertise problem. (...)

Most HEIs only have 1 or 2 QA staff, which is not enough to run an internal system that will meet HEQC requirements. If you ask most VCs, ‘Do you support QA?’, they will agree. But they don’t understand QA as a management tool, they don’t go around banging the QA drum. They just appoint a QA Manager with 1 or 2 support staff and then leave them to it. I have many QA Managers confiding in me that they don’t have sufficient support from the top to do a decent job. They are left marooned, just one man and a dog. (...)

So I’m constantly reminded of the diversity of capacity in our system, even at the top management level. We also have some huge HEIs and some medium to small ones and this will impact on the nature and form of internal QA systems. (Appendix 9.8 AM 3)

This concern about the discrepancies in capacity between institutions was shared by a Quality Assurance Manager who feared that unless these were addressed, the implementation of the HEQC’s policies would lead to political tensions.

My other fear is that the HEQC system presupposes a fair level of sophistication inside HEIs for example that QA managers are competent, work hard and have good management information systems. The demands of developing a quality management system are very complex and comprehensive … But I know that some of our QA managers haven’t a clue and so we will be perpetuating the divide between the more and less advantaged institutions. So unless the HEQC is going to take capacity development very seriously, the historically advantaged HEIs will get self-accreditation and the others will get left behind which will create a difficult political situation for the HEQC. (Appendix 9.9 QAM 2)

Finally, the perennial problem of changing academics’ attitudes towards a greater valuing of teaching and learning was expressed in different ways by a Vice-Chancellor, a Dean and a Quality Assurance Manager.

We need more staff, more money and more training of staff, managers, QA staff and academics. But the most critical thing at the end of the day is that most academics are not on board. In their hearts, all QA Managers know that it’s not just a matter of taking the horses to the water. They don’t know how to make them drink. (Appendix 9.8 AM 3)

So the constraints are really old structures and people who are anti-change and cannot think differently. Very often I think it’s a people problem you know. (Appendix 9.8 AM 5)

There’s so many competing priorities. And at an institution like X, research is always going to be first priority for academics on the ground. And I’ve yet to hear anything other than lip service to prioritizing teaching and learning. So I think we’ve got a very, very serious issue of credibility; credibility in terms of value systems, credibility in terms of understanding where this Resource pack is coming from. (Appendix 9.9 QAM 3)

This comment from an academic summarizes up many of the issues raised by troubled academic decision-makers. He also noted the additional strains imposed on academics by the changing environment. But surprisingly, despite these numerous contextual constraints, he
still expressed a positive attitude towards quality assurance and to the quest for improved practice.

Negative implications (of the HEQC policy) are that it will lead to more administrative duties, the creation of documentation, which takes time. People like me who are pro QA run the risk of getting into conflict with those opposed to it. We have already had debates on academic freedom and autonomy issues. The time issue is serious, it will take away time that could be spent on research. Generally HEIs are taking strain because we are losing our experienced academics and with less experienced staff we now have to deliver better with diverse students. Having said this, to say that QA can only make your life worse is to speak from ignorance. Doing something better can be related to do it more efficiently, innovation can be efficient.

In conclusion, what is noteworthy about the data on decision-makers’ concerns and problems is the overlap between the HEQC officials’ and the senior academic managers’ concerns. These centred on issues of resources, staffing and the human capacity necessary to implement the policies. These concerns were often echoed by Quality Assurance Managers. These are typical concerns that trouble all managers of implementation processes.

Differences between the two groups of decision-makers’ concerns were the following. Some HEQC officials were concerned to empower students to play a role in quality assurance practices. This concern did not seem to be shared by academic managers. This suggests a stronger ideological commitment to ‘taking the side’ of clients (students and especially black disadvantaged students) by HEQC officials than by academic managers. Instead academic managers showed concern about the over-load and tiredness of staff working in their institutions. These differences in concerns between the two groups of decision-makers in the policy development process suggest that, predictably, academic managers were more concerned about local, institutional issues while HEQC officials showed a greater commitment to change (‘transformation’ of the system) and appeared to be more ideologically driven than academic managers. This suggests that of those interviewed, many academic managers adopted a facilitative as opposed to a managerial rationality, leading them to hold values different to those of the HEQC officials who adopted a bureaucratic rationality. This analysis is supported by a second difference; namely that academic managers expressed concern about the large discrepancies in capacity across the system. In contrast some HEQC officials expressed their commitment to constructing a ‘single, coordinated higher education system’ as a policy imperative and seemed prepared to overlook these inequalities. In some cases, evidence of the HEQC officials’ distance from daily institutional realities suggests that they may be more susceptible to ‘contextual simplification’ and ‘contextual occlusion’ in the process of implementing policy (Trowler and Knight, 2002).
8.2.3 The Client Role: Opinion on policy effectiveness and policy consequences

In the critical systems heuristics method, the questions to be asked of clients in a policymaking process are ‘What is the policy’s purpose and its potential consequences?’ and ‘What is the policy’s measure of improvement?’ Perhaps another way of phrasing these questions is to ask ‘Whose interests does the policy serve?’ It was previously established that the HEQC’ policies claim to serve primarily the interests of students who are viewed as the main beneficiaries of the higher education system. It was also established that although the HEQC does mention personal development as a goal of higher education, the over-riding goal emphasized by the Department of Education is the production of highly skilled ‘human resources’ who will lead national reconstruction and development. The data presented in this section and in the next suggest that these values and goals for higher education are not necessarily shared by all academics\(^{168}\).

Given that it was not possible to gather client opinion directly from students, answers to these questions were gathered from representatives of the other three social roles. A selection of these is presented below, categorized according to social role.

Firstly, there was evidence in the data of disagreements around the role of students as clients and as beneficiaries of the higher education system. The following extract from an interview with a HEQC official (an external decision-maker) demonstrates his understanding that the purpose of the HEQC policies is the attainment of equal educational opportunities for all and the protection of students from poor provision.

> We can’t go on endlessly doing development work from no baseline. Then those with no quality will be let in and those without equity will carry on. We can’t give them 20 years to get there, students are suffering. (Appendix 9.7 HEQC 3)

In this comment a second HEQC official also took a strong stand on protecting students, making a statement that seems to exonerate students from all blame for failure.

> The alternative is that you let a student in, you don’t actually worry about the quality, then it’s up to the student to make his way through the system, and when the student fails, you take no responsibility for this …And you blame the victim… (Appendix 9.7 HEQC 4)

He continued, confirming the policy purpose of the first official, but elaborating it further to include ‘human resource development’.

> Our values are those in the White Paper around the transformation of higher education. We work within the national policy framework. We want to see that we have a consistently good higher education system, you know, with people striving for excellence that at least will achieve a minimum level of quality so that students aren’t cheated. That will serve the

\(^{168}\) The data suggest that many academics view their own research as the most important ‘product’ of higher education.
national interest as realizing the major national policy goals, including goals such as the
national human resource development plan. Also to help steer and position the higher
education system using quality as a lever with respect to the international trends that we’re
at the mercy of. (Appendix 9.7 HEQC 4)

In this comment the same official deliberately distances himself from the pedagogic
rationality (‘I know academic development types would like this’) and instead subscribes to
an instrumental view of education-as a means to a political end.

Teaching and learning has its critical side, e.g. one could push the notions of deep versus
surface learning (I know AD types would like this). But we also need good solid subject
teaching across the country, the system would then be effective and produce people who
are technically competent and knowledgeable and this would result in the economic
transformation of the country. If you add critical thinking and citizenship to solid teaching
we will get the transformation we want. But this won’t look after equity. Black kids need
access to a decent basic undergraduate education. So check-lists such as those in the T&L
Resources won’t be a bad thing for weak HEIs to help them get their core business on
track.(Appendix 9.7 HEQC 4)

This official expanded on his vision for the role of students suggesting that he saw himself in
a vanguard role that included forming a political alliance with students in order to ‘empower’
them to take on (presumably) academic staff and management if their expectations are not
met.

We are also going to start a student literacy project on quality. We want to empower
students to understand what they can expect from their institutions in terms of quality.
(Appendix 9.7 HEQC4)

However this position was tempered by a more senior HEQC official who expressed a more
nuanced opinion on according students a client role. She emphasized that students have
responsibilities as well as rights.

Someone made the point in the workshop about student pressure. Of course you’ve got to
be very careful that this client mold - where students proclaim that they’re not happy with
something - doesn’t take over. They should be aware of their rights, and I think that clearly
students are becoming much more aware of their rights in terms of quality - but also of
their responsibilities. They need some means of comparison, how can they understand
good teaching and learning practice? But I would like to be a little more optimistic about
students, they should understand that it’s a hard world out there that they have to go into
and they should want to equip themselves as best as possible. (Appendix 9.7 HEQC 2)

By way of contrast, this academic was altogether wary about viewing students as clients and
using quality assurance to protect their rights. He hinted at the need to acknowledge the
authority of academics and questioned the maturity and expertise of students.

I think personally that the business model for QA works only at the basic level, that the
students are in some sense clients and deserve protection of their rights. But then if you
pursue that model, you get into all sorts of problems and you would move into that area
where the education they receive doesn’t explore anything or develop anything it just gives
them the pre-packaged stuff. And that would be fatal for the whole future of higher
education in my view. (…)
The other aspect is the emphasis on accountability to students. Students are supposed to have a say they’re supposed to be involved in your governance structures within a School and there’s a feeling by some academics that students will hijack the whole administration. I mean we are used to imparting, we decide, ‘Now you want to bring in the students it will be a protracted wild debate.’ So there is a bit of concern about accountability. (…)

And then there’s a general concern that there’s too much transparency. It’s like students, lecturers, everybody has to be involved in governance they take equity too far. People from outside now have to make an input into the curriculum so- ‘who is in control now?’ You know it’s too open, the mystique of being in the University on a Masters programme suddenly disappears because now we have to justify why we are using certain assessment criteria, we have to justify why we have done this, a student can demand this or that. So those are some concerns that I have as a Director. (Appendix 9.11 MBA 3)

The second issue over which different stakeholder groups disagreed was the consequences and effectiveness of the HEQC’s policies. This HEQC official made it clear that the current trend towards accountability was a temporary move by the HEQC. He was adamant that the HEQC did not want to control institutions in the long term.

Once we have established the frameworks, systems and criteria, our goal is to move towards a chain of self-regulation and validation. HEIs should have their systems in place at all levels of the institution, right down to programme level. Our job should be simply to validate these systems, moving to a light touch and focusing more on improvement. We don’t want a panoptic approach, HEIs should self-regulate themselves. We want HEIs to be proactive in this. We want an evidence-based system in which HEIs produce evidence to validate their claims. (…)

We are trying as far as possible to create an environment of self-regulation for HEIs, quality can only be built by HEIs over time we aim to lessen and change the criteria (the emphasis on accountability) and change the balance by increasing the focus on good practice (and emphasize improvement). (…)

If people think we want to control them they have the wrong picture, they must hold onto the macro-picture. (Appendix 9.7 HEQC 1)

However, this HEQC position was clearly not understood by practitioners in institutions. For example this Quality Assurance Manager from an English-medium university accused the HEQC of being driven by political rather than educational motives and expressed her doubts as to whether their policies would result in any improvements at classroom level at all.

I don’t believe these criteria will change what happens in the classroom. They might make us get the paper work together, write up some policies for practices that have always existed (but practice is a living dynamic thing, which is what we want), but they want to see one self-standing document that everyone adheres to, e.g. a QA policy document, all codified and documented. This will lead to a bunch of managers putting stuff together in a hurry, trying to codify existing practice. There is not enough time, the process is not conducive to work-shopping it with practitioners. It is too bureaucratic. Everyone else just carries on, uninvolved, so it is not effective for improving quality. (…)

What we wanted from the external QAA was predicated on a stable HE system. Now QA is being used as an instrument to restructure the HE system. This will be fatal for our approach to QA. I don’t know how much to tell the ordinary academics e.g. those on the MBA programmes. They don’t realize that the HEQC could close them down. It is an abuse of power, no one outside of the institution should tell you to close down a programme or what you may or may not teach. It is compromising academic freedom. The
HEQC’s lack of expertise and their distance from what goes on in HEIs has allowed them to get caught up in fulfilling a state agenda. The quality agenda has been hi-jacked. (Appendix 9.9 QAM 1)

This position was supported by a Quality Assurance Manager from a technikon who questioned whether the HEQC’s policies would achieve their intended purposes.

The HEQC will definitely achieve accountability. People will respond to their frameworks country-wide. But I’m not sure if they will improve the quality of education in HE. Will T&L actually be improved? I’m not convinced. An industrial model can ensure that you produce the same rubbish consistently. They are focusing on systems, even in programme accreditation, and not enough on the quality of teaching and learning. Jacking up systems will give you some improvement, but better documentation and better policies does not result in improvement of provision. (…)

But I would prefer an approach in which people have to think about their practice, and how to be excellent practitioners, not just about meeting prescribed standards. We won’t reach this via the HEQC route. Accreditation becomes a matter of life and death, all or nothing. I would like to see more focus on students -I still see the focus on system rather than on students. Will students feel that there is a difference? Will there be better feedback in the system? Will individual students notice a difference? (Appendix 9.9 QAM 7)

These predictions by Quality Assurance Managers that the HEQC’s policies would fail to be effective and result in improved teaching and learning practices were widely shared by academic managers. There was widespread agreement that a facilitative approach would be more effective.

There is a widespread desire to achieve quality in HE. There is also widespread acceptance of the need to demonstrate that quality exists, that is, to assure quality, the need for formal monitoring is recognized. But the universities and the HEQC differ about the best approach to achieve this. So our goals are similar, but the means of getting there are different. If I had my own way, I would want the HEQC, after consultation, to say to HEIs, “we think this is best practice - now it is up to you to persuade us that some of this is going on in your institution. You demonstrate to us that students at your HEI are getting a good deal. How you do so is up to you.” On the basis of sampling key areas in a particular HEI, the HEQC could then approve the whole quality management system. Most HEIs would respond to this approach which would avoid prescription and compliance and cater for our range of diversity. It is based on a philosophy of self-evaluation - it’s a holistic approach and asks people to evaluate themselves. (Appendix 9.8 AM 3)

This Deputy Vice-Chancellor thought that the HEQC would achieve accountability but not improvement.

I think the HEQC will fulfill its purpose and that HEIs ignore it at their own peril. Here in the Free State there were headlines about the private provider that did not get accreditation and there was a public reaction. So I think that the HEQC signals will make HEIs realize the importance of quality. (…)

But I fear that accountability will override the HEQC’s achievements and improvement will remain in the background until the restructuring of the system has been implemented, for we don’t have the capacity to do all these things properly at once. So people will go the accountability route first for self-preservation. (Appendix 9.8 AM 2)
As already reported in Chapter 8.1.3., the fears expressed by Quality Assurance Managers and academic managers the strategic action by the HEQC would have limited impact appears to have been verified by the opinions of several academics involved in the re-accreditation of MBA programmes. This opinion by one Head of School is an example where all sense of ownership of the exercise and its potential for improvement seems to have been lost.

It was a very stressful experience because it was our first one and also because of the way it was handled. It felt like an interrogation, the approach of the panel and the HEQC in particular was not constructive or developmental. (…) So it wasn’t very useful. We didn’t learn from the process, neither the re-accreditation site-visit nor really the self-evaluation beforehand. They didn’t even give us a decent feedback session at the end. Instead it was a drilling session. Their manner was unhelpful and they didn’t serve our purposes or assist us. (…) Their approach was too aggressive, trying to catch us out. They should be more constructive and developmental. They made it a stressful experience with no positive feedback. (Appendix 9.11 MBA 1.2)

Two Quality Assurance Managers offered more sympathetic explanations as to why they believed the HEQC’s policies would fail to result in improvement. The first suggested that this was partly due to the problems of implementation and a lack of managerial capacity. She suggested that good policy intentions tend to get interpreted bureaucratically by officials at operational level.

I think what the HEQC is doing is ambitious. That doesn’t mean that I don’t think it’s good to aim high but it’s one thing to aim high and another thing to be realistic. And I’m also seeing this year that they are defending their position in terms of aiming high by saying they’re being very thorough but yet they seem to be going beyond their stated principles that the system must be driven by self-evaluation, self-improvement, self-responsibility and institutions should take prime responsibility for quality. And especially this year we’ve seen less of these principles with the accreditation with the audit criteria I suppose also with the MBA re-accreditation criteria. And it’s what X was talking about yesterday - that the leadership of national organizations, be it the Health Professions Council or the HEQC, they may have a certain view that is acceptable, but somewhere in the middle something changes and the people who are actually doing the operational work are bureaucratic, don’t see the big picture, they simply don’t have the capacity at operational level. We see this all the time at the programme accreditation level, we correspond a lot with the HEQC on this. (Appendix 9.9 QAM 4)

This Quality Assurance Manager explained that the HEQC had to take the initiative away from institutions because of the lack of quality and managerial capacity in some institutions. He also makes the important distinction between accountability and compliance, suggesting that it is only the latter that is problematic.

The balancing of accountability and improvement is always a problem in QA systems. There has been a shift towards accountability by the HEQC since the Founding Document of 2001. (…) I think they will achieve their purpose with respect to accountability. But the question is what kind of accountability? They may achieve a superficial compliance kind of accountability, but not an authentic accountability that is owned by academics and departments. Academics don’t generally yet embrace the idea that they should be accountable as a legitimate requirement, they see it as an external imposition. On the one hand I can understand why the HEQC went the way that it did, e.g. the production of
criteria and taking the initiative away from HEIs. But the imposition of criteria by a national QA body will inevitably result in a compliance culture. We had hoped for a more developmental path where academics could be asked to determine internally what criteria are applicable to them.

On the other hand one could ask ‘what’s wrong with compliance?’ At our stage of national development we do need certain minimum thresholds, and there should be no uncertainty about what should be in place to ensure acceptable standards in certain institutions. I do understand the argument that we need clarity and consistency. But the danger is in the way the criteria are communicated and implemented in practice. Will HEIs be encouraged to make the criteria their own and adapt them to their contexts or will they be rigidly imposed from without? (Appendix 9.9 QAM 2)

In summary, there was general agreement across stakeholder groups that the ‘measure of improvement’ of the policy should be improved educational provision for students. But the overwhelming impression given by the data is that because of their over-emphasis on accountability requirements, ideological framing and a lack of understanding of academic culture, the HEQC’s policies are not expected to achieve this intended purpose. However, this view needs to be balanced by that of the senior HEQC official who was adamant that the HEQC’s bureaucratic approach is a short-term strategy to first ensure a minimum threshold of quality provision. Thereafter the HEQC intends to use the granting of self-accreditation status as a means of withdrawing its exercise of bureaucratic power over institutions. The data suggest that only a few stakeholders seem to understand or accept this position. In the long-term the question remains as to whether it will be possible for the HEQC to achieve its improvement of provision goal in the wake of an accountability-driven approach.

8.2.4 The Affected Role: Opinion on degree of discretion and worldview conflicts

In the critical systems heuristics method, the questions to be asked of witnesses to the affected in a policymaking process are ‘To what extent are those affected given the chance of emancipation from the premises of those involved?’ and ‘What are the differing world views on what counts as improvement between those involved and those affected?’ For the purposes of this study I have interpreted the first question broadly to include enquiring into the degree of discretion granted to those who must implement the policies.

Regarding the degree of discretion granted to academics in implementing the HEQC’s policies one academic pleaded for a differentiated application of the policies.

(The HEQC should) allow autonomy and variation in the uptake of policy. They should turn the big guns on the obviously lousy institutions. They shouldn’t treat us all on the assumption that we are all incompetent and lazy. (Appendix 9.10 A 2)

In a similar vein, an academic involved in the MBA re-accreditation reviews made a plea for the process to be voluntary.
I think the intent is good, I must admit I think there are many fly-by-night MBA programmes, but I seriously question the approach. I think a positive approach would be to let people apply to be evaluated, and if they meet those criteria they get accredited. But it’s their choice whether they want to or not and we will allow them to put it on their advertising and their documentation that they have CHE approval. (Appendix 9.11 MBA 6)

Several Quality Assurance Managers described how they attempt to mediate the HEQC’s demands in order to minimize world-view conflicts and to grant some discretion to academics, particularly with regard to the meaning of quality. The Quality Assurance Manager described how he promotes a more facilitative approach within his own institution.

We expect the departments to develop their own criteria. And the reason for it is because I tried to link quality assurance to normal academic practice, something that’s intellectually challenging. So you have to think about the foundations of what you’re doing, and you have to define quality for micro-biology, ‘what is a good quality micro-biology department?’; ‘what are the criteria in terms of how I think micro-biology should be taught?’ And we define the criteria ourselves and then the external people do two things: they have to validate the criteria and they have to validate the self-assessment against the criteria. So the department has to sit down and design the criteria and then score themselves or assess themselves against those criteria and then the external people validate it. (…) The key issue is who sets the criteria. That is the key issue. (…) Yes, that’s my fundamental take on this whole thing is to make it an academic intellectual exercise and that’s the way I sell it; try to sell it.

However, he did acknowledge the risk involved in this approach and the need for caution in the light of the HEQC’s powers of accreditation.

So in some ways it’s a bit of a statement of autonomy but not irresponsible. So we will definitely look at the HEQC’s criteria but we’re not simply going to use them as is. In some cases we will surpass them and there might be cases where we will not meet them and that’s a tricky one if there’s a risk of losing your programme accreditation then obviously you have to be very careful. (Appendix 9.9 QAM 5)

This Quality Assurance Manager alerts one to the fact that world-view conflicts play themselves out within institutions as well as between institutions and the HEQC. Taking a ‘soft managerial’ approach himself, he explained how he accommodates the academic world-view.

These worldview conflicts play themselves out within the institution. For example the senior managers may want an approach to quality that emphasizes value for money and the good use of resources. Academics prefer a ‘fitness for purpose’ approach and feel threatened by the other approaches. They fear a loss of autonomy and academic freedom. This is understandable but they need to realize that they are accountable to the taxpayer and to students - they can’t just be left to do as they please. They need to demonstrate the investment that society is making in their HEI. Academics have to realize that it is not wrong that they are being called to account for how they do their core business. But we should not impose a given understanding of quality on them, let them define it for themselves in a way that is meaningful for them. We can’t go and ask them why they aren’t complying with national policy imperatives - this will just put their backs up. My preferred position is to affirm what they are already doing as important and legitimate and let them tell us how they think their work contributes to society and its transformation. (Appendix 9.9 QAM 2)
A third Quality Assurance Manager from a historically advantaged university explained her position as being based on what is educationally and academically sound. She went on to suggest that the HEQC was not allowing institutions sufficient discretion to implement its policies according to these values.

Other values I know that our academics would go on quite a lot about are academic freedom, and institutional autonomy shifts. Then another value is the principle of running everything from the principle of what is educationally and academically sound. And obviously academic freedom is tied up with that. And if we can kind of justify everything on the basis of what is educationally sound, not what is compliance or what is necessarily strategic - if that’s always the fallback position or bottom-line, then once you determine what is academically sound, then you’ve got to negotiate within those boundaries. And so then the question about the HEQC’s operationalization is ‘are they setting boundaries for us to work within or are they actually defining those boundaries so that there’s no scope or room for discretion?’ Again, I think there’s no latitude. (Appendix 9.9 QAM 4)

This interviewee expanded her position, suggesting that this lack of discretion was based on a lack of trust between state agencies and higher education institutions. She went on to describe how she felt that engagement with and criticism of the state’s position was invariably misinterpreted. She explained this in terms of the wider political and racial tensions in South African post-apartheid society.

If we can do things developmentally and choose and justify our strategy in such a way that we’re being honest and open and we’ll get to the other stuff later - why shouldn’t we be trusted to do that.? So many things in our education system Kathy I think come down to the lack of trust. This may be understandable given our history but what comes of it is the invasive NSB SGB (SAQA) system. The system doesn’t trust us! The creep we saw in the audit criteria is because there’s a lack of trust. It is two-faced to say quality is your responsibility and yet we don’t trust you to do it so here are the criteria. Ja it’s one thing to write the Guides to Good Practice and say we are now trusting you to take this on, but another thing to then stick them into the audit and accreditation criteria. It’s all a matter of trust! … And the DoE, HEQC, SAQA the whole lot of them don’t trust the institutions. But trust is a two way thing. Yes we mustn’t be too whingeing which we are. We whinge a lot but our criticism should be constructive. But on the other hand we want to be treated professionally. If we offer a hand as we did at the workshop yesterday we want the latitude to give an intelligent reason why we need to take this slowly and developmentally we don’t just want to be told this is how it must be done and the auditors are coming to check up on this and this. (…)

Well is trust a value? It goes back to that question that if one of the values you want to engender is trust, then I think there is that clash. And I think that is a real clash and I think it’s actually got to be brought into the open and spoken about because it isn’t being spoken about and there are so many emotions that run around this issue. The lack of trust is construed as being political, e.g. historically black versus historically white. Then there’s a conflation of criticism with being anti-transformation. It’s not easy to be critical then, if you are already put in the ‘historically white box’, you feel that you aren’t being heard and are being misinterpreted all the time. So we need to acknowledge that we have to work through these issues of trust. (Appendix 9.9 QAM 4)

Some academic managers supported the view that the HEQC’s policies did not grant sufficient discretion to academics.
The HEQC will succeed only if they put more emphasis on development and give HEIs the chance to interpret policy slowly in their own ways. They will fail if they apply it in a rigid manner. They would achieve more if they put more emphasis on the goals and objectives of QA and sold this to the academics, rather than telling us exactly how to do it. (…)

One of the tasks of all QA Managers is to try to prepare their HEIs. They are taking the HEQC documents and boiling them down so that academics can grasp and accept them. But the documents are becoming so complex in principle and detail that academics will reject them. There is too little left for their discretion and interpretation. As one colleague said, it is increasingly becoming difficult to defend the HEQC, their actions and documents in our HEIs. (…) They can legislate like crazy, but what are they going to do if the academics say ‘up yours!’? Unless they radically reduce their demands, I wouldn’t be surprised if there won’t be a complete revolt by academics who simply say ‘to hell with this’. What could the HEQC do then? (…) The HEQC is totally dependent on the good will of the academics, many of whom are up to their ears in hard work. Now our academics will have to live with the full fall-out of bad policies. (Appendix 9.8 AM 3)

The data provided extensive evidence of world-view conflict, particularly between those subscribing to the collegial rationality and those subscribing to the managerial or bureaucratic rationalities. Closely linked to the concerns expressed about the need to accord professional discretion to academics, was the debate around the nature and extent of academic freedom that should be granted by the state to academics.

This academic romantically described academic freedom as intrinsic to the nature of universities.

Universities are one of the great creations of humanity. They are great because they are allowed to be, in a certain sense, wild. It is only as free institutions that they flourish. Freedom is the price you have to pay for real universities. There is no other way. (Appendix 9.10 A 3)

After the MBA re-accreditation site-visit, two academics suggested that their academic freedom had been infringed.

A: But if it’s a case of them (the HEQC) coming in and telling the university that their MBA programme doesn’t conform to what the bureaucrats think an MBA programme should look like, I think that challenges academic freedom, I think it challenges innovation. They don’t necessarily know what’s best, so if it’s a case of enforcing a template and saying ‘this is what an MBA must look like’ then I think that there’s a problem. (…)

I mean my sense is that the Minister or the Department of Education are wanting to introduce a nation-wide education system, which has centralised control, which goes against everything, every principle, that universities were founded on. And so while there may be an immediate need to address the situation regarding MBAs, I think there is a broader issue that’s at stake and that is control. Interference dictating what universities can do - how they must do it and I think that that is a very negative trend, a dangerous trend.

B: Quite simply, it’s an assault on academic freedom. (…)

A: And I view this evaluation process and the way it was conducted as part of that same broad assault on academic autonomy. (Appendix 9.11 MBA 6)
It is interesting that a way through this apparent conflict over the meaning of academic freedom was proposed by a young academic who represented the ‘new collegialism’. His well-thought through position suggests that modern universities are too complex to be managed via the traditional collegial approach. He accepted a managerial approach as the only viable alternative.

I agree that academics should be accountable, responsive and strive for good practice. Academic freedom without academic responsibility has no meaning. Academics need to question their freedom in relation to responsibility and accountability. Currently I’m busy studying the nature of universities historically and my interpretation is that accountability and responsiveness are not at odds with why we exist. So I support that the system should make us accountable. Of course many academics are anti-managerialism and government control. But, as a researcher, I’m not convinced about the alternatives to a managerial approach. We need good transparent management and clear structures and reporting. I’m not clear on exactly what collegialism means for modern universities, what are its structural implications? Chaos and conflict? Our issues are complex and I don’t think collegialism can deal with them. It is usually too informal and just creates conflict. If collegiality means having a good discussion on what has worked and what hasn’t worked within an internal QA system as I described earlier, this makes sense to me. For me, the managerial approach brings clarity and structure; I can’t see how this can be bad, given our scale of operation and the levels of complexity. Maybe I’m just a pragmatist, but I remain unconvinced that arguments about academic freedom, autonomy and collegiality can provide real alternatives for running an HEI. I don’t think it’s any longer an alternative just to do your own thing. (Appendix 9.10 A 1)

He went on to suggest that the implementation of quality assurance would cause conflict and tension. His recommendation for dealing with this was good management, including the offering of incentives and rewards for academics who improved their practice.

For QA to succeed in HEIs there needs to be management capacity to deal with the difficulties of implementation and evaluation there will be conflict, tension and stress and staff also need to be trained in QA practices. If the HEIs don’t align their institutional HR management systems to QA and if those who improve aren’t given incentives and rewards, QA will find it difficult to succeed. (Appendix 9.10 A 1)

A third world-view conflict that arose in the data was over the role of the market. Several academics teaching on MBA programmes state their opinion that the market was a better judge of quality than the state. Predictably this view was not share by HEQC officials. This academic complained that a bureaucratic state was hindering the dynamism required by the market.

We, a country that is trying to compete internationally, we’re supposed to be, we know that our education levels are a factor that holds us back. A pro-active dynamic tertiary education higher education system is a requirement and we are shackled. That we can’t respond to the needs as we see them. You know if we get it wrong, the programme doesn’t work, people don’t come, it goes, and we try something else. That’s what being dynamic is about. Instead bureaucrats in government are driving it now, half the time they’re competing over turf. Half the time they don’t know what they want to do and if we can’t go and run with an idea and see if it works, how can we compete with a country like India where rules are there if they help, but new ideas, successful ideas are more important?
They’re running ahead we can’t keep up because we’re fiddling around with reports, it’s madness. (Appendix 9.11 MBA 6)

This position was contradicted by a HEQC official who saw it an ideological and decontextualized perspective. Instead this official viewed the matter from a student perspective and questioned whether, in the South African context, quality regulation could in fact be left to market forces.

Whilst it is true that the systems differ in terms of scale and roles and logics, but the HEQC wants to create a single system. We can’t leave the private sector to market forces - people are too quick to say that the market sorts quality out. This is an ideology and a decontextualised approach that assumes that people have perfect knowledge to make rational choices. (…)

In a 3rd World context such as ours (where hopefully the vast majority of students will be first generation black students), there are severe limits to how much the market can inform people. I don’t think that market forces even determine where white students choose to study. They tend to go by perceptions and reputations. We should note our context - we are an ex-colony and a peculiar society with a very imperfect market which also creates needs. We can’t leave quality to market forces in our context. (Appendix 9.7 HEQC 1)

Finally, the data on attitudes of academics towards the HEQC’s policies threw up two unrelated but interesting observations. The first was that academics are so cynical about government capacity that they do not yet take the HEQC seriously.

And what is a big danger I think is a fundamental belief amongst the academic community that this stuff isn’t for real that a) it’s one of these kind of state inventions to torture the academy and b) there is not capacity either at the central level meaning the DoE or HEQC or really at the institutional level to enforce it, to carry the thing through. So it hasn’t moved centre stage for academics, they don’t see that their well-being is dependant on getting to grips with the stuff. They are basically in a denialist phase if you ask me and are hoping or believing that it will go away. (Appendix 9.8 AM 1)

This observation by an academic manager was confirmed by the following cynical remark made by an academic.

There is, however, one glimmer of hope. The overweening lust for central control allied to intellectual technology of outcomes, criteria, etc. of mind-boggling bureaucratic complexity and crassness all managed and implemented by staff who are the apotheoses of mediocrity can never work. It will collapse under its own bloated weight. (Appendix 9.10 A 3)

A more serious point was made by a Quality Assurance Manager who tried to explain academics’ resistance to policy interventions. He suggested that their resistance was fundamentally a consequence of their academic identity and disposition, that academics are driven by inner motivations usually related to their research within their disciplines. He explained that his own research suggested that most academics lacked the frames of reference to appropriately understand and interpret policy instruments such as the HEQC’s Improving Teaching & Learning Resources.
And what I came to understand is that there’s an immense lack of appreciation of what the policies are actually trying to do and what educational reform was trying to do. (…) It’s their (academics’) sense of identity. They are responding the way they do because of who they are and who they understand themselves to be. I never came across anyone who said ‘the government is asking us to do this’ or ‘institutional management is asking us to do this, hell, I’ve got to drop everything and do it.’ Surprisingly not a single academic told me that. So I think all of this has implications for understanding how these Resources might get used. They will be re-interpreted contextually by whatever frames of reference people already have in place. And so if we’re wanting a nuanced thoughtful interpretation of these policies, we have to work to put in place the frames of reference that will help people to understand where these things are coming from. (Appendix 9.9 QAM 3)

In the interviews, only one HEQC official demonstrated some understanding of the academic world view.

I think the technikon sector welcomed the HEQC because many felt it was going to be a new and better dispensation after SERTEC. But I think once the visits start they’ll start moaning and groaning. It’s a nuisance basically. I think when you’re in the HEQC you would like to idealize your work as being beneficial and saving the system. But I think there’s quite a different perception on the other side. But I mean many very good academics have been doing their own thing. I think they rightly feel, who’s this quality bureaucrat coming to tell us how to do our job? (Appendix 9.7 HEQC 6)

In summary, the weight of the data on the opinions of the affected suggest that the majority of academics hold worldviews that are potentially in conflict with the motivations and value assumptions underlying the HEQC policies. This was particularly evident over issues such as academic discretion and academic freedom. In the data on the MBA re-accreditation reviews there was also disagreement between academics and HEQC officials over the role of students and of market forces in higher education.

What is significant in this data set is the extent of the gap between the traditional collegial world-view and the more instrumental, politically motivated view of higher education held by some HEQC officials. Despite the mediating efforts of some Quality Assurance Managers and some HEQC officials, the data suggest that at this stage in the policy development process—the end of 2003—the HEQC’s policy intervention was largely failing to deal adequately with these world-view conflicts. One can conclude that the HEQC’s policies were not generally considered to be normatively acceptable to the majority of the academics about to be affected by them.

8.3 Analysis of Stakeholder Opinion

This section seeks to analyze the different rationalities, motivations and value assumptions that lie behind the opinions expressed by stakeholders from the different social roles. In doing so, the four rationalities identified in Chapter 2 are drawn upon (the collegial, facilitative, managerial and bureaucratic rationalities). In Chapter 4 these rationalities were linked to
different approaches to evaluation. These connections are represented in Figure 3. The three policy instruments are also plotted on the diagram to illustrate the different approaches to quality assurance that they embody.

Given stakeholders’ identities, roles and institutional locations, one might expect academics (especially those from research-led universities) to adopt a collegial rationality, Quality Assurance Managers to adopt a facilitative rationality, academic managers to adopt a managerial rationality and government officials to adopt a bureaucratic rationality. There certainly is evidence in the data for this pattern, but it is uneven. In the data gathered, academics and Quality Assurance Managers generally spoke from the expected rationalities and discourses-collegial and facilitative and supported the pedagogic project. But many academic managers adopted a facilitative rather than a managerial rationality and not all HEQC officials subscribed to a bureaucratic position.

If the plotting of the three policy instruments is correct, this would explain why the accreditation instruments (as realizations of bureaucratic rationality) elicited greatest opposition from stakeholders, why the audit instrument elicited a sense of disappointment (many stakeholders were hoping for a facilitative approach) and why the Improving Teaching & Learning Resources (as realizations of the pedagogic project and a soft version of managerial rationality) found the widest acceptance amongst stakeholder groups.
8.3.1 Evidence of Collegial Rationality

With few exceptions, the data suggest that academics subscribe to a collegial rationality. This meant that many of academics interviewed saw the HEQC as a potential or actual intrusion. Many viewed the HEQC as a threat to their identities as autonomous professionals who already self-regulated using peer review and connoissuerial evaluation. The data also suggest that there is a large gap and sometimes conflict between academics’ and HEQC officials’ world-views. In general, academics did not find the HEQC’s policies normatively acceptable.

This description from a Quality Assurance Manager captured well the collegial understanding of quality as academic excellence governed largely by tacit practices and evaluated through connoisseurial, peer review mechanisms. She went on to explain how this collegial approach to quality clashes with the HEQC’s more explicit approach to quality assurance.

Academics think of quality as setting high academic standards, e.g. excellence in research. They have their traditional indicators for this and see quality residing in how you teach and research, not in good documentation and procedures. In the traditional way the indicators are all anecdotal and peer review is the main mechanism. The majority don’t see quality as
residing in having good paperwork and processes. Quality is also collective, e.g. a good department will encourage and build up good teaching and good research practices. The clash for me is I think that the HEQC has latched on to a managerial understanding of quality, e.g. providing specifications beforehand, you either meet minimum standards or you don’t. These standards and criteria are not about how much your students are learning or about the quality of journal articles you are producing. Rather they want a policy on X, its all paper work and this is unlikely to capture the substance of what we do. For example, we have just submitted reports to the HEQC on our two MBA programmes. One had all its paperwork in order and the other didn’t, but if I was a student I would much prefer to study the latter programme. (Appendix 9.9 QAM 1)

The generalization that academics subscribe to collegial rationality was confirmed by these comments made by a Head of School involved in the MBA reviews.

(M)ost organizations in fact day to day run anecdotally. They don’t run by written rules and procedures they tend to run anecdotally. And that’s the way it works. And I mean that’s true here, I mean, for example, if you asked the question ‘what policy governs the examination processes at A?’ would you know where to find it? It probably doesn’t exist and if it did, it exists in such a fragmented form that it would take you forever to find it. And yet the fact is, we do know how to run examinations, we bet your life, we do. We’ve been running examinations for ninety years we know how to run examinations. Could we prove it? If this is part of our policy we probably couldn’t. Is that significant? Well, if you’re from CHE, it is. If you’re an academic you don’t give a damn, if you’re a student you think to yourself ‘Does this organization ever justify its reputation in the market place?’ And do we? We have 190 000 graduates to prove it. (Appendix 9.11 MBA 3)

The collegial rationality assumes that academics, as professional of their disciplines, have authority over what they teach and control over the conditions of their work. Some academics interviewed saw the HEQC’s accountability requirements as a threat to this position.

And then there’s a general concern that there’s too much transparency. It’s like students, lecturers -- everybody has to be involved in governance. They (the HEQC) take equity too far. People from outside now have to make an input into the curriculum -- so who is in control now? You know it’s too open, the mystique of being in the university on a Masters programme suddenly disappears because now we have to justify why we are using certain assessment criteria, we have to justify why we have done this, a student can demand this or that. So those are some concerns that I have as a Director. (Appendix 9.11 MBA 4)

A few academics even saw the HEQC’s intervention as symptomatic of a larger ideologically driven move by the state to centralize power and control education-thus stifling the collegial idea of the university.

At the foundation of my dismay is the realization that the type of discourse in the HEQC has become endemic in South African education at the national level and is steadily insinuating itself into every facet of higher education as well. It is a discourse of centrally controlled management (based on dated and increasingly obsolete ideas borrowed from the real business world that is steadily abandoning them, mixed up with a lot of Soviet era planned economy stuff that some of our exiles learned but did not abandon when the actual centrally planned economies went down the tube.) It has one fixed idea - ‘control’. It is a discourse that has not the slightest real interest in any idea of the university in relation to thought and knowledge. It is the discourse of managers and of education as a (state-controlled) business. (Appendix 9.10 A 3)
Of the academics interviewed, only two did not embrace the collegial position. They were both younger academics and may be regarded as representatives of Harvey and Knight’s (1996) ‘new collegialism’. One of them expressed his support for an external quality assurance agency.

In principle I support the idea of an external QA agency. This should allow for better steering of the system by the government. On the other hand there is a danger that politics will play a role and that the process of QA will become ideological. But I think that the HEQC has tried to keep as autonomous as possible from the DoE. (Appendix 9.10 A1)

But he went on to explain his preference for a quality assurance system based on collegial peer review.

When it comes to evaluation, I would prefer peer-evaluation where I tell peers what I do, how I do it and how I plan to improve or have improved. I feel comfortable with peer review internal to my School with a reporting mechanism upwards that is linked to staff appraisal. I would like the opportunity to explain and discuss my work, and what are the consequences of the evaluation and how I should implement improvements. I don’t want to have to defend myself as in a viva. So this process should be a sub-set of an internal QA system. The HEQC could look at audit trails down the levels, but they should be looking at the HEI’s QMS. (Appendix 9.10 A 1)

In terms of the critical systems heuristics method, the data suggest that the majority of ‘witnesses to the affected’ subscribed to a collegial rationality that is based on norms and values that conflict directly with the bureaucratic and (to a lesser extent) managerial rationalities on which the HEQC’s policies were perceived to be based.

### 8.3.2 Evidence of Facilitative Rationality

The data elicited from the interviews suggest that the majority of Quality Assurance Managers (experts) subscribed to the facilitative rationality with some also embracing the pedagogic rationality. This position is based on a faith in the capacity of academics to self-regulate and self-improve through communicative action. This stakeholder group tended therefore to oppose any form of strategic action which they viewed as threatening to their work and to the collegial culture and values, which they accepted as given.

This Quality Assurance Manager from a historically English-medium university expressed her commitment to a facilitative approach and her disappointment that the HEQC had not adopted the same approach. Her comments also demonstrate some understanding of pedagogic issues and values.

We are going to set up an internal system that we think will work based on an understanding of quality that we believe in and hope that at some point these will meet the HEQC’s demands. Their ad hoc demands result in minimum compliance. We won’t use their policy documents as points of departure, we want to develop our own systems, but make sure that they are not entirely different, obviously we don’t want to make academics do double work. Our thrust will be internal, much more developmental and friendly (what we originally wanted and hoped the HEQC would be). You know, we wanted them to be a
national body that had expertise and could help develop our systems, finding holes in our internal systems and sending consultants to help us. We wanted them to add value and to give us guidelines. This is the same role we see the QPU having in the institution, i.e. a resource rather than a policing body. The HEQC is forcing us into a policing mode. We would rather be a resource within the institution, let academics find out what the quality problems are and then refer to us to help and support - it is their investigation of issues that contributes to improving overall quality. No paperwork will fix a bad teacher. It is the teacher-student relationship which is the key to quality, if you can’t fix this at the coal-face then you can’t fix quality. We will try to get communities of people talking to each other, we will encourage self-reflection, identifying quality gaps and finding solutions together. At both group and individual level we want open and honest discussion. At this institution our assumption is that everything works (more-or-less) although the merger might change that. Our programmes and modules exist and we will not use quality as a feasibility exercise or to restructure or close down programmes. We are working rather to get the academics to improve them themselves. (Appendix 9.9 QAM 1)

This Quality Assurance Manager, also from a historically English-medium university, demonstrated a strongly pedagogic approach to quality assurance that involved viewing evaluation as part of an action research on teaching practice.

I think there is an enormous potential for the HEQC just to become bureaucratic nuisances. And when I look at how other people understand, for example setting up evaluation, and gathering student perceptions and stuff like that and how unthoughtfully it’s been done. You know it should be a form of research, it’s evaluation of action research, what we should get involved in, and one has to be very thoughtful and set it up as you would a piece of research. But because we’re having to institutionalize it and because people are looking for generalized instruments I think there’s a danger that it’s just going to become bureaucratic and it’s not going to be useful. And you know I think the hardest part of the job I’ve had at B is trying to make evaluation thoughtful - trying to grow that culture of thoughtfulness. (Appendix 9.9 QAM 6)

A Quality Assurance Manager from an historical Afrikaans-medium university also demonstrated allegiance to the pedagogic rationality, by instead of being critical of the HEQC, he placed blame (for difficulties in implementation) on academics and their resistance to the pedagogic project.

The constraint that I see and that I’ve experienced is the willingness to change the willingness to give teaching and learning its rightful place within the institution, to make teaching and learning part of the core business in the minds and in the hearts of those on the ground - the lecturers, the academics. From my academic experience and background I think that the main constraint is people not buying into a lot of teaching and learning stuff that is being initiated by a body such as the HEQC. (Appendix 9.9 QAM 9)

In contrast, a very different position was adopted by this Quality Assurance Manager from a technikon. She supported the HEQC’s approach to quality assurance because she understood it to be a ‘formal industrial approach’ that is closely aligned to current technikon approaches (presumably this is the approach that the two Quality Assurance Managers quoted above referred to as ‘generalized’, ‘policing’ and ‘unthoughtful’). The gaps in perception between these quality experts serve to highlight the effects of different institutional histories and
cultures on approaches to quality assurance. This also helps to explain why resistance to the HEQC was expressed most strongly by stakeholders from the university sector that has not previously been part of a formal quality assurance system.

Now I’m going to be very honest. I’m not sure that a lot of people spend a lot of time on even thinking exactly what is the philosophical basis of all these policies. I think there’s an underlying assumption that when people oppose the HEQC they’re doing so from a philosophical base. But this isn’t always so, much of the criticism is superficial. In the end there are not such big difference between us and the HEQC. We initially supported the road that they took and when the dust settles we’ll be wanting the same things. So I’m not sure that there’s really is a discrepancy between their values and the paradigm they’re working in. So I think there’s been a big academic debate about the small little differences but in the end there really isn’t such a big difference, in my view. On the whole we were rather surprised at the attitude and the broad view that the HEQC finally took. We were expecting something different because what they eventually adopted, you know the ‘fitness of purpose’, ‘value for money’, ‘transformation’, these are things that were the norms in technikons and we were really surprised to see that that’s what they’re defining quality as. This is a formal industrial approach. If I look at the instrument it’s different, it’s called by different words, but I can fit it perfectly into the excellence model or the TQM or any of those things - we have actually done that. You can fit it nicely into the input-process-output of the excellence model, it’s just the words that are different. There’s no problem in with the model. I don’t think they realize how strong an industrial model they are proposing. (Appendix 9.9 QAM 7)

8.3.3 Evidence of Managerial Rationality

There was no clear pattern in the allegiances and rationalities of representatives of the decision-maker role. Institutional decision-makers tended to adopt a facilitative approach to quality assurance, with some expressing managerial concerns and a few adopting the full managerial position.

This academic manager’s concern to accommodate and work within the grain of collegial rationality was typical of the attitude of those adopting a facilitative approach to quality assurance.

We’ve tried by doing these road shows and trying to explain to academics why we need to be going along this route and we’re trying to do this to get them to buy in rather than to sit and simply say - this is another - I mean the radical one’s would say ‘who are the HEQC to tell us what we should do?’, ‘this is an infringement of our academic freedom’ and all the rest of it. But I think that’s a minority view so that’s encouraging. And so we’re trying hard to get them to buy in and realize that it’s a good thing that we’re doing and it’s not just a case of ticking off the check-list that we’ve got X in place. So we’re trying hard to get away from compliance. Although we realize obviously compliance is there. (Appendix 9.8 AM 4)

In this extract this academic manager demonstrated an understanding of limits of managerialism and a desire to protect the traditional collegial practice of expert peer review.

Conceptually we need to keep quality and quality assurance separate, achieving quality should not be confused with having a QA system. QA and accountability is necessary, but is not directly an improvement device. Setting up a good QMS will not necessarily lead to a good quality education system. This is where the HEQC is making a wrong assumption.
QA is a management tool, let managers manage and use QA to manage well. But quality is what the academics should be concerned about, let them demonstrate this to each other - no one else can judge quality. (…)

Instead the HEQC is going for a heavily over-prescriptive approach which removes opportunities for innovation and feeding self-involvement. Instead of saying ‘Hmm, this is an interesting challenge’, academics will be saying ‘what can I do to get this off my back?’ (Appendix 9.8 AM 3)

This Deputy Vice-Chancellor described how she intends to mediate between the HEQC’s bureaucratic requirements and the collegial traditions of academics. She also demonstrated a commitment to the ‘reflective practitioner’ idea, typical of the pedagogic rationality. But, in closing, she showed how, from a manager’s perspective, the HEQC can be useful as an external threat.

Well we have to balance the HEQC’s policy requirements with what we actually want to do in terms of quality improvement. We have to simultaneously meet the HEQC’s requirements without letting our staff fall into compliance mode. So we’ll introduce things cautiously, apart from the committee context, the Quality and Programme Planning Committee, we won’t disseminate broadly the HEQC documents. Normal academics need to be shielded from these. In any case we will wait until the HEQC’s documents are final before we circulate these to selected people. When we do launch them we’ll just give them an overview and link the requirements to institutional priorities and phase them in gradually. We feel strongly that the HEQC policy direction should be only guidance and support for us, not the essence of what we must do, we have our own thinking on what is good practice for us. This does correspond well with the HEQC documents, but I believe it’s important to establish a quality culture of continuous quality improvement, and so we don’t want to just comply. But it will be difficult to keep the balance, we will only be partially successful. Our Deans have already said: ‘tell us what the HEQC want and we’ll do it!’ So it’s a difficult tight-rope we want to walk. I’m afraid that once you establish a compliance culture, it’s difficult to break it, so I would rather run the risk of not doing enough, not going for coverage and maybe getting into trouble for this. (…)

The carrot that I use is that we are trying to establish or protect a reflective practitioner approach. For me QA must really involve a deeply reflective approach on ‘what, why and how I am doing and how should I improve?’ Not a set of forms to complete. I would rather therefore do less, but do it properly. On the other side, we are already using the HEQC as a kind of stick. We can now say to tardy departments and HoDs, ‘you have to do this’, for example assessor training is our staff development priority. We can now say to Deans ‘we are offering this and if there is not a good response it will become compulsory because the HEQC requires it’.

The views of the last two academic managers, who also have expertise in quality assurance, suggest an understanding of the need to keep accountability and improvement-orientated evaluation separate-if they are to be effective. This position stands in contradiction to the HEQC’s proposals for an integrated model in which both audit and accreditation have accountability requirements.

Generally, the data suggest that academic managers are more attuned to academic culture and more cautious about what is workable than their counterparts at the HEQC. This
contextualized, less ideologically-driven position was illustrated in the following extract from a manager at a historically Afrikaans-medium university.

I think we still have a problem with the HEQC passion for trying to cover everything. In terms of their definitions or quality, I think we will see more of a ‘fitness of purpose’ approach rather than a ‘fitness for purpose’ one. But I don’t see this as necessarily meaning that we clash with the HEQC’s view. We see ourselves as a university in South Africa, having to fulfill functions that are not traditional university functions, in other words we are a university, but in a certain context which means that we have to do extra things that universities don’t usually have to do, for example we have to provide space and time for disadvantaged students to grow. I see QA as involving the monitoring of both planning and implementation. So we are really fulfilling both the ‘fitness for’ and ‘fitness of’ approaches to quality. As for transformation, this is not strongly fore-grounded in our institution, but part of our mission is to serve a diverse body of students leading to the transformation of the students. We feel that all our students are unique in terms of their background, language etc. and that we should find a way to create a space for every student to realize their potential both individual and social, within the parameters of what is possible. So this is our broad mission and vision, we want to be a university that plays its role in building a new society in South Africa, but we can do this only by being a good university, not by being an NGO or something else. So we need to offer good relevant programmes, and research and be a socially responsible, engaged university, also doing things like service learning and research into service learning. (Appendix 9.8 AM 2)

Although the majority of academic managers interviewed seemed to adopt a facilitative approach to quality assurance, a few expressed opinions that indicated support for a managerial rationality. These managers welcomed the HEQC’s interventions as a means of forcing greater accountability on the part of academics.

Well I think it just makes them (academics) accountable for what they do. They’re not here to just sort of sit here and dream you know they’re here to teach, to develop and to research. And they have to account for the time that they’re spending. And I think it’s a good thing. It’s a very, very free work environment and yet it requires a lot of self-discipline and it can actually go very awry if you’re not delivering. (Appendix 9.11 MBA 7)

A manager from a technikon expressed the view that the universities in particular would benefit from the HEQC’s approach.

I believe that the assumption that was made until now that public institutions have good quality assurance processes embedded in their system is a lot of balderdash. I’ve been to too many Senate meetings at different institutions to tell me it’s not about quality - no, it’s about egos. I see it. So I think the assumption until now that the individual Acts of the universities have imbedded in them a quality assurance guarantee was a false assumption. (Appendix 9.8 AM 6)

The data set on academic managers suggests that most mediated between the managerial-bureaucratic and collegial rationalities with a view to being pragmatic, not alienating academics and getting a job done. A few saw the HEQC’s intervention as helpful to their
position as managers, believing that an external quality assurance agency would strengthen their position against uncooperative academics in their institutions.

8.3.4 Evidence of Bureaucratic Rationality

The data suggest that external decision-makers - HEQC officials - did not uniformly adopt a bureaucratic approach to quality assurance. Some of the most senior officials projected a facilitative approach. For example this senior official even expressed concern for the tiredness of academics in the system.

How do we make sure that we get the benefits of quality assurance and not the worst horrors and nightmares of quality assurance? You know we must avoid bureaucratization, and the compliance approach. Because I really think that particularly in terms of teaching and learning you know there are huge challenges facing the institutions, particularly in a context where restructuring takes attention away from the core functions of higher education. So from that point of view I’m hoping that the QA system can keep attention on the core functions. But how to do that without the added layer of bureaucracy, the added complications, the added sense of burden that people are on about? (…)

And then I think the issue of acceptance is very important because I don’t think you can just instruct people, just as I don’t believe you can just legislate quality from the HEQC in Pretoria. You know similarly HE management can’t just legislate improvements in teaching learning practice. So we have to provide incentives, good teaching awards and those kinds of things. (…)

But I think certainly it’s getting the balance right between the carrot and the stick but I think much more carrot in relation to teaching and learning - you know I don’t know how one does that in an environment where everyone is tired. How do you get people excited about teaching? (Appendix 9.7 HEQC 2)

This senior official explained that the HEQC supported both the improvement and the accountability poles in the debate over approaches to quality assurance and saw the self-regulation of institutions as its long-term goal. At the same time he indicated his commitment to an instrumental view of higher education as a means of furthering national development. He went on to make the important point that if the HEQC emphasizes one position at a particular moment (in this case accountability) this is a strategic rather than a principled decision. He also admitted that some of his juniors might be over-zealous about intervention (and control).

Both fitness of and fitness for purpose are important for us. National goals should frame institutional missions, following Castells, we see HE to be the motor of national development. (…)

In the enterprise of creating a national QA system we have to keep both poles in balance. If one or other is fore-grounded at a particular time, that is a strategic decision, rather than one of principle. Contestation around these tensions is healthy. We need to hold the balance over time and take a long view - it will shift with different actors giving different emphases and readings. (…)

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Centralized intervention is only a last resort - it is not our aim - rather our goal is self-regulation. I can understand that in practice an HEQC official may err on the side of intervention, we also need to get the right balance within the organization.

In contrast to the opinions of the academic managers quoted above, this HEQC official explained that the HEQC’s integrated model aims to hold both accountability and improvement together. Surprisingly, he also suggested that the government, the HEQC an academics shared a common set of values.

Yes and this relates also to accountability and development or improvement. As with ‘fitness of’ and ‘for purpose’, to dichotomize either of those two sets of theorems is unhelpful. The HEQC Board has discussed this and they now see these things being inter-related and not as dichotomies, as strengthening one another. But they’re under-pinned by a set of values that the HEQC shares with academics and with the government. We want a diverse system, we want innovation, we want universities and academics to take the full responsibility for quality and not have it imposed…So these are all fundamental. (Appendix 9.7 HEQC 4)

This HEQC official also opposed the setting up of a dichotomy between accountability and improvement and instead suggested an inter-relatedness between the two approaches. He asserted that the HEQC’s proposals were deliberately designed to meet the needs of the South African context. He suggested that once transformation and inequality had been dealt with, the HEQC would be in a position to withdraw.

There is no trade-off between equity and development. This is only in the minds of academics and QA managers. I know that the pragmatic QA in HE literature says that there is always a trade-off between accountability and improvement. This may be true in developed countries such as Holland, where there is a well-established system without huge social disparities. Here QA just keeps the system on a continuous improvement trajectory. So don’t underestimate the nature of society and how it differs in the 1st World. We need to understand the context of quality and the meaning of ‘fitness of purpose’ for our context and once this is established, then design instruments to measure ‘fitness for purpose’. So we first need to deal with transformation and inequality and from there move the system towards self-regulation. So we will start off with a system that needs strong external evaluation as an important tool for measuring and getting minimum standards in place. We need a QA system that emphasizes the duality of accountability and development and their inter-relatedness. We will do development work, but people must first do self-evaluations repeatedly, leading to a culture of self-assessment and ultimately towards self-accreditation. We will measure everyone with the same yard-stick from zero-based assumptions. We will build a legitimate system based on the same criteria, and then later leave it to run itself. (Appendix 9.7 HEQC 3)

The comments of this official suggest a strong ideological framing of the HEQC’s policies. He was quite clear that the HEQC was working to promote the goals of the state (and the interests of students) as opposed to those of academics and institutions. He suggested that only once certain national policy goals were achieved would the HEQC withdraw its strong accountability requirements.
8.4 Conclusion

The analysis of the data above broadly suggests that those stakeholders adopting collegial and facilitative rationalities tended to oppose the HEQC’s proposals whilst those adopting a managerial rationality and/or supporting its ideological position tended to support its policy proposals. It also highlighted the value conflicts that exist between the HEQC (particularly in its bureaucratic moments) and traditional academics, (particularly those from historically English-medium and research-led universities).

The data show how the unequal power relations between the HEQC and the institutions enabled the HEQC to produce its own ‘knowledge and truth’ in its policy discourse. This enabled the HEQC to assert itself as part of the new, strong modernizing South African state, committed to solving social problems. It promoted the idea that quality assurance would lead to equal education opportunities for all as a rationale and justification for an accountability-driven approach.

However, the analysis of the data also suggests that the HEQC cannot get its job done through wielding bureaucratic power alone. Stakeholders were adamant that an over-emphasis on accountability would lead to compliance and not improvement, a hollow short-term achievement. The analysis suggests that HEQC still needs to win consent from academic and quality assurance managers and academics in particular, if its policies are to be effective in the long-term.

This analysis of stakeholder opinion raises some limitations of the critical systems heuristics method. Firstly, the stakeholder groups identified by Ulrich’s four social roles are not homogeneous. The data suggest that wider social histories and ideological commitments can fragment these groups. This phenomenon may be exaggerated in the South African context where democracy is in its infancy and deep rifts in civil society still exist.

Secondly, the critical systems heuristics method may not be sufficiently robust to overcome the distortions in communication that are evident when power relations are unequal. It is not clear that the method can serve to protect ‘the affected’ from the policy intentions of ‘the involved’. For example, in this policy development process, the consultation periods were too short to have allowed extensive consultation with academics using the method. Furthermore, at this stage in the policy development process, ‘the affected’ were insufficiently informed to engage in the debate.

This attempt to use the critical systems heuristics method in the politically constrained environment of a developing country suggests that the conditions of its success may in fact be
a functioning public sphere and a genuinely deliberative democracy. In other words, the goals of the method may actually be pre-conditions for its effectiveness.
Chapter 9  Policy Reformulation: An analysis of the HEQC’s finalized suite of policy instruments

9.1  The Final Instruments for Institutional Audit and Programme Accreditation

During the course of 2004 the HEQC finalized its policy instruments for institutional audit and programme accreditation on the basis of its own learnings from its pilot audits and on the basis of the comments it received from stakeholders. It published the Framework for Institutional Audit and the Criteria for Institutional Audit in June 2004 and the Framework for Programme Accreditation and the Criteria for Programme Accreditation in September 2004. Whilst there appears to be broad consensus in the higher education quality assurance community that the finalized instruments are greatly improved, it is argued below that whilst the detail of the instruments is much improved, the assumptions and rationality on which they are based and their approach to QA have not changed. This is in keeping with the HEQC’s decision or obligation to first establish a threshold of quality provision in the system through imposing an accountability regime in this its first operational phase (2004-2009) before moving to a more facilitative approach in a later phase (2010-2015).

Some examples of the improvements and positive features of the finalized instruments include the following. Firstly the criteria are cleaner, more focused and more ‘user-friendly’. In the case of audit they have been pruned from 39 to 19 and in the case of accreditation from 30 to 19. The confusing distinction between three levels of criteria in audit has been dropped. In the accreditation model the three steps for attaining full accreditation have been streamlined to two, with the ‘mid-term check’ now incorporated into the first candidacy stage. In both documents the HEQC has clarified and expanded its understanding of quality management to include quality assurance and quality monitoring (what one would expect) and also quality support and quality development and enhancement. The latter two concepts are important for furthering improvement in the wake of a quality check.

In the audit criteria document there are two significant developments that allow some discretion to higher education institutions: firstly institutions may add their own additional criteria to those of the HEQC and secondly the HEQC has introduced four open-ended

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169 The HEQC plans to accept applications for self-accreditation status from 2007.

170 This probably means that the same amount of work is required but the system is less cumbersome.

171 The HEQC is still in the process of developing its Quality Promotion and Capacity Development policy framework with a view to operationalising its commitment to quality support and development.
questions (without exemplar indicators) for institutions to answer in their audit portfolios relating to ‘excellence’, ‘a vibrant intellectual culture’, the incubation of ‘new ideas, knowledge and technology’ and recent institutional success in promoting quality (HEQC, 2004a:5). All but the last of these will appeal to collegial rationality and may inspire some enthusiasm from those quarters for the audit process. Furthermore, in order to accommodate context and diversity, institutions are encouraged to develop their own context-appropriate interpretations of the transformation agenda in their mission statements. In turn, audit panels are encouraged to select audit areas for particular focus depending on the mission, goals and level of development of the institutions concerned (Field-notes, HEQC Audit Preparation Workshop, August 2004). In terms of the consequences of audit, the HEQC distinguishes between ‘essential’ and ‘advisable’ recommendations, thus allowing institutions some discretion on how to respond to the audit findings. The HEQC has also committed itself to providing capacity development for those institutions that do not meet its requirements in the first round of audits (Field-notes, HEQC Audit Preparation Workshop, August 2004).

Other positive features that were retained in the HEQC’s final audit model include the fact that the management of teaching and learning remains the central focus of the audits. In addition, audit findings do not result in yes/no summative judgments and do not rank institutions. The focus of the audit remains on validating the existence of a functioning quality assurance management system and on evidence for its effectiveness. The results of audit are not directly linked to funding, although they do have serious consequences for an institution’s reputation and now for the granting of self-accreditation status. Audit teams are comprised predominantly of expert peers who must use and interpret the HEQC’s criteria in making their judgments.

However, there are some features of the finalized audit instrument that, from the perspectives of the collegial and facilitative rationalities, remain cause for concern. Firstly, the fact that the HEQC has determined 19 non-negotiable criteria with detailed indicators removes discretion and ownership from the evaluators to define the meaning of quality for themselves. The setting of such detailed criteria implies that the HEQC knows ‘what works’ and that its criteria will serve as adequate indicators of quality and quality management across all contexts. The HEQC believes that its criteria can be used as ‘evaluative tools’ for both external and internal evaluations. But given the ‘deep structure’ differences between self-generated evaluation and evaluation by an external body discussed earlier, this may be wishful thinking. In compiling

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172 Tacit and possibly naïve theories of academic and educational management and change sit behind the criteria (see policy theory in Chapter 9.4)
their audit portfolios, institutions are expected to self-assess against each of the 19 criteria. This approach suggests that the audits will be primarily for the ‘enlightenment’ of the HEQC rather than for the evaluatees involved. As mentioned above, although the consequences of audit are not directly related to funding, the fact that the audits result in public reports that will contribute to summative, high-stakes judgments on the granting of self-accreditation status could undermine their potential to encourage real improvement. Furthermore, the HEQC seems to want to get institutions to demonstrate, on the basis of evidence that their quality management systems result in improved quality per se. From an evaluation research perspective, this demand to demonstrate impact is not straightforward at all.

In sum, with respect to its instrument for institutional audit, the HEQC has attempted to marry a concern to promote improvement with an accountability check on institutions’ quality management systems. In doing so, the HEQC has also attempted, under circumscribed conditions, to operate communicatively with the sector, at least with academic management. However, its model for audit cannot, at this stage, claim to be facilitative (that is, to fall into Quadrant 3) because it uses standardized criteria across the system and does not allow institutions the discretion to formulate their own quality criteria in line with their individual missions and concerns. In addition, the fact that the results of audit are made public and feed into summative judgments about self-accreditation status pushes the model into Quadrant 4, albeit a weak form of the bureaucratic model.

With respect to the HEQC’s model for programme accreditation, apart from being simplified and streamlined, the criteria for programme accreditation appear to have changed less than those for audit. Positive elements of the accreditation model are the fact that it is based on peer evaluation. Secondly its requirements are very explicit, creating the conditions for a transparent accreditation process. Thirdly, the model includes a focus on process and delivery (as well as inputs and outputs). Fourthly, provisional accreditation will allow programmes to run whilst at the same time, enforcing developmental opportunities to bring them up to standard. A further improvement in the final version of the instrument is that the HEQC has agreed to speed up the accreditation process and will now allow an institution to apply for the candidacy stage; (that is, provisional accreditation and permission to offer a programme) one level above an earlier one, once the first programme has had its mid-term progress report approved. In other words one does not have to wait for the attainment of full accreditation status for a first programme before building on a second. Another interesting point is that the

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173 A truly facilitative approach to audit would involve the adoption of an interpretive approach based on a judicial model rather than a goal-based, pragmatic model in which cause and effect are claimed to be measured.
HEQC does not require student evaluations at the programme level (although it does require graduate surveys). This is viewed as a positive feature because it allows student evaluations to be run at module level only, affording the opportunity to run informal, process-focused evaluations as opposed to summative, outcome-based evaluations. This also allows for the use of interpretive or constructivist approaches to evaluation that are considered more appropriate for the gathering and analyzing of student opinion data.

Given that programme accreditation is evidently an accountability exercise, there is perhaps less to criticize in the HEQC’s accreditation model than in its audit model. However, although stream-lined, the criteria for accrediting new programmes are still too demanding and very comprehensive. Meeting them will require large amounts of time and energy from institutions and academics; the requirement to meet input, process, output, impact and review criteria for full accreditation makes the workload considerable. At candidacy phase, the requirement for an implementation plan that includes time-frames, budget and human resource commitments is also demanding. Furthermore, the fact that accreditation is valid for only three to six years (depending on the duration of the programme), means that re-accreditation cycles will be demanding. The criteria may still be too close to good practice descriptors, that is, they are probably set too high for minimum threshold standards in the South African context. This in turn could result in the stifling of innovation as the heavy demands for attaining full accreditation status serve as a disincentive to academics wishing to develop new programmes. It may also serve as a disincentive to institutions wishing to apply for self-accreditation status.

The high standards set by the HEQC and the consequent workload involved may hinder both the HEQC and self-accrediting institutions in their attempts to re-accredit all existing non-professional programmes 174. However, to the HEQC’s credit, it must be noted that for its re-accreditation exercises (such as the national review of MBA programmes), the HEQC invites expert peers to adapt and contextualise its criteria for the programme concerned. The HEQC claims that its programme accreditation model accommodates diversity and promote continuous quality improvement. But the severe consequences of an accreditation judgment, (the possibility of closing down a programme and, for public institutions, cutting off its funding and a summary of the findings published on the HEQC’s web-site) are likely to undermine the attainment of these policy goals. It is suggested that the HEQC’s accreditation model is a ‘hard’ accountability model for controlling the design and delivery of programmes in the higher education sector. This suggests that it is primarily a realization of bureaucratic rationality located in Quadrant 4.

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174 Ironically, given the chaotic interim registration of qualifications process run by SAQA in 2000, this is probably where most rot in the system lies.
9.2 The HEQC’s Integrated System

This section analyses the development of the HEQC’s ‘integrated’ or ‘interconnected’ model of quality assurance, which aims to hold together both the facilitative and bureaucratic approaches to quality assurance and sustain the tension between accountability and improvement. The tensions between a facilitative and bureaucratic rationality and the accountability and improvement functions of quality assurance were discussed in Chapter 2 and have posed a challenge to senior HEQC officials from the outset. In May 2000, the now Executive Director of the HEQC was already anticipating the problem when she wrote:

The increased range of regulatory frameworks would bring formal coherence to higher education but not necessarily an increase in quality. In addition, as is clear from quality assurance debates in other countries, regulation may be a necessary condition for quality enhancement but not a sufficient one. Over-regulation is even less of a guarantee of quality outcomes. The presence of financial and educational incentives as well as commitment and active involvement of educators and learners will be critical to the real achievement of quality objectives. (Singh, 2000:10)

In thinking ahead to the future role of the HEQC, she pondered:

whether (the HEQC) will be able to balance intelligently its quality development and promotion role with its accountability function? This will depend on an explicit commitment to quality development within appropriate prioritization of its responsibilities. (Singh 2000:10)

During the second half of 2003, the HEQC began to articulate more clearly its position on the relationship between accountability and improvement and between accreditation and audit. As noted in Chapter 8, in a Communique to all HEIs, written in response to stakeholder comments on its proposed audit criteria, the HEQC recommitted itself to the goal of establishing a self-regulatory HE system, but stressed that the HEQC itself is accountable to a range of stakeholders and competing interests and is therefore obliged to develop policy instruments that serve both the accountability and improvement functions (HEQC 2003e). It went on to explain the integrated model.

The HEQC Board considered the implications of promoting only a developmentally orientated audit. However, the consequence of such an approach would be that there would be no possibility of meeting other policy obligations (...) and granting self-accreditation status to institutions on the basis of meeting explicit quality criteria. On the other hand, the HEQC has to ensure that HEI autonomy and responsibility for developing quality management systems that are appropriate to their contexts are not undermined. The Board concluded that it was unhelpful to juxtapose accountability and development and they should not be seen as mutually exclusive, but rather as two necessary and important imperatives that must be pursued simultaneously and kept in balance. (HEQC 2003e: 6-7)

This position is articulated more clearly in a paper by two senior HEQC officials in which they suggest that a new generation of quality assurance systems is emerging which goes beyond the old dichotomies such as accountability versus improvement (purpose), ‘fitness
for’ versus ‘fitness of purpose’ (definitions of quality), minimum standards versus excellence (definitions of quality), programme versus institution (unit of analysis) and state-driven versus collegial (approach to quality assurance). Instead, they propose for the South African national quality assurance system a ‘mixed model’ that they justify on the basis of the peculiar South African context and its transformation imperative.

From the outset, the rationale and objectives for QA were already integrally tied to the post-transition project of large-scale social and economic reconstruction and to an explicit transformation agenda in higher education. This connection highlighted the critical challenge of what kind of system design and operational parameters could give effect to such an ambitious agenda. (Singh and Naidoo, 2003:2)

This analysis is supported in Chapter 6.

According to Singh and Naidoo, the HEQC understands that its key challenge is to combine a suite of quality assurance instruments, with different purposes and philosophies, into a coherent system whilst ‘maintaining the integrity and distinctiveness of audit and accreditation in order to obtain their full benefits, while establishing the appropriate points of connection and convergence between them’ (2003:4). They assert that audits ‘will be conducted largely as a collegial and improvement-orientated form of quality assurance’ (2003:4) focusing on evidence for the effectiveness of internal quality management systems, and in the first cycle, on planning, inputs and processes and only in the second cycle on outputs, outcomes and impact. The accreditation of programmes will continue to use minimum standards to make summative judgments with possibly severe consequences. Both audit and accreditation are to focus on teaching and learning quality, particularly on programme development and review and student assessment and success, but at different levels in the system. In order to maintain the integrity of the model, the HEQC will keep separate directorates for audit and accreditation, it will not grant self-accreditation status to institutions during the first three years of the audit cycle (in order to preserve the developmental nature of audit) and decisions about self-accreditation status will be made by a separate committee, not linked to the Audit Committee. However, the authors do express a concern that institutions’ desire for self-accreditation status may pressurize the HEQC into adopting a stronger accountability model for audit, even in the first audit cycle. In sum, the model aims to use both audit and accreditation in a single system, but to keep their functions distinct and only connect the findings for self-accreditation status decisions. The model also includes a commitment to capacity development for weak institutions with the goal of attaining self-accreditation status. (Singh and Naidoo, 2003:5)

Some of the advantages that the HEQC claims for its new model are that the rigorous minimum standards required for new programmes will protect students, that self-accreditation status will provide a benchmark for institutions -- eventually allowing a return to self-
regulation. Self-accreditation status will also become the goal of the HEQC’s capacity development project. The combination of audit and accreditation reports will provide a sufficiently comprehensive set of information to guarantee stakeholder confidence. However, the authors do acknowledge the challenge they face in imposing such a rigorous system, the link with the transformation agenda and the need for communicative action and engagement with the sector.

The choice of a QA system that combines audit and accreditation in the way in which the HEQC has proposed is related strongly to ‘fitness of purpose’ in relation to the broad social goals that underpin higher education transformation. The challenge will be to ensure that its implementation is effected in a way that fits into rather than undermines the academic and social transformation goals as well as the knowledge and experience of those who have direct responsibility for quality at an institutional and programme level. Of necessity, the process requires openness to engagement, constant discussion, reflection and willingness to learn on the part of all parties concerned. (Singh and Naidoo 2003:11)

They also admit that the proposed integrated model is a ‘high risk venture’ whose potential benefits remain to be tested. They suggest that managing this combination effectively will be a ‘daunting task’ both for the HEQC and for institutions aspiring to self-accreditation status (Singh and Naidoo, 2003:9).

In terms of conceptualization, the existence of both ‘facts’ (accreditation) and ‘norms’ (audit) in a regulatory system is in keeping with Habermas’ (1996) proposals for a legal system (see Chapter 2). But in Habermas’ thinking these two functions are based on different motivations or rationalities and so should be kept far apart and quite distinct. It is suggested that the validity of the HEQC’s ‘integrated model’ will be tested in implementation where it will be important to understand which way the currents between the linkage run and particularly how this effects the developmental integrity of audit.

The two HEQC authors are self-critical and reflexive and list the following possible ‘dangers’ of their proposed model. They suggest that it may lead to ‘system overload’. They acknowledge that it may fail -- because of poor implementation or ‘flawed design’ (Singh and Naidoo, 2003:9). In keeping with the critique above, they do acknowledge that the model could undermine the ‘developmental ethos’ of audit. However, they go on to argue that linking the findings of audit to the earning of self-accreditation status will prevent an ‘open-ended, fuzzy conceptualization of developmentalism’, linking the HEQC’s improvement agenda for institutions to tight time-frames and conditions. Once again, the rationale given for this approach to development is that the HEQC needs to balance the needs of disadvantaged black students with the need for institutional development. In an interesting move, the authors claim that real responsibility for improvement belongs to institutional managers and to the Department of Education. They argue that the HEQC’s improvement agenda can only be supplementary (2003:10).
This paper, written in mid-2003 at a time when the HEQC was busy finalizing the design of its policies and instruments, gives important insights into its thinking. It suggests that whilst promoting a strong accountability approach in this first phase of its operations, the HEQC did not want to let go of improvement and recognized the need for it. However, it appears that the HEQC wanted to define and contain its responsibilities in this regard and indeed, not take prime responsibility for improving the sector. Given all its other responsibilities this seems perfectly reasonable. However, the approach to improvement (described in the paper as linked to tight time-frames and conditions), suggests that their notion of improvement is a far cry from the ideal of self-generated improvement, (which presumably is dismissed as ‘open-ended and fuzzy’). This suggests that the HEQC is defining improvement as other-regulated and tightly linked to its accountability system. This seems to place the HEQC in a ‘tough parent’ role -- with the HEQC deciding what is wrong and coming back to check that it has been put right. In other words, the HEQC is proposing that it define and control the improvement agenda as well as the accountability agenda. It is not clear whether this decision was made on the basis of expediency (as a means of managing an unmanageable task) or whether it was made on the basis of a judgment that weak institutions in the system are not capable of managing their own improvement agendas. It is suggested that there is a danger that this approach will pull the idea of improvement as enlightenment (see Chapter 2) into an accountability frame where it becomes a form of assisted compliance.

This may seem an overly harsh judgment of the HEQC’s proposals for an ‘integrated model’. The judgment relates only to its design. Of course, in the implementation of these policy instruments there is always the possibility that within these frameworks and constraints, the HEQC will negotiate terms with institutional managers and institutions will subvert the HEQC’s intentions (see discussion on implementation in Chapter 10). Furthermore, the high levels of reflexivity and self-criticism evident in these proposals suggest that the HEQC is open to ‘double-loop learning’ and will be open to changing its model as it learns from implementation. A recent CHE publication does not take the success of the HEQC’s model for granted.

It is a key concern for the system and for institutions of higher education, that institutional autonomy be safeguarded in the presence of an external quality assurance dispensation. The approach of the HEQC remains to be tested in practice, although its stated intentions are to balance improvement and accountability roles, and to build a culture of self-managed evaluation to support self-accredited institutions. However, despite a laudable set of objectives, there may yet be risks and unintended consequences: perceptions of checklist compliance, or an excessive and expensive bureaucracy. (CHE, 2004c:154)

Again this statement demonstrates unusually high levels of candour and reflexivity on the part of a government agency.
9.3 A Critical Discourse Analysis of the Final Instruments

In this section four extracts from the final policy texts are selected and analyzed using a simplified form of functional systemic grammar (Halliday, 1994), also drawing on Fairclough’s (1992) critical discourse analysis. In using functional systemic grammar, only two of Halliday’s three meta-functions are used—namely field: the analysis of the ideational meaning of the text (how the text names reality), and tenor: the analysis of the interpersonal meaning of the text (how the text sets up social relations and identities). In analyzing the field of the texts, I look at the participants (actors and goals), the processes (verbal groups) and at the circumstances (prepositional sub-clauses). In analyzing the tenor of the texts, I look at mood (indicated by the finite verb -- declarative, interrogative or imperative), voice (active or passive) and modality (the position taken by the writer with respect to the truth claims being made). I also note semantic chains in the choice of lexicon that run through the texts, linking them to wider orders of discourse. The aim of the discourse analysis is to uncover the lexico-grammatical patterns in the texts and to illustrate how these can be linked to the orders of discourse and the socio-political context that surround and shape the texts. Direct quotations from the texts are indicated by italics.

9.3.1 Framework for Institutional Audits

Restructuring and Transformation Context (Appendix 8.4 p.2-3)

The purpose of this text is to explain to the reader the context, goals and the rationale for the HEQC’s audits. The text has a hierarchical structure with each of the four paragraphs introducing a new layer of context. Paragraph 1 describes South African higher education in terms of the larger socio-political context. This is signaled by the placing of the circumstance In South Africa right at the beginning of the paragraph. Participants in actor position in this paragraph are the higher education system, the challenges of higher education transformation, The restructuring of public higher education and Developments in higher education. Again the device of condensing processes into abstracted nominal groups is used. The subjects of the third paragraph are The work of the HEQC, (the main participant and actor in the third paragraph) and Institutional audits. The purpose and approach to audit is described in this paragraph. The fourth paragraph discusses Audits (the
main participant and actor in the fourth paragraph) and their approach. Note that all the actors in these clauses are abstract nouns - the human agents (who carry out the mergers, audits, the HEQC’s work etc.) are in fact concealed. Halliday (1994) points out that the effect of using nominalizations as the actors and goals of relational processes (see below) is that the verbal processes and their logical connections, (for example in *The restructuring of public higher education*) are lost. This means that the human reasoning behind these actions is also lost and the effect is to close off debate. In other words the text discourages the reader from asking why the restructuring of higher education is happening, because the restructuring is already busy doing something else.

The verbal processes in the first two paragraphs are all relational-they describe states of being; that is, they construct a picture of reality for the reader. Examples include *had been characterized*, *are*, *encompass*, *include*, *are characterized*. The mood of all these verbal groups is declarative in the present tense. The effect of these grammatical choices is to suggest to the reader that this particular construction of reality is true and natural. By contrast the verbal processes in paragraph 3 and 4 are all mental and material processes *will be conducted*, *(to produce)*, *will take*, *(to assist)*, *will address*, *(to evaluate)* and the HEQC is the actor or implied actor. This shift creates a sense of action around the HEQC and gives it strong agency. The shift to the declarative mood future tense not only indicates that these events are still to occur, but that they definitely will happen. In other words the shift to the future tense indicates a high modality-the writer strongly believes that the HEQC will make these things happen.

This assertion of the HEQC’s agency is reinforced by the logical relations set up in the text. For example, a causal logical relation is naturalized in the first paragraph. *The restructuring of public higher education *(to produce)* …* implies a causal relation between the restructuring of higher education and the achievement of a system that meets the state’s policy goals. The grammatical down-grading of this relation to a dependent clause (the main verb is *has been underway*) has the effect of making this logical relation inevitable. The same grammatical device is used in the second paragraph where the rank-shifting of the clause *leading to* makes the causal relation set up between *improved … efficiencies and increased … rates* unquestioned. A direct causal relation is set up in paragraph three *The work of the HEQC … will be conducted … in order/ to produce - a transformed higher education of high quality/ which is able to address … development needs*. The text does not allow one to question the assumptions behind these causal relations. The use of the declarative mood again serves to naturalize these claims.
The following semantic chains are set up in the lexical choices of this text. In the first paragraph a dichotomy is set up between the old and the broken and the new and the just. The South African past is described by the following words *fragmentation, uneven, segregation*; whilst the new South Africa is linked to *justice, democratic, just, quality, improved, effective, efficient and responsive*. The theme of the new and the improved is linked to the work of the HEQC in the rest of the passage, *improved institutional efficiencies, new institutions, increased throughput, improved quality standards, a transformed higher education system, new knowledge and skills, new modalities of provision, new ideas and vibrant intellectual culture*. These meanings link the HEQC to attaining the policy goal of national development.

There is a second semantic chain set up in the text that links the HEQC’s to the attainment of the other policy goal; namely, equity: *access, equity, marginalized groups, women, black students and staff, black and women researchers, continuing uneven development, assist*. What is opaque in the text is the tension between achieving the goal of equity in higher education and the goal of knowledge production linked to developing the economy.

This analysis illustrates how the HEQC’s work is located in the ‘transformation discourse’ and how the HEQC is presented as an agent of the new democratic state that will achieve justice and development. The policy problem and its solution are presented to the reader in a simplified dichotomous discourse that has the effect of naturalizing the HEQC’s worldview. In this regard, the HEQC’s text is typical of policy discourse and the analysis shows how policy texts work to win the reader’s consent.

### 9.3.2 Framework for Programme Accreditation

**Rationale for the Programme Accreditation Model (Appendix 8.6 p.4-5)**

In this text the HEQC is giving information to institutions of higher education about its model for programme accreditation and providing a rationale for the model. At the same time, through its lexico-grammatical choices, it sets up a relationship between itself and institutions. The text is structured as follows. The first sentence states the two rationales for the accreditation model -- *Protection of students* and *maintaining the credibility of qualifications*. The rationale is then picked up again in paragraph 3 where it is given as capacity building and again as protection of students. The rest of paragraph 1 provides a summary of the accreditation model and explains the requirements for the candidacy phase. Paragraph 2 sets out the requirements for the accreditation phase and paragraph 4 explains the HEQC’s plans for self-accreditation. Paragraph 5 deals with the HEQC’s intended relations with other accreditation bodies and paragraph 6 sums up by claiming that the model caters for both accountability and improvement.
In analyzing the field of the text one can identify three actors -- the HEQC, the institutions and the accreditation model itself (variously described as the model, the candidacy phase, self-accreditation status, accountability requirements). When these actors are linked to verbal processes a very interesting pattern emerges. All verbal processes of which the HEQC is actor are in the declarative mood, future tense indicating high modality and strong agency: will utilize, will be evaluated, will enter, will ensure. Most of the verbal processes of which the institutions are actor use the must or have to form of the finite verb; that is, the imperative mood, indicating the highest modality and that these are in fact commands: has to demonstrate (x3), has to submit, must demonstrate, (must) perform. Other verbal processes linked to institutions are material processes such as evaluate, monitor, take (the initiative), suggesting that institutions need to take action and obey. All verbal processes linked to the accreditation model are relational: are (x2, entails (x2), allows, is. As discussed above, the effect of the repeated use of relational processes in the declarative mood present tense is to construct a state of reality for the reader that seems just ‘out there’ as something ‘given’ and ‘natural’. The pattern of using abstract nominalizations with relational processes is typical of technical or bureaucratic discourse (Fairclough, 1992, Chouliaraki and Fairclough, 1999). As discussed above this serves to hide more contentious or complex processes in nominal groups that are represented as neutral agents in technical processes. A second effect of this grammatical pattern is to hide the agency of the HEQC-particularly when the action being described is related to hard accountability actions. For example, in paragraph 6 the agency of the HEQC is deleted completely. In the context of accreditation, accountability requirements for the observance of minimum standards are at the forefront. The grammatical pattern closes off questions such as ‘at the forefront of whose agenda?’, ‘whose accountability requirements?’, ‘observance of minimum standards by whom?’ and the effect is to make the process appear value neutral and objective. The writer of the document continually uses grammatical devices to hide the HEQC’s agency for harsh, accountability-related actions: with conditions set, in a stipulated period of time, is accredited, under certain conditions, will be regulated, accountability requirements.

Regarding the semantic chains in the lexicon there are three types of meanings linked to the three actors in the text. The HEQC is generally the agent only of positive processes and objects such as protection, trust, credibility and encourages. It is also represented as being firm and in control: rigorous, will ensure, will enter, discharge cooperative agreements and legal obligations. As already demonstrated, the HEQC’s negative role is concealed in procedures that become actors in technical, neutral and self-evident processes: the minimum input standards, programme accreditation criteria, accountability requirements. However,
institutions are represented as having to obey, comply and generally keep busy: submit, perform, plan, demonstrate, compliance. The continuous use of the phrase the institution hides the human agents who must carry out these tasks.

The overall effect of these lexico-grammatical choices is to position the HEQC as good and powerful, its technologies as natural and neutral and institutions as under the control of the HEQC and under obligation to comply with its regulations.

A second semantic pattern in the text leads the reader to assume that the HEQC’s accreditation model will achieve both accountability and improvement. The following group of attributes and predicates are used to define the model and link it to improvement: self-accreditation status, efforts for continuous improvement and development, opportunities of development. A second group of attributes and predicates relating to accountability are also attributed to the model: a rigorous programme accreditation process, a compliance and progress evaluation, the observance of minimum standards. The tension between these two orientations is not questioned in the text and the representation of the model as neutral serves to conceal this tension from the reader.

Again, the HEQC’s policy text is not exceptional in displaying these grammatical features—they are typical of policy discourse. Fairclough (1992) argues that linguistic resources such as those demonstrated in this text have developed because language serves not only an ideational function (giving information) but also an ideological one. In other words, texts such as this one simultaneously give information and aim to win consent.

9.3.3 Criteria for Institutional Audits

Teaching and learning and CRITERION 3 (Appendix 8.5 p.7-8)

The HEQC’s purpose in writing this text is to given information to providers on its general requirements for the management of teaching and learning for institutional audit. In the first section 2.2.1.1., it provides an introduction to and rationale for Criterion 3. It then lists its requirements (indicators) for this criterion. Each section is dealt with in turn. As was the case in the text analyzed above, the HEQC is both giving its readers information and also positioning them to comply, but in the case of audit, less strongly than in the case for accreditation.

Again in this introduction to Criterion 3 we see the use of nominal groups or nominalizations as the actors of attributive or identifying relational processes. Examples of nominal groups are efficient and effective institutional arrangements, the quality of teaching and learning, the quality of programmes, appropriate policies, strategies and procedures, The processing and
issuing of certificates ... the illegal issuing of certificates (an extremely long nominal group and clumsy grammatical construction!). Examples of relational processes in the declarative mood, present tense in this section are have to be (x 3), requires, are (x2), is, enhance, allow. Many of these imply high modality. This is reinforced by the interesting pattern in the attributes or identifiers of these processes - they tend to imply that these are matters of such high importance that they are non-negotiable: crucial (x2), attention, necessary, equivalent quality, quality (x2). The effect of these grammatical choices is to suggest to the reader that the HEQC’s definition of reality is true (and urgent) and that therefore the list of criteria that follow are justified and normatively acceptable.

Criterion 3 states that The arrangements for the quality assurance of and support for teaching and learning enhance quality and allow for its continuous monitoring. This is a grammatical pattern typical of technical or bureaucratic discourse that states in neutral terms the way things are, but really means the way they ought to be. The actor is an abstract nominal group and the verbal process is in the declarative mood present tense. This statement captures the logic of audit, namely that it investigates management arrangements and not performance itself. However, the HEQC does not want to know simply that these arrangements are in place, it wants to check that they are effective; that is, that they lead to better quality (which in this construction remains an undefined, empty concept). This may suggest that in audit the HEQC is reluctant to specify the content of quality too specifically.

The indicators for Criterion 3 are written using a rather peculiar grammatical construction (and all the criteria for audit follow this construction): In order to meet this criterion, the following would be expected: followed by a list of abstract and embedded nominal groups. What is grammatically significant in this construction is the mixing of modalities and the use of the double passive voice (we are not told who is doing the meeting or who is doing the expecting). In order to meet this criterion suggests a high degree of certainty (modality) on the part of the writer; that is, the clause suggests that the criterion can be met or not met (by an institution) and that a cause and effect relation exists between having certain procedures in place and meeting the criteria. But this is followed by an unusual finite form would be in the declarative mood and future subjunctive tense, indicating very low modality and conditionality (if I were, then I would ...), but the condition is deleted. This indicates that the HEQC is not certain that it does expect these criteria -- it may be leaving open the possibility of non-compliance with its criteria. Or it may be suggesting that only if it were to take an accountability approach (which it isn’t) then it would expect these criteria. Furthermore, the HEQC may also be attempting to indicate that it will allow some discretionary and interpretive space to implementers, (despite the fact that it is specifying very detailed criteria
and indicators for audit). It was also noted that the writer has deleted both agents - the HEQC and the institution - in this construction. This adds to the effect of the HEQC wanting to background itself from imposing these criteria on institutions. The grammar suggests that the writer is trying to avoid owning up to who is doing what to whom. It may be far-fetched to suggest here that this odd construction indicates reluctance on the part of the writer to take this accountability-orientated approach to audit.

What might be expected by the HEQC is a long list of abstract nominal groups (as predicates of the expecting), with no further verbal processes at all: *An academic planning framework, Quality management systems, Staff development policies and strategies*. These nominal groups are all followed by convoluted dependent or embedded clauses that qualify the head noun: *which articulates well with the institution’s mission and strategic goals, with appropriate resources, time-frames and indicators of success, which promote the professional competence of academic staff, which promote access to students from previously disadvantaged backgrounds*. This awkward construction suggests that the writer was pushing the grammar to its limits in a battle to summarize as much information as possible from the Improving Teaching & Learning Resources into only 19 criteria and their indicators! The effect of this grammatical pattern is again to turn processes into things that then function as participants in further processes, whilst the real agents (the people who have to do all these things) are concealed.

The overall effect of the HEQC’s grammatical choices in this text is that the process of abstraction makes the criteria, and the need for them, appear neutral and self-evident. The lexico-grammatical patterns also suggest that this is a process of recontextualization in which complex, messy and contextualized processes from everyday working life (academic lifeworlds) are being turned into lists of (tentatively) measurable abstract things in a technical or bureaucratic discourse (see discussion below).

**9.3.4 Criteria for Programme Accreditation**

**Criterion 1: Programme Design (Appendix 8.7, p.7-9)**

The purpose of this text is for the HEQC to give information to institutions on what are its minimum standards for granting accreditation. The modality used in the accreditation criteria document is much higher than that of the audit criteria, suggesting that, for accreditation, the HEQC is quite clear on what it wants from institutions and more confident about asserting its authority in this regard. However, the analysis shows that the HEQC is not only providing information, it is also demanding action from its readers.
Criterion 1 states that

The programme is consonant with the institution’s mission, forms part of institutional planning and resource allocation, meets national requirements, the needs of students and other stakeholders, and is intellectually credible. It is designed coherently and articulates well with other relevant programmes, where possible.

The grammatical choices made in this extract are typical of the rest of the accreditation criteria document. The programme is the actor of the relational verbal processes is, forms, meets, and these are followed by lists of identifying phrases and dependent clauses. It is noteworthy that the list of stakeholders to whom the programme is accountable is named, but the use of the passive voice is designed, conceals the most important set of stakeholders, those who teach the programme. By setting up the programme as the actor, the process of teaching is lifted from its local context and all human agency is removed. As already mentioned the use of the declarative mood present tense has the effect of setting up a selection of habitual practices as natural and universal truths—that in fact become the content of the HEQC’s meaning of quality. The grammar sets up a relationship between the reader and the HEQC that suggests that these truths (requirements) are non-negotiable. This claim is confirmed by other grammatical patterns.

The clause that leads into the indicators has a noticeably different grammatical structure to that of the audit criteria. In order to meet the criterion, the following is required at minimum. As suggested above, in contrast to audit, the use of the present tense declarative mood is (and the addition of the phrase at minimum (!)) suggests a high modality. Again the use of the passive voice is required and the deletion of the two key agents, (the HEQC and the provider) means that there is no one to disagree with.

A second difference between the grammatical structure of the audit and accreditation criteria is the use of full sentences for the accreditation criteria and indicators. Generally, in all the indicators, the programme (or aspects of the programme - abstract things), are the actors in these clauses. When the programme cannot be used as the actor of the clause, then the writer uses the agentless passive voice: is made, is not permitted, are taken (into consideration), are planned, are involved, are catered for, are integrated. The only human agents that appear in this text are students, mentioned in indicator (ix) and in a dependent clause in iii).

As mentioned above, the majority of verbal processes in this extract from the accreditation criteria document are relational or possessive: is, meets (x2), are (x3), maintains, has. Where material or mental processes are used they are always in the agentless passive voice. The effect of these patterns is to set up relations between abstractions (things) and an identity,
attribute or possession (other things). This construction is typically used to describe general abstract, conditions that are claimed to be true. The agents, the processes and the logical reasons are all deleted or compressed into nominal groups on either side the relational process (most typically the verb to be)\textsuperscript{175}. The effect of the HEQC’s stating of the ‘ought’ as if it were the ‘is’, is to create a generic abstracted world of quality provision that already exists. The burden of closing the gap between actual reality and the HEQC’s projected reality is the reader’s. Thus, whilst the HEQC is ostensibly only providing information to the reader, it is also implicitly demanding action. The fact that the HEQC’s projected reality is based on numerous choices and is a partial view of reality is concealed by the grammar.

The only concession to local realities and contexts is the occasional circumstance (prepositional phrases) that are tagged onto some of the propositions: where possible (x2), where necessary, where applicable. These concessions to local contexts suggest that the writer is aware that the generic requirements of the HEQC may not fit all realities. However, the HEQC seems to be prepared to negotiate only some of these (seemingly less important) aspects of its requirements.

In conclusion to this section, it is suggested that the two criteria documents can be viewed as typical examples of what Chouliaraki and Fairclough (1999) call the bureaucratization of discourse. This involves a conscious attempt to shape language to meet institutional objectives. Lifeworld discourses (such as teaching and learning practice) are abstracted and generalized and then recontextualised into new institutional contexts (such as a national quality assurance system) as part of the process of ‘rationalizing lifeworlds’. In this process, private spheres are caught up into public spheres where attempts are made to transform everyday habitual practices into rational, explicit and generic, discursive forms. It should be noted that the writing of the ‘Improving Teaching & Learning Resources’ was a first attempt at doing this in the HEQC’s policy development process. The bureaucratization of discourse allows those who do not share the original lifeworld to get a handle on these practices usually for purposes of control and regulation. However, the very nature of bureaucratic discourse -- its high degree of abstraction and genericity -- means that when it is applied back into different institutional sites, they become sites of struggle for the interpretation and appropriation of its meaning. In analyzing the discursive effects of texts it is important to bear in mind that discourse is only one moment in social practice. It is dialectically related to other moments and so its effects are never guaranteed. No doubt the struggle over the interpretation

\textsuperscript{175} Halliday (1994) claims that the historical development of this grammatical form is linked to the development of science and of scientific discourse.
of the meanings of HEQC policy texts will play itself out in social practices such as the
HEQC’s audit and accreditation processes. For example teams of HEQC auditors or
evaluators may have to (re-)negotiate the meanings of criteria with local practitioners who
may contest the intended meanings.

9.4 An Analysis of the HEQC’s Policy Theory

This section reports on the findings of an attempt to apply theory-based evaluation to the
HEQC’s policy ensemble. As explained in Chapter 5, the researcher drew up a ‘hypothesis’ of
the HEQC policy’s theory of change on the basis of a close reading of the final policy
documents in which mechanisms of change and claims about outcomes were noted. This
‘hypothesis’ becomes the research instrument. The final version of the instrument as validated
by two HEQC officials is presented below. The description of the policy theory is contained
in the first table under the columns Causal Factors & Purpose, Context, Mechanisms,
Immediate Outcomes and Impact. The logic of setting out the theory in this way is to capture
how the construction of the problem (causal factors) led to the solution (policy purpose) and
to make explicit as possible the context in which the policies would operate. Key to
understanding a policy theory is the mechanisms for change that it introduces and the
outcomes and impact that it claims or assumes these mechanisms will achieve. The version of
theory-based evaluation used is an adaptation of Pawson and Tilley’s (1997) ‘realistic
evaluation’ discussed in Chapter 4. The assumptions that are made for each category in the
policy theory are listed in the second table.
## Table 1: The HEQC's Integrated QA System: Policy Theory

<table>
<thead>
<tr>
<th>Causal Factors &amp; Purpose</th>
<th>Context</th>
<th>Mechanisms</th>
<th>Immediate Outcomes</th>
<th>Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Historical inequality leading to unequal standards of provision</td>
<td>Global</td>
<td>Audit:</td>
<td>institutional missions promote the national transformation agenda</td>
<td>HEQC's QA system develops actual improvements in the efficiency &amp; effectiveness of provision demonstrated in improved retention &amp; graduation rates</td>
</tr>
<tr>
<td>Lack of access and representivity</td>
<td>System &amp; Institutional</td>
<td>assess institutional mission in terms of national transformation agenda (fitness of purpose)</td>
<td>appropriate QMSs are developed and management becomes more effective and efficient</td>
<td></td>
</tr>
<tr>
<td>Inefficiency</td>
<td></td>
<td>assess extent to which HEI is achieving its own mission (fitness for purpose)</td>
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<td></td>
</tr>
<tr>
<td>Poor management</td>
<td></td>
<td>assess extent to which planning, resource allocation &amp; QM are aligned</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ineffectiveness-high failure and drop-out rates, especially for black students</td>
<td></td>
<td>assess effectiveness &amp; efficiency of QMSs for T&amp;L, R &amp; CE using HEQC criteria &amp; HEQC's open-ended questions (&amp; HEI's own criteria)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Irrelevance</td>
<td></td>
<td>judgement on effectiveness of QA arrangements (commendations &amp; recommendations) in public audit report</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Devt of private provision with some of questionable quality</td>
<td></td>
<td>HEI formulates &amp; implements improvement plan</td>
<td></td>
<td></td>
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<tr>
<td>Purpose:</td>
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<tr>
<td>To design and effectively implement an integrated national QA system that will judge HEIs' quality management capacity (audit) &amp; judge whether programmes meet minimum quality standards (accreditation) in order to ensure accountability &amp; improvement &amp; transform the HE system.</td>
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<tr>
<td>Provide funded development assistance for HEIs that fail to meet HEQC requirements linked to tight improvement plans</td>
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<tr>
<td>Use of the IT&amp;L Resources as good practice benchmarks</td>
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<tr>
<td>Institutional missions promote the national transformation agenda</td>
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<td></td>
</tr>
<tr>
<td>Appropriate QMSs are developed and management becomes more effective and efficient</td>
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<tr>
<td>QM and self-evaluation capacity is developed across the HE sector</td>
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<tr>
<td>The actual quality of programmes, T&amp;L, R &amp; CE is improved, minimum stds are increasingly met</td>
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<td></td>
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<tr>
<td>Poor quality programmes do not enter and are gradually eliminated from the system</td>
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<tr>
<td>Cohorts of trained auditors &amp; evaluators are developed by the HEQC</td>
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<tr>
<td>HEQC collects baseline data on the quality of HE provision across the sector</td>
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<tr>
<td>Audit &amp; accreditation reports provide useful information to HEIs &amp; the public</td>
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<tr>
<td>HEQC's QA system develops a culture of continuous quality improvement and self-regulative capacity in HE</td>
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<tr>
<td>Students are protected from poor quality programmes &amp; historically disadvantaged students (blacks and women), in particular, benefit from HEQC policies</td>
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<td></td>
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<tr>
<td>The credibility of SAn programmes &amp; qualifications is enhanced</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>There is greater articulation between programmes &amp; qualifications</td>
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<tr>
<td>Effective national QA system benefits not only the HE sector, but also society at large e.g. improved equity, access &amp; responsiveness leads to social and economic devt</td>
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</tr>
</tbody>
</table>
Table 1 cont: The HEQC’s Integrated QA System: Policy Theory

<table>
<thead>
<tr>
<th>Assumptions about Causal Factors &amp; Purpose</th>
<th>Assumptions about Context</th>
<th>Assumptions about Mechanisms</th>
<th>Assumptions about Immediate Outcomes</th>
<th>Assumptions about Impact</th>
</tr>
</thead>
</table>
| 1. that the main cause of the ‘problems’ was the unjust policies of the apartheid state, therefore the new modernising democratic state can and must set things right  
2. that for audit the assessment of quality management will lead to improvement of quality management capacity; that this in turn will lead to improved provision of HE  
3. that for accreditation compliance with minimum stds will improve the quality of provision, whilst those not complying will be closed down. | 1. that HE can & should be a motor of national devt  
2. that it is possible to build a ‘single coordinated HE system’  
3. that it is possible to design and implement a single QA system for all institutional types and contexts & accommodate diversity  
4. that mediating historical, cultural, institutional & departmental contexts will not refract policy  
5. that other contextual conditions & policy interventions will not interfere with the implementation of the QA system | 1. that strong HEIs have the management capacity, time & resources to engage & comply with HEQC reqts, e.g. to put QMSs in place, conduct valid self-evaluations & (will want to) meet self-accreditation status reqts  
2. that weak HEIs (e.g. HDIs and merging institutions) will need support & capacity devt to meet reqts & that the HEQC’s CD initiatives will be welcomed & effective  
3. that HEI leadership can persuade academics to cooperate & conduct self-evaluations v. HEQC criteria  
4. that HEQC criteria can be generically & comprehensively made explicit and applicable to all contexts  
5. that practitioners will understand and ‘correctly’ interpret criteria  
6. that auditors & evaluators will be viewed as legitimate and credible  
7. that panellists will agree on the interpretation & application of criteria & make fair judgments  
8. that HEQC reports will be sufficiently diagnostic to point to action for improvement  
9. that internal and external QA systems will be aligned & work together to improve & transform the system | 1. that public HEIs will comply with the transformation agenda  
2. that HEIs will have the capacity to meet HEQC reqts  
3. if not, HEQC devt initiatives will succeed  
4. that externally-driven evaluation processes will generate & validate internally-driven self-evaluation processes leading to changes in social practices  
5. that judgements about the quality of social practices can be made reliably, validly & fairly by QA experts  
6. that the use of peer review will legitimate HEQC judgments for the academic community  
7. that the HEQC has the intellectual, management & resource capacity to run a national QA system effectively  
8. that the HEQC will add value to institutional self-evaluations, to public information and to DoE management systems | 1. that external QA can lead to changes in internal practice  
2. that an integrated QA system involving summative judgments & public reports can simultaneously add value & cause continuous improvement  
3. that real improvements in the quality of provision will be achieved in all HEIs & especially for black & women students  
4. that a QA system that initially emphasises accountability & compliance can later move to an effective self-regulating system, with self-accreditation status as an incentive  
5. that the HEQC can promote the national transformation agenda and simultaneously respect institutional autonomy, diversity and academic discretion  
6. that high quality HE systems contribute to national social & economic development  
7. that the benefits of the national QA system will out-weigh its costs |
The table of the policy theory and its assumptions was the focus of the discussion conducted with two HEQC officials on the evening of 26/08/2004 during an HEQC Auditor Preparation workshop. The report of the discussion is based on the researcher’s field-notes (26/08/2004). Firstly, the two HEQC officials commented on the first table. The researcher edited the original table in line with their comments and later e-mailed it to them for their confirmation.

The remainder of this section discusses the HEQC officials’ responses to the numbered assumptions listed under each of the columns in the second table. In reporting on the discussion, I have not distinguished between the two officials, the opinions belong to one or the other, but there were no strong disagreements between them. Where appropriate, the opinions of other stakeholders regarding these assumptions are raised. Assumptions are indicated in italics and referred to by number.

Causal Factor No.1: the main cause of the ‘problems’ was the unjust policies of the apartheid state, therefore the new modernizing democratic state can and must set things right

Regarding this assumption the HEQC officials agreed that the apartheid education system was the main cause of the low quality of the inherited higher education system. Data presented in Chapter 8 confirms that many other stakeholders, and particularly those from historically black institutions share this world-view.

Causal Factor No.2: audit - the assessment of quality management will lead to improvement of quality management capacity; this in turn will lead to improved provision of higher education

The respondents stated that the HEQC does not hold strongly to this assumption -- rather it is a ‘qualified hope’. They explained that the HEQC believes a well functioning quality management system to be a necessary but not sufficient condition for quality.

Causal Factor No.3: accreditation - compliance with minimum standards will improve the quality of provision, whilst those not complying will be closed down

Again the respondents thought that this was a qualified hope on the part of the HEQC. They thought that accreditation would be more effective in the private sector and for the weaker public institutions. They argued that the private sector only responds to a hard compliance approach because they are driven by a profit rather than by an educational motive (strategic action).

Context No.1: higher education can and should be a motor of national development

The respondents supported this assumption, especially in the case of a developing country where resources and expertise are scarce.
Context No.2: it is possible to build a ‘single coordinated HE system’

Context No.3: it is possible to design and implement a single QA system for all institutional types and contexts and accommodate diversity

The respondents pointed out that the HEQC has no option but to accept the Department of Education’s vision for a single system. However, they also added that because of the divided history of the system, any other approach would be unfair. They insisted that the HEQC does recognize the complexities and diversity of institutions and that it would do its best to accommodate these in audit.

Context No.4: mediating historical, cultural, institutional and departmental contexts will not refract policy

The respondents disagreed with this assumption. This is supported by the analysis of the data presented in Chapter 8 which suggest that practitioners’ histories, cultures and contexts will refract the interpretation and implementation of policy.

Context No.5: other contextual conditions and policy interventions will not interfere with the implementation of the QA system

The respondents felt that the restructuring was likely to delay the development of internal quality management systems, hence the HEQC’s phased-in approach in which merging institutions would be given a three year ‘settling down’ period with audits only commencing in 2007. In Chapter 8 stakeholders’ appreciation of this was noted. The officials also mentioned their belief that a functioning quality management system could greatly assist the merger process, for example as a means of deciding on common programme requirements across a new institution.

Mechanism No.1: strong institutions have the management capacity, time and resources to engage and comply with HEQC requirements, e.g. to put quality management systems in place, conduct valid self-evaluations and (will want to) meet self-accreditation status requirements

The respondents thought that stronger institutions could meet its requirements, but they recognized that there is a lack of quality assurance capacity in the system. Data in Chapter 8 suggest that non-compliance with HEQC policies may also be a matter of conflicting world-views or competing demands.

Mechanism No. 2: weak institutions will need support and capacity development to meet requirements; the HEQC’s capacity development initiatives will be welcomed and effective
The officials confirmed their belief based on experience that capacity development initiatives would be welcomed in weak institutions, especially if they were properly funded. (They mentioned that the CHE and HEQC are raising large amounts of donor funding for this purpose). They also mentioned that the mergers may help solve this problem, but only in the medium-term. However, neo-institutional theory discussed in Chapter 10, suggests that weak institutions may lack the ‘adaptive capacity’ to respond appropriately to pressures for change.

Mechanism No. 3: Institutional leadership can persuade academics to cooperate & conduct self-evaluations against HEQC criteria

With regard to the issue of HEQC credibility with higher education leadership, the respondents explained that the HEQC won ‘buy-in’ to the quality assurance process through its one-day visits and special focus on communicating with Vice-Chancellors when it was first established. They also insisted that the HEQC’s criteria were derived from an extensive consultative process and revised after the comments it received from the sector as well as on the basis of experience gained through its pilot audits. They therefore felt that the sector had no right to object to the criteria at this stage. The data analyzed in Chapter 8 suggests that, despite the HEQC’s efforts at consultation, some stakeholders, especially academics were not adequately included in the process.

Mechanism No.4 has been dealt with in Context No.3 above.

Mechanism No.5: practitioners will understand and ‘correctly’ interpret criteria

The respondents believed that this is primarily an institutional responsibility.

Mechanism No. 6: auditors and evaluators will be viewed as legitimate and credible

HEQC officials admitted that there were bound to be ‘teething problems’ but that these would improve with time. They added that they regarded the auditor and evaluator training process as an important contribution to developing institutional quality expertise. This comment was confirmed by the data on the MBA reviews. But this data set also suggested that the credibility of HEQC panelists is a critical issue that the HEQC needs to address.

Mechanism No. 7: panelists will agree on the interpretation and application of criteria and make fair judgments

The officials admitted that there could be dissent in the panel discussions. However, if panels could not reach consensus, the HEQC would not allow minority reports but would rather just omit the point altogether. Whilst resolving the problem of dissent within the panel, this strategy may lead to bland reports.
Mechanism No. 8: HEQC reports will be sufficiently diagnostic to point to action for improvement

The respondents expressed the belief that provided the panelists were well-trained and had sufficient expertise, this assumption should hold. However, the data in this study suggests that, certainly with regard to the improvement of teaching and learning, panelists may not possess adequate pedagogic expertise. This is concentrated in a relatively small group of people across the country. However, the HEQC’s ‘Improving Teaching and Learning Resources’ could serve as a resource in this regard.

Mechanism No. 9: internal and external quality assurance systems will be aligned and work together to improve and transform the system

The respondents explained that in many cases there were no internal systems and so the HEQC was providing a platform for institutions to take off from. In other cases, they suggested that the HEQC would be flexible, provided that institutions could demonstrate the effectiveness of their internal systems.

Outcome No. 1: public institutions will comply with the transformation agenda

The respondents stated that this was in fact a Department of Education requirement that the HEQC had to support. However, they believed that all institutions would comply because in any case, it was in their self-interest to do so. They also recognized the complexity of institutions and their differing capacities to engage with the national transformation agenda. These comments suggest that the HEQC will allow institutions some discretion in interpreting transformation requirements to their institutional contexts. They also suggest that the HEQC is structurally (as well as ideologically) tied to the transformation agenda. The data presented in Chapter 8 suggest that the majority of stakeholders agree with and will attempt to comply with the demands of the transformation agenda.

Outcomes 2 and 3 have already been dealt with.

Outcome No. 4: externally-driven evaluation processes will generate and validate internally-driven self-evaluation processes leading to changes in social practices

HEQC officials expressed their belief that this assumption would hold, but only where there was good leadership and sufficient quality expertise in institutions. The data on the MBA reviews supports this view. The data presented in Chapter 8 also suggest that the issue of cultural and value-alignment has to be addressed if there is to be alignment between internal and external systems.
Outcome No. 5: judgments about the quality of social practices can be made reliably, validly and fairly by quality assurance experts

Outcome No. 6: the use of peer review will legitimize HEQC judgments for the academic community

The officials thought that assumptions No. 5 and 6 would hold provided panelists attended and took seriously the HEQC training workshops and provided the HEQC could recruit sufficient numbers of senior academics. The discussion on theories of evaluation in Chapters 4 and 7 criticized the HEQC’s adoption of dominant pragmatic models of evaluation, suggesting that this may not be the best model for judging social practices, especially if improvement is the goal of the evaluation.

Outcome No. 7: the HEQC has the intellectual, management and resource capacity to run a national QA system effectively

The officials responded that the HEQC does have adequate intellectual and management capacity, but they expressed concern about the HEQC’s middle and lower level human resource capacity and about the HEQC’s dependence on the Minster of Education for resources.

Outcome No. 8: the HEQC will add value to institutional self-evaluations, to public information and to Department of Education management systems

Both officials believed that this assumption would hold, but that adding value to institutional self-evaluations would take time as the HEQC first needed to gather experience. This assumption may be optimistic and goes against some of the quality assurance literature reported in this study.

When discussing the assumptions made in the HEQC’s policy theory about long-term impact, the HEQC officials were more cautious. This suggests that they recognize the difficulties involved in achieving the sometimes exaggerated claims made for the HEQC’s policies in the policy documents.

Impact No. 1: external quality assurance can lead to changes in internal practice

As suggested as above, the respondents thought that this would hold only where there was good internal leadership and management.

Impact No. 2: an integrated quality assurance system involving summative judgments and public reports can simultaneously add value and cause continuous improvement
The respondents were surprisingly cautious regarding this assumption. They suggested that the HEQC would have to be very careful in its implementation of the integrated model to ensure that it kept audit and accreditation distinct. They explained that this was why the HEQC has two separate directorates for these functions. This suggests that these two officials are aware of the ‘theoretical’ risks implicated in the HEQC’s model.

*Impact No.3: real improvements in the quality of provision will be achieved in all institutions and especially for black and women students*

The respondents stated that this was more a hope than a conviction and they recognized that quality assurance of the weaker institutions would take time to bear fruit for students. However, they felt that accreditation would protect vulnerable students from ‘exploitation’.

*Impact No.4: a national quality assurance system that initially emphasizes accountability and compliance can later move to an effective self-regulating system, with self-accreditation status as an incentive*

The officials indicated that this was certainly the HEQC’s intention and that, once a threshold level of quality has been achieved across the system, the HEQC intends to pull back. They also noted that this has been achieved in other countries.

*Impact No.5: the HEQC can promote the national transformation agenda and simultaneously respect institutional autonomy, diversity and academic discretion*

The respondents commented that the HEQC was very concerned to respect institutional autonomy and diversity in audit. They pointed out audit reports will indicate ‘areas for improvement’ without prescribing what an institution should do about it. The reports will also make a distinction between ‘essential’ and ‘advisable’ recommendations, the former requiring action by the institution whilst the latter only suggesting that attention is advisable. On the other hand, minimum standards for accreditation do make clear what needs to be in place. This response suggests that the HEQC certainly intends to hold onto the integrity of the audit idea. The data suggest that the tension between its accountability (with compliance) and improvement motivations will be played out through the implementation process.

*Impact No.6: high quality higher education systems contribute to national social and economic development*

The HEQC officials both held strongly to the belief that high education can and should contribute to national social and economic development.

*Impact No.7: the benefits of the national quality assurance system will out-weigh its costs*
The officials expressed their belief that in the long run, the benefits of the HEQC system would definitely outweigh its costs, but that it would be costly to get it off the ground initially. The data in this study confirms the latter whilst it is suggested that it is premature to make judgments about long-term costs and benefits.

In conclusion, from a research method perspective, Pawson and Tilley’s (1997) theory-based model and their suggested application of it to an interview process was considered to have been fruitful. The method was fruitful because it brought to the surface critical issues for the successful design and implementation of the HEQC’s policies. Further, it allowed the researcher to gain a better understanding of the HEQC’s thinking (although this was based only on the opinions of two individuals). The discussion also alerted the researcher to the need to understand the dialectic between structure with individual agency and the working of ideology with individual reflexivity. In this sense, the exercise served as a balance to the critical discourse analysis carried out in Chapter 9.3 where the ideological function of the policy texts was emphasized. The discussion around the HEQC’s policy theory uncovered high levels of reasonableness (rationality) and reflexivity in the HEQC’s interpretation of its policies. It also uncovered an ontological commitment to the transformation ideology as a justification for the HEQC’s (and probably personal) motivations, values and policies. (see Chapter 10 for further discussion). This exercise indicated to the researcher the methodological challenge of holding structure and agency, ideology and reflexivity together in dialectical relationship in a policy analysis.
Chapter 10 Conclusions

This chapter is structured as follows. First it summarizes the key findings of each chapter according to the policy cycle that has been used to hold the narrative frame of the study; namely -- setting the policy agenda, policy formulation, policy adoption and policy reformulation. In the process of reporting on the findings, it is made clear how the three research questions that were posed at the outset of the study are answered. In doing so further reflection and comment is made on key theoretical issues that were raised in the literature review chapters\textsuperscript{176} such as the role of external quality assurance agencies and the 'politics of quality', the nature of policy implementation and the relationship between improvement, accountability and compliance in quality assurance systems. Thereafter the significance of the study is discussed followed by its limitations and areas for further research.

10.1 Summary of Key Findings

10.1.1 Setting the Policy Agenda

Chapter 6 discussed the need for a capitalist state to create the conditions for capitalist accumulation and reproduction while retaining its legitimacy. It showed how in the context of globalization and the neo-liberal ‘Washington consensus’ the post-apartheid South African government decided to impose its own ‘structural adjustment programme’ (GEAR). This led to constraints on state spending on social services which in turn led to a need for the Departments of Labour and Education to justify state spending on education and training by asserting their relevance and responsiveness to labour market needs and to national economic development. These two departments set about developing and implementing policies to ensure the greater efficiency, effectiveness and responsiveness of the education and training systems. Higher education was singled out as being particularly unresponsive, ill-managed, inefficient and yet potentially the ‘motor of national development’. This led to the formulation of a vision for a single, coordinated and transformed higher education system as set out in Education White Paper 3 (1997). Key policy goals that give content to the state’s meaning of transformation are efficiency, effectiveness and responsiveness to meet national economic development needs. In addition, equity (or at least equality of educational opportunity) to meet the need for social redress and social development is asserted as a second policy goal.

\textsuperscript{176} In some cases where publications have only recently become available new references are introduced.
is argued in the policy discourse that these goals should be attained simultaneously and the tension between realizing these in practice is either over-looked or down-played. In the discourse that rationalized the need for external quality assurance by a government agency, these policy goals for higher education began to shape the meaning of quality. It has now become part of widely accepted ‘common sense’ in South African higher education discourse that the meaning of quality includes relevance, responsiveness, equity and social transformation. In this sense the quality project works ideologically (see below).

The National Plan for Higher Education (2001a) outlined an implementation strategy for higher education and translated the state’s policy goals into national performance indicators. It set out clearly how the state would seek indirectly (and sometimes more directly) to ‘steer’ the system towards the achievement of its goals via its three steering mechanisms: planning, funding and quality assurance. It also indicated that the transformation of higher education would include a massive re-structuring exercise, merging 36 institutions into 22.

The ‘grand narrative’ of the policy discourse that legitimated state intervention on this scale was caricatured as follows.

‘A strong, modernizing and cleansing post-apartheid state will right the wrongs of apartheid by restoring social justice and overseeing national economic development. Higher education will play a critical role in delivering these policy goals. Firstly, with regard to economic development it will deliver research and innovation and a ‘high skills’ flexible, adaptable work-force and contribute to South Africa’s competitiveness in the global market. Simultaneously equality of educational opportunity for all will be assured in a single, coherent, restructured higher education system. Access and graduation rates will be equitable (representative of the population) and the weak (historically disadvantaged black students) will be protected from unscrupulous providers. The transformation of the higher education system will simultaneously deliver an efficient and effective service, contribute to equity and social justice and respect institutional autonomy and academic freedom.’

The claims made in this grand narrative for quality assurance by an external state agency were that it would improve the efficiency and management of higher education, ensure accountability of higher education to the government and other stakeholders and guarantee equal and high quality educational opportunities for all students. The policy’s theory of change assumed that external quality assurance would cause the quality of higher education per se to be enhanced which in turn would deliver high quality graduates (representative of the population) who would further national economic and social development. The assumptions about cause and effect relationships and the difficulty of resolving the tensions between these goals remain unquestioned in the policy discourse.

It was pointed out in Chapter 6 that the HEQC was mandated with the difficult task of achieving both accountability and improvement of the higher education system and of maintaining a balance between public accountability and institutional autonomy. Furthermore,
from the outset, the work of the HEQC was strongly framed in terms of the Department of Education’s policy discourse. It was always understood that quality assurance was to be a means of achieving the state’s ‘transformation agenda’\(^{177}\). The analysis also noted that this commitment to achieving the state’s ambitious goals for higher education would require a high degree of control and intervention by the state in the affairs of higher education institutions.

These conclusions regarding the setting of the policy agenda for quality assurance in South African higher education raise two issues: the nature of the relationship between the state and higher education in South Africa and the working of quality as an ideology. It is widely argued that in the context of globalization, the concept of higher education as an independent sphere of civil society and as a public good (with its own social practices, identities and values) is being crowded out by a more instrumental view of higher education concerned with its market value, productivity, performance and efficiency (Beck and Young, 2003, Brennan and Shah, 2000, Dale, 1989, Harvey, 2002, Henkel, 2000, Morley, 2003). As trust between higher education institutions and governments breaks down, so institutions are having to reconstruct themselves in terms of state agendas (Barnett, 2003).

In the South African context, Singh (2001) has defended the notion of higher education institutions as institutions of civil society that serve the public good. She is concerned that, in the face of globalization, the notion of the public good is being eroded and that the role of higher education is being reduced to the contribution that higher education can make to national and global economies and to individual and national competitiveness in the market. Singh argues that the notions of ‘development’ and ‘social responsiveness’ should be re-conceptualised and ‘thickened’ to include an understanding of higher education as a public good, which she defines as ‘a common space’ where moral and political goals such as democracy, social justice and a broad understanding of knowledge (including the arts and humanities) can be pursued (Singh, 2001). Singh argues that public higher education should be preserved as a social institution rather than a business and that as such, it could play a crucial role as ‘critic and conscience of society’ (Singh, 2001:12). She concludes by asking ‘whether and how it is possible to balance the different requirements of good scholarship, entrepreneurial efficiency and social justice commitments within a broader notion of transformation’ (Singh, 2001:17-18). And further that

\(^{177}\) This was articulated as the ‘fitness of purpose’ meaning of quality that was to underpin all other definitions (see HEQC’s Founding Document, 2002).
Making social justice issues explicit and real within the notions of HE responsiveness and accountability is likely to prove enormously difficult if not impossible. The task requires not only tenacious commitment, but also clarity of conception about what is required and the mobilization of different role-players around it. (Singh, 2001:18)

This clarity of conception was evident in an interview with a senior official who explained how he understood the need for the HEQC to keep the policy tensions in balance.

With respect to the choices you mentioned, it is not the case that we are only confronting these paradoxes at the implementation stage -- they were always there from the outset and manifest themselves sharply in our HE system. In the enterprise of creating a national QA system we have to keep both poles in balance. If one or other is fore-grounded at a particular time, that is a strategic decision, rather than one of principle. Contestation around these tensions is healthy. We need to hold the balance over time and take a long view -- it will shift with different actors giving different emphases and readings. Over the last two years we have quite deliberately and explicitly had a lead in phase-up to 2003-as a process of policy and system development and consultation. We are about to move into implementation phase and this will test whether our conceptualization is adequate. Of course none of the policy instruments will stay the same, they will be refined over time, we will learn as we go. (Appendix 9.7 HEQC 1)

What is significant about this comment is the suggestion that if accountability is fore-grounded at a particular time, this is a strategic rather than a principled decision that will only be temporary, as the system develops.

Castells (2001) argues that institutions of higher education are dynamic systems with contradictory functions. He also makes the important point that there is no such thing as a ‘pure’ or ‘scientific’ university. Successful institutions manage their contradictory functions in such a way that research and scholarship are protected from immediate economic, social and political processes. There is wide agreement in the literature that this distance is a necessary condition for research productivity.

Without the self-determination of the scientific community in the pursuit of the goals of scientific research, there will be no discovery’. (Castells, 2001:216)

However, historically, one of the functions of universities has always been ideological. They have always generated and reproduced ideologies (usually the dominant ideologies of their political or financial sponsors), and functioned as ‘sites of ideological struggle’, particularly in times of social and political change.

As First World universities become increasingly dominated by market and performativity ideologies and attract funding for research and innovation, there is a danger that Third World universities lag even further behind. This is partly due to a lack of human and financial resources, but it is also because in post-colonial contexts, the ideological function of higher education institutions tends to crowd out the epistemic function. According to Castells (2001), historically Third World universities have become state apparatuses for the generation and reproduction of nationalist and culturally assertive ideologies.
As noted in Chapter 6, the South African state wants to use its institutions of higher education for at least two functions: as engines of national development for global competitiveness and as a means of admitting and training new cohorts of professionals and bureaucrats for the new state (thus producing a new African social elite). Although not overt in the policy discourse, it is suggested that the ideologies of African nationalism and neo-liberalism are at work behind the policy discourse.

The findings of the study suggest that in the old English-medium liberal universities, a low key ideological contest is being waged between old-fashioned liberalism (that includes the assertion of absolute academic freedom and institutional autonomy as academic rights) and African nationalism. In this contest there is a danger that, just below the surface, the ideological struggles between the old and new ruling classes will obscure the fact that a certain degree of ‘distance’ (Castells, 2001) is a necessary condition of academic work, whether or not this need is couched in old liberal discourse.

The study has also shown that because the ‘transformation’ ideology holds the high moral ground, there is a danger that the push for state control (for example using quality assurance to check on equity) might be allowed to suffocate the working conditions necessary for academic productivity. This is precisely why writers such as Muller (2003) (see below) argue that there is potentially an unmanageable tension in South African higher education between the social/ideological function of achieving equity and the development function of delivering world class research and innovation. However one HEQC official argues that academic freedom and institutional autonomy should continue to be protected, but that the nature of the relationship between the state and higher education needs to be re-thought.

With respect to the public sector, those who go on about academic freedom are nostalgic for the past where surprisingly the government had a very laissez faire approach to HE, with very little accountability required. Now the relationship between HE and the state needs to be re-thought, we need a stronger social contract and people need to re-think old notions of academic freedom and institutional autonomy. Just as the professional councils have always been accepted as a means of quality assurance, so the HEQC wants to assure and protect the public. Academic freedom and institutional autonomy should be protected, and there is no reason why QA should be seen to interfere with the academic enterprise. (Appendix 9.7 HEQC 1)

In the South African context, this tension between the need for state intervention and the academy’s need for ‘distance’ from the state is acute. Jonathan (2001) argues that in the South African context, the state needs to intervene to steer and regulate higher education in the public interest because the radical change required in the system will not be delivered through voluntarism or through market forces. She suggests that the South African government’s transformation project (particularly its concern for social justice), flies in the face of the dominant global trend to leave education to market forces. However, whilst exercising
CHAPTER TEN

CONCLUSIONS

democratic oversight, the government should also recognize the role of civil society in having expertise and a legitimate interest in how higher education should be run and should limit the scope of its control and interest in higher education accordingly. Jonathan goes on to argue that the ‘public good’ in a developing democracy has two elements, ‘the current aspirations of citizens’ and ‘the resources for deepening and modifying those aspirations with changing circumstance’. In other words, public institutions need to cater for present demands and also retain the resources to shape and respond to future needs.

Public action in the form of policies for the provision and regulation of HE thus has a tightrope to walk. It must encourage academic work to drive the social train down tracks endorsed by the public but it must also ensure that such work enables both train and tracks to be progressively redesigned, for the sake of future journeys which today neither the public nor its political representatives can plan or foresee. The task of government is to formulate and implement policy which negotiates this tightrope. (Jonathan, 2001:78)

Jonathan elaborates what this means in practice: ideally there should be a democratic compact between state and academy in which the state provides steering mechanisms, ‘levers and pulleys’ such as quality assurance and institutional accountability, to lead HE in the direction of its development trajectory. But the state should leave the content, method and evolution of teaching and research to ‘the expertise of individual academics and to their disciplines and institutions, which foster the critique and renewal of culture, knowledge, skill and value’ (Jonathan, 2001:78).

What has been defended here is legitimate public action, on the grounds that this is implied by democratic accountability as well as by an ethic of social responsiveness. Commitment to such action by government as agent for the public, always in consultation with stakeholders, is the only position available to the state in respect of HE which is consistent with a democratic vision of the public good. (Jonathan, 2001: 78-79)

Noteworthy for this study is Jonathan’s concept of ‘legitimate public action’ and her insistence that it be undertaken in consultation with stakeholders.

Notwithstanding Jonathan’s carefully worded rational approach to legitimate public action, Barnett (2003) warns of the danger of quality working ideologically. He claims that an ideology always offers a narrative of a changed world178 to which its adherents give their consent. He follows Habermas’ conceptualization of ideology as consisting of three elements: ontology (it creates subjectivities), communication (it creates a discourse) and epistemology (it makes truth claims). All three elements are evident in the data analyzed for this study. For example, some of the interviews with HEQC officials showed evidence of ontological commitment to the Department’s vision of a transformed higher education system in a new democratic state and of the role of quality assurance to get there. The discourse created

178 See for example the grand narrative of South African policy discourse summarized above.
around the transformation of higher education is analyzed in Chapter 6. The truth claims made particularly in relation to the HEQC’s proposed ‘integrated model’ of quality assurance was analyzed in Chapter 9. Barnett (2003) suggests that it is the collective ontological commitment of those who espouse an ideology that is most pertinent for analysis. He explains how emotional over-investment in an idea can distort reason and communication with others. The data presented in the study suggest that, due to very different world-views linked to ideological commitments on the part of some academics and some HEQC officials, there is a danger of miscommunication between these parties.

Chapter 6 illustrated how the idea of transformation, as part of the dominant ideology, has ‘naturally’ seeped into the meaning of quality in policy discourse about quality assurance in South Africa. Adherence to the idea of transformation has become hegemonic (part of national ‘commonsense’), so that opposing it has become unthinkable. The study showed that the framing of the imposition of an external quality assurance system in the discourse of transformation has made it very difficult for practitioners and stakeholders in higher education to oppose it (or even to be seen to oppose it). Barnett claims that when quality becomes a state-sponsored project (as opposed to simply ensuring accountability), it begins to works ideologically - colonizing life-worlds, crowding out discursive space and imposing itself as an ‘alien force’ leading to a culture of compliance (Barnett, 2003:97). This concern is articulated by a prominent black Vice-Chancellor writing in the South African Vice-Chancellors’ Association’s local journal.

After our political transition the connection between (institutional) autonomy and transformation was invoked. It thus became difficult to resist state interference as we had to acknowledge that in comparison to other earlier state interferences (…) transformation of the sector was essential. We were caught in that space between a difficult past and a promising future. We found ourselves as HEIs more vulnerable then we had ever been when we had some understanding of who we were fighting. (…) Calls to transform were not easily resisted as being intrusive to institutional autonomy. (Nongxa, 2004:3)

This admission by a black Vice-Chancellor suggests how strongly state interference in South African higher education is working ideologically.

### 10.1.2 Policy Formulation

Chapter 7 on the process of policy formulation illustrates the competing agendas and consequent ‘messiness’, trade-offs and compromises involved in policymaking through

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179 The point of Nongxa’s article is to place on Vice-Chancellors’ agendas a proposal for forming their own ‘community of academic institutions’ who will undertake to self-regulate under a ‘self-defining set of conditions and commitments’ (2004:3). This proposal sounds very similar to the aims of SAUVCA’s original Quality Promotion Unit (1995-1999) which was closed down by SAUVCA due to unreliable peer evaluation and resource constraints.
tracing the production of the HEQC’s Improving Teaching & Learning Resources. It shows how the Working Group of the Improving Teaching & Learning Project sought to influence the HEQC to adopt a facilitative approach to quality assurance in order to promote the pedagogic project. However, the HEQC had hoped to use the Working Group as a source of expertise for the production of its audit and accreditation instruments and also as a means of legitimating its policies within the academic community. The study showed that the expectations of neither party were fully met.

The Working Group failed to persuade the HEQC to adopt a fully facilitative approach (at this stage in the policy process) especially for audit purposes. Partly due to its own ambivalence about serving an accountability function, the Working Group also failed to develop minimum standards for the HEQC’s accountability instruments. This allowed the HEQC to take its ‘Good Practice Descriptors’, written for an improvement purpose, and recontextualise these for its accountability purposes. The analysis suggests that this may have been one reason for the overly demanding and comprehensive nature of the HEQC’s proposals for audit and accreditation criteria. The chapter concludes that whilst the Working Group was able to provide the HEQC with expertise in teaching and learning, it did not demonstrate adequate expertise in evaluation theory and methodology to serve the HEQC’s needs. The findings also suggest that between them, the HEQC and the Working Group largely failed to win credibility with academics through the process of presenting the Resources to the academic community at consultative panels and regional workshops. However, the HEQC’s credibility with mediators such as quality assurance managers and staff developers may have been enhanced by the Working Group’s efforts.

In terms of outputs, the HEQC’s Improving Teaching & Learning Project did eventually manage to produce a set of documents for the improvement of teaching and learning in higher education. Although generally well received by those who attended the HEQC’s regional workshops, (that is those who already supported the pedagogic and quality projects in higher education), the Resources were analyzed as being compromised, hybrid documents, written with pedagogic intent within a managerial framework. Those who welcomed the Resources, mostly support staff and some academic managers, expressed the belief that they would be useful in supporting the development of internal systems for the evaluation and improvement of teaching and learning. The interpretive approach of the Resources was widely appreciated, but many felt that the documents would still need considerable mediation and contextualization if they were to be used successfully with academics. Whilst the Resources were evaluated to have the potential to contribute to the improvement of teaching and learning, they were criticized for failing to provide the HEQC with more creative methods for
judgment-orientated evaluation. The analysis suggested that the Working Group failed to provide the HEQC with theoretical clarity on the appropriateness of different models of evaluation for different purposes and remained committed to constructivist approaches that are only appropriate for improvement-orientated evaluation. In concluding Chapter 7 it was suggested that the Working Group should have investigated the potential of theory-based, knowledge-generating models of evaluation for judgment-orientated evaluation, particularly for audit and possibly even for accreditation.

The analysis offered in Chapter 7 answered the initial research question

2a) To what extent did the Improving Teaching and Learning Resources provide the HEQC’s internal policymaking process with a valid, acceptable and feasible set of norms for good teaching and learning practice to guide its development of policy instruments for institutional audit and programme accreditation?

Clearly, the answer is not straight-forward. In summary it can be claimed that the Resources did achieve their purpose and provided a ‘valid, acceptable and feasible set of norms’ for the improvement-orientated evaluation of teaching and learning in higher education. However, the analysis suggests that they failed to provide the HEQC with a valid model for judgment-orientated evaluation of teaching and learning.

The analysis suggests that members of the Working Group may have failed to make Harvey’s (1999) distinction between accountability and compliance. Because they were so disapproving of compliance-generating approaches and so committed to working with academics for self-generated improvement of teaching practice (the pedagogic project), Working Group members may have over-looked (or resisted) the need for accountability to be demonstrated at all.

Perhaps members of the Working Group were unrealistic in their expectations about what an external quality assurance agency can achieve. The quality assurance literature warns about the limitations of external quality assurance in effecting improvement. For example Harvey claims that ‘the lack of effectiveness of external quality assurance evaluation is supported by numerous effectiveness or impact studies’ (1999). He argues that ‘long term effectiveness is entirely dependent upon the establishment of internal procedures and the development of a culture of continuous improvement’ (1999:9). Quality assurance experts such as Harvey argue that the best way to assure accountability is to establish internal systems of continuous quality improvement. Furthermore, in Chapter 2 Harvey’s important distinction between ‘rendering an account in relation to the goals and legitimate expectations that others may have of one’s
production and services’ (1999:24) and compliance to government policy goals through increased state control and ‘surveillance from a distance’ was noted.

The position advocated in this study is based on Jonathan’s (2001) argument cited earlier; namely, that the ‘academic community’ should accept and respond to the need to demonstrate acceptable levels of educational provision to the HEQC. It should also recognize that in the post-apartheid context a certain measure of state intervention is legitimate. However, if compliance with the Department of Education’s policy goals were to threaten core academic functions, then one would have to determine where the line between accountability and compliance should be drawn. Had the Working Group accepted the principle of accountability and a measure of ‘legitimate public action’ from the outset, it may have been in a better position to assist the HEQC in its difficult task.

This account of the policy formulation process is in keeping with Ball’s description of policymaking as ‘awkward, incomplete, incoherent and unstable’ (Ball, 1997) and of the policy product as ‘cannabilised’ and muddled. The Improving Teaching & Learning Resources need to be understood in inter-textual relationship to other policy documents and instruments in the environment, such as the SAQA regulations that they tried to ‘talk back to’. They can only be fully understood as political artifacts that were constructed in a particular political and historical context.

10.1.3 Policy Adoption

Chapter 8 on policy adoption first looks at stakeholder response to the HEQC’s proposals for audit and accreditation criteria and then at the responses of a handful of stakeholders, particularly academics, to the implementation of its national review for the re-accreditation of MBAs. This is followed by an analysis of stakeholder responses in terms of Ulrich’s critical systems heuristics method. A key finding of this analysis is that stakeholders’ prior beliefs and value assumptions about the goals of higher education, the meaning of quality and therefore an appropriate approach to quality assurance, shaped their responses to the HEQC’s proposals. The findings also uncover a pattern in the relationship between stakeholders’ beliefs and value assumptions, their social roles and the history and culture of the institution at which they work. For example, most academics subscribe to a collegial rationality, most quality assurance managers subscribe to a facilitative rationality and most HEQC officials subscribe to a bureaucratic rationality. But across social roles, those subscribing to collegial and facilitative rationalities tend to come from the historical English-medium liberal universities and/ or from old universities with a strong research culture. Those subscribing to a managerial rationality tend to come from the Technikons and from the historically
Afrikaans-medium institutions. Those subscribing to or supporting a bureaucratic rationality (justified in terms of a commitment to transformation) tend to come from the HEQC and the historically black institutions.

There is widespread agreement amongst stakeholders that some form of external quality assurance in South African higher education is needed. This appears to be the case particularly for those from reputedly ‘weak’ institutions. There is also widespread agreement that the ‘measure of improvement’ should be improved educational provision and improved student learning. The assumption that external quality assurance leads to improved quality management which in turn leads to improvements in the quality of provision seems to be widely unquestioned.

The majority of respondents subscribes to facilitative or pedagogical approaches to quality assurance\(^{180}\) and therefore asserted a need to accommodate academics’ collegial rationality in conducting quality assurance. Amongst those interviewed for this study, there was widespread belief that the HEQC’s policies may not be normatively acceptable to the majority of academics and therefore may not be effective in the long-term. In general, those subscribing to the facilitative rationality felt that the HEQC’s approach to quality assurance is out of keeping with academic norms and institutional cultures and may lead to resistance or more likely to compliance. Others expressed concern that the HEQC and its panelists potentially lack credibility in the academic community because they may not be viewed as genuine disciplinary or academic peers and this may undermine both internal and external quality assurance efforts. Academic managers of this persuasion also expressed concerns about the weariness of academic staff as a result of policy overload and the implementation of many far-reaching changes caused by restructuring.

The HEQC’s approach to quality assurance and to accreditation in particular, is widely identified as bureaucratic and likely to lead to compliance rather than improvement. There was agreement that a facilitative approach would be more effective in the higher education context, especially if improvement of provision was the goal of the quality assurance system.

With regard to the process of policymaking, most stakeholders are of the view that the HEQC’s policy instruments are based on adequate expertise and that the HEQC’s consultative process around them was adequate. However, a minority complained that the process was too

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\(^{180}\) It is important to note that this affiliation may have been an effect of biased sampling – all interview respondents, except those involved in the MBA reviews, had self-selected to attend the HEQC’s Improving Teaching & Learning workshops, meaning that they were probably supportive of the pedagogic project. Respondents to the survey questionnaires were all quality managers or equivalent; that is, people in an expert role.
rushed, not entirely transparent and that the HEQC consulted only on its own terms. The analysis of the HEQC’s response to stakeholder comment suggested that the HEQC did respond to and accommodate the comments it received, but that it was able to do so only within its given frameworks and approaches which remained non-negotiable.

The findings on stakeholder opinion on the individual policy instruments can be summarized as follows. The majority of respondents supported the HEQC’s specification of audit criteria, with some qualifications. There was generally a lack of engagement with methodological issues and widespread acceptance of the pragmatic method of evaluation, even amongst quality assurance managers. Respondents were divided on whether the HEQC should use quality assurance to promote the government’s ‘transformation agenda’. Generally representatives from technikons and historically Afrikaans-medium institutions were content to comply with the transformation agenda being linked to quality assurance whilst those from historically black institutions actively supported it. Representatives from the historically English-medium universities were mostly opposed to the HEQC’s inclusion of transformation in its conceptualization of quality and some viewed it as an assault on academic freedom and institutional autonomy. Generally the majority of respondents were agreed that the audit instrument represented a shift to a more accountability-led approach that would be unlikely to achieve the improvement of teaching and learning practices in the long-term. There was also widespread agreement that academics would be unhappy with the demands of the proposals. Only a minority of institutions claimed to be ready for audit in this form. Some stakeholders were unhappy with the HEQC’s prescription of generic criteria for all contexts and others felt that the HEQC did not appreciate the diversity of contexts, histories and cultures that exist in South African higher education.

Regarding the proposed accreditation instrument, the majority of respondents felt that the criteria were too accountability-driven, too onerous, comprehensive and prescriptive. But a strong minority of respondents, all from historically black institutions, supported the accreditation proposals. Many respondents recognized the derivation of the accreditation criteria from the Improving Teaching & Learning Resources. A large majority felt that the criteria would have served well as good practice benchmarks for internal evaluation, but only 20% felt that they were fair minimum standards. Again respondents warned that academics would complain or be dismayed at the HEQC’s requirements. Only a third of respondents, mostly from historically Afrikaans-medium institutions, thought that their institutions would be ready for programme accreditation. Most respondents pleaded for more time, resources and expertise and welcomed the HEQC’s phased-in approach.
The majority of respondents involved in the MBA national review agreed on the need for some form of quality assurance of MBAs to ‘maintain standards’ and protect students. However, there were large discrepancies in the perceptions of the HEQC and its re-accreditation site-visits. Respondents from well-prepared, well-managed institutions, and especially those who adopted a managerial approach to quality assurance viewed the HEQC process as thorough, professional and fair. In contrast, those adopting a collegial or facilitative rationality, who tended to come from less-prepared collegial-type institutions, viewed the process as bureaucratic, unfair, ineffective, ideologically loaded and lacking in credibility. Some academics felt that the HEQC officials had not treated them with sufficient trust, courtesy and dignity. These more extreme responses to the HEQC site-visit suggest that these academics viewed the implementation of the HEQC’s policies as an affront to their identities as academics and an assault on their academic freedom by the government. These findings suggest that the more strongly traditional and collegial the institutional culture and the more strongly that academics subscribe to traditional academic identities, the more likely there is to be resistance to the HEQC.

At this point in the summary of findings it is possible to claim to have answered the next research question posed for this study

2b) To what extent do different stakeholder groups of the HE community believe the HEQC’s set of policy instruments for quality assuring teaching and learning are valid, acceptable, feasible and potentially effective?

As demonstrated above, the short answer to this question is that some stakeholder groups and probably a majority overall, viewed the HEQC’s instruments to be valid, whilst a minority viewed them as feasible. Others expressed reservations about all four aspects of the HEQC’s instruments and about their acceptability and effectiveness in particular. With hindsight this question seems a bit superficial. A more interesting question would be to understand why the different stakeholder groups adopted different responses to the HEQC’s proposals and why, within each stakeholder group, different clusters of policy actors adopted different responses. The rest of this section seeks to answer this more interesting question.

A closer analysis of stakeholder opinion using the critical heuristics method undertaken in the second section of Chapter 8 draws the following conclusions. Firstly the majority of small sample of academics interviewed tended to adopt a collegial rationality (although there was evidence of the ‘new collegialism’ adopted by younger academics). This latter finding is

181 Although some of these respondents did question the credibility of the HEQC’s panelists.
supported by Henkel’s (2000) work on British academic identities. She finds that younger, new academics tend to be more ‘street-wise’ than their older peers. They also accept the need for accountability and often embrace the pedagogic project (2000:265).

Quality assurance managers tend to adopt a facilitative and sometimes pedagogic rationality, with a few from technikons and historically Afrikaans-medium institutions subscribing to a managerial approach. However, the majority of academic managers in this study did not subscribe to a managerial rationality (as might be expected), and instead many used the discourse of facilitative rationality. But as noted above, this finding is probably a result of the biased sample of academic managers interviewed for this study.182

There was evidence that some HEQC officials subscribe to a bureaucratic rationality and this is often framed by a strong ideological commitment to the transformation of South African society. However two of the most senior officials expressed concerns typical of the facilitative rationality.

As previously suggested, those who supported the HEQC’s policy proposals tend to come from three groupings. Firstly support came from those affiliated to well-managed, well-prepared institutions, often with past experience of external quality assurance (for example the historically white technikons and Afrikaans-medium universities). Typically this group also share a history of compliance to Afrikaner nationalist ideology and authoritarian institutional management styles. The second group that supported the HEQC came from reputedly ‘weak’ and poorly managed institutions. These respondents expressed the hope that a strong interventionist state might rectify matters and put in place the basic conditions for academic work to occur. A third group of respondents appear to support the HEQC for political and ideological reasons; they clearly support the new government and subscribe to the policy discourse’s vision of a transformed and more equitable higher education system, believing that external quality assurance will be a means of realizing this. Due to a history of disadvantage, there tends to be considerable overlap between the second and third groupings.

Those who opposed the HEQC and generally expressed the view that its policy proposals were not acceptable and would not work tended to come from institutions with strong collegial cultures. These tend to be the older universities with strong research reputations. Many of these institutions are also the historically English-medium liberal universities that

182 The sample of interviewees was taken from those who attended (and did not leave early) the HEQC’s regional workshops on improving the management of teaching and learning. It is likely that the more facilitative managers attended and stayed and that the more managerial managers stayed away.
previously enjoyed a laissez-faire or antagonistic relationship with the state and have little or no previous experience of external quality assurance. A few academics from this camp actively expressed a commitment to academic freedom and appeared to be using the old ideology of liberalism to ward off the new ideology of African nationalism.

There was also a second negative response to the HEQC that was only evident by its silence and absence from the debate. The findings suggest that (perhaps the majority) of academics, in particular, are either unaware or disinterested in quality assurance and in the state’s policies for higher education. They appear to want to ‘keep their heads in the sand’ and hope that it will all go away. By refusing to engage, they lay themselves open to accusations of unresponsiveness, elitism and even political conservatism. What was largely absent from the data was a clear academic voice. It is suggested that this may emerge through the processes of implementation.

The data suggest that the gap in perceptions and world-views between those subscribing to a bureaucratic rationality (overlaid with an ideological commitment to transformation) and those subscribing to traditional collegial rationality is extreme. This finding is supported by Barnett’s (1999) claim cited in Chapter 2 that there are ‘deep structure’ differences and conflicts between Quadrant 1 and Quadrant 4 approaches to quality assurance. There is also considerable evidence of the anxiety of those who must mediate between these two positions; namely academic and quality assurance managers. Whilst there is evidence to the contrary, the data suggest that the HEQC (and institutional managers) may not be managing this world-view conflict well, with one of its officials even exacerbating it.

The findings suggest that more communicative work between the academic community and the HEQC is required. The HEQC needs to reassure some academics that it understands their need for some distance and discretion, whilst some traditional academics need to accept the requirement to demonstrate accountability to external stakeholders. For example, academics need to hear the position expressed in an interview with a senior official.

With respect to the public sector, those who go on about academic freedom are nostalgic for the past where surprisingly the government had a very laissez faire approach to HE, with very little accountability required. Now the relationship between HE and the state needs to be re-thought, we need a stronger social contract and people need to re-think old notions of academic freedom and institutional autonomy. Just as the professional councils have always been accepted as a means of quality assurance, so the HEQC wants to assure and protect the public. Academic freedom and institutional autonomy should be protected, and there is no reason why QA should be seen to interfere with the academic enterprise. (Appendix 9.7 HEQC 1)

I now refer in more detail to some of the literature previously reviewed in order to gain a deeper understanding of two issues: firstly the nature of the potentially conflictual relationship
between those adhering to a collegial rationality and those adhering to a bureaucratic rationality and secondly the link between institutional type and rationality.

Midgley’s (2000) theory of ‘boundary critique’ is helpful in gaining a deeper understanding of why the tension exists between some academics and the HEQC. Midgley (2000) developed his theory of boundary critique as an extension of Ulrich’s critical systems heuristics method. He views social boundaries as socially constructed and based on value judgments and emphasizes the importance of reflecting on boundaries during social interventions. According to Midgley, conflict between groups of stakeholders often arises from the fact that they make different ‘boundary judgments’. The system within which each group’s boundary is considered sacred by them and anything outside of that boundary is considered profane. Tensions arise when each group considers the other’s concerns to be profane and conflict can develop over whose boundary is dominant (2000:154). Midgley’s work illuminates the tensions between those adopting the collegial rationality and those adopting the bureaucratic rationality in South African higher education. For example, traditional academics hold the territory of their disciplines and their research to be sacred. Within these boundaries, they understand themselves to be accountable only to other disciplinary peers working in the same territory who share an understanding of their highly specialized work. Whereas the HEQC’s policies propose that a range of external stakeholders should enter this sacred territory with bureaucratic authority to pronounce on its quality. The thought of ‘the profane’ being permitted to trample around in sacred territory and make judgments is threatening to traditional academics’ identities. On the other hand, some HEQC officials view the need to transform higher education to meet the needs of the new nation as a sacred mission. They want to claim the benefits of higher education for society as a whole and for the public good. HEQC officials feel frustrated that academics view their concerns to be profane and of secondary importance. Midgley emphasizes that it is perceptions that count and that these boundary conflicts are usually played out through competing discourses and ideologies. When power relations are unequal, this may allow one group to impose its world-view on another.

Henkel’s (2000) work on academic identities in the UK is also pertinent to this discussion. She claims that identity is closely related to one’s value system. As mentioned above, traditional academic identity is linked to the discipline - a highly specialized elite with strong internal control. She explains how disciplines are more than epistemological constructs. For academics they have become structures of authority, values and identity -- the department. Henkel (2000) claims that academic departments are pre-modern organizational forms that have developed to maintain stability. Academic departments are resistant to change because stability is one of the conditions for knowledge production. Bureaucratic policies such as
quality assurance mean that academic work now has to become explicit and transparent to non-academics (the profane). In the UK, Henkel claims that quality assurance procedures have had an affective impact on academics. It has reduced their status, limited their control of their work environment and undermined collegial relationships. She claims that her research shows that academics in the UK feel a loss of autonomy and power, that their boundaries have been permeated and their normative space invaded (2000:261).

This finding resonates with Midgley’s assertions about the link between values, identity and boundary judgments (‘the sacred’). Both Midgley’s and Henkel’s work suggest that the sometimes shrill reaction of traditional academics to HEQC interventions may be because these individuals sense that their identities and values are threatened by the HEQC’s different values and vision of higher education. In South Africa, one decade after a dramatic political transfer of power, a deeper current also linked to identities may also be at work. For some older white academics HEQC officials may represent the new ruling elite to whom state power has shifted. Succumbing to the HEQC’s requirements may signal for some a close encounter with the reality that the old white ruling class has lost political power which is now wielded by a new black elite.

These suggestions emphasize all the more strongly the need for trust to be developed between the evaluated and evaluators in South Africa. Newton (2000, 2002) (who has researched the impact of quality assurance on academics in the UK) stresses the importance of ensuring that quality assurance does not make academics feel mistrusted, undervalued or manipulated by management or by external agencies. He recommends that under no circumstances should the ‘psychological contract’ between academic staff and their organizations be broken.

An attempt is now made to explore further the link suggested in the analysis of the data between respondents’ institutional type, culture and history and the rationality they adopted with respect to quality assurance. This is done by reference to neo-institutional theory following Newton (2000, 2002) and Muller (2003). In Chapter 6 a brief sociological history of institutional types in South Africa was provided. It is important to understand these institutional histories and cultures in their responses to the HEQC’s interventions. For example the findings seem to confirm the assumption that those who come from institutions previously under tight Afrikaner nationalist control either through consent or coercion (that is all historically Afrikaans-medium universities, historically black universities and all technikons) are more likely to accept and comply with state intervention and control than those who come from institutions with English liberal and, in some cases, anti-apartheid traditions.
However, Muller’s application of neo-institutional theory to the current South African higher education context suggests that one cannot simply read off an institution’s response to national policy from its history and culture. Muller suggests that despite the huge exogenous pressures for change, South African institutions are likely to respond to government policies in differentiated ways, based primarily on endogenous factors (2003:13). In other words, institutions are most likely to respond to policies that correspond with their internal agendas, norms and cultures. (This point was often made by respondents in the data and has been noted in the literature review.) However, Muller suggests that the nature of institutional response may be more complex than this. Neo-institutional theory understands institutions as ‘adaptive systems’ whose responsiveness to change is directly related to their ‘adaptive capacity’. Muller explains that strong institutions with stable systems may possess a strong adaptive capacity but choose to respond to policy changes slowly or not at all -- and will do so if this enhances their endogenous system without threatening their institutional norms and values. This may explain why it is the older established, research-led universities that appear to be most reluctant to adopt the HEQC’s policies. On the other hand, well-managed institutions with a strong adaptive capacity may choose to respond to the HEQC’s policies strategically by complying with and successfully implementing the required changes. For example, historically Afrikaans-medium universities and the historically white technikons may chose to support and implement the HEQC’s policies in a bid to prove themselves and enhance their reputations, (technikons especially) or to throw off their apartheid baggage and be seen to be part of the new South Africa. By contrast, neo-institutional theory suggests that weak unstable institutions may support change opportunistically, but then, because they lack adaptive capacity, may be unable to implement it -- leading to a serious ‘implementation gap’ between policy and practice. The data suggest that this may well be the case for many of the ex-historically black institutions whose respondents supported the HEQC’s policies for ideological reasons or because they have nothing to loose. However their capacity to actually implement the HEQC’s requirements (such as establishing a functioning internal quality management system) is questionable183.

The application of this aspect of neo-institutional theory suggests that successful implementation of HEQC policies is most likely in the historically white Afrikaans-medium universities and technikons because they are generally well-managed, the policies were not

183 This conclusion was supported by the opinions of some quality assurance managers expressed during the ‘critical incident’ captured during SAUVCA’s workshop on the audit criteria proposals (11/04/2003) (see Chapter 8.1.1.)
out of alignment with their institutional cultures and they have the adaptive capacity to implement the requirements.

The analysis suggests that implementation is likely to be less effective in the older established research-led universities and especially in those with English liberal histories. This is because most of these universities already enjoy good reputations. They have the strength to resist or subvert the policies which in many cases are not in keeping with their institutional norms and goals. However, the analysis suggests that it is more likely that this category of institutions will rather aim to quietly subvert and work around the HEQC’s policies than risk open rebellion, thus laying themselves open to the accusation of being politically recalcitrant. In other words, they will strategically aim for compliance and subversion rather than resistance.

This analysis also suggests that despite their support for the HEQC’s policies, weakly managed institutions with low adaptive capacities are unlikely to be able to implement the HEQC’s policies successfully. For various historical reasons, these tend to be the historically black institutions. In order to achieve the state’s policy goals, enormous human and financial resources will need to be expended on building capacity in the weaker institutions. It is not yet clear to what extent the merging of some of these institutions with better managed partners will enable them to adapt. The capacity development initiatives of the HEQC’s Quality Promotion and Capacity Development Directorate will most likely target these pockets in the sector and may contribute to the building of adaptive management capacity.

10.1.4 Policy Reformulation

Chapter 9 analyzes the HEQC’s final policy instruments and concludes that despite some concessions to stakeholder feedback, the HEQC was obliged to retain its accountability-orientated approach and carry out its political mandate to use quality assurance as a means of furthering the Department of Education’s transformation goals. (However, the analysis also shows that the criteria for institutional audit make some allowance for institutional and practitioner discretion). This conclusion about a bureaucratic rationality underpinning the policy instruments was supported by the findings of the discourse analysis which provides evidence of ideological framing of the rationale for the instruments, the positioning of

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184 It is also possible that the shrill resistance from some institutions with old collegial cultures suggests that they may in fact be threatened by the HEQC’s interventions. They have good reputations to lose and it is possible that their management systems do not have the adaptive capacity to respond in a manner that will withstand the HEQC’s scrutiny. The one institution that failed to gain re-accreditation for its MBA may be an example of this scenario.
institutions in compliance mode and the development of a bureaucratic discourse that extensively specifies the reality that the HEQC wishes to impose on institutions. In addition, the discourse analysis uncovered ways in which difficult tensions are glossed over in the HEQC discourse. (It was also noted that these features are typical of policy and bureaucratic discourse).

Chapter 9 concluded by using a theory-based evaluation method to articulate the HEQC’s policy theory and its assumptions. This was discussed with two HEQC officials who validated the analysis and recognized that some of the policy’s assumptions may turn out to be unfounded. The discussion also revealed on the one hand the commitment of the HEQC officials to the transformation vision and on the other their concern that the HEQC apply its instruments in a reasonable, fair and communicative manner.

In conclusion, it was claimed in Chapter 9 that the final policy instruments for audit and accreditation were vastly improved and that the HEQC had genuinely taken into account and responded to many of the stakeholder comments it received. Both revised instruments were judged to be leaner and cleaner than those originally proposed. However, the analysis located the HEQC system in Quadrant 4 as a realization of predominantly bureaucratic rationality. The HEQC’s stated intention to move the system towards Quadrant 3 in the next stage of its operations through the granting of self-accreditation status was also noted.

It remains to answer the first research question posed for this study.

1) To what extent has the HEQC succeeded in developing policy instruments for the quality assurance of teaching and learning that are likely to improve teaching and learning practice in South African higher education institutions?

With hindsight, this question now seems a little naïve. Quality assurance experts such as Harvey and Newton (2004) and Wahlen (2004) would argue that historically external quality assurance agencies have had little impact on the quality of teaching and learning practice. Others argue more negatively that the call for improvement is only a discursive device to conceal the desire for control and compliance (Morley, 2003).

Overall, the findings of the study are ambivalent on this question. This may be because the research question itself is unrealistic. It is no longer clear to the researcher that an external agency should be expected to achieve changes in the micro-practices of teaching and learning. Rather, it is argued that the role of an external agency may be to create the conditions for and to cede discretion to institutional management (and middle management in particular) to achieve this through working with small teams of academics.
The findings suggest that there is likely to be a high degree of compliance with HEQC requirements and, initially at least, given the right conditions, this is likely to lead to improvements in the management of teaching and learning and depending on internal quality arrangements, possibly to improvements in actual provision as well. There is also likely to be high levels of compliance with transformation requirements. The findings suggest that, despite its initial communicative acts towards the academic community, the HEQC thus far has not succeeded in winning over the academic heartland - those adhering to the collegial rationality. But the study shows that the researcher also experienced difficulty in getting academics to engage with quality assurance issues -- except after an ‘implementation experience’. This suggests that it this judgment may be pre-mature. The HEQC’s efforts at recruiting senior academics as auditors and evaluators and its commitment to the use of peer review for accreditation as well as for audit may overturn this situation as implementation proceeds.

The analysis of the data suggests HEQC policies are likely to succeed where they are mediated by astute institutional leadership in certain contexts and under certain conditions. For example they are much more likely to hold for institutions that are already strong and well-managed and where a managerial culture is widely accepted; they are less likely to hold in contexts where improvement is most needed.

Thus at this early stage in implementation, it is difficult and unfair to make any final summative judgments about the HEQC’s long-term effectiveness. Instead two possible scenarios on the trajectory and impact of the HEQC’s policies are provided.

The first scenario is based on a generous interpretation of the HEQC’s policy choices and suggests positive outcomes and impacts. This scenario would be based on a view of the HEQC as a well-meaning, capable organization caught between an unreconstructed higher education system and a state greedy for control of the higher education system to achieve its policy agenda. Oosthuizen (2005) takes this position

Whether it is possible for the HEQC to discharge its intermediary role in a manner that satisfies the state’s strong requirements, whilst at the same time engendering institutional ownership of the quality development process, is by no means clear. The task is complex, but not impossible. (2005:49)

The HEQC is viewed as an intermediary body (between the state and higher education) that has to operate in very difficult conditions (Strydom and Strydom, 2004). The HEQC views higher education as a public good and a democratic space that therefore requires a certain

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185 This is the narrative that the HEQC tells about itself. It is supported in recent articles by Oosthuizen (2005) and Botha (2005).
distance from political pressures. However, its hands are tied by the Department of Education’s ambitious transformation goals. In this scenario the HEQC is understood to be following the normal model of development for quality assurance systems as set out by Verkleij and Westerheijden (2002) (quoted in Jeliazkova and Westerheijden, 2002) (see Chapter 2). According to these authors, the early stages of a quality assurance system involve the establishment of an external agency to quell serious doubts about educational standards and about the efficiency of institutions. According to Verkleij and Westerheijden (2002) this stage involves a state monopoly on standards with the quality agency focusing on the technical verification of minimum standards and public accountability. If the Verkleij and Westerheijden (2002) stagist model is accepted, then it is considered acceptable for the HEQC to specify common criteria across the system. Furthermore, in the South African context, this early compliance stage is also accepted because of the political necessity to undo the legacy of apartheid. This involves ensuring compliance with the state’s transformation agenda in order to ‘level the playing fields’ between institutions in South Africa’s very unequal and fragmented system and to promote social justice, etc. In this period of ‘hard policy choices’, other contending values such as academic freedom, institutional autonomy and self-generated improvement may have to be compromised or deferred until the new system stabilizes and a minimum threshold of quality (and transformation) is assured across the system (although this is never made explicit in the policy texts). Once acceptable levels of provision (and transformation) have been achieved and national and institutional quality assurance systems are sufficiently mature, the HEQC succeeds in moving the system to the next stage - from a focus on accountability (and compliance) to one of differentiated self-regulation and improvement. In the meantime institutional managers succeed in mediating and contextualizing the HEQC’s requirements in ways that encourage the development of meaningful internal quality systems. The HEQC manages to train its auditors and evaluators sufficiently well for them to win credibility in the academic community and academics accept the legitimacy of the HEQC and the need to be externally acceptable. This results in real improvements in teaching and learning practices and in the quality of student learning. (In other words most of the assumptions made in the HEQC’s policy theory hold).

There is evidence in the data that this scenario is certainly the HEQC’s intention. For example, one senior official explained this in an interview.

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186 In Chapter 2 it was noted that in the fifth stage of the supposedly hierarchical model, European external quality assurance systems are reverting to earlier accountability models in response to the need for international comparability imposed by supra-European initiatives such as the Bologna Declaration.
As I’ve said we are trying as far as possible to create an environment of self-regulation for HEIs. Quality can only be built by HEIs. Over time we aim to lessen and change the criteria (the emphasis on accountability) and change the balance by increasing the focus on good practice (and emphasize improvement). Centralized intervention is only a last resort, it is not our aim, rather our goal is self-regulation. I can understand that in practice an HEQC official may err on the side of intervention, we also need to get the right balance within the organization. If people think we want to control them they have the wrong picture, they must hold onto the macro-picture. (Appendix 9.7 HEQC 1)

The second scenario is based on a cynical interpretation of the HEQC’s policy choices and suggests that many of the assumptions made in the HEQC’s policy theory do not hold, leading to negative outcomes and impacts. In this scenario, the HEQC is not an intermediary body but an instrument of the state, itself committed to using external quality assurance to accomplish the state’s transformation agenda. The evolutionary, stagist model of the development of quality assurance systems is viewed as a rationale for opportunist interventions by governments that need to continuously alter their strategies in order to retain legitimacy and control. In this scenario, the South African quality assurance system is predicted to ‘get stuck’ in the accountability and control ‘phase’ and to never manage to ‘evolve’ to later ‘stages’. This occurs because weak institutions do not have the capacity to develop functioning quality management systems -- justifying continued control -- at least for a lengthy period. Meanwhile strong institutions get distracted from their core business by trying to meet the contradictory demands of equity and efficiency and effectiveness. In other words, their energies get sapped by the extensive restructuring entailed in mergers, by meeting the political demand to select and train a new black middle class who have had inadequate schooling and by meeting extensive accountability or compliance requirements. Funding constraints mean that it becomes a battle just to maintain current levels of academic quality. If self-accreditation status is won, it is attained only by non-merged and/ or well-managed historically white institutions, thus creating further divisions and political tensions in the sector. The HEQC’s criteria remain too removed from the concerns of the majority of academics for them to become meaningfully embedded in institutional cultures and practices. Thus the goal of self-generated improvement remains elusive. It is patchily achieved only where there is good leadership, sound resourcing and a managerial culture that promotes the pedagogic project. The rest of the system ‘matures’ from compliance to window-dressing and neither the HEQC nor institutional management impact significantly upon the quality of teaching and learning practices.

These two scenarios paint extreme versions of possible outcomes and impacts of the HEQC’s policies. The analysis of the data gathered for this study and implementation theory (see below) suggests that the reality is likely to be somewhere in between and in any case
differentiated. The researcher’s intent in this study has been to alert stakeholders of the dangers of the second scenario with a view to preventing it.

I now revisit briefly the literature on the nature of external quality assurance agencies and link this to a discussion on Habermas’ account of modernity as a dialectic between ‘systems’ and ‘lifeworld’ (Habermas, 1987).

The discussion on improvement and accountability in Chapter 2 established that it may be too simplistic to view these two motivations as mutually exclusive dichotomies (as members of the Improving Teaching & Learning Working Group did). Instead it was suggested that they be viewed as existing in considerable tension and Harvey’s (1999) additional compliance axis was noted. Given that the conceptual framework established for categorizing approaches to quality assurance was based on Habermas’ work, it is important to return to his arguments at this point.

Habermas gives an account of modernity in which, because of increasing pluralism and ‘disenchantment’, the background consensus required for communicative action is diminishing. This means that traditional practices have to be rationalized (abstracted and generalized -- via the technologization of discourse) in order to bring them into communicative action in the public sphere, where, increasingly, expert systems emerge around truth claims via rational argumentation (for example law, education and art). In modern societies communicative action emphasizes abstracted principles and procedures over specific contexts and contents, thus creating new discourses around social practices. Following Weber, Habermas regards these communicative value systems as ‘sacred’ whilst those dealing with the economy and the state he regards as ‘profane’. In modern societies ‘sacred’ lifeworld systems based on communicative action become separated from ‘profane’ systems based on instrumental action. Instrumental (or strategic) rationality ‘steers’ by using the medium of money or power to get results, whilst communicative action works through rational argumentation to create meaning and understanding (enlightenment). It is crucial to understand that Habermas does not understand these two forms of action as existing in a mutually exclusive relationship, but rather as mutually constitutive -- modern societies require a measure of both forms of rationality. He understands instrumental systems to function productively only when they are institutionalized and anchored in people’s lifeworlds. However, Habermas warns of the danger of allowing instrumental systems to colonize

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187 This discussion is based on the summary of Habermas’ theory of lifeworld and systems in Chouliaraki, L. and Fairclough, N (1999).

188 Midgley applies Weber’s concepts differently in the discussion on boundary judgments above.
s lifeworld systems through commodification (by the market) and through bureaucratization (by the state). Chouliaraki and Fairclough explain Habermas’ political project.

The political project is not replacing instrumental by communicative rationality, it is (negatively) preventing instrumental rationality from spreading too far at the expense of communicative rationality with socially pathological consequences, and (positively) creating the social conditions in which the fully emancipatory potential of communicative rationality can be realized. (Chouliaraki and Fairclough, 1999:84)

Habermas (1996) builds on his theory of the relationship between ‘lifeworld’ and ‘systems’ in his later work on the law, also discussed in Chapter 2. He argues that the law should be ‘Janus-faced’ consisting of ‘facts’ enforced through the medium of bureaucratic power (instrumental action) and ‘norms’ agreed to through rational dialogue (communicative action). He argues that in a ‘deliberative democracy’ the law should work primarily through consent to norms with the enforcement of facts used only as a last resort when communicative action breaks down.

These ideas have provided the thread of a key argument that runs through this study, namely that if quality assurance is to result in the enlightenment of the evaluatees it must be primarily based on communicative action that is anchored in the lifeworlds of the academic community. This position allows both the improvement and accountability motivations to exist in a quality assurance system, but to be effective and to lead to sustained improvement, it claims that communicative action must dominate. In other words, a quality assurance system should be designed to ensure that instrumental action (necessary accountability requirements) enforced by the bureaucratic power of the state does not unduly colonize the lifeworld systems of academic institutions. If this happens the system will not ‘make sense’ to those who must use it and they will either cynically comply or subvert its intentions (Harvey’s compliance axis).

International experience of external quality assurance systems suggests that either communicative action or instrumental action will tend to dominate. It is argued that if improvement (via communicative action) dominates, accountability may be achieved as a by-product, but if accountability (instrumental action) dominates, compliance will be the result leading to ‘hollow improvement’ (Habermas, 1996, Harvey, 1999, Harvey and Newton, 2004). In reviewing the impact of the Swedish external quality assurance system after seven years of audit, Wahlen (2004) concludes that it has had very little impact on institutional culture and teaching and learning practice. But he suggests that it has contributed to greater awareness of the need for good leadership, management and improved quality management systems. In other words, he suggests that external quality assurance may have a beneficial impact on management practices (Quadrant 2) but there is little evidence for its positive impact on collegial practices (Quadrant 1). In fact, international experience suggests that few external quality assurance agencies have ever achieved improvement of teaching and learning
as a lasting impact. Because they are sponsored by the state, they tend to prioritize the solving of political problems over educational problems and are often motivated by the need to increase state control over higher education (Brenan and Shah 2000). This means that they tend to achieve accountability through compliance (through the exercise of bureaucratic power and instrumental rationality) leading to only superficial short-term improvement. Harvey and Newton describe how this approach typically distorts communication and therefore fails to deliver on enlightenment (improvement).

Relying on an accurate self-assessment in a high stakes context, with poorly trained amateur peers engaged in a confrontational setting results in contrived dialogue that offers very little information of value to encourage improvement at the learner-teacher interface or improvement of research outputs. (2004:157)

Harvey and Newton take the argument a step further and claim that most external quality assurance agencies’ concern for improvement is only rhetorical. Instead, external agencies tend to develop quality assurance models driven by ‘opportunism, political expediency and a marked lack of trust in higher education’ (Harvey and Newton, 2004:159).

This argument suggests that the HEQC’s policy choice of an ‘integrated model’ that claims to hold both instrumental and communicative action ‘in balance’ will prove difficult to attain and maintain. As illustrated above, its decision to initially foreground accountability has been taken within a particular political context that involves increased levels of state control over higher education. This suggests that at this stage in the policy implementation process, it will be very difficult to prevent the instrumental / accountability motivation from dominating. A real danger exists that the HEQC’s early yearnings for communicative action with the academic community have been over-taken by the Department of Education’s desire to control higher education in order to change it. There is always a temptation for those who wield bureaucratic power and to act instrumentally as a ‘short-cut’ to getting results. But the literature (and more tentatively, the data in this study) suggests that instrumental action (even if it is accepted as ‘legitimate public action’) only leads to compliance. In this context, the HEQC’s offer of self-accreditation status and its commitment to moving the system to greater self-regulation should be welcomed and encouraged.

Although the implementation of the HEQC’s policies is beyond the scope of this study, a brief discussion on the nature of implementation and of changing social practice is included here as a necessary part of any analysis on the likely effectiveness of the HEQC’s policies. The aim of this discussion is to correct the imbalance of the analysis presented above which is in danger of over-emphasizing structure at the expense of agency and ideology at the expense of reflexivity. Instead these concepts need to be viewed as existing in a dialectical relationship. For example the potential colonization of the lifeworld of academics by the
discourse and social practices of quality assurance should always be understood to contain possibilities for its appropriation or subversion. Foucault criticized Habermas for holding a negative one-dimensional view of power that only works coercively on people as a form of domination. Instead he proposed a view of power as multi-dimensional, working positively through people as well as on them; affording enabling and creative possibilities as well as oppressive constraints (see discussion by Flyvbjerg, 2001). The likelihood of academics subverting the HEQC’s policy intentions are all the more probable because of their conflicting world-views and because of the durability and resilience of the academic disciplines as social organizations (see Henkel, 2000 above).

In Chapter 4 interpretive views of policymaking were discussed. Following Dale (1989), it was noted that education can never be wholly rationalized and managed. Thus the impact of education policies will always be unpredictable, unintended and contested. This is partly because of the relative autonomy wielded by front-line practitioners at the point of implementation. Dale points out that governments and managers can never specify regulations that are sufficiently precise and comprehensive for ‘perfect communication and obedience’ to occur. Instead there is always a discretionary space for the application of rules to particular contexts. This allows practitioners to interpret and implement policies through the lens of their own norms, values and interests. Trowler (2002) claims that policies get re-made through the process of implementation.

Furthermore, applications to higher education of neo-institutionalism, social practice theory and studies on the nature of expertise (Trowler and Knight, 2002, Maassen and Gornitzka, 1999, DiMaggio and Powell, 1991, Moore, 2005) suggest that professional practice involves participation in the practices of social communities which develops a sense of belonging and identity. Knowing and learning are understood not simply as cognitive acts in the mind of the actor, but as located in the social practices of the situation, including the discourses, technologies, habitual practices, values and attitudes of the work situation. Dreyfus and Dreyfus’ (1986) research suggests that skilled expertise is intuitive, beyond the rational, and is bound up in the status quo which is a condition of its practice.

This underlines Henkel’s claim that academic departments are geared towards the maintaining of stability as a condition of knowledge production. Trowler and Knight (2002) suggest that resistance to change by professionals may often be for good reasons, linked to the very nature

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189 Trowler and Knight (2002) state that for higher education this means ‘when we go to work, we go to our Department’.
of their expertise. This supports Castell’s (2001) warning that academic productivity requires
a certain distance from immediate economic and political demands. Because these
communities of practice are central to academic identities any external forces that threaten
them or challenge academic authority tend to be viewed with suspicion.

Heads of Schools or Departments sit at a critical interface between external interests and
central management and internal academic concerns and interests. They are responsible for
implementing decisions made at the departmental level as well as those made by others that
come from above, and they have to manage the tensions and contradictions between the two
sets of demands. This critical role is explained by Johnson as follows,

Heads of Departments operate at a point where both resources and norms form vital,
explicit and contradictory contexts for action-it is at this level of organization and
management that the explicit nature of conflicts and tensions is most keen and most
evident. At this level, intersectional analyses of both resource dependency theory and
institutional theories are both necessary for explaining change in universities 190. (Johnson,
2002)

Using neo-institutionalism’s concept of ‘adaptive capacity’, Moore (2005) argues that
changing academic practices depends crucially on the ‘adaptive capacity’ of middle-level
managers such as Heads of Departments or Schools. He argues that if quality assurance is not
institutionalized at the level of the academic department, it will be run by central management
and will achieve only compliance at departmental level.

This brief discussion on the nature of policy implementation in higher education contexts
suggests that the potential for the academic community to resist or at least subvert the
HEQC’s policies is considerable. This conclusion is confirmed by the findings of the data on
policy adoption which suggest that this potential is likely to be stronger in traditional
research-led institutions with strong collegial cultures. One must conclude that the
implementation of the HEQC’s policies is likely to have very differentiated effects 191 in the
South African higher education system, largely determined by the very different contexts of
application both between and within institutions.

190 Resource dependency theory suggests that because organizations need resources for survival they
have an interdependent relationship with their environment which involves having to accommodate the
demands and conditions placed on them by external funders. Institutional theories take a cultural and
sociological approach to organizational change, arguing that organizational behaviour is always
conditioned by historical norms and traditions, structures and processes. Any policy or outside
intervention is refracted through these normative beliefs which will shape or resist organizational
change.

191 The discussion of Muller’s (2003) work under policy adoption on institutions’ different adaptive
capacities is also pertinent here.
10.2 Significance of the Study

From the perspective of critical theory, the study succeeded in uncovering the ways in which the HEQC’s policy instruments are embedded in ruling class discourse and ideology. The use of critical systems heuristics enabled the researcher to uncover the norms, value assumptions and boundary judgments of the different stakeholder groups. Although the study did not succeed in fulfilling Ulrich’s goal of providing a discursive space for ‘the affected’, the research conducted for the study did contribute (through the South African Universities Vice-Chancellors Association’s National Quality Assurance Forum’s response process) to ‘talking back’ to the HEQC via rational dialogue. And this was largely a fruitful in that the HEQC responded rationally to the comments leading to improved final versions of the policy instruments.

The use of critical systems heuristics also allowed the researcher to uncover, below stakeholder opinion, the deep divisions and differences in perception that lie in the sediments of South African society. The data analysis unearthed the historically formed structures of race, class and culture. The analysis also enabled the researcher to uncover emerging tensions between the old and the new ruling classes in the new South Africa. The study thus contributes in a small way to understanding the complexity of South Africa’s new democracy and how old and new class and race structures play on one another.

Thus the study may have contributed as an example of ideology critique in the new South Africa. Although only a formative, clarificatory evaluation was conducted, it may have served to clarify what is at stake when quality assurance begins to work as an ideological project. In this sense the study may serve as a resource for critical self-reflection by policy actors and quality assurance implementers.

At the level of methodology, the study used an ambitious pluralist design to provide a very detailed picture of a policy development and adoption process. It was able to include and triangulate both insider and outsider accounts. The use of multiple methods and multiple data sources may have strengthened the coherence and internal validity of the study. In a limited way the study serves to illustrate that policy analysis and evaluation is a difficult, complex undertaking that requires careful design and considerable methodological skill on the part of the researcher.

The methodology adopted enabled this researcher to step back (with some difficulty) from the advocacy role initially assumed when working as project manager for the HEQC’s ‘Improving Teaching & Learning Project’. Thus despite the researcher’s personal investment
in the production of the ‘Improving Teaching & Learning Resources’, it is suggested that a valid evaluation of the Resources was achieved.

**10.3 Limitations of the Study**

Perhaps more can be learnt from the limitations and short-comings of the study than from its achievements. Firstly it was made clear in Chapter 1 that this study is a clarificatory evaluation based primarily on qualitative methods with a focus on the design and take-up of policy instruments. This means that its findings are interim, tentative and not conclusive. They are likely to have limited impact on the policy implementation process itself. The fact that the evaluation was undertaken so early in the policy process (prior to full-scale implementation) meant that opportunities for gathering data from those stakeholders most distant from the process was difficult. For example, the reluctance of academics to be interviewed before implementation and their willingness to do so after implementation\(^\text{192}\) suggests that the findings would have been richer if data had been gathered later in the policy process. As it was the academic voice was recovered only through the small sample of academics involved in the MBA reviews, whilst the student voice remained inaccessible. I expect that it would also be possible to capture the student voice post-implementation. Ball (1994a) suggests that a serious policy analysis requires a multi-method, cross-sectional study over a period of at least five years.

A second limitation of the study may have been that the methodology was ambitious. There may have been too many methods and too many instruments for one researcher to deal with. The analysis struggled to keep a balance between agency and structure, reflexivity and ideology and appropriation and colonization. In the end it was not clear that the ambitious quest to link micro and macro-level analyses and to integrate the findings produced by different research methods was adequately achieved. Furthermore, the range of methods was applied to a limited set of data sources that, due to the researcher’s social and institutional location, tended to fore-ground the voices of those from historically English-medium universities and back-ground the voices of those from other institutional types. As noted at the outset of this study, these limitations are typical of interpretative, qualitative studies. Thus the study does not claim external validity and aimed to achieve only adequate levels of reliability. However, it is suggested that the use of triangulation of research methods and data sources did achieve conclusions that are internally valid for the narrow slice of reality that the researcher accessed.

\(^{192}\) This refers to those academics interviewed on the basis of their experience of the MBA review site-visits.
A third limitation is related to the adaptation of the critical systems heuristics method. Ulrich (Ulrich, 1994) argues that the ‘affected’ are competent to engage in dialogue about the rightness of a social intervention by virtue of their ‘affectedness’. This was borne out by the fact that academics only seemed to have opinions on the HEQC’s policies after implementation (for example after the MBA review site-visits). Prior to implementation, the researcher battled to find well-informed academics (and students) who could comment on the policies. In this particular policy process, and presumably in many others, by the time implementation was rolled out, it was too late to intervene. In other words, by the time academic opinion was readily available, the comment period was closed and so was the debate about the policy instruments -- at least for the next six years. A second issue relating to the critical systems heuristics method already discussed was that its assumption about the homogeneity of social groups in the policymaking process was not borne out by the findings. As noted previously, class, race and historical divisions in South African society cut across these groups in ways that may have detracted from the fulfillment of their ‘social role’ in the policy process as envisaged by Ulrich.

A fourth limitation of the research is that it is unlikely to have much impact on the actual policy process. This was recognized at the outset where it was characterized as a ‘weak interventionist’ approach. However, the findings of the study suggest that there is currently a limited ‘functioning public sphere’ in South Africa which constrained debate between stakeholders and the HEQC and also between stakeholder groups themselves. This confirms Midgley’s (2000) critique of Ulrich’s method -- that it only works well in contexts where there is already a ‘functioning public sphere’ and a vibrant civil society.

Finally, a limitation of this study is its initial decision to limit the scope of the research to the public system of higher education in South Africa. The exclusion of the private sector and the failure to properly consider the impact of globalization and internationalization on higher education is a serious omission. This is particularly so in the light of the threat of the GATS decision to view higher education as a service to be traded in a free market. These factors were part of the government’s rationale for establishing the HEQC and there clearly is a need to protect the South African public from sub-standard private and international providers—and perhaps to protect the public system from undue competition. The narrow scope of the study may have led the researcher to over-emphasize the agency of the developmental nation state, ironically at a time when it is widely understood that the power and influence of the nation state is being severely undermined by the forces of the global market.

This list of limitations points to areas for further research.
10.4 Further Research

There are a number of areas of on-going research related to the introduction of a national quality assurance system in South African higher education and the limitations of this study.

Firstly, research on the policy implementation and its outcomes and impact needs to be undertaken -- both at the level of academic departments and institutions and at the HEQC headquarters. In the process it will be important to capture more adequately the student and academic voices. It would also be important to try to understand more fully the content of ‘adaptive capacity’ and how this might be built at academic department level. The effect of the institutional mergers on the implementation of quality assurance should also be researched. For example, it would be interesting to find out whether institutional managers can use quality assurance as a management tool to ensure standards across previously diverse institutions and, more importantly, to encourage development where it is needed. It would also be interesting to find out whether the HEQC manages to successfully undertake capacity development in the weaker sectors of the system within an accountability framework. Perhaps most importantly, research should be undertaken in due course to ascertain the extent to which the HEQC’s policy ‘solutions’ solved the original policy ‘problems’. This would include finding out whether the HEQC’s integrated model does in fact achieve both accountability and improvement and whether the HEQC manages to withdraw to a more facilitative role once basic quality standards are assured.

A second area for further research relates to the need to meaningfully institutionalize quality assurance in institutions and especially at the level of academic sub-units. The question of exactly how to ensure academic accountability to external stakeholders in a way that is in keeping with academic lifeworlds remains to be solved. Research should be undertaken on how best to achieve meaningful and honest self-evaluation within the HEQC’s accountability frameworks.

A third issue to research relates to effective evaluation methods for the improvement of teaching and learning in higher education. Research should be undertaken to encourage the development of evaluation methods that move beyond current pragmatic and connoisseurial models. The use of theory-based evaluation as a method of self-evaluation that may produce sufficiently contextualized and diagnostic findings to encourage ‘deep’ improvement should be explored further.

Fourthly, research should be undertaken on the impact of the privatization and internationalization of higher education in South Africa. The question of how developing nations can turn this development to their advantage needs to be explored.
Fifthly, there is clearly a need for on-going work on developing a multi-methodology for critical policy analysis that is both efficient and effective for achieving high levels of validity and adequate levels of reliability. For example, the research done for this study suggests that discourse analysis of policy texts can be a useful tool for critical policy analysis, but it needs to be balanced with the findings of empirical research on policy practice. Furthermore, detailed discourse analysis was applied only to samples of actual policy texts and not to other data sources such as the interview data. Further work on the optimal combination of research methods and integration of their findings needs to be undertaken.

Finally, ethical questions raised in this study remain unresolved. Further theoretical work needs to be undertaken to understand what is ‘legitimate public action’ in a post-colonial context such as post-1994 South Africa. In this context, how far should ends justify the means? The question of what are context-appropriate theories of institutional autonomy and academic freedom remains to be answered by stakeholders of South African higher education.

10.5 Conclusion

By way of conclusion I would like to reflect on the implications of some of the ideas of Sir Geoffrey Vickers193 (Vickers, 1973, 1980) for achieving quality in organizations. Vickers was himself an experienced manager and his ideas arose from experience as much as theory and include an ethical dimension -- in this sense they are an example of ‘practical reason’.

Regarding policymaking, Vickers suggests that policy solutions should be posed humbly and dialogically because the human capacity to understand complex problems and generate appropriate solutions is very limited.

More importantly, Vickers questions the now common sense assumption that organizations and people are primarily concerned with goal-seeking behaviour. He regards the goal-seeking model of organization as impoverished. Instead he defines organizations as increasingly complex and made up of multiple, interdependent individuals all seeking opportunities for relationship. He understands goals to be important only in the context of a desired relationship. For Vickers, our humanity is based on our capacity to respond appropriately to others within a web of relationships; that is, to be responsible. What is an appropriate response is defined in terms of mutual expectations around roles. Organizations therefore need to set up roles for people and create stability so that these webs of mutual expectations

193 Vickers work was mentioned in Chapter 4 in the discussion on interpretive views of organizations. This discussion is based on an article by Williams, G. (2005) Systems Research and Behavioural Science, 22, 291-298.
and responsibilities can be learnt and carried out in the context of mutual trust. He claims that ‘all ethical thought and behaviour derives from expectations that people learn to expect of themselves as a necessary part of their identity’ (Vickers 1980:54 quoted in Williams 2005:294). Vickers argues that quality of thought and behaviour are initially learnt in the context of a trusting relationship maintained by a stable organization. These standards are initially other-regulated but become internalized leading to dependable high quality responses. Thus the criteria or standards for quality behaviour are generated within an organization but become internalized and linked to the identity of individuals. He explains that it is trust that leads to quality in human relationships which in turn leads to quality performance. Vickers therefore understands effective management to be about supporting desired relationships, avoiding undesirable ones and creating stability and trust. Vickers claims that organizations can only function optimally when there is mutual trust and responsibility. He posits that ‘responsible governments need responsible people and are impotent when these are lacking’ (Vickers 1973:96 quoted in Williams, 2005:297). The quality of an organization is a measure of the degree of mutual trust and responsibility that exists between its members.

Vickers’ refreshing ideas on the nature of quality within organizations resonate with Habermas’ notions of communicative action based on shared lifeworlds and consent to norms. These ideas also explain why instrumental action and goal-based methods of quality assurance do not generate mutual trust and responsibility and therefore cannot create quality. Instead, it is proposed that a model of evaluation likely to improve teaching and learning practice should clarify roles and expectations (for teachers, learners and managers), be undertaken in a context of trust and stability and aim to build mutual responsibility between teachers and learners.

In outlining its vision of a transformed higher education system, the NCHE Report (1996) emphasized the importance of responsibility in teaching and learning relationships. The text below (also quoted in Chapter 6) was written at the beginning of the policy debates on transforming South African higher education when policymakers still trusted higher education to honour its social contract.

Responsible staff will give priority to the different learning needs, the academic progress and the personal well-being of all students entrusted to their education care and guidance.

I am aware that some of Vickers’ ideas seem alarming close to Foucault’s negative concept of ‘normalization’ leading to ‘governmentality’. However, Vickers’ notion of responsibility entails individual agency, choice and the meeting of individuals’ needs whilst Foucault’s concept suggests that individual interests are betrayed.
... Students ... should recognize that the potential benefits of higher education offer a privilege which carries its own responsibilities. (NCHE 1996:179)

The NCHE’s vision of mutual responsibility based on trust is a norm to which we should consciously aspire in higher education in South Africa.


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REFERENCES


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APPENDIX 1

Proposal for Stage 1 of the HEQC’s Project on Improving Teaching & Learning in South African Higher Education Institutions

Source: HEQC 2002 (unpublished)
1. Rationale and Context

1.1 Why the HEQC is Prioritising the Quality Assurance & Improvement of Teaching & Learning?

The Higher Education Quality Committee (HEQC) is currently in a two-year start-up and developmental phase of its work. In its Founding Document (January, 2002), the HEQC identified teaching and learning as one of its major areas of focus:

The HEQC will develop a quality assurance framework that includes an explicit focus on the quality of teaching and learning activities, research and community service in order to deepen and extend the process of higher education transformation (2002:13).

In the Founding Document, the HEQC identifies two of its areas of responsibility as:

Capacity Development: The development and implementation of initiatives to build and strengthen the capacity for high quality provision at institutional, learning programme and individual levels. (2002:20); and

Quality Promotion: The development of a programme of activities to institutionalise a quality culture in higher education and the commitment to continuous quality improvement. (2002:20).

The HEQC plans to make the quality assurance and improvement of teaching and learning a key focus of its activities for a number of reasons:

1. The key to a quality HEI is the quality of its student learning experience and the effectiveness of its teaching and research practices. The effectiveness of teaching is thus a crucial area for a QA system to investigate, but it is also a difficult area to capture. It is difficult to capture because teaching is not a science with a set of generalisable laws or rules that can be universally applied and tested in practice. Furthermore, teaching and learning practices are highly personalized domains involving sets of complex interactions between two groups of diverse human beings (teachers and learners) with
uneven levels of self-awareness and self-reflexivity. Research on the effectiveness of teaching is usually done via student evaluation, peer review, self-reporting and other introspective methods, none of which have high levels of reliability. The gathering of evidence to understand and quality assure the quality of the learning experience an HEI offers thus needs to use a triangulation of research methods and should attempt to investigate both the processes and the products of teaching and learning and to probe it at a range of levels – institutional, faculty, programme and module.

2. In the post-apartheid South African context “making learning happen” more equally across HEIs, which have had different histories and provided unequal learning opportunities during the apartheid era, is not only a challenge, but also an important aspect of promoting equity and redressing past imbalances. One of the key challenges to the HEQC in post-apartheid South Africa is to ensure that all students, at whatever HEIs they attend, enjoy a minimum quality threshold of educational provision and a fair chance to succeed. This means taking quality improvement measures right down to the level of what happens in the classroom.

3. In its Founding Document, the HEQC emphasizes that its understanding of quality and quality assurance encompasses both the accountability and the improvement aspects of QA, and that it is possible to work with both aspects simultaneously and in creative tension. The HEQC wishes to avoid over-emphasizing the improvement dimension of QA, as this is likely to lead to uncritical self-evaluation and only limited improvement, achieved incrementally within the status quo and conventional wisdom. Likewise, the HEQC wishes to avoid over-emphasizing accountability as this could lead to “them versus us” attitudes, a culture of compliance, the alienation of academics and the HEQC engaging only with bureaucratic rather than substantive issues. The HEQC believes that direct engagement with the quality of teaching and learning is one of most urgent and substantive issues that it should tackle and that this should be done by employing both accountability and improvement measures.
1.2 Contextual Factors

The HEQC is currently the only agency of the state involved in HE with direct responsibility for the implementation of policy, capacity building for that implementation and its monitoring and evaluation. Furthermore, the current broader policy context demands that the HEQC engage with teaching and learning issues:

1. Quality assurance conducted under the auspices of the HEQC, is identified in the White Paper (1997) as one of the ‘steering mechanisms’ by which the transformation of HE is to be achieved. More recently, The Department of Education’s National Plan for Higher Education (NPHE) (February, 2001) endorses the important role of quality assurance in achieving its goals. The NPHE sets out national output benchmarks for the system, which are to be monitored through the Department’s planning processes and HEIs are to be rewarded or sanctioned via the new funding framework. The Department places the need to improve the efficiency of the HE system in the short- to medium-term at the centre of its National Plan. The NPHE notes that on average approximately 25% of first-time entering students and 20% of all undergraduate and postgraduate students drop-out of the HE system each year, whilst in 1998 institutional graduation rates ranged from 6% to 24%. The NPHE states,

‘These poor retention rates and high drop-out rates are unacceptable and represent a huge waste of resources, both human and financial.’ (NPHE, 2001: 2.1.3)

‘The Ministry believes that the long-term goal of increasing the overall participation rate must be complemented by strategies to increase graduate outputs in the short to medium-term in order to ensure that the current demand for high-level managerial and professional skills is satisfied. This requires that over the next five to ten years the priority must be to improve the efficiency of graduate outputs from the system. Indeed, it would be
difficult to argue for additional resources to facilitate expansion unless the inefficiencies in graduate outputs are addressed satisfactorily’ (NPHE, 2001: 2.3.3).

‘(H)igher education institutions have a moral and educational responsibility to ensure that they have effective programmes in place to meet the teaching and learning needs of the students they admit’ (NPHE, 2001: 2.3.3).

‘The Ministry expects that at a minimum, over the next five years, the total number of graduates will increase by 10 000 per annum, i.e. from the current total of 90 000 to 100 000 per annum’ (NPHE, 2001: 2.3.4).

‘The Ministry is of the view that the scale of the inefficiencies requires the inclusion of graduate outputs in the new funding framework’ (NPHE, 2001: 2.3.3).

However, the Department is quick to emphasise that the ‘focus on efficiency improvements cannot be at the expense of the quality of academic outputs’ (NPHE, 2001: 2.3.3). Furthermore, with respect to assuring quality, the HEQC is explicitly requested to investigate the effectives of distance education programmes run by contact HEIs and to investigate the quality of postgraduate programmes. The attainment of the National Plan’s policy goals obviously requires an improvement in the quality of teaching and learning in the HE system, but exactly how this is to be achieved remains unexplored in the National Plan and is assumed to be the responsibility of providing HEIs. However, it is well known that few HEIs have the internal capacity to make the changes required, and that it is typically those HEIs that most require the transformation of teaching and learning practices that are least able to effect them.

2. The Ministerial National Working Group on transforming the HE institutional landscape has recently submitted its report to the Minister. The
possible merging of some HEIs on a regional basis will mean that these institutions will be required to rationalize and restructure their academic offerings. This may well be an opportune moment for the HEQC to notify HEIs of its draft quality assurance requirements so that restructuring HEIs can enhance their academic planning and monitoring capacities accordingly.

3. The South African Qualifications Authority tends to be seen by HE academics as an intrusive bureaucracy. However, the SAQA requirements for an outcomes-based format for the interim registration of qualifications, has meant that (albeit in an uneven manner), learning outcomes have been developed for each interim registered qualification. Furthermore, the South African Vice-Chancellors’ Association (SAUVCA), in partnership with the Committee of Technikon Principals (CTP), has established a project to generate NQF standards for all high volume generic qualifications in HE (the Generic Qualifications Standard-Setting Project). These standards could provide minimum quality standards for the HEQC’s programme accreditation and evaluation processes. These generic standards are also being written in SAQA’s outcomes-based format. The HEQC could build on this outcomes-based design requirement by building capacity to effect curriculum alignment\(^1\) at programme and module levels. The HEQC could reinforce the importance of curriculum alignment through the external examining system.

4. Closely linked to the above is the introduction of the New Academic Policy (NAP), which is to be finalized in 2002 and implemented from 2003. Academics and administrators responsible for academic planning, curriculum design, internal and external approval of programmes, etc. will need to understand the implications of the NAP for the structure and format of their provision.

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\(^1\) Curriculum alignment is a term coined by John Biggs to mean that the teaching content and methods and the assessment methods are aligned with and support the learning outcomes for a unit of learning (e.g. a programme or module), thus ensuring that learners have adequate opportunities to develop and then demonstrate the attainment of the learning outcomes specified.
5. The establishment of the Education, Training and Development Practitioner (ETDP) Sectoral Education and Training Authority (SETA) and the possibility of establishing learnerships funded by the Skills Levy, suggests that the HEQC should, with other stakeholders, explore this opportunity for funded continuous professional development of teachers in HE. The HEQC could take the lead in formalizing and accrediting a range of quality staff development programmes.

2. The Scope and Purpose of the Project

2.1 What is Teaching and Learning in Higher Education?

Teaching and learning and research are the core business of higher education. HEIs have traditionally been called “institutions of learning” – they exist in order to make learning happen. The two concepts teaching and learning should not be separated; they are two sides of the same coin, i.e. an interactive process that requires the active cooperation of both learner and teacher. A definition of teaching might be the inspiration and facilitation of learning, whilst a definition of learning might be conceptual and cognitive change as a result of (direct or indirect) interaction with a more knowledgeable and experienced other. Research in cognitive psychology suggests that learning is a complex process and there is certainly no agreement on any one theory of learning. But there is agreement that learning is not only a cognitive, rational process, but also an affective, social and cultural process - thus there are no simple recipes for its success, and personal, cultural and contextual factors cannot be ignored. Learning happens within the inter-subjectivities of learners and teachers as they work together to make common meanings and as learners are inducted into various professional or academic communities. In HE, learning is enhanced through the process of students being inducted into communities of research, scholarship and in some cases, community service, or a professional community.

For the purposes of this project, we will define teaching and learning broadly to include not only the actual teaching and learning processes that go on in classrooms, but also, the policies, plans, procedures and activities that an institution of higher
education undertakes to provide for its staff and students the conditions and environment necessary for high quality learning to take place.

2.2 The Scope of the Project

This project will form the first stage of a more extensive and on-going project to promote and improve teaching and learning under the Directorate of Quality Promotion and Capacity Development. The scope of Stage 1 involves the generation, discussion and pilot testing with the academic community, criteria and benchmarks for the HEQC to use in its evaluation of teaching and learning policies, procedures, practices and products. This needs to be done for the whole higher education sector – namely in universities, technikons and colleges in both the public and private sectors. Stage 1 will also aim to enhance the capacity of the HE system to respond appropriately to the proposed criteria and benchmarks for teaching and learning.

2.3 The Purposes of the Project

1. To develop for the HEQC criteria and guides to good practice on teaching and learning to inform the HEQC’s institutional audit and programme accreditation systems and procedures, with the aim of ensuring that these contribute to the enhancement and valid evaluation of teaching and learning.

2. To engage the academic community in discussion on the suitability of the proposed criteria, suggested indicators and guides to good practice and to take the academic perspective into account in their development.

3. To operationalise the HEQC’s Directorate of Quality Promotion and Capacity Development’s commitment to promoting and enhancing effective teaching and learning practice in the HE system.

3. Project Objectives

The HEQC’s Teaching and Learning project will aim to achieve the following short-term objectives over a period of two years:

Develop and test through research, consultation and piloting, a series of quality criteria and indicators with respect to:

- institutional policies and strategies for improving teaching and learning
- programme design and review
- the evaluation of teaching
• access, academic development and curriculum innovation
• curriculum alignment and student assessment
• postgraduate supervision
• the role of external examiners
• academic staff development.

4. Project Outputs
The effectiveness of the project will be measured against delivery of the following outputs:

1. A needs and capacity assessment report on the teaching and learning needs of South African higher education institutions.
2. A series of workshop designs and materials on key issues in quality assuring teaching and learning in HE.
3. A framework for academic staff development in HE, which will be developed collaboratively with other stakeholders.
4. A series of HEQC ‘Guides to Good Practice’ which set out and explain minimum quality thresholds for teaching and learning and which also give indicators of good teaching and learning practice.
5. A set of recommendations (criteria to be used in evaluating the quality of teaching and learning) for the HEQC’s institutional audit and accreditation frameworks and procedures.

5. Beneficiaries of the Project
Teaching in higher education has traditionally been carried out on a common sense basis premised on an implicit apprenticeship model of learning with no requirement for professional training of academic staff to teach and limited accountability requirements checked through peer review. These ‘cottage industry’ practices generally sufficed in an elite, relatively autonomous system with high staff: student ratios and well-prepared students. Clearly conditions in higher education in the 21st Century have changed making this model obsolete. The globalisation of the world economy and governments’ calls for high-skilled ‘knowledge workers’, the ICT revolution, the massification of HE and the call to lifelong learning and in the South African context in particular, the call for equity and redress and the diversification of the student body, mean that old teaching assumptions, practices and methods are no longer adequate. Instead a professional, theory-driven approach to teaching and
learning is now required. Furthermore, if the HEQC is to place demands for accountability on HEIs and their academic staff, then it is only fair that the HEQC should try to ensure that these demands are generated and accepted by those who have to meet them.

The project will therefore aim to impact directly on the teaching and assessment capacity of academic staff - the key agents of quality in teaching and learning. (It is assumed that students will be the indirect beneficiaries of these developments). Thus key target groups for the proposed workshops will be academics, senior managers responsible for teaching and learning at institutional policy and strategic planning levels, academic middle managers such as programme directors and institutional support staff such as academic development, quality promotion and student development personnel, responsible for quality improvement and capacity development at institutional level. The project will aim to contribute to institutional capacity to plan, monitor and improve internal teaching, learning and assessment practices.

6. Cooperation with other Stakeholders

Direct responsibility for improving teaching and learning practices lies with HE providers. The responsibility of the HEQC is to indicate what its requirements are with respect to the quality assurance of teaching and learning. A small Working Group, drawn from local expertise will be formed to run the project. International experts and representatives of stakeholder organizations will be invited to sit on a Reference Group to advise the Working Group. The project will be located in the Directorate of Quality Promotion and Capacity Development and overseen by the Director, assisted by a Project Manager.

The HEQC will enter into discussions with SAUVCA, the CTP and the APPETD about their involvement and cooperation in the project. Other relevant organizations will also be informed about the project.

References

APPENDIX 2

Draft Improving Teaching & Learning Resources

Source: HEQC 2003 (unpublished)
Introduction

1. Programme Planning, Design & Management
2. Programme & Course Review
3. Access & Admissions
4. Student Development & Support
5. The Assessment of Student Learning
6. Staff Development
7. Postgraduate Research and Supervision.

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**Introduction to the HEQC’s**

**Improving Teaching & Learning Resources**

1. The Quality Promotion and Capacity Development priorities of the HEQC

The *Higher Education Act (1997)* gives the HEQC responsibility for the promotion of quality assurance, in addition to the accreditation of HE programmes and the audit of QA mechanisms of all higher education institutions (HEIs). The *Founding Document* (2001) of the HEQC interprets the quality promotion role of the HEQC, which is to:

> Promote quality among constituent providers in higher education in order to facilitate the development of quality awareness and quality responsiveness in public and private provision. (HEQC, 2001:10)

The *Founding Document* identifies two broad areas of work that recognise the importance, in the South African context, of both promoting quality and supporting capacity development:

- **Capacity Development**: The development and implementation of initiatives to build and strengthen the capacity of high quality provision at institutional, learning programme and individual levels. (2001:20); and
- **Quality Promotion**: The development of a programme of activities to institutionalize a quality culture in higher education and the commitment to continuous quality improvement. (2001:20).

The HEQC established a Directorate of Quality Promotion and Capacity Development (QPCD) in order to take forward the goals outlined above. In accordance with the *White Paper on HE Transformation* (1997), the HE Act and the *Founding Document* the work of the QPCD directorate is based on two closely related principles:

- HEIs have the primary responsibility for quality and for developing effective quality management systems.
- In fulfilling its quality promotion mandate the HEQC will play a facilitating role by developing partnerships with HEIs and a broad range of stakeholders.

2. The Improving Teaching & Learning (ITL) Project

The ITL Project was initiated in 2002 to give effect to the HEQC’s prioritisation of teaching and learning in its QA systems. A parallel project is promoting quality and building capacity in respect of research. The broad objective of the ITL Project is to provide higher education institutions with resources for the improvement of teaching and learning that they can effectively adapt, use and develop further as individual institutions and via regional and national networks, as appropriate. A related objective of the ITL project is to promote the development, by HEIs, of internal systems and practices that will effect improvements in teaching and learning.

A Working Group was appointed with members drawn from Academic Development, Curriculum Development and Staff Development units across the spectrum of South African higher education institutions. The Working Group first undertook a scoping exercise in order to define the focus of their work and its conceptual underpinnings. A *Needs and Capacity Analysis* was also undertaken in a selected sample of 12 institutions. The findings identified the following as key areas for capacity development in South African public higher education:

- The transition from school to HE
- Curriculum development
• Language, numeracy and higher level cognitive development
• Professional development relating to teaching and learning and quality assurance.

Once members of the Working Group had produced draft Guides to Good Practice, the project ran a Consultative Panel for each of the Guides. A total of 48 senior academics and academic managers \(^1\) with expertise in the focus area under consideration and students were invited to share their expertise and to comment on the project’s work-in-progress from the perspective of those who would need to use the Guides for internal review and for improving teaching and learning. A Reference Group comprised of national and international experts was also asked to comment on the Guides, as were members of the HEQC Board. On the basis of the comments received, the Guides were revised and submitted to the HEQC for approval and internal discussion. Thereafter they were used as resources by the HEQC for the development of its proposals for criteria for institutional audit and programme accreditation. The Guides have since been edited and renamed Resources for Improving Teaching and Learning. As part of its quality promotion and capacity development work, the HEQC ran regional workshops late in 2003 to introduce these resources to higher education institutions and to obtain feedback. On the basis of this feedback, the Resources were edited once more.

3. The Purpose of the Improving Teaching & Learning Resources

The purpose of this Resource pack on the quality assurance of teaching and learning is to provide a set of resources for higher education institutions to use when developing their internal quality systems for self-evaluation. The Resource pack aims to set out ‘ideal types’ or models of ‘good practice’ for the management and quality assurance of teaching and learning which are heuristic, illuminating and illustrative, providing common reference points or starting points for institutions to use in developing and refining their own self-evaluation instruments. Their primary audience is therefore intended to be senior and middle managers, programme directors (or equivalent) and expert personnel such as those who work in quality assurance, staff development or academic development units. The Resources are also intended to be used by academics, but we suggest that selections from the pack should be mediated to academics as and when relevant to their needs.

The IT&L Resources may also be useful to merging and restructuring institutions in that they may provide starting points for deliberation around the establishment of new policies and systems for teaching and learning and its quality assurance. In its guidelines for merging institutions, the Department of Education provides the following advice,

> The Quality Assurance unit (of a merging institution) will need to attend to the development of policy in key target areas such as teaching and learning. The implementation of good practice at the teaching-learning interface is critical to institutional quality and equity of outcomes. Merging institutions would be well advised to establish policies in the primary fields of curriculum development and review, the evaluation of teaching and courses and the assessment of student learning. These will be taken into account in the HEQC audit.
> (Department of Education 2003:44)

However, The HEQC’s Improving Teaching and Learning Resources are not intended to be prescriptive, nor are they fully comprehensive or exhaustive. Due to the contingent, context-dependent nature of teaching and learning (see below), they cannot pretend to be directly applicable to any particular situation on the ground. They are not intended to be applied literally or rigidly to specific practices. They will need to be contextualised and adapted to specific institutional, departmental, disciplinary and individual needs priorities and situations.

This Resource pack is intended to stimulate discussion and does not necessarily reflect the views of the HEQC secretariat or Board on teaching and learning policies and practices.

\(^1\) The names of all those who contributed to the development of the Resources can be found in Appendix 1.
4. Approaches to Quality

This Resource pack was developed within an understanding of what constitutes quality, based on the HEQC’s conceptualization of quality as defined in its Founding Document (2001:14):

‘Fitness for purpose in relation to specified mission within a national framework of differentiation and diversity’

This definition recognizes that the quality of learning and teaching in a particular institution is closely related to how well it fulfills its publically-stated mission. Each HEI and individual practitioner in the institution defines the meaning of quality in their own contexts, in relation to the institutional mission and the aligned purposes that they set out or subscribe to for their activities. The fitness for purpose approach to quality is most closely followed in Resource No.6 on Staff Development. This Resource is underpinned by the theory of the ‘reflective practitioner’ which advocates the development of professional educators who can learn from their teaching practice, engage with educational theory and use self-evaluation to self-improve professionally.

‘Value for money judged in relation to the full range of higher education purposes set out in the White Paper. Judgments about effectiveness and efficiency of provision will include but not be confined to labour market responsiveness and cost recovery.’

The Resources do not address this understanding of quality directly, except via the assumption that if learning is the core business of higher education, then where it is carried out effectively, the responsiveness and efficiency of the system will also be enhanced, both in terms of meeting the government’s goals for higher education and in terms of giving students a ‘fair deal’. The value for money approach to quality is not addressed directly, but is arguably found in Resource No.7 on Postgraduate Research and Supervision, an area of provision that should make a critical contribution to national economic development and the national skills development strategy as well as giving students a ‘fair deal’.

‘Transformation in the sense of developing the capabilities of individual learners for personal enrichment, as well as (meeting) the requirements of social development and economic and employment growth’.

The Resources aim to promote this conceptualization of quality by understanding ‘good learning’ to be transformative (i.e. to transform the way students view the world, see the Nature of Teaching and Learning below). The assumption is that if higher education institutions (HEIs) provide transformative learning experiences for students, graduates will in turn become change agents in society and so further the state’s economic and social development goals for higher education. The value assumption here is that quality assurance should serve the interests of students. Irrespective of where they study, all students should be offered a quality education service and a fair chance of academic success (i.e. equality of opportunity). In the South African context, this value assumption is over-laid with the concern to redress past inequalities in educational provision and to promote social justice and equity in post-apartheid South Africa. The quality as transformation approach comes into focus at the micro-level of teaching, the quality of the learning environment, counseling, support services, etc. Resource No.4 on Student Development and Support and No.5 on The Assessment of Student Learning most directly address the challenge of providing transformative learning experiences for students. At institutional level, No.3 on Access and Admissions addresses the challenge of contributing to equity, justice and therefore social transformation as one dimension of quality provision.
Fitness of purpose the Founding Document notes that the above conceptualizations of quality are to ‘be located within a fitness of purpose framework based on national goals, priorities and targets’.

In writing the Resources, the expert group has tried as far as possible to take ‘national goals, priorities and targets’ into account, particularly in the general sense of promoting national social and economic development and equity and social justice. At the level of detailed descriptions of ‘good practice’, we have tried to take into account the targets for the higher education system set out in the National Plan for Higher Education (2001). However, in some cases it is unclear exactly how national targets for the system as a whole should be disaggregated down to institutional, programme and course levels. Secondly, with respect to curriculum planning, design and development, we assumed that higher education practitioners must work within the regulatory environment established by the South African Qualifications Authority (SAQA), including the use of outcomes statements in the registration of qualifications (see section 9.3 below for further discussion on the NQF and OBE). The fitness of purpose approach allows national policies to provide the macro frameworks (mostly for the management, planning and outputs of educational provision) within which institutional missions and goals are formulated (see Resources No.1 on Programme Planning, Design and Management and No.2 on Programme & Course Review).

5. An Approach to Quality Assurance

The position taken by the Working Group is that the focus of any quality assurance system for higher education should be on continual improvement of the quality of student learning. In any quality assurance system there is a tension between improvement and accountability. The position taken here is not to reject accountability as a threat to ‘academic freedom’, provided that accountability does not become ultra vires and allow external authorities the power to make academic judgments. Instead, we suggest that the focus of quality assurance systems should be on improvement – improving the quality of student learning, and that if this is achieved, accountability will be a consequence or ‘spin-off’ effect of that process. This means that the findings of self-evaluations need to be sufficiently diagnostic to lead to concrete and detailed plans for improvements in teaching and learning practice. The implementation of the plans for improvement is unlikely to be effective unless it is based on sound learning theory, and is supported and monitored by management.

6. Link to the HEQC’s institutional audit and programme accreditation

In order to operationalise conceptualizations of quality, it is necessary to specify the variables or criteria for recognizing them (i.e. observable and measurable manifestations of the concepts). In its proposed criteria for institutional audit and programme accreditation respectively, the HEQC has already proposed the criteria to be used for its external evaluations. In drawing up these criteria, the HEQC drew on earlier drafts of the Resources as one source of information. This means that the instruments are closely aligned, although because of the different purposes they serve, the Resources are more detailed and discursive. Resource No.s 1, 2 & 5 relate closely to the HEQC’s audit criteria on teaching and learning and No.7 relates to the audit criteria for postgraduate education. Aspects of all 7 Resources are touched on in the proposed programme criteria. However, in describing ‘suggested descriptors for good practice’, the Resources go one step further and suggest what might be considered to be valid indicators for the identified variables (i.e. they give suggestions for what could serve as evidence for meeting the criteria). By using the quality cycle (planning – implementing – reviewing – improving) as an underlying frame for the suggested criteria (evaluative questions) and their indicators (suggested good practice descriptors), the Resources set up ideal models of good practice. These are ideal, systematic, representations of patterns amongst variables, but as stressed above, it is important not to lose sight of the ideal
nature of these models; they are simplifications and reifications of the ‘messy realities’ and situated practices’ found on the ground.

7. Scope

In selecting key focus areas of the provision of teaching and learning in higher education, the HEQC has attempted to cover all stages of the quality cycle plus key value-adding or transformatory aspects of provision. The following Resources are included in this pack:

1. Programme Planning, Design & Management
2. Programme & Course Review
3. Access & Admissions
4. Student Development & Support
5. The Assessment of Student Learning
6. Staff Development
7. Postgraduate Research and Supervision.

Our attempts to suggest what might be considered as ‘good practice’ in teaching and learning are limited in a number of ways. Firstly, the expert group is aware that our attempts to articulate what we consider to be ‘good’ educational practice have been carried out from within our own limited knowledges, perspectives, contexts, interests and values. The interests and values on which they are premised are likely to be contested and some of the assumptions on which they are premised may not hold. Secondly, ‘good practice’ is contingent, context-dependent and defies generic description. Thus if these Resources are to be useful at all, those who use them must reinterpret and re-describe them and make them their own.

It is noteworthy that there is no Resource on Teaching Approaches, Methods and Delivery. After some debate, the Improving Teaching and Learning Working Group decided that this area is particularly context and disciplinary dependent and so we were reluctant to write a generic typification of ‘good teaching practice’ applicable to all contexts. Instead we have explained our view of the nature of teaching and learning below and also included some principles for ‘good teaching practice’. The view of the expert group is that these principles should be interpreted and applied appropriately to different disciplinary and institutional contexts by professional educators. Other omissions include more specialized aspects of educational provision such as distance education, service learning, e-learning, experiential learning, short course provision, library services and the recognition of prior learning. There are national quality-related initiatives in respect of several of these areas, and the approach of the HEQC is to encourage relevant organizations and specialists to debate and disseminate good practice. The HEQC is in the process of commissioning further Resources to be written in some of these areas.

8. Format of the Resources

Each Improving Teaching & Learning Resource is structured in the following manner:

- The **Focus Area** describes the scope of the Resource, indicates the levels at which it applies (institutional, programme or course/module) and the moments of the quality cycle it addresses (i.e. planning, implementing, monitoring or improving). Given that the boundaries between the focus areas are not always clear-cut, links with other closely related Resources are also pointed out.

- This is followed by a **Rationale** that develops an argument, with reference to the current policy context, as to why the HEQC should take an interest in this area and why these issues should be considered in internal self-evaluations.

- This is followed by a more discursive **Discussion** section in which relevant debates, theories and current contextual issues are put forward.
• This is followed by a set of **Evaluative Questions** that are intended to provide prompts or lines of inquiry into the essential elements of the practice under consideration.

• Each Evaluative Question is ‘answered’ by statements or **Suggested Descriptors of Good Practice**. These attempt to describe or indicate what is currently understood to be ‘good practice’ in our context in a generic and idealized manner.

• The **Suggested Data Sources** that follow provide suggestions for where documented evidence might be gathered or found in order to answer the Evaluative Questions in an evaluation. As far as possible, use should be made of information that providers already gather for other purposes. It should be noted that the data sources suggested are limited to documented information. Obviously, the process of an internal review or external evaluation will generate other types of evidence from meetings, interviews, observations, etc. that will serve to triangulate with the evidence documented in the provider’s review report.

• A **Glossary of Terms** is provided for each Resource.

• Finally a list of **References and Further Reading** is provided. Suggestions for further reading are confined to accessible literature that would be appropriate for staff development.

9. Discussion

In this last section of the Introduction, we introduce and problematize three issues that challenged the Improving Teaching & Learning Project’s Working Group in the process of developing the Resources. Firstly we discuss the nature of teaching and learning in higher education, secondly we look at some of the challenges related to implementing change in higher education and discuss how Teaching & Learning Strategies might be implemented. Thirdly, we discuss a specifically South African issue, namely outcomes-based education and how it might be applied to higher education.

9.1 The Nature of Teaching & Learning in Higher Education and Principles for Good Teaching Practice

Historically, the primary function of universities has developed from being institutions for teaching in the Middle Ages, to institutions for research (post Humboldt) to currently being institutions for learning (which includes both teaching and research). The idea that institutions of higher education should be places of learning is not new, but what is increasingly of concern in the ‘knowledge society’, is what kind of learning is taking place? In keeping with a conceptualization of quality as transformation, the Working Group suggests that one of the central concerns of HEIs in South Africa should be the enhancement of ‘transformative learning’ (see below). In this section we tease out what are the implications of this for teaching.

Given that teaching is not an end in itself, but exists to bring about learning, one tends to teach (implicitly or explicitly) according to how one thinks learning happens. Traditional approaches to teaching in higher education have assumed that the presentation of content (usually via lectures) is sufficient for learning to occur. But increasingly this assumption is being questioned. In his well-known book, *Learning to Teach in Higher Education*, Ramsden reflects on the relationship between teaching and learning.

> The best way to improve teaching is to inquire into the effects of one’s teaching on student learning ... The nature of teaching is context-related, uncertain and always improvable. Effective teaching refuses to take its effect on students for granted. It sees the relation between teaching and learning as problematic, uncertain and relative. Good teaching is open to change; it involves constantly trying to find out what the effects of instruction are on learning, and modifying that instruction in the light of evidence collected. (Ramsden 1992:102)
However, teaching is more than a craft, it is also a profession. This means that it should be knowledge or theory-based:

The professional authority of the academic-as-scholar rests on a body of knowledge. The professional authority of the academic-as-teacher should rest on a body of didactic knowledge. This comprises knowledge of how the subjects he/she professes is best learned and taught. (Ramsden, 1992:9).

There now exists an extensive body of knowledge not only on theories of learning and cognition, but also on learning in higher education and specifically on the teaching and learning of particular disciplines in higher education. We turn briefly to some of these theories of learning in order to understand how learning, and in particular, transformative learning has been defined and explained. For,

The most important thing we can do in order to develop, raise or assure the quality of the learning produced in higher education is to reveal the kind of learning we should bring about, the ways of seeing we think it is important for students to develop. (Bowden & Marton 1998:16)

Most theories that understand learning to be transformative are based on constructivist notions of cognitive development in which learners are understood to build and change their existing meaning and knowledge structures in order to assimilate or preferably accommodate new knowledge. The emphasis is on the learner actively constructing knowledge for himself/herself through learning activities or ‘performances of understanding’ and through social interaction or mediation by the teacher. Some examples of definitions of learning within this school are quoted below:

Learning is a qualitative change in a person’s view of reality; it involves conceptual change on the part of the learner. (Ramsden 1992)

Learning is the internalization and transformation of social tools of thought which are communicated to the learner through social interaction and instructional conversation. (Tharp & Gallimore, 1988)

Learning is the reconstruction of elements of one’s meaning production system which are collective and socially and culturally constructed. This also involves acquiring usage of unfamiliar discourse. (Northedge, 1994).

Adult educationists also understand learning to be transformative, for example Mezirow’s theory of ‘perspective transformation’ suggests that learning occurs as a result of ‘critical reflection’ on prior assumptions, and Freire’s critical pedagogy uses ‘conscientisation’ to change the way adult learners see the world and act on it. “Phenomenography” (Enwistle 1988) has contributed an additional perspective on learning in higher education, namely that how students perceive particular learning task demands largely determines whether their approach to learning will be ‘deep’, ‘strategic’ or ‘surface’. It is only the deep approach to learning that results in transformative learning, for it is characterized by a focus on underlying meaning, the use of a well-structured knowledge base, relating new knowledge to old knowledge and working conceptually and relationally.

Theories of learning such as these suggest that ‘good teaching practice’ can facilitate ‘deep’ approaches to learning and enable students to actively build and transform their cognitive and knowledge structures. The following principles of ‘good teaching practice’ are suggested as a means to this end:

- Making clear to students the purposes and intended outcomes of the learning task
- Achieving ‘curriculum alignment’ – i.e. the learning outcomes, selection of content, teaching methods and assessment methods all support each other, i.e. they are coherent and aligned.
- Modeling the epistemic principles and discursive conventions of the discipline and making explicit ‘the rules of the game’
- Facilitating the development of cognitive structure by ‘lending’ learners one’s own conceptual anchors, cognitive structure and strategies to assist their thinking and acting
• Developing an appropriate motivational context so that the learning is meaningful to students
• Creating powerful learning environments which focus on learner activity, interaction, variation in task demands and the application of knowledge to real world problems in order to facilitate the building of cognitive structure
• Providing opportunities for learners to test, extend, reflect on and revise their ideas through performances of understanding
• Questioning to prompt students to undertake cognitive operations that they would not produce unassisted
• Getting students to make connections with previous knowledge and maximizing their awareness of their own knowledge construction
• Assisting students to build meta-cognitive knowledge about their own thinking processes, approaches to learning and learning needs
• Changing students’ ways of seeing and thinking about the world.

The constructivist view of teaching for transformative (deep) learning is summed up by Bradbury:

The task for mediation is, therefore, to represent tasks to students in such a way that their epistemic character, which is usually implicit or covert, is heightened or made salient. … In terms of this approach the locus of the problem which must be overcome, is neither the learner nor the teacher; rather our attention should be focused on innovation within the curriculum and the mediated interaction which occurs between learner and task. The teaching-learning process needs to be constructed in such a way as to modify and change, not just the content of what the learner knows, but rather, to create conditions for restructuring and reorganizing information that will produce a new way of cognizing reality. (Bradbury 2000: 72)

It is interesting to note that several of the principles for ‘good teaching practice’ identified above have been confirmed by empirical studies based on student opinion data; these include:

• Enthusiasm for one’s subject and the ability to motivate students to learn
• Respect for students and sensitivity to their levels of understanding
• Appropriate expectations and work-loads for students
• Competence in one’s field
• Sound preparation, clarity of course requirements and good organization of the material
• Clarity of explanation and the ability to support discussion
• Encouragement of independent thought in students
• Fair assessment procedures and constructive feedback. (Webbstock, 1999).

However, excellent teachers do not operate in isolation. Good teaching practice needs to be developed and supported by an institutional environment and culture that is conducive to learning. We now turn to discuss how managers might work to create the conditions for transformative learning through the formulation and implementation of institutional policy.

9.2 Policy-making and the Challenge of Implementing Change in Higher Education Institutions

Traditional approaches to policy-making have assumed a rational-purposive, stagist model in which policy gets formulated, implemented and evaluated. This somewhat naïve approach views policy-making as a top-down intervention that is based on causal social laws and has predictable consequences that can be empirically verified. The assumption that policy is unproblematically implemented is based on an invalid theory of change. For example it assumes on the part of the implementers, adequate time and resources, complete acceptance, perfect communication and perfect obedience. This traditional approach is mirrored in a top-
down management style that assumes that organizational policy and planning stand in a deterministic relation to implementation. This ‘scientific management’ tends to focus on efficiency and assumes that the conditions of implementation are fixed and stable within a closed system.

More recent interpretive approaches to policy-making suggest that policy reforms are more like ‘reasoned arguments’ or ‘social transactions’ (Parsons 1995). Policy-making is understood to be a process of interaction between goals, intentions, contexts and local interests and perceptions. Policy-making is viewed as an evolutionary process that should include democratic deliberation as policy gets re-made in the process of implementation. Interpretive approaches to management tend to view an organization as a culture that is socially constructed and maintained by everyday practices, rituals and symbols. It emphasizes the importance of values, images and meaning-making in the change process and understands that organizational change requires a change in organizational culture, identity and discourse.

Critical approaches to policy-making and management emphasize the conflicts and power struggles involved in change processes. They suggest that wherever power is exercised there is resistance. A Neo-Marxist position understands policy to construct social reality to suit the interests of the dominant group or class. Thus this approach does not trust policy, law or governments to guarantee freedom, democracy or quality for all. A post-modernist approach denies that rationality can be disinterested and deconstructs policy discourses to prove this.

As mentioned above, a key challenge facing leaders of higher education institutions is how to go about implementing policy that will create the conditions for transformative learning to occur. One means of attempting to do this is the development and implementation of institutional ‘Teaching and Learning Strategies’. This practice is common in Holland, the USA, Australia and the UK and is government funded in the last two countries. The idea is also currently being implemented in several South African higher education institutions. A Teaching and Learning Strategy is essentially a set of specific goals, priorities and targets set at institutional level within a specified timeframe for the management and improvement of teaching and learning. It includes setting out responsibilities, resources and review and evaluation mechanisms. It is usually aligned to the institutional mission, strategic plans and quality management system. In the UK the format for HEFCE funded Learning and Teaching Strategies includes the following categories: context (what already exists and what needs changing), process of creation (how ‘buy-in’ by academics was achieved), goals, targets, strategies to address institutional culture, curriculum development, learning-teaching-assessment practice, quality assurance, quality enhancement, infra-structural changes, implementation, monitoring and evaluation.

However, when it comes to implementation, it is widely agreed that institutions of higher education are some of the most complex organizations in existence (Clarke 1983, Kells 1999, Becher 1999). They are key organizations of civil society and, in the West, have survived and resisted the incursions of both church and state over centuries. Whilst the very idea of the university presupposes debate, change and the discovery of new ways of knowing and doing, the systems, structures and cultures of higher education institutions are notorious for being resistant to change. Some of the reasons for this include:

- They serve multiple stakeholders and therefore have multiple purposes and goals that are usually poorly stated and attract only minimal or nominal support from academics. This is because there is an inbuilt tension for academics between loyalty to their disciplines or fields of study and loyalty to their institutions.
- As ‘loosely coupled systems’, ‘networks of networks’ or ‘constellations of communities of practice’, higher education institutions are characterized by the decentralization of power and an extensive and complicated delegation of authority, particularly with respect to the core functions of teaching and research.
• The nature of governance in higher education institutions is a messy mixture of collegial, managerial, bureaucratic and political modes and as a consequence decision-making procedures are often fluid, complex and inconclusive. Governance is often resisted by academics’ pursuit of disciplinary, departmental or individualistic goals.
• The management of higher education institutions is often hindered by the absence of timely and useful information about the organization and a lack of mechanisms to gather it.
• It is difficult to measure the achievement of goals in higher education, particularly with respect to teaching and learning because there are numerous variables that cannot be isolated and there are few, if any, direct cause and effect relationships.
• Academics are socialized to be single-minded, critical and individualistic. They are typically distrustful of authority and resistant to (perceived) infringements on their academic freedom. (Adapted from Kells 1999:301-302)

The description of higher education institutions above suggests that rational-purposive, top-down management models (which seem to be assumed in much of the discussion on Teaching & Learning Strategies) are generally counter to higher education cultures and so are unlikely to be successfully implemented. Likewise, implementation processes are seldom linear or sequential, making it difficult to pinpoint the causes of problems. According to Trowler and Knight (2002), the conceptualization of institutional change in higher education institutions is usually carried out simplistically following the traditional approach outlined above and therefore often based on wrong assumptions about the nature of the organizations and the process of change. For example, it is often assumed that higher education institutions are culturally homogeneous and well-coordinated organizations. It is assumed that strong leadership, tough top-down management and the effective use of techniques of control and measurement will effect change. But, given the nature of higher education institutions characterized above, this approach to change management is clearly inappropriate.

In an analysis of the weaknesses of institutional Learning and Teaching Strategies in higher education institutions in the UK, Gibbs (2001) makes the following observations:
• Some strategies have remained policies on paper and are unlikely to change everyday teaching practices because of lack of attention to change mechanisms and processes.
• Initially many higher education institutions focused on simply doing ‘more with less’ but retained traditional teaching and learning approaches.
• Others realized the need to change teaching and learning approaches, but focused on changing the practices of individual lecturers. This approach has failed to develop critical mass and to change institutional teaching and learning conditions and cultures and therefore has had minimal impact.
• Institutional factors that constrain teaching innovations on the ground and that typically are not addressed include time-tableing, the allocation of teaching time for contact hours but not for curriculum development, assessment regulations and practices, the lay-out and design of classrooms and lack of support and incentive for innovators (e.g. lack of funding for research into teaching).
• Many teaching and learning strategies are not based on explicit theories of learning.
• Many fail to link directly into the ‘quality gaps’ identified in evaluation findings.

Instead, following Kells (1999) and Trowler and Knight (2003), the following interpretive approaches to implementing change strategies in higher education institutions are put forward here. Given that power in higher education institutions is distributed and that change gets reinterpreted and socially constituted in locally contingent ways in particular ‘communities of practice’, it is recommended that the academic department or programme team be the focus for strategies for change. Managers should expect diverse results from change processes because those who carry out the change need to develop psychological ownership of the process – usually through collective exploration, negotiation and bargaining. This means that
successful change strategies need to be closely aligned to the norms and values of those who must implement them. Change strategies need to be supported by leadership, a sustainable resource base and good infrastructure. Change strategies also need adequate levels of internal motivation and leaders who attend to people’s feelings as well as persuading them to change by rational means. According to Kells (1999), the quality of support for the implementation process and the degree of discretion granted to those implementing change on the ground appear to markedly affect the outcome. He warns that,

Unless the institution is ready, unless a significant number of formal and informal leaders are interested in using the proposed scheme to accomplish high priority items on their agendas, one should not proceed with the intervention. Unless the key working professionals are comfortable with the method because they have helped to design its local implementation, (...) and unless one takes the time to accomplish these things in ways tuned to local needs and rhythms, very little will happen, or that which is introduced will fail in such complex institutions. (Kells, 1999: 305)

This pack of Improving Teaching & Learning Resources could be used to stimulate debate and discussion around the formulation of Teaching & Learning Strategies. Such strategies can serve to give authorization, resources and coordination to efforts to improve teaching and learning across higher education institutions. The Working Group recommends the development of institutional Teaching and Learning Strategies, but with certain provisos. International experience suggests that if these policies are to become properly institutionalized, they need to be carefully planned, resourced and supported, integrally linked to the institution’s mission and quality management system and most importantly, collectively interpreted, developed and owned at departmental and programme level. An analysis of the departmental culture and context and the real concerns of lecturers must be taken into account. Teaching and Learning strategies should also be underpinned by valid theories of learning. Furthermore, given the current overwhelming demands of the state’s restructuring requirements for South African higher education institutions, it is important that Teaching and Learning Strategies prioritize a few do-able goals within realizable timeframes.

9.3 Higher Education and the Debate around the National Qualifications Framework and Outcomes-Based Education

We now turn to a specifically South African issue, namely the use of outcomes-based education as a method of curriculum design and specification and its place in the quality assurance of teaching and learning in higher education.

Ever since the establishment of the NQF in 1995, the relationship between the South African Qualifications Authority (SAQA) and higher education in South Africa has been uneasy. Early post-apartheid policy documents such as the NCHE (1996) and the White Paper (1997) committed higher education to participating in the building of the NQF and all higher education institutions were obliged to submit their qualifications in an outcomes-based format to SAQA for interim registration in 2000. At this stage a compromise between SAQA and HE was reached and SAQA allowed whole qualifications and qualifications based on unit standards, as well as unit standards as originally conceptualized, to be registered on the NQF. This allowed higher education to deal with meaningful units of curriculum and prevented the inordinate fragmentation and atomization of knowledge and the need to register countless unit standards on the NQF. However, higher education representatives continued to experience difficulties working within SAQA’s standard-setting system in particular.

In 2001 the CHE produced A New Academic Policy for Programmes and Qualifications Discussion Document (released by the Department of Education in 2002) which was an attempt to make the SAQA-NQF system amenable to the needs of higher education. In doing so, the NAP proposed an Articulation Column between general formative qualifications and career-focused qualifications in order to provide a ‘catch-up’ space in the curriculum for
students moving across the framework and for those who do not meet formal entry requirements. The NAP also proposed a ‘nested approach’ to standards setting in an attempt to protect the center of the nest, the actual programme that gets delivered, from undue bureaucratic interference and to retain for academics the authority to design, teach, assess and evaluate their own programmes. It was proposed that quality control through standard-setting would be achieved through the ‘design-down’ method, namely that each layer of the standards-setting ‘Russian doll’ would inform the standard nested within it so that national standards such as level descriptors, qualification types and the generic qualification standards registered on the NQF would inform the design of specific qualifications that would therefore not need to be registered individually on the NQF.

In 2001 the Departments of Education and Labour set up a Study Team to Review the Implementation of the NQF. Its report, the Study Team recommended a loosening of SAQA’s jurisdiction over higher education, additional responsibilities for the CHE instead and emphasized the need to build relationships of trust between the different institutions of education and training in South Africa. In 2003, in response to the Study Teams’ report, the Departments of Labour and Education produced further proposals for discussion in a Consultative Document entitled An Interdependent National Qualifications Framework System which developed further the NAP ideal of setting up separate ladders of qualifications for different types of institutional learning, linked by articulation columns. It also included proposals for the CHE-HEQC to become a ‘Hi-Ed Quality Council’ responsible for both standard-setting and quality assurance in higher education. However, these proposals also await finalization.

At the time of writing, the HEQC remains the accredited ‘umbrella’ ETQA for higher education, responsible to SAQA for quality assurance for the whole of the Higher Education and Training Band. Whilst the HEQC is aware of the higher education’s criticisms of the SAQA-NQF system, it remains obliged to work within that system and remains politically committed to the idea of an NQF of which higher education is a part.

We now outline some of the key objections and critiques that have emerged from the South African higher education sector with respect to the NQF and outcomes-based education during the last decade. We focus primarily on conceptual issues as the practical issues are well known.

1. The Integration of Education and Training

One of the goals of the South African NQF is to integrate education and training. This is based on the assumption that different forms of learning are interchangeable and transferable and that their equivalences can be measured and calibrated on a qualifications framework.

Educationists and policy analysts from the higher education sector (Ensor 2001, Morrow 2001 and Shalem et al 2004) have objected that this idea is based on the wrong assumption that all forms of knowledge are based on the same epistemology and that they can be de-linked from their contexts of acquisition. Furthermore, Ensor (2001) points out that education and training are based on different modes of social organization that cannot be regarded as equivalent. She argues that educational institutions are set aside to educate; traditionally they were considered to be a ‘public good’ and education was considered intrinsically worthwhile; education is provided by expert educators who deal with hierarchical structures of knowledge. Training, on the other hand, has an instrumental view of knowledge (it is always for something else), whilst knowledge in training has a flat, segmented structure that is suited to the unit standards method of packaging and specifying the curriculum (see below). Given these very different social logics, the higher education sector has questioned the wisdom of attempting to integrate education and training.
2. Separation of Educational Functions

As indicated above, the NQF system sets up separate systems for the following tasks: curriculum design (standard setting), educational provision or delivery and curriculum evaluation (quality assurance). It is only for the second function that responsibility is delegated to ‘providers’, whilst responsibility for the conceptual work involved in the first and third functions is delegated to groups of representative stakeholders, centrally appointed - NSBs and SGBs for standard-setting and ETQAs for quality assurance.

Educationists in higher education have objected that SAQA’s notion that the inputs, process and outputs of education can be separated is false (Ensor 2001); that the question of what students should learn, how they should learn and judgments about what they do in fact learn cannot be separated. Further, we would argue that before quality learning can be registered, managed or assured, it has to be found. If, as we suggested above, learning is about changing the way students see and understand the world and about giving them access to more powerful ways of seeing (Bowden and Marton, 1998), then the intended outcomes of learning must be conceptually integrated with the content and process of learning. In addition, acquiring disciplinary and professional knowledge and skills, in such a way that it changes ways of seeing and thinking, requires participation in particular communities of practice with shared histories of learning (Wenger, 1998). SAQA’s assumption that learning can be specified in a decontextualized form (statements of learning outcomes), ignores this social and institutional nature of learning and the role of human agency in learning which is always socially and culturally mediated. The implications of these understandings of learning are that the ever more detailed specification of statements of learning outcomes, assessment criteria et cetera will not enable ‘outsiders’ to fully understand the intentions or effects of learning (Shalem et al, 2004). It is only ‘insiders’, disciplinary or professional experts, who can provide the content and context required to make statements of learning outcomes and assessment criteria meaningful. This suggests that, at the level of complexity demanded by higher education and professional practice, primary responsibility for the design and evaluation of curricula should remain in the hands of those who teach, namely members of disciplinary and professional communities of practice that share a common epistemic culture, norms and discourse.

3. Unit Standards and the Outcomes-Based Method

In recent decades, the university curriculum has been widely criticized for being constructed around the nature of the disciplines and for its isolation from and irrelevance to the world of work. In the quest for greater transparency and accountability in education, providers have been required to make explicit the knowledge and skills that they intend learners to develop. In order to do this, competency-based approaches have been transplanted from training to education. The competency-based approach is derived from the task analysis of an occupation that leads to the explicit and precise description of observable workplace performances (performance standards). Learning outcomes are then derived from these workplace performances as in turn are assessment criteria, range statements et cetera. In SAQA’s NQF system, these specifications were to be registered on the NQF as unit standards. Despite SAQA’s concession to higher education to register ‘whole qualifications’ on the NQF as opposed to unit standards, the SAQA system was originally designed using unit standards as its basic building block.

The assumptions underlying the unit standard methodology are that knowledge can be broken up into small discrete units described primarily by learning outcomes and assessment criteria; where, by whom and how these get taught and learnt is irrelevant to the quality of learning. Instead, national systems of standard setting and quality assurance linked to assessment and based on the outcomes-based method are established to ensure the consistency and reliability of quality across the system (Ensor 2001). In this method of curriculum design the learning outcomes stand in a privileged relation to other elements of the curriculum and are supposed
to determine its content, teaching methods and assessment. This idea is linked to the ‘design-down method’, whereby the final exit-level outcomes of a programme or qualification are meant to determine the learning outcomes of smaller units of learning (unit standards or modules) that a learner undertakes to get there. This logic is built into the ‘nested approach’ to qualifications design whereby the more generic standards (e.g. level descriptors) are supposed to determine the more specific nested within them (e.g. qualification types and then generic qualification standards) that in turn stand in a prescriptive relation to specific programme and module designs.

Critiques of this methodology from the perspective of higher education have pointed out that it is generally incompatible with the discrete and hierarchically structured nature of disciplinary knowledge and to a lesser extent with the disciplinary clusters that are found in professional fields of knowledge. In a collection of unit standards, learning is assumed to be additive, the parts equaling the whole. In higher education, which is supposed to prepare students for an unknown rather than a known future, learning outcomes are often experienced as over-prescriptive and cumbersome, leaving no space in the curriculum for innovation, creativity and excellence. Furthermore, this approach has been criticized for marginalizing discipline content and the process of learning. Shalem et al, (2004) insist that the content of the curriculum, its conceptual frameworks, its order and logic of acquisition and the context and process of learning should be taken into account in considerations of the quality of learning. Other critics have also noted that unit standards tend to describe objectified, decontextualised behaviours or performances that oversimplify the nature of practice (Morrow 2001). Unit standards or statements of learning outcomes cannot account for the conceptual and theoretical frameworks (powerful ways of seeing) offered by the disciplines and professions that are critical for transformative learning to take place. Shalem et al (2004) also argue that learning requires ‘cognitive distancing’ from the immediacy of practice which allows the student to locate an issue within a conceptual web and knowledge base and to see it in new or different ways. This is crucial for the developing the capacity to handle new situations. Furthermore, as learning outcomes become more complex, the relationship between the learning outcomes and their assessment becomes increasingly more ambiguous and does not lend itself to (exhaustive) description beforehand. Rather the gap between teaching intentions and what students actually learn has to be interpreted by professional judgment. In other words, in student assessment learning achievement has to be inferred from performance and tends to defy prior objectification beforehand and unambiguous demonstration.

A final critique of the outcomes-based method is its naïve view of language linked to an empiricist epistemology (Morrow 2001). In other words, this method assumes that knowledge is simply ‘out there’ transparently available for all to observe and describe objectively and precisely through language that corresponds directly and unproblematically to reality. It is this correspondence view of language that leads to the assumption that any knowledge and practice can be sufficiently described in language (the unit standard) for any stakeholder to understand, irrespective of whether they belong to the community of practice concerned or not.

A more sophisticated understanding of language suggests that reality is always mediated and interpreted by language, that is, language is discursive and is linked to particular ways of seeing and talking about the world. This supports the position referred to above that it is only expert peers who are full members of particular communities of practice and who share a common discourse, who are able to provide the context and meaning necessary to make informed judgments about the nature and quality of learning achieved.
4. Generic Skills

An instrumental view of higher education advocates that the goal of higher education should be to prepare students for employment. Given that the nature of employment is increasingly uncertain, the development of generic skills has been proposed as a solution to this uncertainty. General transferable skills are stand-alone, decontextualized, generic competencies such as problem-solving, communication, the ability to learn and work in teams *et cetera*, that graduates are deemed to possess and be able to flexibly activate and adapt to novel situations. SAQA has bought into this idea and has specified a list of ‘critical cross-field outcomes’ that are to be built into every qualification registered on the NQF.

However, research suggests that generic transferable skills don’t really exist (Ashworth & Saxton 1990, Bowden & Marton 1998). Rather, these educationists suggest that skills are necessarily embedded in content and are developed primarily through experience of the professional field to which they are meant to relate. Skills are therefore not generic (problem-solving means different things in different contexts), and are only transferred with difficulty by very experienced learners.

Given the seriousness of the criticisms summarized above, the HEQC, as the ‘umbrella ETQA’ responsible to SAQA and the Department of Education for the quality assurance of higher education, is in a difficult situation. Politically it remains committed to the vision of an NQF in which higher education plays a constructive role and practically it has to work within the SAQA-NQF system. At the same time it needs to conduct its quality assurance activities with intellectual integrity and from a higher education perspective. The position taken by the Working Group is that it is still possible and even, in some ways, useful to work with the outcomes-based approach, provided that this is done, with certain provisos, and from an interpretive as opposed to technical understanding of curriculum and pedagogy. There are significant ontological and epistemological differences between these two paradigms that go some way to explaining the clash of perspectives described above.

Below we suggest some of the implications of this paradigm shift for working within the SAQA’s NQF-OBE system. We also include some principles arising from the discussion above that we suggest should be considered if the cognitive interest served by higher education is not to be undermined.

1. It has already been agreed that whole qualifications and programmes are the appropriate unit of curriculum and evaluation for higher education. Normally in the HEQC’s system of quality assurance, courses or modules will be subjected only to self-evaluation and external quality assurance will function only at the level of the programme and the institution, and in both cases rest on prior self-evaluation. Only in exceptional circumstances will the HEQC need to scrutinize teaching and learning activity below the level of the programme.

2. It is important that the detail of what happens inside a programme is controlled by those who teach it. Nor should curriculum knowledge and skills be understood as self-evident and given. Academics need to be assured of the authority, discursive space and discretion to deliberate in programme teams or with external peers on the nature of the curriculum and its effects on student learning. At programme level, academics as disciplinary experts and professional educators, should continue to take responsibility for curriculum design and development – this includes selecting content, setting learning outcomes, determining teaching-learning methods and methods of assessment. Academics should also take

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2 This paradigm is informed by Habermas’ practical or hermeneutic knowledge constitutive interest which is governed by communicative rationality (see Grundy 1987).

3 This paradigm is informed by Habermas’ technical knowledge constitutive interest which is governed by instrumental rationality.
primary responsibility for the evaluation of the curriculum through self-evaluation. As suggested above, external evaluation should be used to validate self-evaluation and expert peers should be used in this process.

3. Curriculum knowledge should be underpinned by social institutions, epistemic cultures and social networks of expert practice. Traditionally these have been located in the disciplines and professions and different disciplines and fields have different cultures, norms and epistemic assumptions. These differences should be taken into account when designing QA systems.

4. Standard setting and quality assurance in higher education and the evaluation of teaching and learning in particular, should take into account the knowledge base and conceptual framing that a programme offers its students. Again this means relying on the opinions of expert peers, who are members of the community of practice under consideration, when making judgments about quality.

5. Learning outcomes should be derived from the knowledge base of the curriculum and the demands of the discipline as well as from the needs of the profession or career. They should be understood as useful planning tools to guide students and assessment procedures. However, they should not stand in a prescriptive or deterministic relation to other elements of the curriculum. They should be used only to guide and shape pedagogy, teaching-learning activities and assessment. Assessment, in particular, requires an interpretive approach in which professional judgment is used to make context-dependent decisions about the quality of learning achieved. In a properly aligned curriculum, all its elements, learning outcomes, content, pedagogy and assessment are mutually supportive, providing students with an optimal learning environment.

6. It follows that national standards such as level descriptors, qualification types and generic qualification standards registered on the NQF should also be used descriptively rather than prescriptively – both for curriculum design and quality assurance; they should be used to guide and advise curriculum development and evaluation at programme level. They should not be used to prescribe the curriculum or to determine accreditation judgments. The system should allow space for these decisions to be made on the basis of context-dependent professional judgment.

7. Stand-alone generic skills should not be expected to be taught in the higher education curriculum. Instead academic and professional skills should be explicitly built into the curriculum and taken into account in assessment.

8. A high quality programme should provide students with a solid knowledge base, with opportunities for conceptual development and transformation and the ability to apply this knowledge appropriately in real-world contexts. The emphasis on either the knowledge base or the application to professional contexts will depend on the nature of the programme, but in either case, students should be forced to go beyond surface rote learning of content and to understand the relations between content and concepts and between content and context.

The position advocated here, that is, of understanding curriculum from within an interpretive paradigm, has implications for how readers should read and understand the set of Resources that follow. It must be emphasized that these are provided as guides for self-evaluation practice to be adapted to local conditions and disciplinary contexts at the discretion of academic and academic managers. They are intended to be used descriptively and not prescriptively. In the Resource on Programme Review we encourage academic and programme teams to develop their own criteria for self-evaluation, using these and any other resources available to them. In this way self-evaluation can produce useful insider knowledge.
for reflection and improvement. It is vital that institutional quality management systems ‘ring-fence’ this space for reflection and deliberation by those who teach, and that the demands of institutional management, the HEQC and other ETQAs are prevented from colonizing it. If this discretionary space for academics is not protected, the conditions for curriculum innovation and creativity will be undermined.

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Further Reading


**Appendix: List of Contributors**

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The HEQC would like to thank all those from the academic community who contributed to the development of the Improving Teaching and Learning Resources, as members of the Working Group, the Consultative Panels and the Reference Group:

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1. Programme Planning, Design & Management

Focus Area
This Teaching & Learning Resource on Programme Planning, Design and Management applies to both an institution and faculty's academic planning system and to the school / department responsible for managing a particular programme. Whilst it has a bearing on all moments of the quality cycle (planning, implementing, monitoring and improving), it applies particularly to the planning moment that, at programme level, includes a focus on the design and inputs for a particular programme. This Resource deals with the setting of the purpose and learning outcomes for a programme and therefore sets the agenda for programme and course review (see Resource No.2). Providers are therefore urged to use Resources 1 & 2 as an integrated package. This Resource informed and elaborates on the HEQC’s Criteria for Institutional Audits (April 2004) (see Criteria 7-10 for programme development, management and review) and also relates to the ** HEQC’s Proposed Criteria for Programme Accreditation 2004-2009 (see criteria for Input: activities, resources and conditions that should be take place in preparation for the offering of a programme).

Rationale
The planning, management and resourcing of academic programmes are key focus areas for managing quality at any educational institution. Without sound planning and adequate resourcing, programmes will fail to meet the needs of their learners and other stakeholders; without good management, the implementation and on-going improvement of programmes is impaired. Furthermore, the review of programmes becomes very difficult if inadequate planning and design of the programmes has not been undertaken beforehand. The quality of the planning, design and management of academic programmes is thus an important indicator of the effectiveness of educational provision.

At programme level, high quality conceptualization and design of a programme and its qualification is the first step towards achieving high quality educational provision. It is at this planning stage that teams of academics need to deliberate and decide how to meet the needs of their target student population, the demands of their discipline(s) and the various external stakeholders to whom they are accountable. The clear definition of the purpose of a programme, its knowledge base and the exit-level learning outcomes of its qualification provide key reference points against which the effectiveness of the programme and the performance of its students can be evaluated.

In the current context of institutional restructuring, academic planning is an urgent priority for all institutions that are merging or restructuring. This Resource may be useful for assisting these institutions to re-plan and rationalize their curricula. In this regard the Department of Education in its guidelines for merging institutions advises that,

Decisions (about academic planning) should be taken on the basis of rational, defensible criteria and rise above personal interests and keep the strength and integrity of the academic programmes as a major objective. (DoE 2003: 36)

The Evaluative Questions and Suggested Good Practice Descriptors in this Resource may be of assistance to merging or restructuring institutions in setting up coherent academic planning systems and in providing some guidelines for ‘rational and defensible criteria’ that can be used to determine what their curriculum offerings should be.

Discussion
Although quality assurance in higher education has traditionally used the department or school as the unit of analysis/ evaluation, in keeping with international practice and recent national policy, the HEQC has designed its quality assurance system using the institution and the programme as the units of evaluation. Furthermore, it is often argued that a programmes-
based approach is a student-centred approach in that, during their time at an institution of higher education, students register for and aim to complete a programme of study leading to a target qualification. The programme is the umbrella concept that defines a student’s academic experience and is therefore the appropriate unit for the evaluation of teaching and learning.

Traditionally the content of an academic discipline, plus the academic’s conscious or unconscious epistemic framing of that content, was the key determinant of the higher education curriculum. In the past two decades the following factors have begun to impinge on the design of the higher education curriculum: globalisation, massification of higher education, internationalization, distance and e-learning, the concern for greater responsiveness, shifts in knowledge production and the putative emergence of Mode 2 forms of knowledge, concerns about the meaning of ‘graduateness’ including the need for graduates to demonstrate ‘employability’ and the need to produce ‘lifelong learners’ (see Breier, 2001, Chapter 1, for further details). In post-apartheid South Africa the curriculum structure proposed for responding to these various pressures was the academic programme which, early policy documents, such as the NCHE (1996) and White Paper (1997,) suggested should be the unit for planning, funding and quality assurance in a single co-ordinated higher education system (see Glossary of Terms below for a definition of a programme). It was also assumed that a programmes-based approach to curriculum would allow for greater flexibility, responsiveness and inter-disciplinarity than the traditional disciplinary curriculum.

In South Africa, recent curriculum restructuring has also been shaped by the implementation of the National Qualifications Framework and SAQA’s insistence on the use of an outcomes-based format for qualifications design and for the interim registration of all higher education qualifications in 2000. However, the failure of the SAQA discourse to make sense to academics on the ground and the ‘implementation vacuum’ that followed the early visionary policy documents and the protracted delay in the finalisation of a New Academic Policy for higher education on the part of the Department of Education, have meant that individual institutions have had to implement the policy shift to programmes without adequate guidance. Higher education institutions have interpreted and implemented the ‘programmes-based approach’ to curriculum development in different ways, which include the definition of a programme itself (Breier, 2001). In the absence of finalized national planning guidelines and frameworks, national system goals such as articulation, mobility, regional co-operation and system coherence may now be even more elusive than before (Breier, 2001: 36).

However, since 2001 when this conclusion was drawn, greater policy coherence and detail is emerging. For example, the HEQC’s draft proposals for criteria for programme accreditation (2003) give detailed minimum standards on what is required for a programme, whilst the New Academic Policy is expected to be finalized in 2004. With respect to the NQF, the HEQC remains committed to working within the framework, but in a way that does not compromise the creativity, innovation and expertise required to offer high quality higher education programmes. With respect to outcomes-based education, the HEQC supports the use of learning outcomes, but only a ‘weak’ form of the outcomes-based approach to curriculum design.1

Where a programmes-based approach to curriculum development is adopted, there are far-reaching implications for curriculum practice and quality assurance, such as the following:

1. Academics need to work in programme teams (often led by a programme director or convenor) in order to plan, design and review the programmes on which they teach.

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1 For a more detailed discussion on OBE and the NQF see Introduction to the HEQC’s Teaching & Learning Resources, section 9.3 above.
2. Institutional academic planning and management information systems need to cater for qualifications, programmes and courses/modules.

3. Institutional quality management systems need to design their systems to cater for the programme as the primary unit of academic review. However, for reasons of efficiency and cost effectiveness, given the HEQC’s six-year accreditation cycle, multi-purpose providers may choose to review all the programmes offered by a School or Department in a single clustered process.

4. Courses/modules should be designed and reviewed as components of programmes and not as isolated units. This raises a number of complicating issues. For example, a module may serve more than one programme and its status (e.g. pre-requisite, core or elective) may vary from programme to programme. Whilst it is desirable to review each course/module comprising a programme in terms of its fitness-for-purpose for a particular programme, this is likely to become onerous and time-consuming for the academic staff concerned. The HEQC’s view is that an institution’s quality management system should ensure that all courses/modules are reviewed regularly, but not excessively, and that a judicious selection of course review data for the review of a particular programme is acceptable. Whilst the process of programme review should collate and analyse data from course/module reviews, this need not include data from every single module/course comprising the programme. Furthermore, the data from course/module reviews should be collected throughout the review cycle (e.g. over a period of 5 years).

5. The co-ordination of qualification planning, design and registration requirements with those of programme accreditation suggests that institutions should ensure that their programme and qualification designs conform to the ‘general qualification standards’ laid down in the Department of Education’s Draft New Academic Policy² so that they are recognizable and fundable and can articulate on the National Qualifications Framework. In the 1st Candidacy Phase of the accreditation process for new programmes, the HEQC will ensure that programme and qualification designs conform to the New Academic Policy’s ‘general qualification standards’ as laid down in the level descriptors (e.g. Level 7 for a degree), the qualification type descriptors (e.g. for a Bachelor’s Degree), and as laid down in the ‘generic qualification standards’ (e.g. for the B.Sc.), where these are registered on the NQF. The HEQC may also use specific qualification standards, if these exist and are registered on the NQF, to evaluate specific programmes and their qualifications. However, as discussed in the Introduction above, in making accreditation judgments, the HEQC will not impose national standards on specific programmes in a mechanistic and prescriptive manner. Rather, it will use national ‘general qualification standards’ as one amongst a range of criteria to guide it in its decision-making process.

Curriculum design should also be informed by learning theory, in other words, we should plan to teach according to the way(s) in which we know students learn. In the Introduction to these Resources we defined learning as conceptual change - change in the way the learner sees the world and change in the learner’s cognitive structure. This definition is based on a constructivist view of learning, which we suggest is one of the most fertile learning theories for higher education. This approach emphasizes that meaning is created by the student, through the student’s learning activities (active learning). To facilitate this meaning-making by students, lecturers need to make the purpose and outcomes of learning tasks clear, motivate students to achieve these and provide a sound content and conceptual base as well as learning activities and opportunities for students to interact with others around the learning tasks. The emphasis of teaching should always be on developing student understanding and the curriculum challenge is therefore to determine what selection of content and kinds of teaching-learning activities are required so that students attain the kinds of understandings we

² or finalized New Academic Policy when this becomes available.
intend. A key principle underpinning a constructivist approach to curriculum design is that of curriculum alignment (Biggs 1999) which means simply that content, teaching-learning activities and assessment methods all support students in the attainment of the specified learning outcomes, in other words, all four dimensions of the curriculum – content, learning outcomes, teaching-learning activities and assessment are mutually supportive. In this Resource, we have used this principle to underpin our elaboration of what ‘good practice’ in curriculum design entails.

The specification of learning outcomes raises the currently contested issue of outcomes-based education (OBE), the method of curriculum design and qualification specification currently required by SAQA and promoted by the DoE in the schooling system. In the Introduction above we argued that a technicist, instrumentalist implementation of OBE in which learning outcomes are rigidly prescribed and standardised across the system, is not appropriate to higher education, where the nature of knowledge is exploratory and open-ended and where diversity should be encouraged. In the specialized knowledge domains of higher education, the exercise of expert professional judgment is required to articulate specific learning outcomes in particular knowledge domains, to mediate and interpret their meanings in particular contexts and classrooms; and in assessment to interpret what performances might count as evidence that adequate levels of understanding and learning have been achieved. This is not to deny that the broad specification of learning outcomes can serve as a useful planning tool that helps to clarify the purpose of learning to students and assists in achieving alignment of the curriculum.

**Evaluative Questions**

**A: Institutional Level:**

The following evaluative questions may be adapted for use in self-evaluating the quality of an institution’s curriculum design and management system or academic planning system:

1. Is there a curriculum management / academic planning system in place for the planning, approval and administration of academic programmes? How does the system allocate responsibility and lines of accountability? How effective are organizational structures?

2. Does the institution have clearly defined policies and effective procedures for determining the need for a programme and for designing and approving programmes and their modules/ courses?

3. How does academic planning and programme approval link to the operationalisation of the institution/ academic unit’s mission and goals, Teaching and Learning Plan (as appropriate) and agreed ‘programme and qualification mix’ (as appropriate)?

4. How does academic planning and programme approval take into account the requirements of legitimate external stakeholders?

5. How are issues of feasibility and the resource implications of running a new programme considered prior to its approval?

6. How are staffing policies and procedures used to ensure that there is suitable academic staff to teach the programmes on offer?

7. How are recruitment, selection and student development procedures used to ensure that sufficient numbers of adequately prepared students enter the programme?
8. How are management information systems used to record and disseminate information about the programme?

9. How are management mechanisms used to ensure that the results of programme review and evaluation feed back into the planning process at both institutional and programme levels?

B: Programme Level:
The following evaluative questions may be adapted for use in self-evaluating the quality of a programme’s design:

10. To what extent does the programme serve national and/or regional needs?
    If a public provider, do the qualifications offered on the programme fall under the institution’s approved ‘Programme and Qualification Mix’?
    Does the programme’s design cater for equity of access and for equity of outcome, (i.e. of qualification output)?

11. Have the designers of the programme taken into account the requirements set out in the general qualification standards defined in the New Academic Policy as well as (where applicable) any relevant generic and specific qualification standards? Does the qualification(s) offered on the programme therefore articulate with other qualifications registered on the National Qualifications Framework?

12. To what extent does the programme meet disciplinary and academic requirements as well as being relevant to the needs of legitimate stakeholders (e.g. students; communities of scholarship; professional bodies; the institution; potential employers of its graduates; local communities)?

13. To what extent is the design of the programme coherent and aligned?

14. To what extent is the delivery of the programme feasible?

15. How does the provider demonstrate capacity to manage the programme adequately?
<table>
<thead>
<tr>
<th>Evaluative Questions</th>
<th>Suggested Good Practice Descriptors</th>
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<tbody>
<tr>
<td><strong>Institutional Level</strong></td>
<td></td>
</tr>
<tr>
<td>1. Academic Planning &amp; Curriculum Management</td>
<td>An effective management structure is in place that identifies individuals, and structures at each level of the organization responsible for the planning, management and administration of programmes. Procedures, time-frames, lines of accountability, reporting and communication are clearly defined. Usually macro-planning and monitoring are managed centrally, with responsibility for design and implementation lying at the programme and course level. As far as possible, central approval procedures should encourage innovation at flexibility at the latter levels.</td>
</tr>
<tr>
<td>2. Policies &amp; procedures for design &amp; approval</td>
<td>The provider has developed clearly defined policies, procedures and realistic time-frames for the design and approval of its academic offerings and provides guidelines for academic staff and programme teams to work from. The institution has a well-planned course/ modular and programmes-based system, in which the credit-ratings, levels and status (e.g. core or elective) of its modules are clearly specified so that they articulate internally. All programmes in the institution are approved on the basis of transparent criteria, by an institutional authority that is independent of the programme team. There is consistency of standards across the institution.</td>
</tr>
<tr>
<td>3. Operationalisation of mission &amp; goals/ Teaching &amp; Learning Plan</td>
<td>The institutional mission and goals and/or teaching &amp; learning plan have been operationalised into an academic plan and programme profile. This is well understood throughout the institution and is used as a criterion for the internal approval of new programmes.</td>
</tr>
<tr>
<td>4. Consultation with external stakeholders</td>
<td>As appropriate, programme teams consult with external stakeholders such as professional bodies, potential employers, government departments and local communities about the nature of their programmes, to ensure that graduates meet employability requirements and labour market needs in both the short and long-term.</td>
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<tr>
<td>5. Feasibility &amp; resources</td>
<td>There is alignment of planning and budgeting. Programmes are not approved to run unless feasibility studies, a business plan and financial accounting confirm that there are adequate financial, physical, human and administrative resources to run them by means of their planned delivery mode and a well-resourced learning environment. Time-tabling, venue allocation and learning resource production are worked out efficiently for all modules on offer in a way that accommodates the delivery method and the needs of targeted student groups.</td>
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<tr>
<td>6. Staffing</td>
<td>The institution has the capacity to recruit, select and develop a sufficient number of academic and support staff who have the necessary qualifications and expertise to teach and support the programmes on offer so that their outcomes are attainable. Scholarly activity/ research is a requirement for staff appointed to teach at degree level and above. The institution provides for both the scholarly and professional development of its academic staff.</td>
</tr>
<tr>
<td>7. Students</td>
<td>The institution has the capacity to market its programmes, select and place sufficient numbers of suitable students on its programmes.</td>
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Where applicable, the institution has specified its diversity/equity and ‘size and shape’ targets. These are translated into criteria for the approval of academic programmes. At programme level, provision is made for alternative/flexible entry and the curriculum is enriched to match students’ levels of preparedness, e.g. opportunities for student support and development are available at a range of academic levels.

8. Management information systems

The provider has the demonstrated capacity to capture and continually up-date all necessary information about its programmes including their registration and accreditation status using a comprehensive software system. Relevant aspects of this information are regularly made available to staff, students and the public, e.g. any staff member of a programme team can access student records for the programme concerned.

The management information system also monitors student performance which, where necessary, is used for timeous educational intervention.

9. Mechanisms for improvement

An effective quality management system is in place.

There is evidence that the results and recommendations of internal review and external evaluations of the institution and its programmes are fed into new planning cycles leading to curriculum improvement.

B: Programme Level:

10. National/Regional need and Equity

National &/or Regional Responsiveness
A purpose or rationale for the programme explains how it will meet national/regional labour market, development or other socio-cultural needs.

Department of Education Approval
The qualifications offered on the programme are located in a CESM cell approved by the Department of Education for the provider concerned.

Institutional Responsiveness
The purpose of the programme contributes to the realisation of the institution’s mission and goals.

Equity
The programme’s design accommodates equity considerations, for example the programme has realistic and explicit entry assumptions that contribute towards the attainment of ‘representivity in enrolment’ (NPHE 2001:3.2) and to the ‘broadening of the social base of students’ (NPHE 2001:2.4). The programme’s design also caters for the learning needs of its target student population, ensuring that all students have a fair chance of success. For example, this may be achieved through a range of strategies such as the offering of ‘articulation certificates’, alternative access routes, the recognition of prior learning, foundation modules or credits, academic development or extended and enriched curriculum opportunities.

11. Conformity to the NAP & Articulation on the NQF

Conformity to the NAP
The design of the qualification(s) offered on the programme takes into account the general qualification standards laid down in the New Academic Policy (forthcoming), and where there are generic qualification standards (e.g. the B.Sc.) and specific qualification standards (e.g. the B.Sc. (Geology)) registered on the NQF that apply, the qualification design also conforms to these.
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<th>12. Academic Demands &amp; Relevance</th>
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<td><strong>Articulation</strong></td>
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<td><strong>Entry &amp; Exit Points</strong></td>
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<th><strong>13. Curriculum Alignment &amp; Coherence</strong></th>
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<tr>
<td><strong>Student Need</strong></td>
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<tr>
<td>The programme offers all students a degree of curriculum choice and flexibility and is delivered via an appropriate media and technology mix.</td>
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<tr>
<td><strong>Disciplinary Demands</strong></td>
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<tr>
<td>There is evidence that the content and theory taught on the programme is current and up-to-date with recent developments in the discipline/field.</td>
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<tr>
<td>There is evidence that, where appropriate, staff’s research activities contribute to the depth and rigour of the programme’s offerings.</td>
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<tr>
<td><strong>Contextualisation</strong></td>
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<tr>
<td><strong>Requirements of External Stakeholders</strong></td>
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<tr>
<td>** Marketable Qualifications**</td>
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<tr>
<td><strong>Research Competence</strong></td>
</tr>
<tr>
<td><strong>Purpose &amp; Exit-Level Outcomes</strong></td>
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<tr>
<td>Modular Design</td>
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<td>The modules or courses comprising the programme are likely to realise its over-arching purpose and graduate competences. Modules/ courses are adequately planned, for example by specifying the following: title, level, credits, purpose, learning outcomes, list of key content areas, status on the programme (core or elective), rules of combination and pre-requisites, assessment strategy and methods. This information is clearly communicated to students to inform their choice of modules/ courses.</td>
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<th>Intellectual Coherence</th>
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<td>The programme’s design is fit-for-its-purpose, it offers a coherent intellectual map of the field and, offers sufficient sustained content and theoretical depth and/ or interdisciplinary breadth and opportunities for student choice.</td>
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<th>Assessment</th>
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<td>Assessment tasks and their assessment criteria are aligned with the content taught and specified learning outcomes. At key exit points on the programme, students are required to demonstrate their learning achievements through integrated assessment methods that draw on a range of knowledge and skills learnt from across the courses/ modules of the programme.</td>
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<th>14. Feasibility</th>
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<td>The programme’s means of delivery have been carefully considered and supported by a business plan and budget.</td>
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The necessary financial, physical, infra-structural and administrative resources are made available by the provider. |

An appropriate range of student support services such as library, computer, IT and student counselling services are provided. |

Time-tabling and venue allocation are carefully planned to accommodate the needs of targeted student groups. |

Particularly where the programme is offered via mixed-mode or distance mode, the design and delivery of learning resources is properly resourced and managed. |

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<th>15. Management Capacity</th>
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<tr>
<td>Academic staff members work in programme teams coordinated by a programme convenor. This ensures that the programme is planned and taught as a coherent whole rather than as a series of discrete courses/ modules. Management, administrative and management information systems are in place to ensure the smooth running of the programme. Staffing, teaching and assessment arrangements are well planned and carried out efficiently. Student enquiries and complaints are dealt with effectively and timeously. A quality management system ensures that the programme and its delivery are continuously up-dated and improved.</td>
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Suggested Data Sources

These suggestions are not intended to be used as a check-list. They are offered rather to assist and guide providers on what may be appropriate sources of data. This list will obviously need to be adjusted depending on the nature and context of the institution and/or programme under consideration and the purpose of the evaluation being undertaken.

A: Institutional Level

- Institutional mission statement
- Approved ‘Programme and Qualification Mix’
- Organogram illustrating the structures and lines of responsibility for academic planning and approval
- Documentation on policy, procedures and guidelines to academic staff for the planning and design of programmes
- Documentation on consultation with external stakeholders around programme development
- Documentation on financial planning and budgeting for programmes
- Documentation on policies and plans for the appointment, induction and development of academic staff
- Documentation on policies for student admissions and student development
- Examples of management information data on programmes
- Academic Handbooks or Calendars
- Other promotional material on academic offerings
- Policy documentation on the quality assurance of programmes

B: Programme Level

- Documentation on the registration and accreditation status of the programme
- Programme handbook, course outlines and other information made available to students
- Organogram illustrating the internal and external approval paths for the programme and the result obtained at each point of the process
- Evidence to show that the purpose and aims of the programme are congruent with the provider’s mission and ‘Programme and Qualification Mix’
- Evidence to show that the requirements of relevant external stakeholders have been taken into account
- Organogram showing the programme structure, the modules comprising the programme, their titles, levels, credit-ratings etc. and the exit qualifications from the programme
- Brief set of learning outcomes and content areas for each core/compulsory module/course offered on the programme
- Where appropriate, brief description of contextualisation strategies used on the programme
- Brief description of the method of delivery of the programme and of the resources available to support this
- Brief description of student support or development offered by the programme
- Brief description of integrated assessment strategies to be used on the programme
- Where applicable, a programme budget
- List of staff who teach on the programme, plus their abbreviated CVs and where applicable, an indication of how staff research activities contribute to the programme
- Numbers and profile of students enrolled for each level/year/qualification on the programme
- Examples from the student record system kept by the programme administrator
- Description and documentation on the internal QA arrangements for reviewing and improving the programme.
Glossary of Terms

Academic planning refers to the activities undertaken by an educational provider to plan, design, approve and resource its academic offerings – i.e. its programmes, modules and qualifications.

Curriculum is a contested term that we understand to include both the intentional plan and design for learning and well as what is actually accomplished interactively by students and teachers.

Curriculum alignment refers to the principle of ensuring that the purpose of a programme (or module) is supported by the content selection, learning outcomes, teaching-learning methods and assessment practices used to deliver it.

Programme Here we have adapted the definitions of a programme and qualification given in the New Academic Policy Discussion Document (2002): A programme is a purposeful and structured set of learning experiences that leads to a qualification that is registered or falls under a qualification standard that is registered on the NQF which in turn conforms to the general qualification standards prescribed in the New Academic Policy. A programme is accredited by the HEQC with reference to the relevant qualification standards registered on the NQF as well as expert benchmarking at the level of programme specialization. In an outcomes-based system, a programme can be defined as a purposeful and coherent combination of units of learning (modules or unit standards) that is designed to enable learners to achieve the purpose of the programme as expressed in learning outcomes.

[At the time of writing the Department of Education is in the process of finalizing the New Academic Policy for Higher Education. Given the difficulties in coming to agreement on a common definition of a programme across the sector and also the practical difficulties of gathering data on programmes, it is recommended that there should be a 1:1 correspondence between a programme and a qualification, that is, that a particular programme should lead to one and only one qualification, whilst a particular qualification should be attained through a single route only, namely a specified programme.]

Qualification A qualification is the formal recognition and certification of learning achievement awarded by an accredited provider. In the outcomes-based approach intrinsic to the NQF, a qualification signifies and formally certifies the demonstrated achievement by a learner of a planned and purposeful combination of learning outcomes, at a specified level of performance.

References & Further Reading


2. Programme & Course Review

Focus Area
This Resource for Programme and Course or Module\(^1\) Review refers to the programme and course level of an institution’s educational activities. However, the review of any programme or course should be conducted within the context of an institution-wide quality management system in which the effectiveness of an institution’s academic provision is monitored and improved across the system. All three aspects of review are inter-related like the layers of an onion. For analytic purposes we have dealt with them separately, moving from the macro to the meso to the micro levels of review: a) the Quality Management of Academic Review, b) Programme Review and c) Course Review. In this Resource the HEQC provides guidance to providers and to programme evaluators for the internal and external evaluation of programmes, for course review and for establishing a quality management system for academic review (i.e. to manage at institutional level the review of both courses and programmes). In Resource No. 6 on Staff Development, the HEQC provides guidelines for the evaluation of teaching. The intention in providing these resources for internal review and self-evaluation procedures is to assist providers to develop quality management systems that are likely to improve teaching and learning; it is not to prescribe a quality management blueprint to providers, nor to suggest that the HEQC intends to scrutinize all self-evaluative activities. Whilst recognizing that the evaluation of teaching and the internal review of courses is fundamental to the achievement and enhancement of curriculum quality, the HEQC intends to leave this level of activity largely to providers.

Rationale
Since teaching and learning are to be a primary focus of the HEQC’s quality assurance activities in the first phase of its work, systems for the review and evaluation of the inputs, process, outcomes and impact of educational provision (courses and programmes) becomes a key concern. As the external quality assurance agency for the country, the HEQC is mandated by government to accredit all programmes and from time to time to undertake national reviews or evaluations of targeted programme types. Both of these functions involve external evaluations of programmes but these will always be based on prior internal self-evaluations. This Resource thus aims to assist institutions in setting up their quality management systems for internal review. Needless to say, the system and criteria set up by the HEQC for summative external evaluation will have a ‘wash back’ effect on the internal systems and criteria that institutions establish for themselves internally. However, if the purpose of the HEQC’s quality assurance system is to be the improvement of teaching and learning, then it is crucial that self-evaluation be owned by those being evaluated. As academics are the agents of improvement in teaching and learning, it is vital that the evaluations and their findings are meaningful to them. Furthermore, because curriculum\(^2\) development is a continuous, recursive and highly contextualised activity, judgments and advice from external agencies and outsiders can only serve as a stimulus to continuous self-improvement.

It is important to note that the HEQC does not intend to scrutinize teaching and learning activities below the level of the programme, unless there is good reason for it to do so. In its audit activities, the HEQC will scrutinize an institution’s management of programmes, its

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\(^1\) In all cases our use of the term ‘course’ can be substituted with the term ‘module’. Whilst most HE institutions in South Africa have adopted a modular curriculum structure, we have chosen to keep the term ‘course’ as it is more inclusive and remains in common use amongst academics.

\(^2\) For the purposes of this Resource, the term ‘curriculum’ is used in its widest sense and encompasses elements of curriculum planning and design such as learning outcomes and assessment; curriculum delivery such as learning materials and support for learning; as well as the actual learning experience that students undergo.
procedures for programme design and approval and for programme review. It will also ascertain the extent to which review findings are used for staff development and curriculum improvement, including the improvement of student access and success. In so doing, it will be in a position to evaluate the overall effectiveness of an institution’s quality management system.

With respect to the accreditation of particular programmes, the HEQC assumes that institutional programme reviews include evidence on how the courses comprising the programme are being quality assured by the provider’s internal quality management system. The HEQC’s accreditation system is complex. It is based on three categories of programme each with its own accreditation or re-accreditation arrangements:

1. **New Programmes**: those professional and non-professional programmes that have not existed before or have been significantly changed and have not yet completed their first accreditation cycle. From 2004 all new programmes will be required to meet the HEQC’s minimum threshold standards for accreditation. New professional programmes will, in addition, be required to meet the statutory licensure requirements of their relevant ETQA. The meeting of these standards will be ascertained via 3 accreditation phases – a candidacy evaluation which focuses on input criteria and a quality management plan for the programme; a mid-term check on performance and compliance with candidacy conditions; and a full outcomes evaluation which requires a compliance report, throughput rates and a self-evaluation report which includes an assessment of inputs, process, output, impact and an improvement plan. Full accreditation status is granted by the HEQC for a period of 6 years. All 3 phases are to be overseen by the HEQC. At least one site visit from an external agent is mandatory to achieve accreditation status.

2. **Existing Professional Programmes**: those programmes that have interim registration status on the NQF and/ or those that have completed their first accreditation cycle, and fall under the statutory and licensure requirements of an ETQA other than the HEQC. From 2010, these will need to be re-accredited every 6 years by their relevant ETQA, as recognized by the HEQC. The exact nature of the re-accreditation process will depend on the type of co-operation agreement entered into between the HEQC and the ETQA concerned. These processes are likely to follow the model of internal review followed by an external evaluation under the auspices of the ETQA concerned.

3. **Existing Non-Professional Programmes**: those programmes that have interim registration status on the NQF and/ or those that have completed their first accreditation cycle, and still fall under the jurisdiction of the HEQC. From 2010 these programmes will need to be re-accredited by the HEQC, based on a process of institutionally managed internal programme and course review validated by external evaluation.

From 2007 HE institutions may apply to the HEQC for self-accreditation status that will allow them to re-accredit their own existing non-professional programmes. The HEQC will base its decision on evidence gathered from all three activities listed above — institutional audit, national programme evaluations and programme accreditation results – plus an academic review plan submitted by the applying institution. This Resource therefore applies in particular to those institutions wishing to demonstrate to the HEQC that they have

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1 See the HEQC’s Accreditation Framework and Proposed Criteria for the HEQC’s Programme Accreditation Cycle: 2004-2009 (2003) for further details. The latter contains the HEQC’s minimum standards or programme accreditation criteria and indicators which were informed by this Improving Teaching and Learning Resource pack.
developed quality management systems for academic review that are sufficiently robust to maintain and improve the quality of their education provision above the HEQC’s minimum standards.

The evaluative questions and suggested descriptors that follow are intended to be generally applicable to all these possible variations for the conducting of programme review and evaluation. Users will need to interpret them flexibly, depending on the purpose and context in which they are used.

**Discussion**

A programme (and its courses) is a carefully structured educational intervention, designed to effect learning in its students. The extent to which students do in fact, achieve the intended learning outcomes is therefore a measure of the effectiveness of a programme or course. This is seldom achieved unless there is ‘curriculum alignment’ in the programme/course’s design (i.e. the educational intervention (content selection and teaching-learning activities) is carefully designed so as to take students from their current levels of development to levels where they can demonstrate, through appropriate assessment tasks, the attainment of the targeted learning outcomes). Therefore, in a programme review, it is essential that the voice of those who designed and taught the programme and its courses is heard, particularly their rationale for teaching as they did. If the goal of continuous quality improvement is to be met, then programme review should be seen as a learning opportunity for academic staff to understand and reflect on their teaching practice and its consequences for learning. Teaching staff should be afforded an opportunity to articulate the educational rationale and theory of learning that underpins their practice, to observe the impact of their teaching on learning and to reflect on what the findings may mean for the improvement of their own practice. Ideally this self-evaluative and improvement process should be based on sound educational principles and learning theory. It should also be conducted in a non-threatening community of educational practice in which peers (other staff on the programme and educational experts) share the findings and jointly pursue collective solutions to the problems identified.

Judgments about student achievement, the attainment of learning outcomes and curriculum alignment are difficult to make and require professional judgment. They are usually best conducted by suitably qualified and experienced expert peers, familiar with the discipline(s) or profession, context and educational practices involved. Thus, course and programme review should be based on self-evaluation but validated by external peer review. Traditionally this has been done through a system of internal moderation and external examination. The HEQC supports this tradition of peer review, but believes that if it is to avoid operating as a reproductive and conservative influence and to serve as means of quality assurance and enhancement, it needs to become more rigorous, explicit, systematic and professional.

Given that student learning is arguably the core business of the higher education endeavour and that students are key participants in the learning process, student opinion on courses and student or graduate opinion on programmes gathered through student evaluations is one of the most direct measures of teaching and learning quality. Concerns are often raised about the validity and reliability of student feedback data, hence our concern for triangulation of data. However, research suggests that student evaluations correlate moderately well with levels of student learning and also with staff self-evaluations of their own teaching. Harvey and Knight (1996) suggest that student evaluation data should not be used as performance indicators or to make comparisons across courses, programmes and institutions, but that, when limited to direct concerns around teaching quality and student services, student evaluations are an effective instrument for measuring quality. They suggest that the kinds of questions that should be addressed to students include the following:

4 This process can be understood as contributing to the development of ‘reflective practitioners’ (see Resource No.6 on Staff Development).
The lecturer – enthusiasm for the discipline/field, rapport with students, clarity of explanation, availability to help with study problems;
The course – clarity of goals, effective organization, appropriate workload, appropriate level of difficulty, effectiveness of teaching methods, opportunities for group interaction, fairness of assessment;
Student services and support – provision of learning resources and facilities and equipment, quality of the learning environment, helpfulness of support staff, availability and quality of support services, quality of accommodation, cafeterias, etc.

Formulaic designs of student questionnaires are seldom effective as students soon get tired of them and fail to take them seriously. This problem can be dealt with firstly by ensuring that students receive feedback on what is being done to address the problems that they raise (see below). Secondly a variety of methods for collecting student feedback data, apart from questionnaires should be used, such a focus group interviews, student participation in the identification of the evaluation questions and e-mail prompts. Thirdly, academic staff ought to be involved in the design of the student evaluation so that it is tailored to their particular course, interests and concerns and related to a particular group of students. Many institutions deal with this by providing a bank of typical questions for students from which staff can select and adapt for their particular purposes.

Since the review of programmes and courses are key components of an institutional quality management system, procedures need to be in place to ensure that insights and learnings from internal reviews are acted upon and plans for improvement are implemented (i.e. that the ‘quality loop’ is closed). This should include support and resources for the implementation of improvement plans. An institution should also provide a framework for academic staff regarding the method and frequency of reviews and offer support for ensuring the quality of the review method. As mentioned above, if stakeholders, particularly students, are to be encouraged to take the collection of data seriously, then it is desirable to provide feedback to them on what has been learned and on how problem areas/issues will be addressed. Academic review needs to be handled transparently and sensitively since it has the potential to impact negatively on the academic staff members concerned. When an institutional quality unit (or equivalent) responsible for managing internal reviews, gathers data from students and other stakeholders, those responsible for offering the programme or course need to have access to these data and be provided with the opportunity to respond to it. Only when student opinion data is triangulated with reports from those responsible for designing and offering the course, and ideally also with peer review reports, can a review or evaluation be considered reliable and valid.

Whilst programme evaluation usually has a summative purpose, the review of courses or modules should ideally be conducted whilst the course or module is being taught so that problems or gaps identified can be addressed whilst students still have the opportunity to derive the maximum benefit from the improvement. In such cases, course reviews would be formative in purpose and not hold any punitive consequences for the teaching staff concerned. As stressed above, if the goal of quality assurance is improvement of teaching practice, then it is important that institutional managers establish quality management systems which ‘ring-fence’ formative or improvement-orientated review at the level of the course. This is not to say that the findings of formative course review cannot be used for summative purposes, e.g. for summative programme evaluation (e.g. to demonstrate improvements), on condition that those involved have given their consent for the data to be used for this purpose. The key findings of course reviews can be collated, sanitized and aggregated in order to inform a comprehensive review of the programme of which the course or module is a part. Comprehensive programme evaluations are usually used for summative purposes that allow decisions to be made about the future of the programme, its accreditation status and, if a public provider, its funding by the Department of Education.
A market-based conceptualization of quality suggests that the effectiveness and impact of a programme can be judged by measuring the satisfaction of its key stakeholders – i.e. students and graduates, the wider institution and employers. The results of opinion surveys of these groupings can also be included in a programme review, but it should be noted that, apart from the opinions of students, who are participants in the teaching-learning process, these surveys should count as indirect rather than direct measures of the quality of teaching and learning.

A programme’s overall graduation and retention rates provide a quantitative picture of its efficiency. Base-line statistics such as this provide a useful means of routine programme monitoring, i.e. they serve a summative as opposed to diagnostic or improvement-orientated purpose and can alert evaluators to areas for further scrutiny. In an evaluation report quantitative data should ideally be accompanied by a brief interpretation and explanation.

Many higher education institutions already have systems of departmental or school review. The HEQC wishes to promote the programme as the unit of analysis for its focus on the quality assurance of teaching and learning. However, it also wishes to build on institutions’ already existing practices, provided they are sufficiently rigorous and systematic to assure and enhance the quality of teaching and learning. Due to the vast number of programmes that a multi-purpose institution will have to review within the 6 year (re-)accreditation cycle mandated by the HEQC, and given the human and financial resource constraints that many institutions have to work under, it is likely that many institutions will continue to conduct their programme reviews via a clustered process, such as a Faculty, School or Departmental review, wherein a cluster of cognate programmes are reviewed and evaluated in a single process. This method of organizing a review/evaluation need not detract from the importance of using the programme as the basic unit of review.

Throughput data is best analysed using cohort rather than head-count analyses. This is because head-count analysis only works where intake numbers are stable. Given the Department of Education’s emphasis on the need to widen access and attain greater representivity in student composition, student intakes are unlikely to remain stable.
2a) Evaluative Questions for the Quality Management of Academic Review

The following evaluative questions may be adapted for use in self-evaluating an institution’s quality management system for programme and course review:

1. Does the institution have a comprehensive and clearly laid out policy for the quality assurance of its academic offerings?
   - How does the policy allocate responsibility for quality assurance to academic line managers?
   - How does the policy ensure that programmes and courses are reviewed on a regular, but not onerous, cycle?
   - How does the policy ensure that data gathered at course level are aggregated to feed into programme reviews and/or School reviews?
   - Does the policy provide guidelines on who has access to data and on how data may be used?
   - What provision is in place for the regular review and refinement of the academic review system itself?

2. What guidelines, procedures and support does the institution offer academic managers and teaching staff to ensure the quality and rigour of the academic review process?

3. How does the evaluation method for programme review ensure that data is triangulated to provide a valid review?

4. How is feedback from course and programme review used to effect curriculum improvement?

5. How are the findings of review or evaluation made available to stakeholders, especially to students?

6. How does the institution provide support to develop further the educational expertise of its academic staff on the basis of review results?

7. How does the institution use expert peer review to judge the quality of student learning, to moderate and validate the assessment of students and to evaluate the effectiveness of its curriculum?
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<tr>
<td>1. Policy for the Quality Management of Academic Review</td>
<td>The institution has appointed a senior manager, usually supported by a Quality Committee or equivalent, to be responsible for the development and review of policy on quality management and assurance and to oversee its implementation. Implementation of the quality management policy is built into the job descriptions of all line managers. The policy has been widely disseminated throughout the institution and is 'owned' by those responsible for its implementation. Programme Directors (or equivalent) are responsible for planning and conducting review at programme level and for ensuring that reviews of courses comprising the programme are conducted and that the results are aggregated to inform the review of the programme as a whole. Quality promotion staff is available to advise and assist academic staff in the review process. Responsibility for course review is delegated to course convenors/designers/facilitators with the assistance of quality promotion staff. The policy requires Programme Directors or Heads of Departments or Schools to take responsibility for ensuring that insights from reviews at both programme and course level are recorded, reported and reflected upon and that weaknesses are addressed and strengths are built upon. <strong>Review Cycles</strong> The policy provides guidelines regarding the frequency with which review should take place. This frequency will vary for programme and course review with courses being reviewed more frequently than programmes. The review cycle takes account of the HEQC's six yearly accreditation cycle. At programme level, there is at least one formative review process within a six year cycle. Formative review of courses and modules takes place more frequently, on an on-going basis. <strong>The Triangulation of Data</strong> The policy makes a distinction between raw data (for example, the results of student opinion/perception surveys) and an review report wherein processed data from different sources are triangulated, analysed and reflected upon and fed into plans for improvement. The perspectives of those who teach and design the course are included in the triangulation process. <strong>The Use of Review Data</strong> The policy protects individuals against the un-triangulated use of data, not only by making a distinction between raw data, and a review report but also by identifying clear paths of responsibility for quality management and by providing guidelines on who has access to review data. The review process is fully documented and open to scrutiny. The policy stipulates that stakeholders, especially students, are informed about the way review findings have been used to inform development at both programme and course level. Where suggested changes cannot be made, stakeholders are informed of the reasons for this. Review findings are systematically and regularly used to refine and improve the academic review system itself.</td>
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</table>
### 2. Guidelines and Support for Academic Review

Quality promotion staff with expertise and theoretical understanding of higher education and evaluation is available to advise and assist academics and academic managers in the review process. Training in evaluation is also available as part of a staff development programme.

Hardware/software is available to assist academic staff in the design, processing and analysis of survey instruments.

Review is understood as part of an on-going cycle involving the examination and interrogation of practice and is not associated with sanctions or threats, provided that insights derived from evaluation are acted upon.

The on-going professional development of academic staff and those who support them (e.g. quality promotion staff) is a priority for the institution.

### 3. Review Method

In any review, whether at programme or course level, data from a number of perspectives are triangulated in order to gain a holistic understanding. At programme level, the perspectives of students, those teaching on the programme, external examiners and as appropriate, other stakeholders e.g. professional bodies, employers, are sought. At course level, the perspectives of students, course/module convenors and ideally peers are sought.

A variety of different review instruments are used to collect data depending on the size of the group whose perspective is sought and the nature of the questions being asked. These review instruments could include questionnaires comprising both closed and open-ended questions, focus group interviews, individual interviews as well as other more informal data collection tools which allow data to be collected in an on-going way.

Analysis of data from varying sources is undertaken both quantitatively and qualitatively and is appropriate to the nature of the questions asked and the amount of data collected. The validity of conclusions drawn from review data is interrogated in the same way as conclusions drawn from research would be validated.

### 4. Use of Feedback for Curriculum Improvement

The review process requires that areas of weakness are identified and addressed through the development of detailed plans for improvement. These plans are documented as part of the review report. The implementation of these plans is resourced and monitored by Programme Directors and/or Heads of Departments/Schools. Further review/evaluation takes place to check on the efficacy of improvements.

The review process also requires that strengths are examined in order to build on them. Plans to further develop areas of strength further are monitored by programme managers.

### 5. Dissemination of Review Findings

The programme review report is made available to stakeholders in draft form for comment. In the case of students, the report is made available in a mediated form and is communicated directly to the students on the programme or through their representatives. Stakeholders are invited to comment on the draft report and these comments are considered before the report is finalised and plans for improvement implemented.

At course level, course convenors provide feedback to class representatives and, where time allows, to entire classes. The course review report is available for perusal by students. Comments from students are considered in the finalising of the report.
6. Staff Development & Support

Educational expertise is available to support academic staff in interpreting review findings and in making plans for improvement. Ideally such plans should be based on sound learning theory. This support is available in the form of individual consultations if necessary. Once plans for improvement have been developed, support is provided to ensure that those working on the curriculum have the necessary skills and understandings to carry through the improvement. The support provided is on-going and usually informal, but may link to a formal staff development programme. The provision of support is planned as part of the review process.

7. Peer Review

The Assessment of Students at Course Level

**Internal Examiners (or Assessors, SAQA)**

The academic staff who teach a course/module are responsible for designing, running and marking both formative and summative student assessments, for recording the results and for giving feedback to students.

Traditionally, academic staff have been considered competent to assess students by virtue of their academic qualifications, but in future professional training in assessment should become a requirement e.g. the confirmation of a permanent post for new staff could be conditional on acquiring assessment expertise.

The institution makes provision for staff development in assessment, especially for new staff members.

**Internal Examiners (or Internal Moderators, SAQA)**

For summative assessment on a course, and especially where more than one marker is involved, it is recommended that at least 50% of the final marks are moderated via a system of internal moderation (i.e. the checking of the reliability of the marking). Traditionally this has been done after the marking is completed, by another academic, who did not teach on the course, usually from the same department. But for large classes, it is acceptable and more efficient for the marking team, led by the course convenor, to work together and compare and moderate each other’s marking as the marking proceeds.
The Assessment of Students at Exit Qualifications

External Examiners (or External Moderators, SAQA)
It is recommended that for summative assessment for exit qualifications external examiners are appointed to examine at least 60% of the credits at the exit level at which a qualification is awarded, (e.g. summative assessment for 72 credits at Level 7 for a Bachelor's Degree is externally examined).

The institution has clear criteria for the appointment of external examiners, e.g. they should be independent experts in their fields with qualifications at least one level above the qualification being examined (except of course for PhD level), and should be changed every three years. External examiners are approved by Senate and responsible to Senate.

The institution provides documentation on the curriculum and all relevant assessments and guidelines or a format to assist external examiners in the completion of their reports. Completed external examiners reports are returned to the lecturer concerned and also copied to the Programme Director or Head of Department/ or School. Where problems are raised, these are discussed with the lecturer concerned and the academic manager ensures that agreed improvements are effected.

External examiners have the right to adjust marks and they are required to approve the final marks list for the qualification concerned. Ideally they should also comment on:

- The validity of the assessment instruments in relation to the specified learning outcomes, (ideally prior to their implementation);
- The quality of student learning and the standard of student attainment across the spectrum of results;
- The reliability of the marking process;
- The quality of feedback given to students;
- Any concerns or irregularities with respect to the observation of institutional/ professional regulations.

Remuneration for external examiners is commensurate with the extent of their duties.
**The Validation of a Programme's Assessment Strategies**

**Programme Evaluators (or Verifiers, SAQA)**

Programme evaluators are the discipline/professional experts who form part of an external programme evaluation team. They may be appointed by either the institution, the HEQC or another ETQA such as a professional body. The institution or evaluating agency provides guidelines or a format outlining their functions and clear criteria for their appointment (e.g. they should be independent, recognised experts in their fields and also have qualifications or expertise and experience in curriculum and assessment).

The functions of programme evaluators should include:

- Evaluating the curriculum design, knowledge base and the assessment strategy for the programme as a whole, in relation to its purpose, exit level outcomes and relevant generic qualification standard;
- Judging the appropriateness and validity of integrated assessments and the standard of samples of student performance on these;
- Reviewing external examiners reports on courses within the programme for the period under review and ensuring that their recommendations have been considered and acted upon;
- Commenting on the overall progression and graduation rates for the programme in relation to its purpose and student intake;
- Checking that institutional and professional regulations and procedures for assessment have been adhered to;
- Making recommendations for the improvement of the programme to the relevant academic and academic managers
- If appointed by the HEQC, making recommendations on accreditation status to the HEQC’s Accreditation Committee.

Remuneration for programme evaluators is commensurate with the extent of their duties.
2b) Evaluative Questions for Programme Review & Evaluation

The following questions may be adapted for use for both internal programme review and the external evaluation of programmes:

1. To what extent are students attaining the intended exit-level learning outcomes or graduate attributes and demonstrating satisfactory levels of conceptual understanding and knowledge of the discipline or field? Are expert academic or professional peers (as appropriate) satisfied with the relevance and quality of learning achieved by students on the programme?

2. To what extent is the curriculum of the programme properly aligned?

3. To what extent are students and recent graduates generally satisfied with the programme as a whole, in particular its relevance, delivery and assessment practices?

4. To what extent are employers/ the professions/ the community (as appropriate) satisfied with the quality of graduates from the programme?

5. To what extent are members of the programme’s teaching team satisfied with the institutional leadership and management of the programme? To what extent are they satisfied with the resources and facilities allocated to them to run the programme?

6. To what extent do the programme’s student graduation and retention rates meet the Department of Education’s benchmarks stipulated in the NPHE, 2001:2.3?

7. To what extent is the programme achieving ‘equity of outcomes’ or representivity in graduate output, NPHE, 2001:3.2?

8. How does the programme review/ evaluation contribute to a well-managed, comprehensive and effective institutional system of internal review and external evaluation?

9. How are the feedback and results of the programme review/ evaluation used to effect improvements in the programme’s design and delivery and to develop further the educational expertise of academic staff?
<table>
<thead>
<tr>
<th>Evaluative Questions</th>
<th>Suggested Good Practice Descriptors</th>
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<tbody>
<tr>
<td><strong>B: Programme Review</strong></td>
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<tr>
<td><strong>1. Effectiveness: Quality of student learning</strong></td>
<td>External examiners’ reports provide evidence that properly sampled assessed student work (particularly on integrated assessments at qualification exit points from the programme) suggests that qualifying students are attaining the full range of specified exit-level learning outcomes and are demonstrating appropriate levels of conceptual understanding and disciplinary or professional knowledge. Samples of student performances are judged by expert peers (external examiners or programme evaluators), to meet disciplinary/ professional standards, to be consistent with the New Academic Policy’s level descriptor for the level of the qualification awarded and, where applicable, with the relevant generic qualification standard registered on the NQF. For key assessments the distribution of scores across the cohort is appropriate.</td>
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<td><strong>2. Effectiveness: Curriculum Alignment</strong></td>
<td>Scrutiny of curriculum and assessment documentation (by expert peers, e.g. external examiners) demonstrates alignment between programme content, teaching and learning methods, entry requirements, levels of student preparedness, exit-level outcomes and assessment methods and criteria. These linkages are clearly communicated to students on the programme.</td>
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<td><strong>3. Student Feedback</strong></td>
<td>Student/ graduate opinion surveys conducted on the programme’s core modules or on the programme as a whole, indicate that the majority of students are satisfied with the programme and with its delivery and assessment practices in particular. Where student dissatisfaction has been expressed, there is evidence to show that the teaching staff concerned have interpreted this, resulting in efforts to address or improve the situation.</td>
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<td><strong>4. External Stakeholder Feedback</strong></td>
<td>Opinion surveys of external stakeholders of the programme are conducted where appropriate and feasible. These indicate that stakeholders are satisfied with the programme’s curriculum and with the competence of its graduates. Where stakeholder dissatisfaction has been expressed, there is evidence to show that efforts have been made to address/ improve this. (For Technikons, independent Advisory Committees could play a central role in giving external stakeholder feedback).</td>
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<td><strong>5. Programme Team Feedback</strong></td>
<td>There is evidence to show that staff who teach on the programme are satisfied with the leadership and management of the programme provided by their department/ school/ faculty. The programme team are also satisfied with the teaching resources, facilities and support provided for them by the institution/ faculty/ school/ department.</td>
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<td><strong>6. Efficiency: Graduation &amp; Retention Rates</strong></td>
<td>Programme managers report on their graduation (and retention) rates for the programme overall. Taking the nature of their student intake into account, programme managers have developed plans and strategies for enabling the programme to meet the Department of Education’s graduation and retention benchmarks in the medium- term (e.g. graduation rates for 3 year programmes should be 25% of the programme’s total enrolment, NPHE, 2001:2.3).</td>
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<tr>
<td>Section</td>
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<td>7. Equity: Representivity in Graduate Output</td>
<td>The programme can justify its race and gender profile in relation to the historical profile of its field and in relation to institutional equity targets. There is evidence to show increasing representivity on the programme and that the composition of the qualifying class increasingly resembles that of the entering class, (i.e. increased representivity in intake leads to increased representivity in graduate output.)</td>
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<td>8. System of Programme Review</td>
<td>The institution has established a quality management system for all its programmes which is based on the triangulation of data gathered from a range of sources such as programme evaluators' reports, external examiners' reports on the assessment of students, student opinion data, external stakeholder opinion (as appropriate) and most importantly, self-reflection by programme teams and by teaching staff on their teaching practice. The provider has demonstrated the capacity to evaluate and strengthen its own quality assurance procedures.</td>
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<td>9. Implementation of Improvement Plans</td>
<td>The institution’s quality management system for programme review involves clear reporting lines and accountability which ensure that review results are reported up the management system and followed up with monitored improvement plans. These plans are based on sound education theory and supported by resource provision and staff development. Review and evaluation results are explicitly fed into the next planning cycle. There are effective and transparent procedures for closing down a course or programme.</td>
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2c) Evaluative Questions for Course Review

Below is a list of the kinds of questions that could be adapted for use for the internal review of academic courses or modules using self-review and peer review or student evaluation. Ideally, the academic staff involved in teaching the course should formulate or select their own evaluative questions and should not feel obliged to “cover” all aspects of a course review each time they teach it. The list of evaluative questions given below could also be adapted for student evaluations (suggestions follow in brackets where applicable). Course reviews should not be onerous to academic staff and should not aim to be comprehensive. They should rather be focused to capture data that can inform the specific, context-related concerns of the teaching staff, with a view to effecting manageable improvements that are owned by the staff concerned.

1. To what extent is the design of the course in alignment with the purpose of the programme and with other programme design elements?
   [To what extent did each course contribute to the overall purpose and coherence of the programme and to your attainment of the exit-level requirements?]

2. To what extent is the course’s design in keeping with the institution’s curriculum structure requirements?
   [Was the course well organised and structured?]

3. Have specific learning outcomes and appropriate content selection for the course been defined and communicated to students? To what extent do the learning outcomes contain an appropriate mix of disciplinary and professional knowledge and skills?
   [Were the goals, learning outcomes and content of the course made clear to you? Do you think they are appropriate to your future career?]

4. To what extent is the design of the course teaching methods, delivery methods and course materials based on a detailed knowledge of the profile of students enrolled for the course?
   [How effective were the teaching methods (specify) employed on the course?]
   [Were the course materials well organised and pitched at the right level for you?]

5. On what basis are teaching and learning methods determined? To what extent do they foster active learning by students?
   [What opportunities did the course provide for active learning, group interaction, etc.?]

6. To what extent is the course content current, relevant, academically justifiable and sufficiently demanding?
   [To what extent did you find the course content relevant, stimulating and pitched at the right level?]

7. To what extent is the assessment of students valid and fair? How is provision made for feedback from assessment to inform learning?
   [Did you find the assessment on the course fair? Did you receive adequate feedback so that you could understand where you had gone wrong? What opportunities were there for you to learn from your mistakes?]

8. To what extent is there curriculum alignment between the learning outcomes, the course content and the teaching-learning methods and assessment tasks?
   [To what extent do you believe that the teaching methods, course materials and learner support provided you with a fair chance to succeed on this course?]
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<tr>
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<tr>
<td><strong>C: Course Review</strong></td>
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<tr>
<td>1. Alignment with the programme</td>
<td>It is evident that the specific learning outcomes and content of the course contribute to students’ attainment of the programme’s exit-level qualification(s).</td>
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<td>The contribution of the course to the programme in terms the development of a knowledge base and academic or professional skills and their sequencing is evident.</td>
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<td>The relationships and rules of combination between this course and other courses on the programme is clear.</td>
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<tr>
<td>2. Conformity to institutional curriculum structure requirements</td>
<td>The course/module meets the institution’s curriculum planning and design requirements such as module size, credit-ratings, rules of combination, entry requirements, assessment regulations, etc.</td>
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<td>3. Specific learning outcomes</td>
<td>Learning outcomes and content for the course are specified and communicated in public documents such as programme handbooks, course outlines or academic calendars.</td>
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<td>The learning outcomes are appropriate for the level of the course, for its content and for its function in the programme as a whole.</td>
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<td>The learning outcomes include the development of disciplinary and professional skills as well as the development of an appropriate knowledge and conceptual base.</td>
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<td>4. Appropriateness for student profile</td>
<td>Course designers have a good understanding of the profile of the target group of students – (e.g. in terms of their prior learning experiences, levels of language proficiency, content knowledge, academic skills and current learning environment).</td>
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<td>The choice of teaching-learning methods, course materials, media, technology, delivery methods, estimated number of notional study hours, pacing and sequencing are made primarily on the basis of the student profile and student learning needs.</td>
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<td>These are varied and flexible to accommodate a diversity of students.</td>
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<td>5. Teaching-learning methods</td>
<td>Teaching-learning methods are carefully considered and theoretically justified. They are appropriate to the subject matter, student profile and delivery method. There is evidence of innovation in teaching-learning methods and deliberate attempts to encourage and develop deep approaches as opposed to surface approaches to learning in students.</td>
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<tr>
<td>6. Course content</td>
<td>The content selected for the course provides sufficient depth and breadth to contribute to the purpose of the course and programme.</td>
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<td>The course content is academically acceptable and up-to-date and provides students with an adequate conceptual framework and knowledge base.</td>
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<td>The quantity and complexity of the content is appropriate to the level of the course and does not unnecessarily over-burden students or duplicate content in other (required) courses.</td>
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7. Assessment of students
Assessment tasks and criteria are aligned with the course learning outcomes and content.
The course provides opportunities for formative assessment with detailed feedback to students.

8. Curriculum alignment
The course design and its implementation ensure that the course content, teaching and learning content and methods and materials and learner support provide students with a fair chance of attaining the learning outcomes specified for the course and of demonstrating this through assessment.

Suggested Data Sources
These suggestions are not intended to be used as a check-list. They are offered rather to assist and Resource providers on what may be appropriate sources of data. This list will need to be adjusted depending on the nature and context of the programme or course review under consideration.

For Programme Review:
- Institutional quality management policy and teaching and learning plan
- Documentation on the registration and accreditation status of the programme and its qualifications
- Organogram showing the programme structure, the courses/ modules modules comprising the programme, their titles, levels, credit-rating and the exit qualifications from the programme
- Programme handbook, course outlines and other information made available to students
- Curriculum and assessment documentation to demonstrate extent of curriculum alignment; these should include all exit-level learning outcomes, integrated assessment tasks and criteria and a sample of assessed student work on these.
- Reports from programme evaluators and external examiners on summative assessment practices, particularly for exit qualifications, that comment on the quality of student achievement and also on the extent of curriculum alignment
- Graduation rates for the programme as a whole, preferably using cohort analyses
- Retention rates for years 1 and 2
- Performance profiles (i.e. distribution of scores across cohort) for key modules or assessment events
- Graduation and retention rates by race and gender groupings
- Analyzed results of student opinion surveys
- Analyzed results of external stakeholder opinion surveys (as appropriate)
- Analyzed results of programme team opinion surveys and self-evaluations
- Evidence of educational research and development (including publications)
- Description of the internal quality management system for programme and course review and evaluation, including examples of data gathering instruments and completed course review reports
- Improvement plans, and where relevant, evidence of their implementation.
- Internal programme review reports
- External programme evaluation reports

For Course Review
- Organogram showing the programme structure, the courses/ modules comprising the programme, their titles, levels, credit-rating and the exit qualifications from the programme
• Programme handbook, course outlines and other information made available to students
• Curriculum and assessment documentation to demonstrate extent of curriculum alignment
• Student profile giving race and gender breakdown
• Relevant reports from internal and external examiners
• Course through-put rates
• Analyzed results of student opinion data
• Self-evaluation report by the course convenor which includes an improvement plan

Glossary of Terms

The Quality Management of Academic Review refers to the internal quality management system that an institution of higher education establishes to monitor, review and improve its programmes and courses.

Programme Review refers to the internal self-evaluation procedures that a provider undertakes to monitor and reflect on the outcomes and impact of its academic programmes. The findings of programme reviews should feed into the institutional quality management system where decisions are taken and action for improvement planned and resourced.

Programme Evaluation refers to the external quality assurance procedures undertaken by an external agency (e.g. expert peers, the HEQC or delegated partner ETQA) to make an independent assessment of a programme’s outcomes and impact and/ or to validate the findings of an internal programme review.

Course/ Module Review refers to the internal self-evaluation procedures that a provider undertakes to monitor and reflect on the outcomes of the education it provides through its courses/ modules. The findings of course reviews should feed into the reviews of the programmes of which they are a part.

Formative evaluative activities that are undertaken to inform improvement, in this case of teaching and learning and the curriculum.

Summative evaluative activities undertaken to inform a judgment or summary decision, in this case on the effectiveness of a programme.

References & Further Reading


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34.

3. Access and Admissions

Focus Area
This Resource deals with institutional policy and practice relating to the admission, selection and placement of students. These policies and practices are crucial in determining an institution’s ‘size’ (the number of students it enrolls), its student composition (the kinds of students it targets and enrolls) and its ‘shape’ (the types of programmes into which students are placed). Clearly admission policies also impact at the programme level, but this Resource does not deal directly with entry requirements for specific programmes; this aspect of quality is assured through the HEQC’s procedures for programme accreditation and re-accreditation. This Resource should be used in conjunction with Resource No.4 on Student Development and Support that deals with curriculum and learning environment issues aimed at ensuring that access leads to academic success.

The following concepts are used to describe the different dimensions of institutional admissions policy and practice:

Access:
The widening of access to higher education is an equity-driven concern that relates to the strategies and procedures that an institution undertakes to make its educational services accessible to a diversity of students. This usually involves developing flexible entry requirements and selection mechanisms, such as assessment for the recognition of prior learning, institutional/programme specific entry tests or alternative admissions procedures, mature age exemptions and the adjustment of traditional entry requirements. The widening of access also involves intensive curriculum development, and often staff development as well, to ensure that higher education curricula are responsive to the learning needs of a diverse student intake and in order to enhance retention and graduation rates. (The provision of curriculum enrichment opportunities and academic development is dealt with in detail in Resource No.4 on Student Development and Support). The challenge in widening access is to ensure that those to whom access is granted have a fair chance of academic success.

In the National Plan for Higher Education (NPHE) (2001), the Department of Education has set equity targets for the higher education system as a whole, including for example, the need to move towards race and gender representivity in enrolment and to address skewed representation in SET, Business and Commerce and postgraduate programmes in particular. The NPHE also emphasizes the need to ensure that representivity in enrolment leads to representivity in graduate output, (NPHE 3.2). Whilst enrolment statistics for individual institutions are unlikely to be able to mirror the Department of Education’s national system targets, institutions are expected to set their own enrolment targets, which include equity targets and take national enrolment targets into account.

Enrolment:
Enrolment refers to regulation and management of admissions, usually at national level. For example, in the National Plan for Higher Education (2001), the Department of Education has set national enrolment targets in terms of ‘size’ (a participation rate in higher education of the 20-24 age group of 20% to be achieved over the next 10-15 years.), and ‘shape’ (enrolments to be 40% in the Humanities, 30% in Business and Commerce and 30% in SET over the next 10 – 15 years) (NPHE 2.2). However, institutional enrolment targets and results will be affected by a range of factors over which institutions do not always exercise control; examples include historical, geographical and socio-economic contexts, supply and demand factors, competition from other institutions, institutional missions and approved ‘Programme and Qualification Mix’ plans.
Admissions Management:
This refers to the policies and procedures that an institution sets up to manage the admission, selection and placement of students. This includes the systems, structures, personnel and services that an institution establishes to recruit students, to process applications, select and place students on particular programmes and to integrate academic acceptance with financial and housing services, etc.

Selection and Placement:
This is the heart of any admissions policy and involves the specific criteria and procedures that a provider uses to select applicants and to place them in a particular programme of study.

Rationale
In developed countries during the second half of the 20th century, public higher education was seen as a vehicle for offering individuals equality of opportunity and the possibility of social mobility. The extent to which this goal has been achieved is debatable. However, in the South African post-apartheid context there is a strong imperative for public higher education institutions to commit themselves to furthering social justice through widening access and increasing representivity. The HEQC has identified transformation as an important aspect of its conceptualization of quality, critical elements of which are equity and redress through higher education. Likewise, the promotion of ‘equity of access and outcomes’ and the ‘redress of past inequalities through ensuring that student, graduate and staff profiles reflect the demographic composition of South African society’ is one of the Department of Education’s strategic objectives for the transformation of the higher education system (see NPHE (2001) and The Transformation and Reconstruction of the Higher Education System (May 2002)). In the NPHE (2001:3.2), the Department makes explicit its position on access and equity. As noted above, it suggests that the current participation rate of 15% of the 20–24 year old cohort is too low and that, as a middle income country, South Africa should achieve a participation rate of at least 20% over the next 10 to 15 years. The participation of African and Coloured students in higher education is currently estimated at 12% (see Department of Education 2002g: 3.1.1). This is due largely to the weak output of the schooling system. For example in the 2002 Senior Certificate results 68.9% of all who wrote the exam gained a Senior Certificate, whilst only 24.5% of these obtained matriculation with endorsement (the official entry requirement for universities). The latter is estimated to be less than 10% of the Grade 9 school cohort (SAUVCA-CTP, 2003:147). However, between 1993 and 2000 the proportion of African students in the higher education system has increased from 40% to 60%. But these statistics hide the fact that the majority of African students are enrolled in distance humanities and teacher training programmes. The proportion of African students in SET and Business and Commerce programmes remains low (Badat, 2004:21). In the NPHE, the Department urges institutions (especially those where black students constitute less than 50% of the total enrolment) to establish targets, and strategies for achieving the national benchmarks in order to move towards equity in the demographic composition of their student bodies.

With respect to gender, it is estimated that in 2000 53% of all students in universities and technikons were female. But as for African students, females are seriously under-represented in ‘hard’ areas such as SET and Business and Commerce and are also under-represented in postgraduate studies (Cloete, N. & Bunting, I. 2000:17). The Department of Education is therefore also concerned that equity targets ensure that black and women students are selected and placed in those programmes where they are currently under-represented (see Department of Education 2002g:3.1.2).

The concept of ‘disadvantage’ should be defined by class as well as race and gender. This suggests that it is inadequate to simply target black and women students for access, but that institutions should also aim to admit students who have attended disadvantaged schools, (an indicator of lower class status). This can be done by identifying rural and township schools
and by using alternative admissions routes to admit a certain quota of students from such schools.

**Discussion**

Clearly, an institution’s admission policy is an obvious place to look for evidence for or indicators of the realization of these national transformatory goals and values. However, the challenge for higher education institutions in South Africa is not simply to open access, but to do so in ways that are responsible, financially feasible and academically sustainable. The widening of access inevitably requires additional resources to be spent on students who are under-prepared for higher education study. Institutions have to weigh up these national demands for equity with the need to act responsibly towards the student (who may incur debts and not succeed at HE studies), towards the state (that may subsidize and provide financial aid for the student) and towards its teaching staff (who need to carry additional teaching demands). Higher education institutions also have to balance social justice demands with other goals and purposes of higher education such as the need to produce internationally recognized research and high quality graduates.

Some of the tensions around access are recognized by the Department of Education in the NPHE where the Department acknowledges that it will be difficult to significantly increase the annual intake of non-traditional students in the short-to medium-term (2001: 22), because of the chronic mismatch in output from the schooling system and the entry requirements of higher education, for universities in particular. Instead the Department wants in the medium-term, to focus on improving the efficiency of the higher education system in terms of improving graduation and retention rates, especially the disproportionately high black student failure and drop-out rates. It sets a national target to improve graduation rates over the next 10-15 years to 25% of the total enrolment for 3-year programmes. Given that black student failure and drop-out rates are disproportionately high and that SET and Business/Commerce programmes generally have even higher failure rates, there is a potential tension between the widening of access and attaining a better ‘shape’ and the achievement of greater efficiency. However, past practice suggests that the most effective solution to this problem is to support the widening of access with comprehensive, sustained, high quality curriculum interventions which develop students’ general academic and cognitive skills, their language competence and their capacity for self-directed learning, in the context of mainstream learning; thus ensuring their eventual success in higher education (see Resource No.4 on Student Development & Support).

Finally, it should be noted that, given the different histories of higher education institutions in South Africa and their consequent differences in student intake and composition, issues of access and admissions are realized in very different institutional contexts. The complexity and challenge of access issues will be compounded in the context of merged institutions (see below).

**The Current Admissions Policy Context**

The *Higher Education Act (Act 101 of 1997)* does not specify a minimum admissions requirement for study in higher education; but it does require that ‘the admissions policy of a public higher education institution must provide for the redress of past inequalities’. While providing for the continuation of present admission arrangements to public higher education institutions, as administered by the Matriculation Board of SAUVCA and by the CTP, it re-affirms the right of public higher education institutions to determine their own admissions policies subject to the provisions of the Act. This includes the right to determine entrance requirements for particular programmes, student numbers for particular programmes and the manner of their selection. Public higher education institutions are obliged to publish their

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1 The statutory responsibilities of the Matriculation Board expire at the end of 2004.
admissions policies. The *Higher Education Act* does not attempt to set a legislative framework for admission to private higher education institutions. It is assumed, however, that in applying for registration with the registrar of private higher education institutions, information concerning admission requirements must be furnished.

Currently, admission requirements are as follows:

**Admission to Technikons**:
Admission requirements for study at a technikon are determined in the Joint Statute for Technikons by the CTP. At present a learner must be in possession of a Senior Certificate to be eligible to enroll for technikon study. Technikons are also empowered to set additional admission requirements for specific programmes. Programmes that involve the study of mathematics and science often have such additional requirements. Contrary to universities, technikons do not distinguish between admission requirements for diploma and degree study. This is because the admission requirement for the Bachelor of Technology Degree is currently an appropriate National Diploma or equivalent that in turn requires only a pass in the Senior Certificate for entry.

**Admission to Universities**:  
To register for degree study at a public university in South Africa, a learner needs to be in possession of a Senior Certificate with a matriculation endorsement, a certificate of complete or conditional matriculation exemption, or needs to be awarded graduate status. The ministerially approved regulations published in terms of the provisions of Section 74 of the *Higher Education Act*, as amended, set out the criteria and rules under which the various types of certificates of endorsement, complete and conditional exemption may be granted. The administration of this admissions policy is undertaken, on behalf of the universities, by the Matriculation Board of SAUVCA. The rules governing both endorsement and exemption status are extremely complex, especially in terms of the required combinations of Grade 12 subjects. Some universities also offer initial diplomas, e.g. in the case of teacher education. For these programmes, students may be admitted to a university with only a Senior Certificate.

Universities are also allowed to set additional admission requirements for specific programmes over and above the minimum mentioned above. This is established practice for professional degrees, especially for the health professions. In most cases this has been due to infra-structural limitations on places and to agreements between the universities and the professional board/council in question. In those programmes where mathematics and science feature strongly, it is common practice for universities to specify minimum Higher Grade Senior Certificate performance levels in these subjects. More recently, as universities have developed more focused programmes in response to demands for greater relevance and responsiveness, this practice has become more widespread. An increasing number of universities now also specify additional minimum requirements for language.

During the 1990s, exceptions to this admissions policy were allowed and the number of students admitted by exception is on the increase due to the misfit between current policy, the government’s strong equity agenda and the reality that the number of students exiting the schooling system with matriculation endorsement or exemption is on the decline. The Joint Statute of the Universities allows the Matriculation Board to issue a certificate of conditional exemption ‘to a person who, in the opinion of the senate of a university, has demonstrated, in a selection process approved by that senate, that he or she is suitable for admission to bachelor’s degree studies, which certificate shall be valid for admission to that university only’. This practice, known as Senate Discretionary Conditional Exemption 3, has been used

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2 Recently renamed ‘Universities of Technology’.

3 In the case of private providers, it is usually the management or Academic Board of the institution that would make decisions about admissions and alternative admissions requirements.
with increasing frequency in the past few years as universities have responded to falling student numbers and the inadequate matriculated output from the schooling system. The granting of Senate Discretionary Conditional Exemption plus the provision of a foundation programme could be viewed as a form of recognising prior learning, in that the university concerned admits students who do not meet the statutory admission requirements, provides them with a form of appropriate prior learning (the foundation programme) and then assesses and recognises this prior learning as the equivalent of a Senior Certificate with Endorsement i.e. Exemption.

Also under the Senate Discretionary Conditional Exemption concession, some universities have instituted institution-specific entrance tests for prospective students. In most cases, all students with a Senior Certificate below a certain aggregate are required to write these tests. The results are normally used to assist university administrators make alternative admissions and placement decisions. This development is due largely to the now widely accepted fact that the Senior Certificate is only a good predictor of academic performance for those students within the top range of scores. Admissions based solely on Senior Certificate results for those within the lower range of scores are therefore believed to exclude unfairly many students with academic potential.

More recent policy initiatives that will have an impact on institutional admissions policies include the following:

The South African Qualifications Authority
SAQA’s requirement that all qualifications specifications for registration on the NQF include the recognition of prior learning (RPL) as a means of entry to the programme leading to the specified qualification poses a challenge to institutions of higher education. The recognition of prior learning (or current competence) is promoted as a strategy for increasing access to non-traditional, mature students. The Department of Education suggests in the NPHE (2001) that increasing access for workers, mature learners and disabled learners is an important goal in its own right. However, currently in higher education, with the exception of a few successful innovations, the goal of implementing RPL remains unrealized on any significant scale due to the contested nature of some of the assumptions on which it is based and the high levels of resources and assessment expertise that it entails. If higher education institutions are to take up the RPL challenge responsibly, they will need to integrate RPL into their access and curriculum development policies and strategies and develop RPL selection instruments and assessment protocols based on the specification of entry requirements in terms of generic learning outcomes. Institutions will also need to set aside dedicated human and financial resources for the counseling, educational interventions and labour-intensive assessment procedures that are necessary if applicants are to be enabled to articulate prior experiential learning (usually tacit and context-dependent) in protocols such as learning portfolios in recognizable, explicit and abstract academic discourse.

Secondly SAQA has challenged traditional assumptions about school-leaving requirements. In its FETC Policy Document (April, 2001), SAQA has proposed the abolition of the Higher/Standard/Lower Grade distinction made in the current Senior Certificate exam and recommended that a simple pass in the FETC should be the statutory minimum requirement for admission to all institutions in the higher education sector. SAQA also regards the endorsement/exemption requirement on the Senior Certificate for admission to universities as an obstacle to widening access.

The draft NAP makes the case for differentiated access and curriculum responsiveness. It proposes an ‘Articulation Column’ to provide horizontal and diagonal articulation between qualifications. This mechanism could provide a curriculum enrichment space in the system
for those who do not automatically meet the formal entry requirements of their target programmes. It could also be used for the process of recognizing prior learning. The NAP also recommended that the Department of Education subsidise Foundation Programmes in the Articulation Column at Level 5 to assist learners to make the transition from Further to Higher Education.

**The Funding of Public Higher Education: A New Framework (15 November 2002)**

The Ministry of Education has indicated in its new funding framework that it will allocate a portion of ‘earmarked funding’ for ‘foundation programmes and teaching development’. For at least the first 5 years of the operation of the new funding framework, approximately an additional 15% of the FTE enrolment of first-time entering contact students to funded foundation programme places across the country (2002b:25). Foundation programme students will be funded at subsidy prices equivalent to those for standard undergraduate cells. Institutions will have to bid for their share of this ear-marked funding through the three-year rolling plans process. It is assumed that by ‘foundation programmes’ the Department means discrete, add-on programmes pegged at Level 5. It is not clear what these proposals means for the funding of integrated models of academic development, but it seems unlikely that there will be additional funding for students enrolled in this form of academic and curriculum development.

At a general level the new framework for funding involves a shift to the allocation of 50% of teaching funding on the basis of output (50% remains for input, i.e. students registered). This steering of the system towards greater efficiency has been mentioned above - the NPHE has set a national target for improving graduation rates to 25% of the enrolment for three-year programmes. However, it is unlikely that these output goals can be met without the implementation of academic development measures. Strategies for improving access and equity and the quantity and quality of graduation output are not necessarily contradictory, on condition that they are supported by adequate resources to provide the curriculum interventions required for historically and educationally disadvantaged students to succeed.

**Proposals for ‘the Establishment of a National Higher Education Information and Applications Service for South Africa (Department of Education 2002)**

These proposals recommend the establishment of a national centralized Information and Applications service for all first-entry students wishing to study at under-graduate level at any South African public higher education institution. It is recommended that institutions retain their right to set admission criteria and the number of places available for specific programmes and that the NHEIAS generate offers to applicants on this basis. The objective of these proposals appears to be the rationalization of the admissions process in the interests of national planning and efficiency gains and to ensure that all students have access to the same range of choices.

**Institutional Restructuring**

The Department’s restructuring of the higher education landscape through institutional mergers and in particular through the creation of 5 ‘comprehensive’ institutions, means that most institutions are having to redevelop their admissions policies and redesign their curricula. Whilst the merger process provides new opportunities for improving access and admissions policies and practices, it also requires guidance from the Department in terms of the finalization of outstanding policy documents such as the NAP and NQF Review.

**Proposals for a Further Education and Training Certificate**

The Department of Education intends to phase in the new FETC from 2006 to replace the Senior Certificate as the Level 4 exit qualification from 2008. The National Curriculum Statement Grades 10-12 (Oct 2002) suggests that there will be 3 FETCs:

- FETC (General) – the schooling pathway
- FETC (General Vocational) – the FET colleges pathway
- FETC (TOPS) – the trade, occupational and professional pathway.
The proposed FETC is a 130 credit whole qualification pegged at Level 4 on the NQF and will be awarded on the basis of a minimum of 60 credits achieved at the 30%–39% band and 70 credits at the 40%–49% band. There will be no higher / standard / lower grade distinctions, and five grading bands. It is anticipated that the FETC will be the equivalent of the current Senior Certificate without matriculation endorsement (SAUVCA-CTP 2003). Whilst this may be an adequate level of attainment for a school-leaving certificate, given that disparities in the quality of provision of schooling provision will remain in the medium term, there in concern in the higher education sector that the proposed FETC will not serve as an adequate threshold for entry to higher education. SAUVCA has suggested that there is a need to establish minimum thresholds for higher education entry, especially levels of numeracy and literacy and to run further admissions and placement tests alongside the FETC for entry to higher education. Even if such a dual testing system is developed, this will not, in the medium term, do away with the need for alternative entry routes into higher education for students from disadvantaged educational backgrounds.

Evaluative Questions:

The following questions may be adapted for self-evaluating the quality of an institution’s Access and Admissions policy and practice. The questions are clustered according to the three dimensions of an admissions policy, namely access, admissions management, selection and placement.
Access

1. Does the institution set explicit equity-driven enrolment targets? How do the institution’s enrolment targets cater for optimum size, student composition and ‘shape’ issues (i.e. what kinds of students get placed in what types of programmes)?

2. Does the institution have a well-motivated and comprehensive admissions and access policy approved by Senate and Council? To what extent is the admissions policy informed by the institution’s mission, its enrolment targets, its approved ‘Programme and Qualification Mix’, the demand for access and its socio-economic context?

Admissions Management

3. How is the admissions policy managed and implemented? To what extent does the policy involve the adoption of a holistic approach to the management of admissions and access?

4. How are admissions policies publicised across the institution and is there consistency in their application?

5. How does the institution proactively liaise with potential pools of students in its local communities? How does it proactively disseminate information on what the institution can offer?

6. To what extent are applicants’ enquiries promptly and effectively dealt with? To what extent are applications systematically and transparently processed according to explicit admissions policy and procedures?

7. How does the institution, in its recruitment and admissions procedures, provide applicants with guidance about a range of flexible entry routes, with broad curriculum and career guidance and assistance with respect to second choices, re-routing, etc.?

8. How does the institution cater for applicants who meet its admission requirements but are not offered places?

9. To what extent are selection and placement trends at both institutional and programme level monitored via a sound management information system? Are findings fed back into the admissions system to inform and improve admissions policy and selection and placement procedures?

Selection and Placement

10. To what extent are the institution’s academic planning and admissions requirements based on defensible selection criteria? Has the institution developed mechanisms for flexible entry routes which are not based only on school-leaving results – and how are these mechanisms validated?

11. To what extent has the institution developed a range of differentiated access options at the entry level into which students can be placed appropriately, ensuring ‘goodness of fit’ between levels of preparedness and the demands of the curriculum?
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<th>Evaluative Questions</th>
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<tr>
<td><strong>Access</strong></td>
<td>Enrolment targets to address equity concerns are set by the institution. Access routes and a range of flexible entry routes are designed to support these targets. Management information shows that progress is being made towards realising these targets across faculties, programmes and levels.</td>
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<tr>
<td>1. Equity of access</td>
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| 2. Alignment between admissions policy & strategic & academic planning | The institution uses an approved and publicised admission policy. The admissions policy is aligned with the institution’s mission, enrolment targets, strategic plan and ‘Programme & Qualification Mix’. It also takes account of the demand for access and the institution’s socio-economic context. It includes realistic plans to meet specified size and shape enrolment targets within set time-frames. These are clearly spelt out in terms of enrolment targets for both ‘regular’ and ‘flexible’ entry routes.  

The institution’s capacity to contribute towards the attainment of the National Plan for Higher Education’s policy goals (NPHE 2001 2.2; 2.4-2.6) is fully exploited. |
| **Admissions Management** |          |
| 3. Policy & management structures | There is clarity on the roles, functions and reporting lines of those responsible for developing and implementing admissions policy. For example, the institution has a clearly defined admissions policy development structure that is driven by a senior executive officer, directly accountable for the admissions policy. The implementation of the policy is also driven by a senior manager, with structures clearly accountable to him/her.  

The policy and organisational structures enable the integration and co-ordination of functions that impact directly on student admissions. In particular, well structured links are established and maintained between structures/divisions such as:  

- The Institutional Admissions Committee; Academic Development Programmes; Alternative Assessment Services (e.g. RPL, alternative admissions); The student Data/Records System; Faculty Administrations;  
- Faculty Admissions and Re-Admissions Committees; Academic Planning;  
- Financial Aid and Student Housing and student representatives or organisations.  

This means that an offer of a place to a particular applicant includes the allocation of accommodation and where applicable and possible, an offer of Financial Aid, ensuring that students are settled efficiently on arrival at the institution. |
| **4. Internal dissemination & consistency of application** | The admissions policy is accessible to all who need it, e.g. it is posted on the institution’s web-site. Admissions officers, Faculty managers and other staff dealing with admissions are well acquainted with the institutional admissions policy and procedures. The policy stipulations are applied consistently across the institution. |
| **5. Recruitment & dissemination of admissions information.** | Information on the institution’s educational opportunities, admission regulations and application procedures (both regular and flexible) are disseminated to prospective students in good time for students to make appropriate decisions. A variety of accessible, student-centred dissemination strategies are employed to enhance the attainment of the institution’s size and shape targets, e.g. web-sites, resource packs for students who present themselves for the 1st time at registration, etc.  

The disseminated information is accurate, comprehensive and devoid of unrealistic promises. |
| 6. Effectiveness, efficiency & transparency | The institution provides efficient and accurate responses to applicants’ enquiries. Admissions officers are in a position to pronounce on the status (e.g. rejection, waitlisted, acceptance) of an application at any given moment. The information management system used allows constant data up-date and simultaneous access by all related offices.  

All decisions taken in relation to prospective student's admissions are clearly and openly accounted for in terms of the provisions of the policy. The Admissions Office, or related divisions, is equipped to serve the needs of a diversity of applicants.  

Clear and effective communication lines between admissions' officers and programme managers are maintained throughout the admission cycle. Where an institution has positioned itself to enrol a significant number of students from SADC countries and beyond, a specialised unit is in place to deal with the logistics of enrolling foreign/ international students. |
| 7. Flexibility of entry routes & advisory services | The institution has identified specialized personnel to deal with applicants' queries about career options, curriculum choices and second choice re-routing. These services are proactive and efforts are made to make potential students aware of any flexible/ alternative entry routes provided by the institution. |
| 8. Management of unplaced students | Cases where applicants who meet minimum admission requirements but are not placed in a programme, are investigated with a view to identifying the inhibitory factors to access. Inter-institutional links are established and strategies are in place to re-route these applications.  

Cases where applicants are offered a place but do not take it up are also followed up. The reasons for their failure to register are fed into the admissions review process.  

The institution can provide evidence to demonstrate that its admissions policy and recruitment strategies ensure a good match of demand and supply of educational provision, with minimal wastage. |
| 9. Monitoring & improvement | An applications management information system linked to a student management information system is in place that allows selection, placement, registration and student progression to be recorded and traced through to graduation. This enables equity targets to be monitored across Faculties and programmes and the results of the admissions policy to be researched and fed back into future deliberations and improved enrolment and admissions strategies. |
| Selection & Placement | National admissions criteria, as set out by statute, professional bodies, etc. are acknowledged and adhered to.  

Selection criteria and mechanisms for flexible entry routes and the widening of access are well-motivated, researched and evaluated. Where appropriate, these include credible mechanisms and learner support for the implementation of the Recognition of Prior Learning/ Current Competence. |
11. Differentiated access options & responsible placements

The results of admissions mechanisms are used to judiciously place students in appropriate programmes/curricula, (e.g. foundation/bridging programmes, enriched/extended curricula).

If approved in the New Academic Policy, the proposed Articulation Certificates/credits are used responsibly with a view to widening access and improving success in mainstream programmes.

The institution aims to ensure that students admitted via flexible/alternative selection mechanisms have a fair chance of academic success.

Suggested Sources of Data

These suggestions are not intended to be used as a check-list. They are offered rather to assist and guide providers on what may be appropriate sources of data. This list will need to be adjusted depending on the nature and context of the institution under consideration.

- Institutional mission, strategic plans, three-year rolling plans, approved ‘Programme and Qualifications Mix’
- Student enrolment equity targets and reports on the monitoring of these targets
- evidence on the extent of their realization
- Enrolment, graduation and retention rates
- Admissions policy documentation, including policy on flexible/alternative admissions, RPL, re-admissions, etc.
- Standing orders for the Admissions Committee or equivalent
- Organogram illustrating admissions organizational structure and reporting lines
- Prospectus, application forms, resource packs and other documentation sent to prospective applicants, with a covering rationale
- Promotional material: examples of flyers, web-sites, media clips and other forms of recruitment undertaken
- Documentation on career and curriculum guidance prepared for students
- Examples of selection assessment instruments
- Documentation and enrolment statistics on institutional provision of flexible entry routes including subsequent curriculum enrichment, e.g. student development programmes/extended curricula, etc.
- Student feedback on admissions procedures
- Reports on the findings of admissions research and evaluation
- Institutional internal and external review reports

Glossary of Terms

Access: The widening of access to higher education is an equity-driven concern and relates to the strategies and procedures that an institution undertakes to make its educational services accessible to a diversity of students.

Enrolment: Enrolment refers to regulation and management of admissions usually at national level.

Admissions Management: This refers to the policies and procedures that an institution sets up to manage the admission, selection and placement of students.
Selection and Placement:
This involves the specific criteria and procedures that a provider uses to select applicants and to place them in a particular programme of study.

Matriculation endorsement:
An endorsement to a senior certificate issued by SAFCERT in accordance with the regulations recommended by SAUVCA via the Matriculation Board, approved by the Minister of Education and published in the Government Gazette.

Matriculation exemption:
A certificate of complete or conditional exemption from the matriculation endorsement requirement issued by the Matriculation Board on behalf of SAUVCA to candidates who satisfied regulations for complete or conditional exemption as published in the Government Gazette.

References and Further Reading


Department of Education (2002c) National Curriculum Statement Grades 10-12 (Schools), DoE, Pretoria.


Department of Education (2002f) Qualifications and Assessment Policy framework Grades 10-12 (Schools), DoE, Pretoria.


5. The Assessment of Student Learning

Focus Area
This Improving Teaching & Learning Resource for the Assessment of Student Learning applies to institutional, programme and course levels of assessment practice. Assessment policies and systems are usually determined at institutional or faculty level, whilst their implementation and the extent of their effectiveness needs to be evaluated at programme and course level. This Resource is closely related to Resources No.1 on Programme Planning, Design & Management and No.2 on Programme and Course Review.

The assessment of student learning is understood to mean the practice of designing formal tasks for students to complete and then of making inferences from and estimating the worth of their performances on these tasks. One can also understand assessment to be a form of research that aims to find out what students know, understand and can do. As with the principle of triangulating research methods, so with assessment, one is likely to ascertain better what students can do if a range of different assessment (research) methods is employed and if the research instruments are fit for their purpose.

Rationale
In South Africa the goal of a transformed higher education system is sought by means of a variety of strategies, significant among these are measures to widen access, improve throughput and completion rates and produce graduates with the knowledge and skills considered relevant to the needs of a developing society and economy (see NPHE 2001). Assuring the quality of the assessment of student learning is central to the achievement of these aims for three reasons. Firstly, assessment has the potential to determine whether more equitable access (student input) is realised as more equitable achievement (student output). Historically, assessment practices have often acted as barriers to student progress, restricting achievement. In order to strengthen public confidence and promote the credibility of assessment in higher education, its principles, methods and procedures need to be transparent and robust and its assessors accountable. Secondly, although the curriculum may target disciplinary and professional knowledge and skills, appropriate to the goals of individual, social and economic transformation, if assessment procedures fail to prioritise and test for these competences, students are unlikely to acquire these intended learning outcomes. Finally, it is well documented that assessment has a critical influence on the quality of teaching and learning (the ‘wash-back’ effect) and so can be used as a powerful point of leverage for change and improvement in education. Thus measures to assure high quality assessment of student learning that also activate its potential to improve teaching and learning, should be a priority in the face of the challenges currently posed to higher education. The HEQC considers assessment practice to be a key indicator of the ‘health’ of teaching and learning in institutions of higher education and therefore a valid focus of quality assurance activities. It also acknowledges the need for capacity development amongst teaching staff in this area.

Furthermore, as the ETQA for the HET Band, SAQA has assigned formal functions to the HEQC with respect to the quality assurance of assessment in the higher education system:

1. In terms of the ETQA Regulations (1988), the HEQC is responsible for ensuring the integrity, validity and reliability of assessment in the HET system. The HEQC will ensure that its responsibility for assessment in the HET system is upheld via its quality assurance system which involves a combination of institutional audit and programme accreditation

2. However, the HEQC recognizes the right of the Senates of public higher education institutions to retain operational responsibility for the assessment of their students in

3. The HEQC will therefore delegate responsibility for assuring and maintaining the integrity, validity and reliability of assessment to its constituent providers, both public and private, under certain conditions: For example, during institutional audits, the HEQC will ask providers to demonstrate the effectiveness of their assessment policy and system (see the HEQC’s Criteria for Institutional Audits, 2004: Criteria 11-14). Secondly, at programme level, assessment practices will be scrutinized by the HEQC in its accreditation and re-accreditation processes (see Proposed Criteria for the HEQC’s Programme Accreditation Cycle 2004-2009).

Discussion

Assessment is arguably the teaching-learning practice where the academic staff most directly exerts power over students. It is also the educational event that holds the highest stakes for students in terms of their achievement. As such assessment should afford students sufficient opportunities for individual feedback on their progress. For these reasons, measures to quality assure the accountability, transparency and rigour of assessment practices are critical, as are measures to ensure that teaching staff are competent to carry out their assessment responsibilities professionally.

However, the development of fair, valid and efficient assessment provision in higher education requires a more comprehensive role for assessment than has traditionally been the norm. The purposes for which assessment is used need to be extended beyond the summative (the measuring, recording and reporting of end-point achievement) and the diagnostic (indicating aptitude and preparedness for a course of study). Assessment should also be used for developmental or formative purposes, namely to inform and strengthen learning and teaching. Assessment should therefore be recognised as an essential and integral part of teaching and learning. The realisation of such a role for assessment in higher education is dependent on a concerted effort to professionalise the assessment practices of academic staff. Assessment practice in higher education needs to be de-mystified and made more explicit, accountable and transparent.

However, an emphasis on assessment, which is exacerbated through the modularisation of the curriculum, can lead to over-assessment and the consequent over-burdening of staff and students alike. This can be countered by a judicious and strategic use of assessment for clearly defined purposes. For example, summative assessment can be spread across a module, using a range of methods such as projects and assignments to alleviate the heavy weighting and high stakes traditionally attached to examinations at the end of the module. The use of structured and supported peer and self assessment for formative purposes lightens the marking burden on staff and enables students to gain a better grasp of the meaning of the assessment criteria. The development of a ‘good fit’ between the purpose of assessment, the nature of the content and skills being assessed and the assessment method selected is crucial to achieving validity in assessment. This usually requires a diversification of assessment methods and practices within a course, which in turn can alleviate the burden of over-assessment.

Our emphasis on the principle of curriculum alignment (see Resources No.1 & 2) suggests that assessment methods and tasks should be aligned with the content and skills explicitly taught during the course. In other words, care should be taken to ensure that assessment tasks do indeed test for the learning outcomes that were specified for the course. This involves making explicit the learning outcomes and levels of knowledge, understanding and skills one intends students to achieve and then designing assessment instruments that will effectively test students’ attainment of these outcomes. More specific ‘assessment criteria’ can be designed for each assessment task.
In the ‘Suggested Good Practice Descriptors’ below, we advocate an outcomes-based approach to assessment, but we do so cautiously, suggesting a weak constructivist as opposed to a behaviourist approach to outcomes-based education (see Introduction 9.3 for further discussion). This approach allows educators to use their professional judgment to interpret the meaning of specified learning outcomes and assessment criteria in their teaching practice in contextually sensitive ways. Student performance is understood as indirect evidence of the cognitive development or learning that has taken place in learners’ minds. In other words, the assessor makes an inference about levels of competence or learning attained from a student’s set of performances; and crucially, the two concepts, performance and competence are kept separate and not elided. This approach allows students to demonstrate their learning (competence) in creative and unanticipated ways. It is therefore important to make provision for and to reward students who perform unexpectedly and creatively, as well as to provide a guide to expected performance by means of pre-specified learning outcomes and assessment criteria. We are also sceptical about SAQA’s insistence on the assessment of generic skills or ‘critical cross-field outcomes’ (see Introduction 9.3 for further discussion) because it is not clear that generic skills exist independently of specific knowledge domains and contexts of practice. Instead we advocate the development of explicit academic and professional skills as well as a sound knowledge and theoretical base in the disciplines. It is the concept of ‘knowing in action’ or ‘praxis’ in specific disciplinary or professional contexts that perhaps better expresses our understanding of the application of knowledge and skills. This suggests that ‘generic skills’ will mean different things in the different disciplinary and professional contexts in which they are embedded and further that it requires disciplinary or professional experts within communities of practice to determine the significance of students’ performances in these contexts.
Evaluative Questions
The following questions may be adapted for use in self-evaluating the quality of an institution, faculty or programme’s assessment of student learning:

1. Does the institution have an assessment policy and effective procedures for guaranteeing its implementation? To what extent do the policy and procedures ensure academic and professional standards in the design, approval, implementation and review of assessment strategies for courses, programmes and for the qualifications awarded?

2. How does the institution moderate and validate its assessment procedures and results in order to ensure their validity and reliability and to ensure the integrity of the qualifications it awards?

3. How is the institution dealing with SAQA’s challenge to recognise prior learning?

4. To what extent are the academic staff, responsible for official decisions on assessment, appropriately trained and experienced and competent to assess? What staff development opportunities does the institution offer its teaching staff in order to improve and professionalise its assessment practice?

5. To what extent are institutional/ faculty/ professional rules and regulations governing assessment adhered to? To what extent is assessment conducted securely and with rigour and fairness?

6. To what extent are the principles, procedures and practices of assessment explicit, valid, and reliable?

7. To what extent are assessment decisions recorded and documented securely, accurately and systematically over time?

8. To what extent are the purposes for which assessment is used explicit and appropriate? To what extent are assessment data and results used for developmental purposes to adjust teaching and assessment practices and to improve the curriculum?
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<tr>
<td><strong>1. Policy and procedures</strong></td>
<td>There is an institutional policy on assessment which makes explicit the values, theories or philosophy of assessment on which it is based. The policy aims to ensure the development of valid, reliable and transparent assessment practices in keeping with academic and professional standards. The policy also provides for the effective validation of assessment practices. There are procedures through which faculties and departments/schools are accountable for the implementation of the institutional assessment policy. The policy includes guidelines or regulations for the following – formative assessment, the provision of feedback to students, the weighting of class marks (continuous assessment) and examinations, security procedures, disciplinary and appeals procedures, regulations for marking, grading, aegrotats, supplementary examinations, condoned passes, DP requirements, plagiarism, etc. There are structures at institutional, faculty and department/school level to implement, monitor and review its assessment policy. Assessment decisions made by the committees/boards at these levels are validated by external expert peers. Academic managers are committed to the implementation of the institutional assessment policy and teaching staff and students are aware of the responsibilities and rights that it accords them.</td>
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</table>
| **2. Moderation System** | **The Assessment of Students at Course Level**

**Internal Examiners (or Assessors, SAQA)**
The academic staff who teach a course/module are responsible for designing, running and marking both formative and summative student assessments, for recording the results and for giving feedback to students.

The institution makes provision, including time release, for staff development in assessment, especially for new staff members.

**Internal Examiners (or Internal Moderators, SAQA)**
Internal moderation is conducted to provide a reliability check on the marking process and to provide developmental feedback to staff on their assessment practice.

For summative assessment, and especially where more than one marker is involved, at least 50% of the final marks are moderated via a system of internal moderation (i.e. the checking of the reliability of the marking). Traditionally this has been done after the marking is completed by another academic, who did not teach on the course, usually from the same department. But for large classes, it has been found to be more effective for the marking team, led by the course convenor, to work together and compare and moderate each other’s marking as the marking proceeds. |
The Assessment of Students at Exit Qualifications

External Examiners (or External Moderators, SAQA)
It is recommended that for summative assessment for exit qualifications external examiners are appointed to examine at least 60% of the credits at the exit level at which a qualification is awarded, e.g. the summative assessment for 72 credits at Level 7 for a Bachelor’s Degree are externally examined.

The institution has clear criteria for the appointment of external examiners, e.g. they should be recommended by the examining department, independent experts in their fields with qualifications at least one level above the qualification being examined (except of course for PhD level), and should be changed every three years. Reciprocal arrangements should be avoided. External examiners are approved by Senate and are responsible to Senate.

The institution provides documentation on the curriculum and all relevant assessments and guidelines or a format to assist external examiners in the completion of their reports. Completed external examiners reports are returned to the lecturer concerned and also copied to the Programme Director/Coordinator or Head of Department/School. Where problems are raised, these are discussed with the lecturer concerned and the academic manager ensures that agreed improvements are effected.

External examiners have the right to adjust marks and they are required to approve the final marks list for the qualification concerned. Ideally they should also comment on:

- The validity of the assessment instruments in relation to the selected content and the specified learning outcomes, ideally prior to their implementation, (there should be a suitable range of different assessment methods to ensure that all outcomes are validly assessed);
- The quality of student learning and the standard of student attainment across the spectrum of results in relation to the learning outcomes, international academic/professional standards and relevant generic qualification standards;
- The reliability of the marking process;
- The quality of feedback given to students;
- Any concerns or irregularities with respect to the observation of institutional/professional regulations.

Remuneration for external examiners is commensurate with the extent of their duties.
The Validation of a Programme's Assessment Strategies

Programme Evaluators (or Verifiers, SAQA)
Programme evaluators are the disciplinary/ professional experts who form part of an external programme evaluation team. They may be appointed by either the institution, the HEQC or another ETQA (e.g. a professional body).

The evaluating agency provides guidelines or a format outlining their functions and clear criteria for their appointment (e.g. as for external examiners, but they should also have qualifications and/or expertise and experience in curriculum and assessment).

The functions of programme evaluators should include:

- Evaluating the curriculum design, knowledge base and the assessment strategy for the programme as a whole, in relation to its purpose, exit level outcomes and relevant generic qualification standard;
- Judging the appropriateness and validity of integrated assessments and the standard of samples of student performance on these;
- Reviewing external examiners reports on courses comprising the programme for the period under review and ensuring that their recommendations have been considered and acted upon;
- Commenting on the overall progression and through-put rates for the programme in relation to its purpose and student intake;
- Checking that institutional and professional regulations and procedures for assessment have been adhered to;
- Making recommendations for the improvement of the programme to the relevant academics and academic manager(s)
- If appointed by the HEQC, making recommendations and on accreditation status to the HEQC’s Accreditation Committee.

Remuneration for programme evaluators is commensurate with the extent of their duties.

The Assessment of Postgraduate Research

Exit level outcomes and assessment criteria or an explicit description of the quality of research achievement required, plus thesis production and lay-out requirements, timetables and examination rules are clearly communicated to students on commencement of studies.

Internal and external examiners are appointed according to acceptable criteria; e.g. at least one examiner external to the institution per dissertation/ thesis is appointed. Examiners are appointed on the basis of qualifications, experience, expert knowledge in the research area and independence.

The institution provides clear guidelines to external examiners on the standard/ quality of research achievement required, on the nature of their task and on institutional examining regulations. The requirements for examination reports are clearly documented for examiners. External examiners report directly to the Senate (or its sub-committees) or equivalent of the institution.

There are clear guidelines on how assessment judgments, corrections and further work is communicated to students and monitored by their supervisors. Without undermining the principle of assessment by academic judgement, assessment decisions are made transparently and students are afforded reasonable access to information (e.g. examiners’ reports). There are appeal mechanisms for students and opportunities for them to defend their theses, e.g. through an oral defence.

Higher degree committees or similar structures consider examiners' reports qualitatively and make considered decisions about examination results.
3. The Assessment of Current Competence (RPL)  
The institution has procedures for recognising prior learning through assessment. This includes procedures for the selection of potential RPL candidates and personnel and structures to support them through the RPL process. The process involves the identification, documentation, assessment, evaluation and transcription of prior learning against specified learning outcomes so that it can articulate with admissions requirements to target programmes and be recognised for entry, exemption or accreditation purposes.

The assessment instruments developed for RPL are designed and implemented in accordance with the institution’s policies on fair and transparent assessment.

4. Assessment training  
The institution has an appropriate staff development strategy capable of improving its assessment practice. The institution makes provision for accredited training/education in assessment theory and practice at both basic and advanced levels. Novice academic staff are encouraged to take the former and those with responsibility for assessment above the course level, e.g. programme directors and external examiners, are encouraged to take the latter. There are adequate opportunities and incentives for staff to undergo this training.

The institution ensures that there is some assessment expertise in each department/school.

5. Rigour & security of the assessment system  
Adherence to Regulations
Regulations ensure the robustness of assessment procedures especially with regard to limiting opportunities for plagiarism. Breaches of assessment regulations are dealt with effectively. Institutional/faculty/professional regulations governing assessment are published and clearly communicated to students and relevant stakeholders. There is evidence that these are widely adhered to.

Students Rights & Responsibilities
Students are provided with information and guidance on their rights and responsibilities regarding assessment processes e.g. definitions and regulations on plagiarism, penalties, terms of appeal, supplementary examinations, etc.

Students have the right of reasonable access to assessment information.

Student appeals procedures are explicit, fair, effective and timely.

6. Explicitness, validity and reliability of assessment practices  
Explicitness
Qualification specifications meet SAQA’s, the Draft NAP’s and/or professional requirements.

The level of challenge of assessment is appropriate to the level at which the qualification is pegged.

The learning outcomes and content selection for a programme/course and how they are linked to assessment criteria and judgements are clearly stated and communicated to students.

Learning activities enable the realisation of the required assessment performances and both are aligned with specified learning outcomes.

There is evidence that this is common assessment practice across the institution.
### Validity
Assessment procedures are effective in measuring student attainment of the intended learning outcomes.

A range of assessment tasks and methods are employed to ensure that all types of learning outcomes (knowledge and skills) are validly assessed.

There is at least one integrated assessment procedure for each qualification which is a valid test of the key purposes of the programme. (Integrated assessment can involve the assessing of the products and the processes of learning and the use and application of knowledge and skills in real world contexts).

### Interpretation of Assessment Performance
There are published, clear and consistent guidelines/regulations for: marking and grading of results, aggregations of marks and grades, progression and final awards, compensation and/or condonement and the timeous publication of results. These guarantee the integrity of the qualifications awarded.

Interpretation of results, especially for student feedback, is qualitative as well as quantitative.

There is an appropriate mix of criterion- and norm-referenced assessment.

### Reliability
There is a system for maximising the accuracy, consistency and credibility of results regardless of who is assessing, (e.g. consistency of inter and intra-rater marking is achieved, there is concurrence between assessors and external examiners on the nature and quality of the learning achieved.)

### 7. Recording of assessment results
Student records are well organised, accurate, reliable and secure.

Assessment data are accessible to academic managers, administrators, teaching staff and students, as appropriate.

### 8. The use of assessment data for a range of explicit purposes, which include learning
Institutional policies and practice recognise assessment as a key motivator of learning and an integral part of the teaching and learning process. At the programme and course/modular level, assessment is systematically and purposefully used to generate data for summative purposes (grading, ranking, selection, predicting) and additionally for formative and diagnostic purposes, such as providing timeous feedback to inform teaching and learning and to improve curriculum and assessment practice itself.

Assessment data are also used to examine student performance trends and to inform institutional academic planning.
Suggested Data Sources
These suggestions are not intended as a check-list. They are offered rather to assist and guide providers on what may be appropriate sources of data.

- Institutional assessment policies, procedures and regulations, including those for RPL
- Guides for External Examiners / Programme Evaluators
- External Examiner / Programme Evaluators’ reports
- Correspondence with External Examiners/ Programme Evaluators
- Staff development strategy on assessment
- Faculty handbooks
- Programme and module templates
- Descriptions of assessment strategies and related student hand-outs
- Assessment instruments (tasks) with any accompanying, explanatory/supporting documents given to students
- Examples of students’ work with feedback, as well as marked exam and assignment scripts
- Mark sheets and marking guides
- Self evaluation and plans for improvement from lecturers
- Student opinion surveys which include comment on assessment directly or indirectly
- Student data-base

Glossary of Terms

Assessment of student learning – The practice of designing formal tasks for students to complete and then of making inferences from and estimating the worth of their performances on these tasks.

Criterion-referenced assessment - Student performance is judged against pre-specified criteria or standards.

Diagnostic assessment - This is used to predict academic potential, often used in placement testing.

ETQA – Education and Training Quality Assurance body.

Formative assessment – This is used to improve learning through the provision of feedback to students on their progress, serves needs intrinsic to the educational process.

Norm-referenced assessment – Student performance is compared with that of peers in the same class or cohort; is associated, with the averaging of scores and with attempts to obtain a bell-shaped curve of mark distributions.

Recognition of Prior Learning - A means of recognising what individuals already know and can do. RPL is based on the premise that people learn both inside and outside formal learning structures (including learning from work and life experience) and that this learning can be worthy of recognition and credit in formal education institutions. RPL is used extensively by those seeking admission to a course, advanced standing for a course or credits towards a qualification. RPL can also be used by those seeking entry to a particular field of employment, promotion or self-deployment.

Summative assessment – This is used to certificate the attainment of a certain level of education and to make educational decisions; formalised assessment used to serve needs extrinsic to the educational process.

Reliability – This concerns issues of consistency in assessment, for example would the same results be achieved on another occasion, have marker factors influenced the results in any way and how far can the results of this performance be generalised to other performances?

Validity – This concerns the accuracy and appropriateness of methods of assessment and the dependability of the inferences made on the basis of assessment results. Seeks to
answer questions such as ‘are we assessing the right things and are we assessing the things right?’

Note: In assessment design, there is usually a trade-off between achieving validity and reliability.

References and Further Reading


SAQA (South African Qualifications Authority) (2001b) Criteria and Guidelines for ETQAs, SAQA, Pretoria.


4. Student Development & Support

Focus Area
This Improving Teaching & Learning Resource for Student Development and Support applies largely to institution level with regard to policy and planning (the first moment of the quality cycle) and to programmes, courses and service units when it comes to implementation and monitoring (the second and third moments of the quality cycle). This Resource is closely linked to Resource No.3 on Access and Admissions, to Resource No.1 on Programme Planning & Design and to Resource No.6 on Staff Development.

A constructivist view of learning proposes that new knowledge arises from a structured relationship between the external cultural environment and the mind of the learner. This suggests that student learning is primarily influenced by structured teaching-learning interactions; but access to learning resources that support teaching and other social and personal factors in the learning environment also influence the quality of a student’s learning. Therefore the enhancement of student learning entails attention to both academic and support and development functions in the institution. For this reason, we advocate an integrated and holistic approach to creating the conditions for learning. We have therefore included both student development and support and student academic development together in this Resource. All aspects of institutional, curriculum and support service organization and delivery that impact on the quality of the student experience are pertinent to this area of focus. Depending on their histories and contexts, different higher education institutions will adopt or develop different models for structuring the provision of student development and support services and student academic development. The deliberate linking of aspects of institutional life that are often treated as disparate, serves to focus on the student and the integrated nature of the student experience. However, given that these functions and responsibilities are often distinct in institutional structures and processes, we have devised separate evaluative questions for student development and support on the one hand and for student academic development on the other.

Traditionally student academic development initiatives have been part of institutional strategies to widen access, diversify student profiles and cater for students who enter the institution academically under-prepared. Academic development programmes and curriculum innovations have therefore tended to be clustered around the entry and pre-entry levels and designed to cater for disadvantaged or under-prepared students. However, it is recommended that the scope of academic development should be expanded to include curriculum development initiatives at all levels of higher education, including postgraduate levels, and that, as appropriate, it should target all students for the development of specified graduate skills and/or to improve the quality of learning across an institution.

Rationale
Together with the production and dissemination of knowledge, student learning and development is the central purpose of higher education. Across the globe, the massification of higher education means that it is no longer an elite system with more or less homogenous enrolments. As student bodies become increasingly diverse, so providers need to respond by adapting their curricula and teaching and learning practices to the needs of their students. Furthermore, in South Africa, the public higher education landscape is being deliberately restructured to reflect more accurately the demographics of the country’s population. The Department of Education is concerned to increase the participation of blacks and women in higher education, especially in the areas of Science, Engineering and Technology and Business and Commerce. Overall, the Department of Education aims to increase the participation rate in higher education of the 20 – 24 year cohort to 20 % within the next ten to fifteen years (NPHE, 2001: 2.2). In addition an increase in the participation of adult and working learners is encouraged. Furthermore, if South Africa is to produce sufficient numbers
of graduates with the skills required by a modern economy, the number of postgraduate enrolments will also need to increase. This means that student development and support at postgraduate levels also demand attention. While addressing the social imperative for greater access and equity, the Department of Education aims simultaneously to improve the efficiency of the higher education system by increasing graduation rates as well as the number of students completing postgraduate qualifications. Although the number of students in the system from under-represented groups has increased significantly since 1990, there has not been a significant increase in the retention and graduation rates of historically under-represented groups, especially at postgraduate level (Badat, 2004).

Most South African higher education institutions are challenged to deal with increasingly diverse student profiles. This is being manifest not only in terms of race and gender but also in terms of educational background, levels of preparedness, language, ethnicity, religion and nationality (as increasing numbers of SADC students enroll at South African campuses), as well as age and maturity (as more adult, part-time and working students enter the system). As discussed above, South African higher education is under pressure to respond simultaneously to national drives for greater equity and for greater efficiency. The tension between equity and diversity on the one hand and efficiency on the other is likely to be resolved only if providers create appropriate learning environments in which students feel welcomed and supported and if providers develop theory-based, well-resourced curriculum strategies to enable first generation students to learn to control academic discourses and master their attendant cognitive practices.

Discussion

The multilingual nature of South African society can be viewed as both a resource for and a challenge to student development. The rich and diverse cultural heritage of students should be recognised and celebrated in campus life, whilst the need to produce graduates proficient in an international language has to be seriously addressed. To this end, providers should consider carefully the development and implementation of institutional language policies in which regional languages are at least recognised as languages of administration and campus life and the academic study and development of South African languages and their use as regional languages and as languages of learning is promoted through the formal curriculum. In addition, institutional language policies should include measures to support the development of the institution’s language of learning and the development of academic literacy and discourse.

In order to avoid a deficit model of second language speakers of English and to promote critical as opposed to reproductive academic literacy, the following principles are presented for debate and consideration for institutional strategies to deal with multilingualism and academic ‘under-preparedness’:

1. All students come to higher education with primary discourses (everyday ways of speaking and thinking acquired through their families and communities) that are inappropriate for the secondary academic discourses that they will have to acquire to function in higher education.

2. Because education is a process of enculturation as well as cognitive development, the learning of secondary discourses is always filtered through primary discourses and may conflict with or threaten a student’s ‘enduring sense of self’. A campus culture that affirms and respects students’ primary discourses and cultures will minimise such conflicts and encourage learning and development.

1 With respect to English language proficiency, it is well known that South African students typically demonstrate high levels of oral fluency in everyday English but weak reading and writing skills in formal academic registers.
3. The learning of languages and discourses for academic purposes is labour-intensive and time-consuming. Research shows that ‘quick-fix’, 'add-on' remedial courses have little value, particularly because few students are able to transfer what is learnt to the mainstream curriculum. Relevance and contextualisation are crucial for language learning and recurrent, meaningful and authentic practice is also required. This suggests that language proficiency development is best achieved if it is integrated with mainstream curriculum content and developed through real discipline-specific tasks. The design and teaching of such integrated programmes usually requires the collaboration of both discipline and language development specialists. Mainstream courses that lend themselves to academic development should be identified and included in credit-bearing academic development/ foundation programmes in which content is re-worked to provide a vehicle for the explicit teaching of the epistemology and cognitive practices, skills, discourse and genres, associated with the target discipline or profession.

4. Initially, students’ language competence needs to shift from everyday usage to controlling specialised academic discourses. This requires intensive mediation and scaffolding in which students have opportunities to interact with experts in the target discourse who can model the discourse and make explicit its cognitive, epistemic and discursive demands. This socio-cultural, constructivist approach to learning suggests that academic experts should ‘lend’ their conceptual frameworks to learners; successful mediation enables learners to build their own appropriate cognitive structures so that they can continue to learn independently thereafter. This process of mediation also requires a relationship of trust and recurring individual feedback. With regard to distance education, it is possible to achieve this level of mediation through carefully prepared texts and supportive, detailed, individual feedback.

5. Once students have gained control of specialised academic discourses and developed appropriate cognitive structures and knowledge bases, they need to develop the power to critique the social constructedness of the knowledges and discourses of higher education and to learn to critically frame competing discourses. This demands the development of meta-cognition and meta-awareness that again require the active re-organisation of learners’ cognitive frameworks through teaching-learning interaction in which the epistemologies of different knowledges and discourses are made explicit and open to question.

High quality provision of academic development in the South African context demands engagement with principles such as these. The application of these principles underpin some of the more successful academic development interventions pioneered in South Africa to date.

**Evalutative Questions**

The following questions may be adapted for use in self-evaluating the quality of student development and support services and student academic development provision at an institution of higher education:

**Generic Questions:**

1. How does the institution build an institutional culture that is student-centred and where all members of a diverse student body can learn and develop optimally?

2. Is there institutional policy (or guidelines) in place that conceptualizes and promotes student support and academic development in an integrated manner?
What structures are in place to give effect to this policy?

3. What system does the institution have in place for monitoring and evaluating the effectiveness of its student support services and student development programmes and for improving these?

**Student Development & Support:**

4. What student development and support services does the institution provide and how well are these resourced and managed? How have the student support services been adapted to serve a diversity of students?

5. How student-centered and efficient are the institution’s student administrative services? How have the student administrative services been adapted to serve a diversity of students?

**Student Academic Development:**

6. What model(s) of student / academic development has the institution adopted? Why were these models adopted?

7. How do faculties, schools or departments implement institutional policy and models of student development in their academic programmes and teaching-learning activities? What types of curriculum innovation are being implemented to promote student academic development? How does the institution ensure that this is integral to integrated with students’ mainstream studies?

8. How does the institution make provision for a multilingual society? How do faculties, schools or departments implement institutional language policy? How do they ensure that students whose home language is not the language of learning have adequate opportunities to develop academic literacy in the language of learning?

9. How is student performance monitored and students at risk of failure identified? Is timeous educational intervention provided for such students?

10. What staff development opportunities does the institution provide to enable teaching staff to improve their curriculum and teaching practice in order to cater for a diversity of student learning needs? In particular, how is teaching staff encouraged and rewarded for specific curriculum innovation to address the needs of second language and educationally disadvantaged students?
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<tr>
<th>Evaluative Questions</th>
<th>Suggested Good Practice Descriptors</th>
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<tr>
<td><strong>Generic:</strong></td>
<td></td>
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<tr>
<td>1. Institutional Culture &amp; Diversity</td>
<td>The institutional culture reflects the diversity of its student population and promotes an ethos of service and tolerance. Institutional culture is supportive of academically under-prepared students, women, minorities, students from SADC countries, other international students, HIV positive students, disabled students and adult or working (part-time) students and other under-represented groups. The institution's administration, communication, support services and curricula reflect and value diversity. For example, if working/part-time students are targeted, then RPL and student development programmes should be provided to enable mature students to re-enter HE after extended periods away from study, childcare facilities should be available and curriculum and administrative structures should be sufficiently flexible to accommodate their circumstances.</td>
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<tr>
<td>2. Policies/ Guidelines for Student Development &amp; Support</td>
<td>An institutional policy (or guidelines) provides a rationale for and outlines the institution’s intention to offer programmes and services that will afford all students adequate academic, environmental and personal support to ensure that they have a fair chance of achieving academic success. The policy provides principles and values to guide the provision of a comprehensive range of student development and support services responsive to the diversity of the student population and strategies for managing their implementation in an integrated manner. The policy includes a clear statement on language and language of learning policy, which is appropriate to a multilingual society. Strategies and outcomes of the policy are clear and measurable. The implementation of the policy is the responsibility of a dedicated senior manager. Knowledge of the student support and development policy and its services and programmes is widely disseminated throughout the institution.</td>
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<td>3. Monitoring &amp; Improvement</td>
<td>The institution monitors and evaluates its student development and support services at regular intervals to ensure that both academic staff and academic development staff and students are satisfied that these meet the needs of the student body and are widely used. Subsequent student development planning takes account of this feedback. Where there are indications that a programme or service does not fulfill its aims, student development strategies are re-assessed and improved.</td>
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<td><strong>Student Development &amp; Support:</strong></td>
<td>The institution provides a comprehensive range of student development and support services which meet its students' needs, enhance their educational experience and the learning environment and cater for a diverse student body. Examples of recommended services include financial aid, residences, library and laboratory services, sports and recreational facilities, orientation and leadership programmes, career guidance, curriculum guidance, gender support groups, health and counseling services, including support for students with HIV/AIDS, disabilities, computer and IT training and services. Services are available at the three important phases of a students' career: on first entering the institution, services to promote retention during their stay and the move from higher education into the world of work. There is evidence to show that these services are well-resourced and well-managed. The majority of students is aware of these services and finds them accessible.</td>
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<td><strong>5. Administrative Services</strong></td>
<td>Core administrative services such as enquiries, admissions, progression, fees and graduation are carried out efficiently and effectively within a student-centred ethos. Specific measures have been taken to ensure that the administrative services can deal with a diverse student population, e.g. through employing administrative staff from under-represented groups, through establishing an international office, through providing after-hours services for working students, etc. Administrative procedures are clearly communicated to students and are perceived by students to be transparent and fair. Administrative services are supported by an integrated management information system that is efficient, accessible, comprehensive and user-friendly.</td>
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<td><strong>Student Academic Development:</strong></td>
<td>The institution's models of academic development are appropriate and responsive to the needs of its students. The institution can provide a well-argued rationale for its academic development strategies in terms of its equity targets, its student profile, its students' prior learning, students' levels of language proficiency, the general academic skills and the specific disciplinary skills demands of its curricula.</td>
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<tr>
<td><strong>6. Models of Academic Development</strong></td>
<td>Curriculum Development The institution encourages and resources curriculum development initiatives that are responsive to the needs of its student body. These include additional enrichment programmes and integrated teaching and learning strategies that develop language proficiency, academic skills and academic literacy and enhance linguistic, cognitive and epistemological access to specific academic discourses and their practices.</td>
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<td>Availability and accessibility</td>
<td>An appropriate and comprehensive suite of academic development programmes with integrated curriculum strategies are provided to cater for the range of students at the institution. The availability and scope of academic development initiatives and programmes are clearly communicated to the student body. There are clear procedures for referral to these programmes and services. These may include certificate programmes in the Articulation Column as proposed in the Draft NAP 2001, foundation and bridging programmes, language development courses, integrated academic literacy initiatives, tutorial support, peer support, writing development services, computer literacy development within mainstream disciplines and post-graduate research development programmes, etc.</td>
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<tr>
<td>Foundation/ Bridging Programmes</td>
<td>Well conceptualised and theorized Foundation / Bridging Programmes exist in all faculties. The requisite skills and literacies, such as numeracy, reading and writing academic texts, computer literacy, library and research skills are taught within disciplinary content in an integrated manner.</td>
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<td>Selection Criteria</td>
<td>The placement of students in academic development programmes is carried out transparently and is based on clearly communicated selection criteria. Alternative validated selection mechanisms such as RPL or alternative entrance tests exist to widen access and ensure students are appropriately placed.</td>
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<td>Integration</td>
<td>Whether the curriculum is re-structured to cater for student academic development through ‘stand-alone’ programmes or through extended or enriched curricula, these initiatives are well integrated with or a part of the mainstream academic programmes of the institution. Academic development programme coordinators and/ or tutors work together with mainstream programme teams in order to assist teaching staff to develop innovative theory-based curricula which make the epistemic, cognitive and discourse demands of their disciplines explicit and to share feedback on student learning problems.</td>
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<td>8. Multilingualism and Language Development</td>
<td>The institution’s language development policies and strategies are supportive of multilingualism. Wherever possible, students’ home languages and cultures are affirmed and built upon. Opportunities for English language proficiency development are available in all faculties and are integrated with mainstream curriculum content. Curriculum design at programme and course level includes integrated academic literacy strategies which enable students to acquire the cognitive and discursive skills to function as members of specific disciplinary or professional communities. Where necessary, strategies for particular individuals or small groups of students are employed, always within the context of relevant discipline specific tasks.</td>
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## 9. Monitoring Student Performance

**Systems**

There are systems for monitoring student performance at institutional, faculty and programme levels in order to ensure timely identification of students who are at risk of failing in particular courses/programmes.

**Follow-up / advising**

There are strategies for advising students about ways to improve their chances of success and for referring them to appropriate academic development programmes.

**Re-admissions**

Rules for re-admission are clear, defensible and sensitively applied. Wherever possible, students are advised about alternative routes to obtaining a qualification or training.

**Systems of appeal**

The institution has a system for appeal against summative assessment and exclusion processes. The appeals procedures are explicit, fair and effective.

## 10. Staff Development

The institution provides educational expertise and resources to facilitate curriculum development initiatives. Staff development is provided to enhance lecturers’ and tutors’ skills for working with under-prepared and second language students at both undergraduate and postgraduate levels across the curriculum.

A formal staff development programme is available that takes into account the need to prepare teaching staff to develop curricula that are responsive to student diversity. Tutor/mentor development and training is also accredited through this programme.

The achievement of excellence in teaching and curriculum development is recognized and rewarded through the institution’s promotion criteria and awards system.
Suggested Data Sources

These suggestions are not intended to be used as a checklist. They are offered rather to assist and guide providers on what may be appropriate sources of data. This list will need to be adjusted depending on the nature and context of the institution, faculty, school, department or programme under consideration.

Institutional level

- Institutional mission statement
- Documentation on policies and procedures for student admissions, access and student development
- Documentation on policies and procedures for multilingualism/ language, student development and support services, academic development
- Policy documents on the quality assurance of services and programmes
- Documentation on policies for the appointment, induction and training of student development and student support staff

Faculty, School, Departmental or Programme level

- Documentation on planning and budgeting for academic development programmes and curriculum innovation
- Curriculum documentation relating to curriculum innovation for academic development
- Documentation on the promotion of support services and student development programmes for students
- Student performance tracking systems
- Relevant evaluation and review reports and improvement plans

Glossary of Terms

**Student development** refers to those extra-curricula campus activities designed for quality of life and for personal and social development such as leadership development, sport, gender support groups and student political, cultural, religious and social societies as well as appropriate forms of communication and support for off-campus students.

**Student support** refers to those services that support students in their day-to-day lives on campus as well as those services that support them in their academic work. This includes, amongst others, services such as financial aid, bursary and loan schemes, residences, student counseling, library services and resources, IT provision, health services, support for students with HIV/ AIDS, etc.

**Student academic development** refers to the curriculum strategies employed at the teaching-learning interface to enhance the quality of learning and the academic performance of students. In South Africa, a specific meaning of student academic development is alternatively understood as academic development or educational development, referring specifically to institutional responses to the needs of under-prepared students. It is important to recognize that all of these terms most centrally refer to curriculum development (in its widest sense, including the design of content and forms of delivery and staff development). Student academic development therefore refers to both specific ‘stand-alone’ or ‘add-on’ programmes (e.g. Bridging, Recruitment, Preparation or Foundation Programmes aimed at the specific needs of a particular group of students), as well as to curriculum development initiatives in the mainstream academic curriculum at all levels of higher education (i.e. NQF levels 5 – 10 and may also include those at level 4).
References and Further Reading


6. Staff Development

Focus area
This Improving Teaching and Learning Resource applies to staff development operations at institutional level. However, the effectiveness of staff development for teaching is most evident at the course/module level, i.e. at the interface of staff-student interactions. For this reason, we have added a sub-section to this Resource on the Self-Evaluation of Teaching (see 6b below), which refers to the review and improvement of teaching at course level.

Staff development in this Resource, is understood to refer to the professionalisation and development of academic staff and academic development staff, i.e. the focus is on those who teach. However, we are aware that staff development should be approached holistically. We are also aware that, in our context, academic development, student development and support services remain an under-resourced area requiring development. For the purpose of this Resource then, staff development is understood as an umbrella term for developing the capacity of higher education staff and in particular those who teach, to fulfill their professional roles effectively. This includes training, educating, capacity-building and individual consultation. We understand training to refer to the acquisition of occupational or job-related skills, educating to refer to the usually formal process of learning and understanding education theory and practice and capacity-building to refer to the informal development of targeted skills and knowledge. Staff development has traditionally been conducted on an informal basis, but increasingly a mixed model is being adopted in which informal approaches are complemented with formal programmes of professional development.

It is also important to acknowledge the fact that increasing numbers of academic staff work on a contractual and often part-time basis. It is unlikely that staff who are paid to teach by the hour will be motivated to voluntarily attend staff development workshops or programmes. It is also likely that institutions will be less inclined to invest in their development. In this situation, it is all the more vital that institutions be prepared to provide incentives for part-time contract staff to invest time and energy in developing themselves as professional educators. In these circumstances, a series of short informal capacity-building workshops are likely to be the preferred mode of delivery, as opposed to the heavy commitment required for studying for formal postgraduate qualifications in higher education.

Rationale
Globally, changes in the environment in which institutions of higher education operate has led to pressures to change approaches to teaching and learning and to the ways in which it is managed. Some of these trends in changing teaching and learning practice include:

- A shift in emphasis from content and teacher-centred teaching and instructional delivery to student and concept-centred learning;
- A shift in emphasis from a supply driven, discipline-based curriculum to a demand-driven more interdisciplinary and contextualised curriculum with performance, problem-solving and integrated outcomes;
- A shift from exclusive academic control over the curriculum to stakeholder participation in curriculum negotiations.

Furthermore, the challenges of teaching the ‘non-traditional student’ and the development of educational research and new understandings about teaching and learning have resulted in the critique of traditional teaching practices and approaches as being inadequate to meet the needs of the ‘new student’. Technology has also revolutionized teaching and learning. Academic staff members now face the challenge of introducing effective ways of engaging technology for learning.
If lecturers are to become knowledgeable about new educational theories and methods and apply them effectively to their changing teaching contexts, the provision of staff development for teaching is critical. Higher education lecturers now require knowledge and skills in curriculum planning and design, assessment, multi-method delivery, software and learning resource development, mentoring, teamwork and a knowledge of learning theory. It is a rare individual who can successfully develop these skills in a voluntary, amateurish manner. The idea that higher education teachers require no preparation or training as educators is fast becoming an anachronism.

In the First World, during the last two decades, the training of higher education teachers has become common practice. It is compulsory for tenure nationally in Norway, it has become common institutional practice in Holland and Australia, and, in the USA, the Preparing Future Faculty movement is gaining momentum. In the UK the establishment of the Institute of Learning and Teaching (ILT) in 1999 as an accrediting body for entry into the profession of higher education teaching has resulted in a huge increase in staff development training programmes and enrolments. The establishment of the ILT is part of an integrated national strategy to improve quality in higher education by the HE Funding Councils which includes the establishment of a Learning and Teaching Support Network and the funding of 24 ‘subject centres’ to establish discipline-specific communities of good teaching practice. Many British institutions now link their objectives for staff development and training to their human resource strategies and to their institutional learning and teaching strategies. The practice of continuing professional development has also become widespread in higher education.

In addition, there is general recognition of the need to strengthen the skills of leadership, staff management and performance management at all levels in higher education institutions. A relatively recent development is research and a burgeoning literature on specifically academic management and leadership and organizational development. Staff development should therefore provide opportunities for training, education or capacity-building in teaching practice (which includes curriculum design and development and assessment), higher education studies and research, academic management and leadership, organizational development (including quality assurance) as well as in information technology up-grading.

In post-1994 South Africa, the transformation of the higher education system demands a professional corps of academic staff and academic development and support staff who can meet the learning needs of their students and respond appropriately to the demands of the new policy environment. In order to realise new and ambitious policies, policy makers have been keenly aware of the need to build the capacity of academic staff. The White Paper on Education (1997:33-34) and other policy and discussion documents such as A New Academic Policy for Programmes and Qualifications in Higher Education (2001:119) highlight the urgency of professionalising educators in higher education institutions. The HEQC has likewise identified staff development as one of the key focus areas for enhancing the quality of teaching and learning in the South African higher education system (see Criteria for Institutional Audit, Criterion No.9, HEQC 2004:12).

Staff development is primarily an institutional responsibility and is operationalised within an institutional context, however it is increasingly influenced by national policies and global trends. Institutions respond to these demands and take up national policies in different ways depending on their missions, contexts, institutional culture, resources, etc. However, given that institutional performance is ultimately dependent on staff effectiveness, all South African higher education institutions should provide resources and incentives for their staff to meet their own professional goals and to contribute to the realization of institutional missions. Staff development should be an integral part of an institution’s human resource development strategy and practice rather than an isolated, optional activity. Furthermore, the development...
of academic staff should be at the centre of any attempt to respond to the challenges currently
facing professionals in higher education.

Discussion
Traditionally, the professions have held a strong service value orientation. They have been
based on an unspoken social contract that professionals exercise specialist knowledge and
expertise disinterestedly and for the common good. In exchange, society has granted the
professions the power of self-regulation; it has therefore been assumed that reflection and
self-improvement are integral to being a professional. However, in the last two decades there
has been a shift in authority from academics (as professionals) to ‘employers’ (governments,
managers and business) and to ‘consumers’ (students). The reason for this appears to be a loss
of trust and the crumbling of the social contract between the academy and society, largely as a
result of the academy’s loss of its monopoly on knowledge production and the undermining
of its service ethic by market values (Barnett, 1997). The current dominance of
‘managerialism’ in higher education and the focus on the market-related extrinsic ‘goods’ of
higher education have led to an identity crisis for many academics who do not identify with
the externally imposed extrinsic ‘goods’ higher education is supposed to produce and who
consequently experience an undermining of their authority and status. This may well be due
to lack of public debate about the purposes and values of higher education, which now tend to
be given top-down from governments and managers.

We would argue that it is important for academics reclaim their professionalism and that one
way to do so may be to revive a commitment to learning (about teaching and learning) as a
professional value and an intrinsic ‘good’ of higher education. In his well-known Scholarship
Reconsidered (1990), Boyer argues for four types of scholarship: discovery, integration,
application and teaching. As we argued in the Introduction, teaching here should not be
understood to mean simply the transmission of knowledge, but the rather the challenge of
transforming the learner. This endeavour is worthy of scholarship and we would argue, needs
to be given greater respect and support in the academic community. A commitment to the
scholarship of teaching could be pursued deliberately by academics, who, as professional
educators, take control of their teaching practice and seek to reflect, research, build theory and
improve practice, supported by communities of good teaching practice. Such educators would
be in a position to use quality assurance measures to improve their teaching and learning,
provided they were given the institutional and deliberative space to do so.

In the Introduction, we suggested that teaching be defined as planned efforts to bring about or
facilitate learning in others. We also suggested that teaching does not automatically result in
learning; there is no direct cause and effect relationship between the two activities. If the link
between teaching and learning is uncertain and unpredictable, then it follows that any attempt
to define good teaching will be limited; good teaching practice cannot be reduced to a formula
or set of generalisable laws. If this were the case, then professional development would mean
simply the handing over of a body of rigorous theoretical knowledge to future practitioners
that they could then apply instrumentally to well-formed problems in the field. However,
educational theory is never ‘pure’ in the classical scientific sense and it can only be validated
in specific educational practices. The ‘classroom’ with its unpredictable human subjects and
any number of uncontrollable variables is the educational ‘laboratory’; there is no other. The
advancement of educational knowledge therefore depends on linking the findings of research
(theory) with its effectiveness in action (practice), and on building theory from effective
practice; it is therefore always bound up in specific contexts and contingent here-and-now
judgments. Thus educators can never be sure of ‘getting it right’ beforehand because the
exercise of professional expertise is always more than the routine application of established
theory. The application of educational knowledge to practice always entails self-conscious
analysis and interpretation of a specific situation. The practitioner must re-interpret his/her
professional expertise in each new situation. Educational knowledge is therefore developed within and alongside professional practice.¹

This understanding of the scholarship of teaching and its practice underpins the decision by the Working Group not to produce an HEQC Resource specifically on good teaching practice (see Introduction). We feared, firstly that such an endeavour would be bound to fail and would be unable relate to the diversity of teaching contexts that exist in South Africa; and secondly, that it might be used to develop prescriptive, top-down accountability approaches to the quality assurance of teaching which would be go against our understanding of the nature of teaching and learning itself.

However, good teaching is not just an individual responsibility, it is also dependent on environmental, institutional and structural factors such as resourcing, staffing, workloads, venues, libraries, time-tabling, good leadership and management, incentives and human resource policies and practices. We suggest that it is these institutional factors that affect teaching practice and that either support or discourage the conditions for transformative learning to happen, that are appropriate for an external quality assurance agency to scrutinize. Invariably, factors such as these, which are beyond the control of the individual lecturer, militate against creative and innovative teaching practice and also against professional development for teaching. A key issue in this regard is the low status of teaching in research universities in particular. It is here that leadership is required to raise the profile of teaching and the scholarship of teaching and to ensure that it is adequately recognized and rewarded through institutional employment policies and practices such as appointments, tenure, promotion, incentives and appraisal.

A further factor militating against professional development for teaching is the mental models that academics have of teaching and of themselves as teachers. Because the majority of academics have never received any professional training in teaching they tend to rely on common sense beliefs about and habitual practices for teaching. For example, if a lecturer believes that teaching involves the imparting of information to students, then he/she will understand professional development to mean learning ways of doing so more efficiently and effectively. It is only once lecturers understand their role to be the facilitation of learning, and preferably learning that is transformative, that on-going professional development and an interest in the scholarship of teaching begins to make sense. Thus we suggest that the starting point for staff development should be the individual lecturer’s own teaching practice and reflection on that practice, preferably from within a supportive community of educators and peers.

This raises the issue of models or approaches to staff development. As Graham Webb has shown in his book Understanding Staff Development (1996), this is fundamentally an ontological and epistemological matter. However, without entering these debates here, suffice it to suggest that there are at least three approaches commonly practiced in South Africa currently. The first is the skills development, competency-based approach that is promoted by the Department of Labour, the SETAs and SAQA. Whilst this approach works well for the development of given technical skills such as IT, data-base management and conducting library searches, we suggest that, given the nature of teaching as discussed above, it is inappropriate for developing the scholarship of teaching.

The second approach might be called the development approach, which is usually the approach adopted in the implementation of Teaching and Learning Strategies, advocated in the Introduction above. Whilst Webb (1996) critiques this approach for exhibiting ‘Enlightenment optimism’, we suggest that provided development is understood to be open-

¹ These ideas have been popularised in Schon’s influential books The Reflective Practitioner (1983) and Educating the Reflective Practitioner (1987).
ended, contested and susceptible to capture by particular interests or ideologies, it remains a useful approach. The development approach is useful because it is usually based on a top-down management strategy that ‘gets everyone on board’, provides motivation and incentives and is able to deal with the environmental and institutional factors related to teaching discussed above. The development approach is usually most effective when strategies for changing teaching practice are initiated from the top but implemented at departmental or school level by teams of academics. However, if change is to be transformative rather than reproductive, these teams will need education or academic development specialists to work closely with them to provide the educational theory and critique necessary to challenge old assumptions (and to do so tactfully!). This makes the model an expensive, labour-intensive one and it success is never guaranteed.

The development approach to staff development is often complemented by the ‘action research – reflective practitioner’ model that advocates setting up action research groups within which individuals can reflect critically and improve their own practice. Action research is defined as

 collaborative, critical (and self-critical) enquiry by reflective practitioners who are accountable to make the results of their enquiry public. They evaluate their own practice and engage in participative problem-solving and in continuous professional development. (Zuber Skeritt 1993:47)

Action research understands the research process itself to involve social change. Thus practitioners plan, implement, document, analyze and reflect on changes to their practice with a view to continuous self-improvement. The findings of action research are fed directly back into practice in an iterative change process. This model of staff development offers academics the possibility of developing an evidence-based, critical view of their teaching practice. Its advantages are that it is a more bottom-up approach that can be owned by academics and puts the responsibility for and power to change in the hands of individual practitioners. In so doing, it also acknowledges the complex, contextualized nature of teaching and of professional work in general. The weaknesses of this model is that it is often difficult for individuals to sustain a continuous cycle of enquiry, reflection, planning and action, unless they are supported by a team and by the institutional leadership and environment. Furthermore, experience does not equal learning, and reflection on experience is not always sufficiently informed and critical to result in sustained improvement of practice. Again, this model works best when there are dedicated educational specialists who can facilitate groups of reflective practitioners and help them to ensure that their practice is adequately informed by educational or learning theory and visa versa. The model of self-evaluating teaching in a ‘safe space’ proposed in Resource 6b below is based on this ‘action-research - reflective practitioner’ model and attempts to put the quality assurance of teaching at the service of ‘reflective practitioner’ development.

In concluding this discussion on approaches to staff development, we suggest that the three models presented here are not mutually exclusive and that they can be used in complementary ways depending on the purpose and nature of the professional development required. In fact we would argue that in the higher education context, the improvement of teaching can be well served by a judicious combination of the development and reflective practitioner approaches. This would entail the creation of the conditions for action research to improve teaching practice to be initiated, supported and resourced by institutional management whilst the detail of how this gets done and control of the process would lie in the hands of small groups of academic ‘reflective practitioners’ supported by education specialists.

Having considered approaches to staff development, we now turn to local staff development practice. Despite the existence of small pockets of good practice, initiatives to professionalise teaching in higher education in South Africa are still at an early stage of development. The staff development movement in South African may be weakened by the lack of a professional association for HE educators to drive it. Initiatives to date have been taken, not by academics
themselves, but by staff development and academic development practitioners and by human resource development officers.

Firstly, as part of the SAQA drive to generate standards for the NQF, a group of mostly staff developers formed an HET ‘standards-generating body’ (SGB) that managed to develop a unit-standards based Postgraduate Certificate for Higher Education and Training which is currently registered on the NQF. This qualification at Honours level 7 (level 8 in the newly proposed interdependent NQF) and comprises 120 credits. The purpose of this qualification is stated as follows:

The PGCHET is a post-graduate qualification intended to provide professional development and recognition for HET practitioners who lack formal HET teaching qualifications. It will enable persons with high levels of discipline-related qualifications to qualify themselves for specific roles/obligations as practitioners in HET. It is directed at persons with HET teaching experience at NQF levels 5 and above and persons wishing to specialise in HET as a field of study. The target group, therefore, includes in-service academic staff at HET institutions and academic staff registered for HET learnerships in terms of the Skills Development Act.

It offers the following unit standard options:

Core Unit Standards: (100 credits)
- HET 01: Analyse Higher Education and Training mission, context and legislation (10 credits)
- HET 02: Design, develop and implement assessment of learning in Higher Education and Training (20 credits)
- HET 03: Mediate and facilitate learning in Higher Education and Training (20 credits)
- HET 04: Mentor and advise learners in Higher Education and Training (10 credits)
- HET 05: Conduct research into Higher Education and Training practice (10 credits)
- HET 06: Interpret and design learning programmes and modules for Higher Education and Training (20 credits)
- HET 07: Manage learning facilitation in Higher Education and Training (10 credits)

(The core unit standards are compulsory)

Elective Unit Standards: (20 credits)
- HET 08: Manage a Higher Education and Training learning programme (10 credits)
- HET 09: Design and develop web-based learning (WBL) (10 credits)
- HET 10: Design and implement experiential learning in a workplace (10 credits)
- HET 11: Supervise research in Higher Education and Training (10 credits)
- HET 12: Moderate assessment (10 credits)

A second South African initiative is that of the Higher Education Staff Development Initiative (HESDI) which was established in 2000 by human resource development and academic development practitioners to promote the professionalisation of academic and support staff in higher education. HESDI is currently working with the Education Training and Development Sectoral Education Training Authority (ETDP SETA) to establish learnerships and skills programmes in higher education. Learnerships for administrators, laboratory and educational technicians are being developed as well as a learnership for academics leading to a SAQA registered qualification. This means that institutions will be able to claim back from the Skills Levy Fund for training offered to employees in this way.

Whether these initiatives will result in greater take-up of professional development by institutions and particularly by individual academics remains to be seen. Across the country there currently exists at least a dozen formal academic staff development programmes at both universities and technikons as well as several non-credit-bearing induction programmes for new staff. Most of the former lead to a range of NQF registered qualifications – postgraduate certificates, postgraduate diplomas and coursework Masters degrees. These programmes have generally been developed independently by higher education development specialists to suit particular institutional contexts. Some programmes are based on the ‘reflective practitioner’
model, whilst others adopt a competency and skills development approach. Many of the programmes pre-date the development of the SAQA qualification standards and go beyond the Postgraduate Certificate or Diploma level, whilst others conform loosely to the specifications of the PGCHET. Incentives for academic staff to enroll for such programmes include remission of fees, recognition of the qualification for promotion or reward, annual distinguished teacher awards and, in a few cases, a higher education teaching qualification is a requirement for confirming tenure for new staff. However, with a few exceptions, numbers enrolling for these programmes remain small, except where it has become a compulsory requirement for new academic staff. Some of these programmes in higher education serve a second stream of academic and academic development staff who wish to go beyond improving their practice and who wish to pursue the scholarship of teaching as a serious research focus. For this group, some of these HE programmes, usually located in Faculties of Education, offer full Master’s and Doctoral research degrees.

Informal staff development activities in South African higher education are less well documented, but we assume that most institutions currently make some provision for informal training and capacity-building activities for their staff. These tend to be better attended than the more demanding formal programmes as they are usually require short-term commitments and deal with targeted skills or issues.
Evaluative Questions
The following questions may be adapted for self-evaluating the quality of the policy and practice of staff development in institutions of higher education:

1. Does the institution have an institutional staff development policy/plan/guidelines that is aligned with its own mission as well as with national policy frameworks?

2. How are staff recruitment strategies and selection and promotion criteria aligned with the institution’s staff development policy and equity targets?

3. How does the institution provide career development for all academic staff from the commencement of their employment until resignation or retirement?

4. How does the institution integrate its staff development strategies with broader staff performance and appraisal systems?

5. How does the institution promote the scholarship of teaching? To what extent does the institution recognize the scholarship of teaching as a valid academic career path? How does the institution provide the necessary expertise, resources and structures for the development of teaching staff?

6. How does the institution monitor, review and improve its staff development provision?

7. What procedures are in place whereby a staff appraisal or performance management system feeds into the review and improvement of staff development and into institutional quality improvement plans?
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<th>Evaluative Questions</th>
<th>Suggested Good Practice Descriptors</th>
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<td>Staff Development</td>
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| 1. Institutional policies, guidelines or plans on staff development | The institution has a coherent staff development policy that is aligned with its mission and goals and teaching and learning strategy; it is based on a staff needs analysis that also takes into account relevant market, social and national developments. For example, the staff development policy/ plan is in keeping with the following national legislation:  
*The National Plan for Higher Education* – the policy takes cognisance of the requirement for ‘improved staff equity’ (2001: 3.3)  
*The Employment Equity Act* – The policy takes cognisance of an ‘equity plan’ to recruit staff from designated groups and to provide professional development activities in order to attain equity in the institution’s staff profile.  
*The Skills Development Act (SDA)* - the policy conforms to these requirements; e.g. a Skills Development Facilitator is appointed who integrates the academic staff development plan with a broader institutional training and development plan.  

The staff development policy is supported by academic leadership and is widely disseminated and adhered to across the institution.  
The institution has set aside adequate resources and time in staff workloads for the implementation of its staff development policy/ plan. |
| 2. Alignment of recruitment strategies, selection and promotion criteria | Staff recruitment and selection strategies and criteria are systematically aligned with the staff development and human resource policies.  
Other attributes and competencies apart from formal qualifications, such as personality, values, commitment, etc., are considered in the recruitment strategy.  
There are explicit procedures for staff mobility and development, linked to performance and equity targets. These are made clear to prospective and current staff and are applied transparently.  

The recognition and reward of excellence in teaching is deliberately promoted and receives the same priority and status as excellence in research. *Ad hominem* promotion criteria reward performance in research, teaching and academic management equally. |
| 3. Comprehensive career development provision | There is a systematic staff/ career development programme directed towards the realisation of organisational and individual objectives. This is based on an analysis of key developmental and training needs such as the scholarship of teaching and management and leadership development. Staff development provision consists of an appropriate mix of formal NQF registered programmes and informal workshops, development initiatives, etc. for continuing professional development, usually designed in response to identified needs, as well as individual consultation. The staff development programme is explicitly linked to procedures for staff rewards, promotions, mobility and development. Overall there is evidence that the staff development programme and activities have a positive influence on the satisfaction of staff and on their performance.  

The institution invests in innovative and comprehensive forms of staff development provision and support, for example: |
Staff orientation/ induction
The institution provides a comprehensive induction/orientation programme for new staff members.

Internship and Mentorship for new lecturers
There is an organized programme of training and development for academic staff members on probation. Ongoing support of junior staff is provided through mentorship by senior colleagues with educational expertise.

Skills Programmes and Learnerships
Provision is made for IT and other necessary skills up-grading. Skills programmes may be supported by the ETDP SETA and could be offered for different teaching roles, e.g. junior lecturers, tutors, mentors, demonstrators and student assistants.

Research training and development
Young staff members are encouraged and supported to complete higher research degrees.

Development of Academic Leadership
Training programmes for Heads of Departments, Deans, etc. are offered.

Development of HE Educational Expertise
Ongoing support for the development of expertise in higher education is provided for academics, staff developers, academic development staff, quality promotion staff, etc.

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<th>4. Integration of staff development with performance/ developmental systems</th>
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<td>The staff development plan is operationalised within an institutional performance management system. The plan could also be informed by a ‘skills audit’ (an institutional audit of staff education and training needs).</td>
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<tr>
<td>The staff development plan is aligned with teaching and learning strategies and curriculum development plans in order to effect relevance to teaching practice.</td>
</tr>
<tr>
<td>The staff development plan is implemented in a working environment that is conducive to carrying out good teaching practice, that enhances an employee’s work climate and also enables the holistic development of staff.</td>
</tr>
<tr>
<td>Professional development activities are integrated into the job descriptions and workloads of academic staff.</td>
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<tr>
<td>There are procedures in place to manage poor performance; training and support are given to under performing staff.</td>
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<th>5. Promotion of the scholarship of teaching and resources for staff development</th>
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<td>Higher education studies is recognised as an important sub-discipline worthy of academic study and research.</td>
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<tr>
<td>Accredited programmes in higher education are offered that lead to qualifications registered on the NQF. Such programmes are designed to provide academic staff with opportunities to apply educational theory to their own practice and to develop their own teaching specialisations.</td>
</tr>
<tr>
<td>The programmes are offered by suitably qualified and credible experts in higher education studies.</td>
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<tr>
<td>Research into teaching practice is encouraged, e.g. the institution provides staff with release time, funding and access to educational expertise in order to conduct research into teaching practice.</td>
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<tr>
<td>The quality management and / or staff development and appraisal systems support the development of teaching portfolios to promote self-reflection on teaching practice</td>
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in an unthreatening climate, (see 6b below).

The institution recognises the scholarship of teaching as a valid career path which is built into its appointment, tenure, promotion and appraisal systems. It provides incentives and awards for good teaching practice and research on teaching, e.g. a Distinguished Teacher's Award, which has research on teaching as a key criterion.

The institution provides financial support for research into teaching and bursaries or remission of fees for study for teaching qualifications.

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<th>6. Monitoring, review and improvement of staff development provision</th>
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<tr>
<td>The staff development policy is monitored using a range of data sources, such as the evaluation of staff profiles, self-evaluation by teacher and the evaluation of staff development courses and programmes.</td>
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<tr>
<td>Review of the staff development plan is also informed by external factors such as new national policies.</td>
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<td>The institution has a system in place to make necessary changes to the SD plan in response to the feedback obtained through evaluation.</td>
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<th>7. Staff appraisal/ performance management feeds into review and improvement of the SD plan</th>
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<td>There are well-designed policies and procedures in place for staff appraisal. These include guidelines on who should carry out appraisals, confidentiality of the appraisals and the cascading of goals (from organizational, faculty and departmental level to programme teams and individuals).</td>
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<tr>
<td>Staff members are given the opportunity to first self-evaluate their own performance against negotiated goals/ outcomes (this includes the self-evaluation of teaching).</td>
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<tr>
<td>Weakness in staff performance are identified and dealt with sensitively by line-managers. Further staff development activities are negotiated with the staff member concerned and provided by the institution.</td>
</tr>
<tr>
<td>The overall results of staff appraisals inform staff development plans and reviews.</td>
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<tr>
<td>Improvement plans are acted upon, properly resourced and monitored.</td>
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6b) The Self-Evaluation of Teaching

In this Resource, the term ‘self-evaluation’ is understood to mean the review of teaching practice conducted by the teacher or lecturer concerned in order to examine what s/he does in a rigorous fashion in order to improve practice.

Rationale

We suggest that as part of staff development, institutions should provide ‘safe spaces’ for their teaching staff to undertake formative reviews of their own teaching practice, (i.e. the self-evaluation of teaching as opposed to that of programmes and courses, see Resource No.2). The self-evaluation of teaching should have no threats or sanctions attached and should not be used directly for summative purposes. In this way self-evaluation can be used to develop ‘reflective practitioners’ and through the action research method can be an important means of gaining immediate improvements in the teaching practice of individual academics. For this model to work, it is crucial that the academics concerned own the self-evaluation process, its findings and improvement measures. For this reason we have separated course review from the self-evaluation of teaching and have included the latter in this Resource on Staff Development.

Discussion

In a multi-cultural, multilingual country, with a history of inequity, such as South Africa, an understanding of staff development for teaching as the provision of a set of ‘across-the-board’, generic teaching skills could improve the quality of teaching to a point, but it is unlikely to promote excellence and ownership because of the highly contextualised nature of teaching and learning and because of the very diverse contexts in which higher education teachers work (see Discussion above). A ‘one-size-fits-all’ approach to staff development for teaching is unlikely to enable higher education lecturers to meet the diverse needs of students from differing linguistic, social and cultural backgrounds, without even taking into account variations in institutional teaching environments such as infrastructure and resources. Thus, the provision of basic generic courses on teaching skills in higher education need to be complemented by initiatives to encourage higher education teachers to become ‘reflective practitioners’, who are able to observe and reflect upon the extent to which their teaching is ‘fit for its purpose’ in a given context. As a result of this process of observation and theory-based reflection in a supportive educational community, ‘reflective practitioners’ are able to adapt and improve what they do in an on-going way. The self-evaluation of teaching is key to reflective practice, since it is the means by which educators observe and gather data on their practice in order to facilitate reflection and improvement. If observation and reflection on teaching are to be rigorous, self-evaluation needs to interrogate the assumptions (particularly about learning) on which teaching is based, as well as teaching strategies/approaches themselves. This is particularly important in South Africa where, assumptions about what students ought to know are often invalid because of the poor quality of the learning experiences that have previously been made available to them.

Although self-evaluation as a part of reflective practice has the potential to enhance the quality of teaching significantly, it can be problematic because of the (perceived) dangers inherent in teachers revealing what might be considered to be poor or ineffective practice. If self-evaluation is to be used to identify areas where practice does not meet the demands of particular teaching contexts, teachers need to be assured that the identification of problem areas will not result in negative consequences. An environment needs to be created in which it is ‘safe’ for teachers to observe, reflect and deliberate upon their practice openly and honestly within an informed and supportive group.

The self-evaluation of teaching requires teachers to elicit perceptions from a number of different perspectives (i.e. to triangulate data sources). Ideally, students’ perceptions on the
quality of teaching need to be balanced with the perceptions of peers. A peer, in this case, might be a colleague, a member of a staff development or quality promotion unit, an external examiner or any other peer who can act as ‘critical friend’ and whose perceptions are based on some educational expertise. The teacher’s own perceptions regarding the extent to which his/her teaching enables learning to happen also needs to be taken into account along with perspectives derived from educational theory and research. If student perceptions alone are allowed to dominate, then evaluation runs the risk of simply becoming an exercise in gauging client satisfaction.

When the self-evaluation of teaching is part of reflective practice, it can enhance the scholarship of teaching since it promotes the critique of practice that is often facilitated by conversations about teaching amongst peers and by reference to educational theory and literature. Self-evaluation and reflection on higher education practice that is written up in a teaching portfolio or published should be recognized and rewarded in the same way as are other forms of research.

In a quality management system, findings from the self-evaluation of teaching and subsequent plans for improvement should feed into a staff appraisal system. In this way the self-evaluation of teaching becomes a non-threatening way of identifying problems that need to be addressed and of setting future professional development goals.

**Evaluative Questions**

The following questions may be adapted for use in self-evaluating the quality of procedures an institution puts in place to promote the self-evaluation of teaching as an aspect of staff development:

1. How does the institution promote the self-evaluation of teaching as a means of enhancing reflective practice?

2. How does the institution ensure that self-evaluation of teaching takes place within a ‘safe’ space?

3. To what extent is support available for the self-evaluation of teaching?

4. How is the self-evaluation of teaching recognized and rewarded?

5. How does the self-evaluation of teaching form part of a more comprehensive staff appraisal system?

6. Can it be demonstrated that self-evaluation improves the quality of teaching?
<table>
<thead>
<tr>
<th>Evaluative Questions</th>
<th>Suggested Good Practice Descriptors</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>The Self-Evaluation of Teaching</strong></td>
<td>Academic staff are encouraged to evaluate their own teaching on an on-going basis in a policy/set of guidelines on staff development which is aligned with the institution’s vision/mission statement and/or Teaching and Learning Strategy.</td>
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<tr>
<td></td>
<td>The self-evaluation of teaching is also encouraged through the institutional reward system (usually via the submission of teaching portfolios for peer review). The policy/set of guidelines and reward system are actively managed and implemented through institutional structures and through the promotion of a ‘culture’ of reflection on teaching.</td>
</tr>
<tr>
<td><strong>1. The Promotion of the Self-Evaluation of Teaching</strong></td>
<td>Policy/guidelines exist which ensure that data elicited from student or other perspectives cannot be used without the permission of the teacher concerned.</td>
</tr>
<tr>
<td></td>
<td>The policy/guidelines state that data from a single perspective is not deemed to be an evaluation without being balanced with perceptions from other perspectives.</td>
</tr>
<tr>
<td></td>
<td>The policy states that problems identified through self-evaluation will not have negative consequences for the staff member concerned, provided they are addressed.</td>
</tr>
<tr>
<td></td>
<td>Self-evaluation as part of reflective practice is documented by means of a teaching portfolio which is open to scrutiny by peers.</td>
</tr>
<tr>
<td><strong>2. Provision of a ‘Safe’ Space</strong></td>
<td>Educational expertise and support, in the form of consultation or by means of an on-going staff development programme, is available to assist staff in the design and analysis of appropriate self-evaluation instruments. This support is then extended to allow staff to reflect on the results of self-evaluation and to address problem areas.</td>
</tr>
<tr>
<td><strong>3. Support for the Self-Evaluation of Teaching</strong></td>
<td>A teaching portfolio or other reflective document is required for probation purposes and/or for and promotion on the basis of teaching achievement.</td>
</tr>
<tr>
<td></td>
<td>Teaching portfolios are peer reviewed against a set of criteria that explore the extent to which evidence-based reflection enhances teaching. This evidence is produced through the self-evaluation of teaching.</td>
</tr>
<tr>
<td></td>
<td>Assessments of portfolios then serve before academic staffing committees or other reward and promotion structures.</td>
</tr>
<tr>
<td><strong>4. The Recognition &amp; Reward of Teaching Excellence</strong></td>
<td>The institution has in place a comprehensive staff appraisal system which uses trained staff to assist academic staff in setting goals for themselves, including those related to the development of teaching. Teaching portfolios based on the self-evaluation of teaching are used as a tool to monitor the realisation of these goals. The iterative process of goal achievement is documented by means of teaching portfolios.</td>
</tr>
</tbody>
</table>
6. Improved Teaching Practice

| The institution can demonstrate via a sample of teaching portfolios and other quality assurance data that the self-evaluation of teaching does lead to improvements in teaching practice. |

Suggested Sources of Data

These suggestions are not intended to be used as a check-list. They are offered rather to assist and guide providers on what may be appropriate sources of data. This list will need to be adjusted depending on the nature and context of the institution under consideration.

- Institution’s Mission Statement
- Teaching and Learning Plan/ Strategy
- Policy/ Guidelines on staff development
- Quality assurance policies, reports and documentation
- Human resources’ policies
- Current HR data on recent trends in the staff profile – i.e. the number, composition, skills, qualifications, distribution and levels of staff.
- Documentation on the institution’s performance management or appraisal system
- Planning documents on the implementation of the Skills Development Act, Employment Equity Act and other relevant labour legislation
- Documentation on staff needs’ analyses
- Workplace Skills Plan and Reports
- Information on recruitment, selection, appointment and promotion procedures
- Organogram illustrating the structures and lines of responsibility for staff development
- Evaluations of formal higher education and staff development programmes, induction, mentoring, learnerships and informal training workshops, etc.
- Examples of software or guidelines intended to assist staff in the evaluation of teaching, e.g. custom-built student opinion questionnaires, etc.
- Examples of data collection tools intended to elicit students’ perceptions of teaching
- Guidelines / procedures intended to assist staff in evaluating the teaching of peers
- Examples of teaching portfolios
- Criteria used to assess teaching portfolios
- Information on institutional expenditure on the professional development of staff
- Information on how the impact of staff development is determined

Glossary of Terms

**Action Research** – a method of research designed to change and improve practice which involves a continuous cycle of planning, implementing, documenting and reflecting critically on practice. The process is usually conducted through collaboration in a group of like-minded researchers.

**Professionalisation** – the process of developing professionals who, by definition, possess a rich knowledge base and can use theory and reflection on practice to operate autonomously and ethically as experts in their field. Professionals have the capacity for continuous self-improvement.

**Reflective Practitioner** – a thoughtful practitioner who learns from the interplay between theory (prepositional knowledge) and practice (procedural knowledge and experience) and so is capable of self-improvement.
References & Further Reading


7. Postgraduate Research & Supervision

Focus Area

This *Improving Teaching and Learning Resource for Postgraduate Research and Supervision* deals with the support and oversight of postgraduate research in some detail. It is therefore applicable to research intensive institutions that have a strong research focus specified in their missions. The good practice described in this Resource will not apply to those institutions (particularly in the private sector) that do not offer postgraduate research degrees. However, in its Criteria for Institutional Audit, the HEQC assumes that ‘some measure of research activity is underway in all higher education institutions (e.g. research undertaken to inform teaching)’ (HEQC 2004:15). Furthermore, Criterion No.15, which applies to all institutions, requires that ‘clear and efficient arrangements are in place for the support and development of research functions and postgraduate education’ (Ibid.). In Criterion No.17 the requirements for postgraduate supervision are elaborated further, but this applies only to those institutions with a research focus. However, we can assume that in its institutional audits, the HEQC will expect to find at least a research policy and plans to support and develop research capacity amongst staff in non-research focused institutions.

This Resource applies to all research programmes, e.g. Masters by full thesis and PhD studies and also to the research components of taught or structured Masters and Doctoral programmes. This Resource has implications for policy development, the establishment of structures for research implementation and monitoring and it is applicable to institutional, faculty, departmental and postgraduate programme levels. At the institutional level it relates to institutional policy to assure the quality of postgraduate qualifications and to regulate and improve procedures for research supervision. At the institutional level it also relates to the promotion of a research culture in which a research infrastructure and environment is provided and the conditions created for developing research capacity in both staff and students. Specific postgraduate research programmes sit at the programme level where their quality depends on the professionalism of individual supervisors, the quality of the students and on the more specific research capacity, facilities, regulations and procedures provided by faculties, schools or departments.

The term ‘postgraduate supervision’ refers to the supervision or promotion of students’ research activities leading in whole or in part to the awarding of a master’s or doctoral degree. Its goals are both the production of a good thesis and also the transformation of the student into a competent and independent researcher. The supervision process is essentially a complex teaching and mentoring activity that includes a range of activities such as:

- assisting students to define a research topic and design an acceptable research proposal,
- getting the proposal approved,
- giving guidance on appropriate literature,
- assisting with the determination of the research design and methodology,
- supporting students in the collecting and analyzing of data and writing up the thesis or dissertation as a final product,
- providing detailed feedback to the student,
- meeting reporting requirements on the student’s progress,
- writing a final report on the research process for the external examiners and examining committee.

At the institutional or faculty levels postgraduate students also require support to access funding for their research and guidance on how to make their research results public.

Rationale

In its National Plan for Higher Education (NPHE), the Department of Education suggests that the ‘value and importance of research cannot be over-emphasised. Research … is perhaps the most powerful vehicle that we have to deepen our democracy (2001:5.1: 71). Despite this and the
strong emphasis placed by the White Paper (1997) on the need to develop research capacity and output to ensure both open-ended intellectual inquiry and the application of research activities to technical improvement and social development, the current capacity, distribution, outcomes and throughput rates of the public higher education research system remain cause for concern. In the NPHE, the Department calls into question the ability of the higher education system to meet the research and development agenda of the country (2001: 5.1:72). In support of this contention, the following statistics are quoted in the NPHE:

- In recent years there has been a 10% decline in total published research outputs
- There has also been a decline in the South African share of world research output
- Only 6 universities are responsible for 65% of research outputs and for 70% of all Master’s and Doctoral graduates in the system
- Masters and Doctoral enrolments as a proportion of total enrolments are far too low – 5.0% in 1995 and 5.7% in 1999
- Black students constitute only 30% of all Master’s and Doctoral enrolments and women only 40%.

The Department of Education has set an increase in postgraduate enrolments and outputs as a strategic goal for the South African higher education system. It suggests that in the next 5 years the system should improve the efficiency of its postgraduate outputs so that Master’s graduates constitute 6% of the annual output of graduates and Doctoral graduates constitute 1% (2001:5.3:76). The Department aims to steer the system to improve its research outputs through the following mechanisms:

- The New Funding Framework introduces a separate research component based on research outputs, i.e. Master’s and Doctoral graduates and research publications.
- The Department will provide earmarked funding to build research capacity and for postgraduate training in historically black universities and in technikons and for the facilitation of inter-institutional research collaboration.
- The Department will consider providing postgraduate scholarships to students from under-represented groups, and for subsidy purposes it will treat foreign postgraduate students as South African students.
- In the NPHE, the Department also calls on the HEQC to make the evaluation of postgraduate programmes a priority (2001:5.3:77).

Traditionally, postgraduate supervision is not an area that has been systematically quality assured. The process has usually been left to the trusted professionalism of the individual supervisor, with minimal guidance and ‘interference’ from the institution. Given this context, the HEQC has identified the quality assurance of postgraduate research programmes as an important concern in its focus on improving the quality of teaching and learning, particularly for those institutions that specify postgraduate research in their institutional mission.

Discussion

Those institutions that plan to increase their postgraduate enrolments and outputs will need to first create the institutional conditions for this to occur, for example guidelines and policies for developing and evaluating research proposals, the provision of research funding, incentives for research outputs, staff training and development, the development of research support networks and generally developing a research-conducive infrastructure and culture. Pressure to do so will be particularly acute for those technikons and historically black universities that currently lack appropriately qualified staff and appropriate research infrastructure and so fail to attract postgraduate students. Likewise merging institutions will need to attend to the development of a common research infrastructure and culture across the new institution. However, even those institutions that are perceived to be strong research institutions could benefit from a review of the quality of their postgraduate research and supervision practices.
Postgraduate supervision and research training is a core academic activity for most higher education institutions worldwide and is distinctive in that it provides the link between research and teaching and learning. Traditional approaches to postgraduate supervision are characterized by isolated, intense and sometimes intimate personal relationships based on an apprenticeship model that often sets up a dependency relationship between student and supervisor and unequal power relations that are easily abused. Traditionally, this model of supervision has allowed informal and idiosyncratic approaches by the supervisor and required enormous commitment from the student. It is often characterized by slow throughput rates, unaccountable behaviour by supervisors, disputes between students and supervisors and a general lack of clarity on procedures and regulations for the supervision process. In the South African context the traditional apprenticeship model carries with it additional historical and political ‘baggage’; namely that the supervisory role has been dominated by white male supervisors and is often perceived to have been characterized by exclusive and elitist practices.

Recent shifts in knowledge production towards more applied research, a greater emphasis on employability, qualification inflation, greater numbers and diversity of students and pressure on higher education institutions to produce more postgraduates in less time, has meant that the traditional practice of supervision is under pressure. Its nature is changing and being replaced by more pragmatic and efficient approaches, based on explicit accountability and contractual requirements for both parties, an emphasis on research skills training and an emphasis on the employability of the graduate. The shift to a more formal, contractual and accountable relationship has the advantage of protecting both staff and students from negative perceptions and from the possibility of exploitative relationships. However, we believe that it is important to preserve as far as is possible, the intense one-on-one supervisory relationship, whilst avoiding the dangers of isolation and exploitation. This can be achieved by creating communities of research practice within departments into which novice researchers can be inducted and which serve to ‘dilute’ the supervisory relationship and monitor the supervision process.
Evaluative questions

The following questions may be adapted for use in self-evaluating the quality of postgraduate supervision and research training:

1. Does the institutional mission and strategic plan emphasise research and postgraduate niche areas? If so, how is this aspect of the institutional mission realised through its planning and resource allocation procedures?

2. How are postgraduate studies and supervision managed and quality assured at the institution?

3. Does the institution have clear policies, regulations and procedures for each stage of the postgraduate research process? How does the institution ensure accountability for the implementation of these policies and regulations?

4. To what extent are guidelines, acceptable to the local research community, communicated to postgraduate students on their rights and responsibilities with respect to the supervision of their research?

5. How does the institution/faculty/school/department provide a research-conducive infrastructure and environment for its postgraduate students?

6. How does the institution provide appropriate induction to research and research skills training and support for postgraduate students, particularly for under-prepared students?

7. How does the institution provide access to funding opportunities for postgraduate students?

8. To what extent are guidelines and criteria, acceptable to the local research community, provided for the selection and appointment of postgraduate supervisors? How does the institution provide guidance and staff development for postgraduate supervisors?

9. To what extent are guidelines and criteria, acceptable to the local research community, provided for the appointment of internal and external examiners and for the examining process?

10. How does the institution regularly monitor and review its postgraduate provision, completion rates, outputs and the employability of its graduates? Does this quality management system include eliciting student feedback on supervision and the review of postgraduate policies and procedures?
## Improving Teaching & Learning Resources

<table>
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<tr>
<th>Evaluative Questions</th>
<th>Suggested Good Practice Descriptors</th>
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</table>
| **1. Realisation of institutional mission through planning and resource allocation**  | Mission statements and strategic plans relating to postgraduate research have been operationalised, for example as faculty plans.  
Postgraduate enrolment and output targets are clearly stated.  
Recruitment and admissions procedures for postgraduate studies are aligned with these plans and targets.  
Postgraduate research plans are supported by business plans and/or research funding.                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| **2. Effective management of the postgraduate system**                                | The institution has developed clearly defined policies, procedures for:  
the recruitment, admission and induction of postgraduate students,  
the approval of research proposals,  
the supervisory relationship,  
the appointment of supervisors and examiners,  
thesis presentation and examination,  
the award of degrees,  
student complaints and appeals  
postgraduate publications  

The institution's postgraduate research policy is supported by financial, administrative and organisational support and staff development.  
Lines of accountability for the supervision process are clear. A senior academic/line manager is assigned responsibility per faculty/school/department to coordinate research degrees, monitor the progress of postgraduate students and oversee assessment procedures. For Structured Master's degrees the same person ensures that coursework and research are properly coordinated. Supervisors are required to document and report regularly to a senior manager on the supervision process.  
Monitoring and review of this system takes place regularly and includes student feedback.                                                                                                                                                                                                                                                                                                                                                                                                 |
| **3. Postgraduate policies and procedures**                                          | The institution has developed postgraduate policies, regulations and procedures that are in keeping with its general research policy.  
Postgraduate policies and regulations are widely disseminated, understood by students, administrative and academic staff and implemented consistently across the institution.  
Admissions  
Admissions procedures are clear, consistently applied and aligned with the New Academic Policy (once finalised). As far as possible, decisions about admissions are linked to funding opportunities for the students concerned. Regular selection criteria ensure that students admitted to particular research programmes are adequately prepared to undertake the required research. Equity and access concerns are responsibly built into selection criteria and protocols; for example, if students do not meet regular admissions requirements, flexible entry routes could be provided through the recognition of prior learning or alternative assessment protocols which could include interviews, presentations, references, portfolios of previous work, etc. Where the institution/faculty does admit students via alternative/flexible admissions procedures, provision is made for additional research training, language and writing skills development and support both prior to and during the research process. |
### Approval of Research Projects

Training for research proposal development is provided for students. Criteria for the approval of research projects includes consideration of the following issues: the suitability of the project for the award in terms of the research questions and conceptualisation of the research, suitability of methodology and analysis and scientific integrity of the proposed research. Further considerations include evidence that the student has the required research competences to complete the project, evidence that a suitable supervisor is available, the availability of facilities and resources for the completion of the project.

### Student Complaints and Appeals

Open, fair and formal procedures are in place for hearing and adjudicating student complaints about the quality of the institution’s supervision and support provision and for appeals against assessment decisions; these are clearly communicated to students. Students have the right of reasonable access to their records.

### 4. Rights & responsibilities of postgraduate students

The rights and responsibilities of postgraduate research students are clearly communicated to them, ideally in the form of a supervision/learning contract. This includes specifying students’ responsibilities for registration, the payment of fees, communicating with and setting up appointments with supervisors, the nature and frequency of contact with the supervisor, attendance at meetings, seminars, etc., progress reports and monitoring of progress, submission of written work, meeting of deadlines and meeting examination requirements and degree regulations.

The expectations of students with respect to observing research ethics, codes of conduct, regulations on plagiarism, copyright and intellectual property rules, rules for publication, sponsors’ conditions, teaching assistant duties, health and safety procedures are also made explicit.

### 5. Provision of a research-conducive infrastructure and environment

The institution provides a research-conducive infrastructure and environment for its postgraduate students. For example, students are inducted into an active research community, provided with a suitably skilled and knowledgeable supervisor and/or supervisory committee, adequate research facilities and equipment are provided such as computing and IT facilities, library facilities, study and laboratory space and technical equipment and accommodation. Optimal access to these facilities is available.

Postgraduate students have access to other academics in their specialisation, visiting researchers and other experts and financial support for conference attendance and publication.

There are opportunities for communicating and meeting with other students, presenting and receiving feedback on work in progress and for effective student representation and for establishing postgraduate student associations.

### 6. Research skills training and student support

The institution seeks to build student research capacity, particularly for under-prepared students, through a range of support activities such as: an orientation/induction programmes, research design and methods training, research skills training, language and writing skills development, editorial support for writing, the development of research and professional skills (such as project management, information retrieval and data-base management), a mentoring system and the provision of guidance and counselling in the event of difficulties.
<table>
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<tr>
<th>Postgraduate students have access to appropriate student support and development facilities such as counseling, health care, social and recreational facilities.</th>
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<tr>
<td><strong>7. Funding opportunities</strong></td>
</tr>
<tr>
<td><strong>8. Selection and appointment and guidance for supervisors</strong></td>
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</table>
| **9. The assessment of postgraduate research** | Assessment criteria and/or an explicit understanding of the quality of research achievement required, plus thesis production, length, referencing and lay-out requirements are clearly communicated to students on commencement of studies through an institutional or faculty guide/handbook. Internal and external examiners are appointed according to acceptable criteria; e.g. at least one examiner external to the institution per dissertation/thesis is appointed. Examiners are appointed on the basis of qualifications, experience, expert knowledge in the research area and independence. The institution provides clear guidelines to external examiners on the standard/
quality of research achievement required, on the nature of their task and on institutional examining regulations. The requirements for examination reports are clearly documented for examiners. External examiners usually report directly to the Senate (or its sub-committees) or equivalent of the institution.

There are clear guidelines on how assessment outcomes, corrections and further work is communicated to students and monitored by their supervisors. Without undermining the principle of assessment by academic judgement, assessment decisions are made transparently and students are afforded reasonable access to information (e.g. examiners' identities and reports). There are appeal mechanisms for students and opportunities for them to defend their theses, e.g. through an oral defence.

Higher degree committees or similar structures consider examiners' reports qualitatively and make considered decisions about examination outcomes.

On completion of their research, students are encouraged and guided on by their supervisors on how to publish their findings in suitable journals.

<table>
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<tr>
<th>10. Monitoring &amp; review of postgraduate research</th>
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<tr>
<td>The institutional quality assurance system ensures that the processes and outcomes of postgraduate research programmes are monitored and reviewed regularly, usually at programme and/ or school/ faculty level. Reviews are based on data gathered from postgraduate student feedback on the quality of their learning experience, supervision and support infrastructure, examiners reports, supervisor and research co-ordinators' self-reviews and reports. Other sources of data could be feedback from external funders and employer/ graduate surveys.</td>
</tr>
<tr>
<td>The institution runs a central research information system which captures and monitors overall completion times, graduation rates and postgraduate research outputs.</td>
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<td>Review results are fed into future planning cycles.</td>
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</tbody>
</table>

**Suggested Data Sources**

These suggestions are not intended to be used as a check-list. They are offered rather to assist and guide providers on what may be appropriate sources of data. This list will need to be adjusted depending on the nature and context of the institution and/or programme under consideration.

At institutional level:

- Institutional mission statement
- Institutional three year rolling plan, programme and qualification mix
- Documentation on postgraduate policies and procedures
- Organogram of the postgraduate decision-making and accountability structures at the institutional/ faculty/ departmental levels
- Documentation on admission requirements for postgraduate students
- Documentation on staff development programmes for postgraduate supervisors
- Guideline documentation for supervisors
- Guideline documentation for examiners
- Guideline documents for postgraduate students
- Documentation regarding postgraduate student support facilities and available research infrastructure
- Documentation regarding funding available for postgraduates
- Documentation regarding progress made towards reaching equity targets in postgraduate enrolments and outputs
- Research reports relating to postgraduate studies (e.g. completion and throughput rates)
At programme level:

- List of postgraduate supervisors (and co-supervisors), their CVs, topics that they are supervising and their students
- Samples of postgraduate supervision contracts or agreements
- Samples of supervisors’ reports on the supervision process
- List of internal and external examiners and their CV’s
- Samples of external examiners reports
- Postgraduate student opinion data
- Graduate or employer surveys where available.

Glossary of Terms

**Postgraduate supervision** - the supervision or promotion of students’ research activities leading in whole or in part to the awarding of a master’s or doctoral degree.

References & Further Reading


APPENDIX 3

A Proposal for HEQC Policy on the Registration and Training of Assessors and the Moderation of Assessment

Source: HEQC 2002 (unpublished)
A Proposal for HEQC Policy on the Registration and Training of Assessors and the Moderation of Assessment

1. SAQA’s Requirements

In considering its position on these matters, the HEQC will need to take into account the following legislation and regulations promulgated by SAQA:

1.1 SAQA Act (No. 58 of 1995), the ETQA Regulations (1998) and the Criteria and Guidelines for ETQAs (2001)

According to the SAQA Act, SAQA must pursue the objectives of the National Qualifications Framework and execute its functions after consultation and in co-operation with (among others) the CHE, the HEQC and higher education institutions. It must also have due regard for the statutory rights, powers and functions of the governing bodies of universities and technikons (section 5(2)).

SAQA is responsible for the accreditation of ETQAs and the assignment of functions to them (SAQA Act, Section 5(1) (a) and (b)). Assignment involves the transfer of functions. It is different from delegation, which may be withdrawn by the delegator. Such functions have been prescribed in the Education and Training Quality Assurance Bodies Regulations, 1998 (No.19231 of 8 September 1998).

The functions assigned by SAQA to an ETQA in the ETQA Regulations (1998), with respect to assessment, are as follows:

9(1)(c) “monitor provision by constituent providers
9(1)(d) evaluate assessment and facilitate moderation among constituent providers
9(1)(e) register constituent assessors for specified registered standards or qualifications in terms of the criteria established for this purpose
9(1)(f) take responsibility for the certification of constituent learners.”

(SAQA, 1998:17)

With respect to assessment and assessment systems, according to the ‘Criteria and Guidelines for ETQAs’,

“ETQAs are required to evaluate the assessment policies and procedures of constituent providers and ensure the management and monitoring thereof. The universal assessment principles of fairness, validity and reliability form the foundation for assessment policy and evaluation for accreditation processes and procedures. ETQAs will be required to demonstrate capacity, at ETQA and constituent provider levels, to implement an assessment management system that is part of the quality assurance cycle. The system should focus on maintaining the integrity of assessments and achievements against the standards and qualifications registered on the NQF and for which the ETQA is accredited.”

(SAQA, 2001: 30)

With respect to the registration of assessors, most ETQAs may, with SAQA’s approval, delegate the registration of assessors to a constituent provider or another body (Regulation 9(2)(b)). However, the HEQC (and any other band ETQA established by statute) is required to delegate the registration of assessors to its institutions provided that their quality management systems include the monitoring of this function (Regulation 9(2)(c)). In such
circumstances SAQA must be notified. Correspondence from SAQA to the HEQC on the ‘Delegation of Assessor Registration’, elaborates this further:

“1. The CHE-HEQC must seek approval for delegating the function from the Authority;
2. The CHE-HEQC must indicate how the Criteria that will be used in the registration of Assessors will be met;
3. Role and responsibilities of all parties involved in the delegated function should be spelt out;
4. The CHE-HEQC should acknowledge in writing that it remains accountable to the Authority for the delegated function;
5. The CHE-HEQC should give an indication of the providers whose Quality Management System include the monitoring of this function as per 9(2)(c) and hence qualify for this delegation.” (SAQA, correspondence dated 30 May 2002)

With respect to certification, the ‘Criteria and Guidelines for ETQAs’ state that

“ETQAs will have jurisdiction over the issuing of certificates of award and achievement to constituent learners. … Some ETQAs may devolve all certification responsibilities to their constituent providers … The ETQA will, in this event, be responsible for ensuring the maintenance and integrity of the certification and awards process.” (SAQA, 2001, 31)

1.2 SAQA’s Criteria and Guidelines for the Registration of Assessors (October 2001)

In this document, SAQA states that the purpose of the registration of assessors is a means of ensuring that whoever assesses learner competence across all fields and economic sectors and at all NQF levels, meets a consistent set of criteria agreed by SAQA. This will ensure that all NQF registered standards and qualifications are assessed consistently, even though assessors will be registered with different ETQAs and the context of assessment will vary greatly according to the level and field of the qualification.” (SAQA, 2001: 5).

In Chapter 2 of this document, the requirements for the registration of assessors are spelt out as follows:

“2.1 All registered assessors must have met the requirements of the generic assessor standard, and should be certificated by the ETDP SETA or by the relevant ETQA in agreement with the ETDP SETA in this regard.
2.2 This requirement will be enforced from the end of May 2004, by which time all assessors should be able to demonstrate competence against the new standard, either through participating in a training and assessment programme or through undergoing an RPL process. Once the system is fully operational, the status of certificated assessors can be checked on the National Learner Records Database.
2.3 All registered assessors are registered to assess using specified standards and/or qualifications; the registered assessor must be able to demonstrate competence in relation to these specified standards and qualifications, at or above, the level of the qualifications in question. The status of registered assessors can be checked on the appropriate ETQA database or website.
2.4 All registered assessors must have met any additional requirements laid down by their constituent ETQA. The status of registered assessors can be checked on the appropriate ETQA database or website.” (SAQA, 2001:6)
In Chapter 4 of the same document, SAQA lays down its recommendations to ETQAs:

4.1 “Criteria for the registration of constituent assessors must include the SAQA requirements.

4.2 Additional criteria imposed should take into account the areas of expertise for assessors identified by SAQA (these include subject matter expertise, contextual expertise, education, training and development expertise, planning, administrative and management skills and interpersonal skills).

4.3 The ETQA should develop a strategy for implementation which identifies elements critical for the short-term and those that can be put in place in the medium and long-term.

4.4 ETQAs should decide on the period of registration of an assessor and have mechanisms to review the assessor’s registration at the end of the stipulated period. Assessors are registered by the relevant ETQA and can be de-registered if they do not comply with the ETQA requirements.” (SAQA 2001: 12)

1.3 SAQA’s Criteria and Guidelines for Assessment of NQF Registered Unit Standards and Qualifications (October, 2001)

In this document SAQA provides guidelines for assessment policies, systems and procedures for ETQAs and their constituent providers.

With respect to criteria for external moderators (external examiners or programme evaluators), SAQA suggests that,

‘Individuals who will be external moderators should be experienced, know the learning area well, have undergone training for moderation, and have credibility among assessors and within their area of knowledge and expertise. A high level of personal and interpersonal skills is also required.’ (SAQA, 2001:62)

SAQA lists the responsibilities of external moderators (programme evaluators) as follows:

- ‘Checking that the systems required to support the provision of learning programmes across the institution/learning sites are appropriate and working effectively
- Providing advice and guidelines to providers
- Maintaining an overview of provision across providers
- Checking that all staff involved in assessment are appropriately qualified and experienced
- Checking the credibility of assessment methods and instruments
- Checking internal moderation systems
- Through sampling, monitoring and observing assessment processes and learners’ evidence, ensure consistency across providers
- Checking assessors’ decisions.’

(SAQA, 2001:62)
2. Legislative Authority and Policy Proposals with respect to Assessment in Higher Education

2.1 The Higher Education Act (1997):

According to the CHE’s “Response to SAQA on the ‘Criteria and Guidelines for the Registration of Assessors’ Document”, in the case of conflict between statutory provisions, the Higher Education Act prevails over any other law dealing with higher education, except the Constitution (section 70).

The Higher Education Act provides that the Council of a higher education institution is responsible for its governance and the Senate is responsible to the Council for the institution’s academic and research functions. No institutional statute or rule that gives effect to the institution’s academic function, including “the studies, instruction and examination of students” may be made, amended or repealed “except with the concurrence of the Senate of such institution” (section 32(2)(b)). Thus the authority for the assessment of students in a public higher education institution rests with the Senate of such institution and no other body except the Council to which it is accountable.

The Higher Education Act establishes the HEQC as the quality assurance body for higher education, and provides that the HEQC may delegate any quality assurance function to “other appropriate bodies capable of performing such functions”.

Note: Private providers of higher education are not covered by these clauses in the Higher Education Act and so legally, the HEQC remains directly responsible for the quality and consistency of assessment in these institutions.

2.2 The Report of the Study Team on the Implementation of the NQF (April 2002):

Since the promulgation of SAQA’s requirements documented above, the Study Team on the Implementation of the NQF has made its recommendations to the Ministers of Education and Labour. Whilst the response of these Ministries is still awaited, the HEQC should take note of the Study Team’s Recommendations regarding the registration of assessors.

The Study Team recommends that

“The registration of assessors should not be required of individuals employed by an accredited institution or accredited workplace provider and the requirement should be amended accordingly” (2002:109).

The point is expanded below,

“We advocate sustained investment in the training of assessors in outcomes-based assessment. A requirement for registration puts the emphasis in the wrong place, on regulation rather than capacity building. Insistence on implementing the policy would be likely to alienate significant sections of the provider community and stimulate either resistance or nominal compliance. …. The Study Team’s view is that no assessor employed by an accredited institution should be required to become a registered assessor” (2002:106).

The Study Team further recommends that, the ETQA responsible for the setting of standards or qualifications within its designated area of interest (it proposes that this be the CHE for higher education), should be responsible for moderation, the registration of assessors (where these are not employed by an accredited institution), and should have jurisdiction over the issuing of certificates, awards an achievements (2002:109) – (presumably, this refers to the CHE/HEQC for higher education).
Thus, provided private institutions of higher education are accredited by the HEQC and provided that the programmes of both public and private higher education providers are accredited, the Study Team recommends that the requirement to register academics as assessors should fall away. It further recommends that the CHE/ HEQC be responsible for the moderation of assessment in higher education and that it have jurisdiction over the quality of the qualifications awarded by higher education institutions.

In its response to the ‘Report of the Study Team on the Implementation of the NQF’, the CHE supported these recommendations regarding the registration of assessors and the moderation of assessment. However, given that policy decisions on the basis of these recommendations have not yet been made by the Departments of Education and Labour, the HEQC will in the meantime adopt an interim assessment policy which is in keeping with the Higher Education Act, the Study Team’s recommendations and which will uphold the principles that underpin SAQA’s requirements.

3. HE Concerns with SAQA’s Requirements

From the perspective of higher education, several concerns arise with respect to a literal application of SAQA’s requirements for ETQAs and for the registration of assessors in particular:

1. In promulgating these regulations, it does not appear that SAQA has adequately consulted and cooperated with the CHE/ HEQC and higher education institutions. Furthermore, SAQA has not shown due regard for the statutory rights, powers and functions of the governing bodies of universities and technikons vested in them by the Higher Education Act, 1997.

2. SAQA’s proposed criteria for the registration of assessors, namely meeting the requirements of its generic assessor unit standard No.ASSMT 01 which involves clocking up 15 credits (150 hours) at level 5 (UG 1st year) on how to “plan and conduct assessment of learning outcomes” against a given standard or qualification registered on the NQF using a pre-designed assessment instrument, is quite unsuitable and inappropriate as a means of assessor training for academics.

3. SAQA’s assumption that the registration of assessors based on the requirement that they all demonstrate competence on unit standard No.ASSMT 01, will automatically result in consistent and reliable assessment across the education and training system is highly questionable. Higher education has traditionally sought to quality assure the consistency and reliability of its assessment practices through a system of external examining (moderation) based on peer review. We suggest that, if professionalised, regulated and overseen by the HEQC, this system is far more likely to be acceptable to the academic community and to guarantee both the reliability and the validity of the HE assessment system. Furthermore, the establishment and oversight of a more professionalised external examining system by the HEQC, in cooperation with higher education institutions, could be the means by which the HEQC meets SAQA’s requirements for evaluating assessment and facilitating moderation among both public and private constituent providers and for ensuring the maintenance and integrity of the certification and awards processes of its constituent providers.
4. Recommendations:

1. In terms of the ETQA Regulations (1988), the HEQC accepts its responsibility for ensuring the integrity, validity and reliability of assessment in the HET system.

2. The HEQC recognizes the right of the Senates of public higher education institutions to retain operational responsibility for the assessment of their students in terms of the Higher Education Act of 1997. (The HEQC will insist that, in the case of conflict between SAQA’s requirements and Senates’ responsibilities, in terms of the Higher Education Act, the Act prevails.)

3. The HEQC will ensure that its responsibility for ensuring the integrity, validity and reliability of assessment in the HET system is upheld via its quality assurance system which involves a combination of institutional audit and programme accreditation.

4. The HEQC will delegate responsibility for assuring and maintaining the integrity, validity and reliability of assessment to its constituent providers, both public and private, under the following conditions:
   
a) By the end of December 2003, the managements of HE providers must furnish the HEQC with the following information:
   i) an institutional assessment policy which includes a policy for recognizing prior learning,
   ii) a description of the structures and procedures established for implementing and monitoring the assessment policy,
   iii) a description of the institution’s external examining system (moderation and validation) at both module/ course, programme and postgraduate thesis levels which includes criteria for the appointment of examiners and an outline of their functions and reporting requirements,
   iv) a staff development strategy for ensuring that the academic staff responsible for official decisions on assessment are appropriately trained and experienced.

   b) During institutional audits, the HEQC will ask providers to demonstrate the effectiveness of their assessment policy and system described in a) above. The HEQC reserves the right to use ‘audit trails’ to validate provider claims about assessment.

   c) Applications for the accreditation of programmes by the HEQC (Stage 1, candidature) will include the requirement to state how assessment on the programme is moderated and the provider’s criteria for the appointment of moderators (external examiners) and their reporting requirements. The implementation and effectiveness of these moderation procedures will be validated via the HEQC’s three-stage accreditation process, namely through mid-term checks (Stage 2) and programme evaluations (Stage 3).

5. The HEQC will ensure that its Criteria and Standards for audit and accreditation incorporate the high standards for assessment and moderation practice (described in its draft Guides to Good Practice). The HEQC will use these criteria and standards to judge whether an HE provider meets the conditions for the delegation of responsibility for assessment as spelt out in No.4 above.
6. The HEQC will recognize as competent assessors those individuals who have completed its training programme for auditors and programme evaluators.

7. The HEQC will encourage providers of higher education to develop modules or unit standards in assessment training for HE staff and to become accredited to offer these.

Kathy Luckett  
Improving Teaching & Learning Project  
October 2002
References:


APPENDIX 4

Questionnaires on the HEQC's Proposals for Audit and Accreditation Criteria
SAUVCA NATIONAL QUALITY ASSURANCE FORUM
Questionnaire on the ‘Proposed Criteria for the HEQC’s First Cycle of Audits: 2004 – 2009’

Once you have read the HEQC’s document, please complete the questionnaire below. Please use the attached version of the HEQC’s document, in which we have altered the numbering to enable us to keep track of the criteria. Please see the end of the questionnaire for a list of abbreviations used. Please return the completed questionnaire in electronic format no later than noon, Friday 28 March to:

LuckettK@iafrica.com
cc: @sauvca.org

Section A: In response to the following questions on the discussion document, please put an X next to the option that best matches your opinion. If you wish, you may also add a comment to elaborate or explain your answer. Wherever relevant please indicate the particular criterion and/ or exemplar indicator to which you are referring by using the attached re-numbered version of the HEQC document.

1. Below are 6 principles to which the HEQC has committed itself in previous policy documents. To what extent do you think this Discussion Document gives expression to these principles?

   a) primary responsibility for QA rests with HEIs themselves
      largely
      adequately
      hardly
      not at all

   b) audit involves an investigation into and judgment on the effectiveness of an HEI’s QMS
      largely
      adequately
      hardly
      not at all

   c) HEQC criteria and procedures will be developed in consultation with HEIs
      largely

NB This information is for research purposes only and will remain strictly confidential

Name of person completing the questionnaire:

Position:

Institution:
adequately
hardly
not at all

d) the HEQC’s QA model will be based on self-evaluation and external validation
largely
adequately
hardly
not at all

e) the emphasis of the HEQC’s QA system will be on improvement rather than on accountability
largely
adequately
hardly
not at all

f) the HEQC’s understanding of quality is based on fitness for purpose, value for money and transformation within a framework of fitness of purpose
largely
adequately
hardly
not at all

Comment:

2. The HEQC’s approach to audit is to provide a common minimum set of key quality requirements against which it will judge HE management and practice and the effectiveness of an HEI’s QMS in particular. This means that the HEQC is not following a purist ‘fitness for purpose’ approach to audit where it would be left up to HEIs to develop their own criteria. Given the South African context and the scope of the HEQC’s responsibilities, this approach to audit by the HEQC should be supported.

strongly agree
agree
disagree
strongly disagree

Comment:

3. The HEQC claims that its audit criteria are one of main vehicles for giving practical effect to national policies (P.7). This suggests that the HEQC is foregrounding a ‘fitness of purpose’ conceptualization of quality. This position should be supported.

strongly agree
agree
disagree
strongly disagree

Comment:
4. This document suggests that the HEQC will not be granting self-accreditation status in the first round of audits. This position should be supported.

   strongly agree
   agree
   disagree
   strongly disagree

Comment:

5. The HEQC document explains how it intends to use ‘general criteria’ for ‘general scrutiny’ and ‘specific criteria’ for ‘in-depth scrutiny’ and audit trails. This approach adequately addresses the problem of the degree of specificity of the criteria.

   strongly agree
   agree
   disagree
   strongly disagree

Comment:

6. The HEQC’s format for the criteria, namely a criterion statement followed by more detailed indicators which are provided simply as examples rather than as prescriptions, is appropriate for audit.

   strongly agree
   agree
   disagree
   strongly disagree

Comment:

7. The HEQC’s proposed audit criteria are sufficiently general and flexible to cater for the diversity for the South African HE system.

   strongly agree
   agree
   disagree
   strongly disagree

Comment:

8. It is acceptable that in this document the HEQC has specified detailed indicators for its criteria in an uneven manner, (particularly for the ‘in depth scrutiny’ areas and sub-areas), because these are intended only as examples of acceptable practice.

   strongly agree
   agree
   disagree
   strongly disagree

Comment:
9. The HEQC’s proposal to use a basic grading model to classify the final outcome of its audits (i.e. good, satisfactory, not satisfactory) (P.39) is appropriate and should be supported.

   strongly agree
   agree
   disagree
   strongly disagree

   **Comment:**

10. The HEQC has now provided sufficient information, guidance and impetus for systematic implementation of QA to begin at my HEI.

   strongly agree
   agree
   disagree
   strongly disagree

   **Comment:**

**LEVEL 1**

11. It is appropriate for the HEQC to judge the fitness of a HEI’s mission in terms of ‘the transformational agenda’. (P.19, Criterion 1)

   strongly agree
   agree
   disagree
   strongly disagree

   **Comment:**

12. It is reasonable and a vital quality concern to expect an HEI to integrate its planning, resource allocation and quality management functions. (P.19-20, Criterion 2)

   strongly agree
   agree
   disagree
   strongly disagree

   **Comment:**

13. The HEQC’s expectation that HEIs should be using benchmarking and comprehensive user surveys as data for QA processes by the first round of audits is realistic. (P.20, Criterion 3)

   strongly agree
   agree
   disagree
   strongly disagree

   **Comment:**
LEVEL 2

14. The HEQC’s identification of the management of teaching and learning, research and service learning as the core functions of HE and therefore as key areas for ‘general scrutiny’ in the first round of its audits is appropriate. (P. 20-21)

   strongly agree
   agree
   disagree
   strongly disagree

Comment:

15. The HEQC’s exemplar indicators for the QM of teaching and learning are both fair and feasible. (P.22 Criterion 4)

   strongly agree
   agree
   disagree
   strongly disagree

Comment:

16. Within the Management of Teaching and Learning area, the HEQC has correctly identified and highlighted areas where quality is at risk, namely short courses, partnerships, academic support and certification. (P.22-24, Criteria 4.1-4.4)

   strongly agree
   agree
   disagree
   strongly disagree

Comment:

17. The HEQC’s exemplar indicator, which suggests that one can evaluate the impact of offering short courses in relation to success rates in whole qualifications, is realistic. (P.23, Criterion 4.1 ii)

   strongly agree
   agree
   disagree
   strongly disagree

Comment:

18. The HEQC is correct to assume that research activity and postgraduate education occurs at all HEIs and that the quality management of research should therefore be a focus area for general scrutiny at all HEIs. (P.21, 24)

   strongly agree
   agree
   disagree
   strongly disagree
19. The HEQC’s criteria and exemplar indicators for the quality management of research are appropriate and feasible at my HEI. (P.24, Criterion 5)

   strongly agree
   agree
   disagree
   strongly disagree

Comment:

20. It is clear from the discussion document what the HEQC means by service learning programmes. (P.21, 25)

   strongly agree
   agree
   disagree
   strongly disagree

Comment:

21. The HEQC’s emphasis on the importance of service learning, its proposed third area for general scrutiny for all HEIs, is appropriate for our context. (P.21, 25)

   strongly agree
   agree
   disagree
   strongly disagree

Comment:

22. The HEQC’s criteria and exemplar indicators for the quality management of service learning are appropriate and feasible at my HEI. (P.25, Criterion 6)

   strongly agree
   agree
   disagree
   strongly disagree

Comment:

LEVEL 3

23. The HEQC’s selection of programme development and review and student assessment and success as the critical focus areas for an in depth scrutiny of teaching and learning in the first round of audit is appropriate. (P.25, 26)

   strongly agree
   agree
disagree
strongly disagree

Comment:

24. The implementation of a QMS to meet the HEQC's proposed criteria for programme management, planning, approval and review is feasible at my HEI. (P.27-28, Criteria 7, 7.1-7.3)

strongly agree
agree
disagree
strongly disagree

Comment:

25. The HEQC's proposal to use additional criteria for professional/ vocational programmes and work-based learning and distance learning programmes should be supported. (P.29-30)

strongly agree
agree
disagree
strongly disagree

Comment:

26. The HEQC's criteria and exemplar indicators for professional/ vocational programmes and work-based learning and distance learning programmes are realistic and feasible. (P. 29-30, Criteria 7.4-7.7)

strongly agree
agree
disagree
strongly disagree

Comment:

27. The HEQC's criteria for programme review are fair and feasible at my HEI. (P.31, Criteria 7.8-7.10)

strongly agree
agree
disagree
strongly disagree

Comment:

28. The HEQC's criteria and exemplar indicators for assessment policies and practices are valid and their implementation is feasible at my HEI. (P.32-33, Criteria 8, 8.1-8.5)

strongly agree
agree
29. It is fair and appropriate that national benchmarks (as laid down by the DoE in its National Plan for Higher Education, 2001) be applied at the programme level. (P.34, Criteria 8.6, 8.7)

Comment:

30. My HEI has the management information capacity to enable it to assess the extent to which it is achieving the Department of Education's benchmarks for efficiency and equity at the programme level. (P.34, Criteria 8.6, 8.7)

Comment:

31. (This question is applicable only to those HEIs who include research in their mission and goals).
   The implementation of a system for research management and postgraduate education which would meet the HEQC's proposed criteria is feasible at my HEI.

Comment:

32. The HEQC's criteria for an 'in-depth scrutiny' of research (P.36-38, Criteria 9, 9.1-9.5) are sufficiently distinctive from those proposed for 'only general scrutiny' (p.24).

Comment:
Section B: Please use a sentence or two (maximum 5 lines) to respond to the following open-ended general questions: NB Your responses to these questions will be used for research purposes only and will not be identified with any institution or individual.

1. To what extent do you think that the consequences of audit as spelt out by the HEQC are clear, acceptable and fair? (P.39)

2. To what extent do you think the HEQC’s proposals for audit will result in improvement in the HE system and, in particular, protect the interests of students? (You may want to distinguish between short-term, medium-term and long-term impact in your response).

3. What unintended consequences or side-effects do you anticipate the HEQC’s first cycle of audits, based on these proposed criteria, might have?

4. Do you think that the HEQC has sufficiently consulted and engaged with the HE community in developing its proposed criteria for audit?

5. At a national level, what do you think the HEQC still needs to put in place in order for its proposed audit system to work effectively?

Institutional Issues:

6. What do you think the impact of this proposed audit system will be for HE managers and how do you think they will respond to this?

7. What do you think the impact of this proposed audit system will be for HE teaching staff and how do you think they will respond to this?

8. My HEI will be ready for an audit and confident of obtaining satisfactory outcomes within: (Please indicate with a X)
   1 - 2 years
   3 – 4 years
   4 – 5 years
   more than 5 years
9. What still needs to be put in place at your HEI to meet the HEQC’s audit requirements?

10. What are your HEI’s key capacity development needs in this respect?

11. What factors are likely to hinder the implementation of a QMS that will meet the HEQC’s requirements that are beyond your and your senior managers’ control?

12. To what extent do you think that the HEQC has left sufficient interpretive space for you and your leadership to devise a QMS based on self-evaluation that will be both feasible and acceptable to academics in your HEI?

Thank you very much for taking the trouble to complete this questionnaire.

LIST OF ABBREVIATIONS:
DoE Department of Education
HE higher education
HEI higher education institution
HEQC Higher Education Quality Committee
QA quality assurance
QMS quality management system
SAUVCA NATIONAL QUALITY ASSURANCE FORUM

Questionnaire on the Proposed Criteria for the HEQC’s Programme Accreditation Cycle: 2004 – 2009 (26 September 2003) for completion at the workshop held on 6 November, 2003

Please complete the questions below at the workshop and hand your questionnaire in before leaving.

1. We¹ support the HEQC’s proposed model for programme accreditation (based on the distinctions between new and existing programmes and existing professional and existing non-professional programmes and a phased in approach to accreditation, beginning with new programmes).

YES ☐

NO ☐

Please give reasons for your position:

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

¹ Those involved in QA at your institution with whom you may have discussed the HEQC’s proposals prior to attending this workshop.
2. We think that the scope of the HEQC’s classification of criteria for programme aspects is fair.

YES ☐

NO ☐

Please give reasons for your position:
_____________________________________________________________
_____________________________________________________________
_____________________________________________________________

3. We think that the set of criteria for programme accreditation proposed by the HEQC are appropriate:

a) as minimum standards for the HE system.

YES ☐

NO ☐

Please give reasons for your position:
_____________________________________________________________
_____________________________________________________________
_____________________________________________________________

b) as benchmarks for internal self-evaluation.

YES ☐

NO ☐

Please give reasons for your position:
_____________________________________________________________
_____________________________________________________________
_____________________________________________________________
4. We believe that the HEQC has achieved the right level of specificity in its criterion statements and indicators / requirements.

YES ☐

NO ☐

Please give reasons for your position:

____________________________________________________________________

____________________________________________________________________

____________________________________________________________________

5. We support the HEQC’s classification of programme accreditation outcomes as good (accreditation granted), satisfactory (accreditation granted conditionally) and not satisfactory (accreditation not granted).

YES ☐

NO ☐

Please give reasons for your position:

____________________________________________________________________

____________________________________________________________________

____________________________________________________________________

6. Our institution is ready to meet the HEQC’s requirements for the 3-stage accreditation process for all new programmes beginning with the candidacy stage in 2004.

YES ☐

NO ☐

If no, please explain why and suggest when you will be ready:

____________________________________________________________________

____________________________________________________________________

____________________________________________________________________
7. From 2010, assuming we are granted self-accreditation status, our institution will cope with the requirement to re-accredit all of our existing non-professional programmes in terms of cost, person-power and time.

YES □

NO □

If no, please explain why:
____________________________________________________________________
____________________________________________________________________
____________________________________________________________________
____________________________________________________________________
____________________________________________________________________

8. Do you have any criticisms of specific criterion statements and their requirements / indicators?

*Please use the HEQC’s numbering e.g. Criterion 7 (ii)*
9. How do you think the following groups of stakeholders will respond to the implementation of the HEQC’s proposed criteria for programme accreditation and re-accreditation?
   a) Academics:

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

b) Academic managers:

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

c) Students:

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

10. What do you think will be the likely consequences (intended and unintended) of implementing this proposed system of programme accreditation for the HE system as a whole?

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________
11. To what extent do you think that the HEQC is developing a coherent national QA system for HE (bearing in mind the proposed criteria for institutional audit, national programme reviews, the requirements for self-accreditation status and these proposed criteria for programme accreditation)?

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

12. Any other comments?

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

THANK YOU FOR COMPLETING THIS QUESTIONNAIRE
APPENDIX 5

Compiled Questionnaire Responses
SAUVCA NATIONAL QUALITY ASSURANCE FORUM
Questionnaire on the ‘Proposed Criteria for the HEQC’s
First Cycle of Audits: 2004 – 2009’

Section A
In response to the following questions on the discussion document, please put an X next to the option that best matches your opinion. If you wish, you may also add a comment to elaborate or explain your answer. Wherever relevant please indicate the particular criterion and/ or exemplar indicator to which you are referring by using the attached re-numbered version of the HEQC document.

1. Below are 6 principles to which the HEQC has committed itself in previous policy documents. To what extent do you think this Discussion Document gives expression to these principles?

a) primary responsibility for QA rests with HEIs themselves

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NB This information is for research purposes only and will remain strictly confidential

Positions:
QA Managers/ Directors (1 also Director of Academic Planning) – plus 1 Acting DVC, 2 Directors of Institutional Planning, 1 Director of Academic Development, staff from one Quality Promotion Unit and staff from one Academic Planning Office

Institutions:
16 universities
5 technikons
No significant differences in responses bet 2 institutional types, so analysed tog. as HE sector, total of 21/35 responses = 60% response rate.
b) audit involves an investigation into and judgment on the effectiveness of an HEI’s QMS

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c) HEQC criteria and procedures will be developed in consultation with HEIs

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</tr>
<tr>
<td><strong>sub-total</strong></td>
<td><strong>14</strong></td>
<td><strong>66.5%</strong></td>
</tr>
<tr>
<td>hardly</td>
<td>6</td>
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d) the HEQC’s QA model will be based on self-evaluation and external validation

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</table>
e) the emphasis of the HEQC’s QA system will be on improvement rather than on accountability

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</tr>
</tbody>
</table>

f) the HEQC’s understanding of quality is based on fitness for purpose, value for money and transformation within a framework of fitness of purpose

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<tbody>
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<tr>
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<tr>
<td><strong>sub-total</strong></td>
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</tr>
<tr>
<td>hardly</td>
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<tr>
<td>not at all</td>
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<tr>
<td>total responses</td>
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</tr>
</tbody>
</table>

Comments Summary:

**Negative:**
Criteria represent a shift away from an improvement/development approach towards an accountability-orientated system
Concept of ‘fitness for purpose’ is largely subsumed by ‘fitness of purpose’
Developmental agenda has been lost
What affects the whole doct is that so many other policy docts are not finalized – audit and accreditation framework, NAP, NQF review, etc.
Wrt transformation, we are concerned that the HEQC is using service learning as the sole indicator of transformation
2. The HEQC’s approach to audit is to provide a common minimum set of key quality requirements against which it will judge HE management and practice and the effectiveness of an HEI’s QMS in particular. This means that the HEQC is not following a purist ‘fitness for purpose’ approach to audit where it would be left up to HEIs to develop their own criteria. Given the South African context and the scope of the HEQC’s responsibilities, this approach to audit by the HEQC should be supported.

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<tr>
<td>total responses</td>
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</table>

Comments Summary:

Positive:
Whilst this may be a deviation from the HEQC’s original approach, it should be supported because
- HEIs requested minimum criteria, they need guidance
- the SA HE landscape is so diverse
- the link bet audit and accreditation means that the HEQC is bound to stipulate a minimum set of requirements

Negative:
HEQC has gone too far in determining ‘fitness of purpose’, an HEI’s mission should be taken into account there comes a point where institutional autonomy is threatened

3. The HEQC claims that its audit criteria are one of main vehicles for giving practical effect to national policies (P.7). This suggests that the HEQC is foregrounding a ‘fitness of purpose’ conceptualization of quality. This position should be supported.

<table>
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<tr>
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</table>
Comments Summary:

Positive:
Criteria are sufficiently general to allow room for manoeuvre
Criteria are needed to ensure consistency of judgment across HEIs

Negative:
HEQC should allow HEIs space to define for themselves how they will respond to national policy
Determining ‘fitness of purpose’ is the DoE’s problem, not the HEQC’s
HEQC’s emphasis has moved strongly towards accountability
Concerned about threats to academic freedom and institutional autonomy

4. This document suggests that the HEQC will not be granting self-accreditation status in the first round of audits. This position should be supported.

<table>
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<tr>
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<tbody>
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<tr>
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<td>19</td>
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</tbody>
</table>

Comments Summary:

Positive:
Audit system needs to settle first
HEIs need to use 1st round to get their IQMSs in place, thereafter compete for S-A status
Granting of S-A in 1st round will perpetuate disparities bet HEIs
A developmental audit should not result in S-A, a summative judgement

Negative:
HEQC should not presuppose that no HEIs meet high standards, it is unfair to hold back more advanced HEIs – no one will get S-A till 2010
Audit should not focus only on meeting minimum requirements
Granting of S-A could save a lot of money and effort – an efficient way fwd
Where will the HEQC get the capacity to (re)accredit all programmes in the system?
HEQC had offered S-A as a carrot, a major incentive for HEIs has been lost and the HEQC’s reputation damaged

5. The HEQC document explains how it intends to use ‘general criteria’ for ‘general scrutiny’ and ‘specific criteria’ for ‘in-depth scrutiny’ and audit trails. This approach adequately addresses the problem of the degree of specificity of the criteria.
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<thead>
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<tr>
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</tr>
</tbody>
</table>

Comments Summary:

**Positive:**
- HEQC doc moves well from general to more specific areas

**Negative:**
- HEQC doc remains vague at Level 3
  - Not clear what distinguishes the criteria for the different levels and not clear what all the criteria are

6. The HEQC’s format for the criteria, namely a criterion statement followed by more detailed indicators which are provided simply as examples rather than as prescriptions, is appropriate for audit.

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<tr>
<td>total responses</td>
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</tbody>
</table>

Comments Summary:

**Positive:**
- Avoids being over-prescriptive
- Caters for differences bet HEIs
  - If HEIs can set their own criteria, then HEQC cannot use these to make comparisons

**Negative:**
- Danger that examples will become requirements in practice
- Difficult to implement because of uneven distribution of the examples
- Makes summative judgments very vague, examples are insufficient for an accountability model
7. The HEQC’s proposed audit criteria are sufficiently general and flexible to cater for the diversity for the South African HE system.

<table>
<thead>
<tr>
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<th>valid percentage</th>
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<tr>
<td>total responses</td>
<td>20</td>
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</tr>
</tbody>
</table>

Comments Summary:

Positive:
Most elements referred to in the criteria would need to be in place irrespective of the character of the HEI

Negative:
Criteria should be formulated using a developmental scale from minimum requirements to good practice, many of these are closer to good practice
Criteria do not accommodate large DEIs, under-resourced HDIs or merging HEIs
Not all HEIs do research as is assumed at Level 2

8. It is acceptable that in this document the HEQC has specified detailed indicators for its criteria in an uneven manner, (particularly for the ‘in depth scrutiny’ areas and sub-areas), because these are intended only as examples of acceptable practice.

<table>
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<tr>
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<td></td>
</tr>
<tr>
<td>total responses</td>
<td>21</td>
<td></td>
</tr>
</tbody>
</table>

Comments Summary:
Positive:
HEQC is simply trying to signal priorities for the 1st round of audit

Negative:
HEQC is causing confusion and uncertainty
Detailed criteria for audit trails should be clear, balanced and exhaustive – particularly for an accountability model
HEQC should focus only on Level 1 for 1st round, Levels 2 & 3 should be only to encourage development of QA systems using Guides to Good Practice

9. The HEQC’s proposal to use a basic grading model to classify the final outcome of its audits (i.e. good, satisfactory, not satisfactory) (P.39) is appropriate and should be supported.

<table>
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<tr>
<td>agree</td>
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<td></td>
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<tr>
<td>total responses</td>
<td>21</td>
<td></td>
</tr>
</tbody>
</table>

Comments Summary:

Positive:
“Good” still leaves room for improvement

Negative:
Add more categories
This is a subtle form of ranking HEIs
If the HEQC can make these judgments, why not also for self-accreditation status?
Summative judgments should be avoided in the 1st audit cycle, instead HEIs should be put on a developmental path and be subject to qualitative judgments
What is the point of such grading?

10. The HEQC has now provided sufficient information, guidance and impetus for systematic implementation of QA to begin at my HEI.
<table>
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<tr>
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<tr>
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<tr>
<td>total responses</td>
<td>21</td>
<td></td>
</tr>
</tbody>
</table>

**Comments Summary:**

**Positive:**
But HEIs should not be dependent on the HEQC for developing their internally driven QMSs

**Negative:**
HEIs need the promised Guides to Good Practice and audit manual before preparations for audit can seriously begin
Information has been provided, but training and capacity building are absent
Time is needed, especially for merging HEIs
It is very difficult to operate in a context where so many ke policy documents are not yet finalized, e.g. Guides to Good Practice, NAP, draft audit & accreditation frameworks

**LEVEL 1**

11. **It is appropriate for the HEQC to judge the fitness of a HEI’s mission in terms of ‘the transformational agenda’. (P.19, Criterion 1)**

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</tr>
<tr>
<td>total responses</td>
<td>20</td>
<td></td>
</tr>
</tbody>
</table>

**Comments Summary:**

**Positive:**
There is no need for institutional missions to be out of step with the transformational agenda;
HEQC doct allows for a multi-faceted understanding of transformation
Negative:
Mission of each HEI should be the starting point
HEQC should not judge an institution's mission only to its HEQC’s understanding of the transformational agenda, this should be a dialogue with each HEI
We are concerned that service learning is being used as the sole indicator of transformation

12. It is reasonable and a vital quality concern to expect an HEI to integrate its planning, resource allocation and quality management functions. (P.19-20, Criterion 2)

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<td></td>
</tr>
<tr>
<td>total responses</td>
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</tbody>
</table>

Comments Summary:

Positive:
Integration between these 3 systems is vital
Fine, but within a reasonable time-frame

Negative:
Inappropriate/ not possible for large/ merging HEIs

13. The HEQC’s expectation that HEIs should be using benchmarking and comprehensive user surveys as data for QA processes by the first round of audits is realistic. (P.20, Criterion 3)

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</tbody>
</table>
Comments Summary:

**Positive:**
User surveys are important but HEIs need time to learn how to use them

**Negative:**
It's not clear which benchmarks we are to use
User surveys are expensive to run and often invalid
Bench-marking is not yet possible at national level
We don't have the capacity to do this and where is the capacity building for this?
Unrealistic, expecting too much, shows a lack of sensitivity on part of HEQC

**LEVEL 2**

14. The HEQC's identification of the management of teaching and learning, research and service learning as the core functions of HE and therefore as key areas for 'general scrutiny' in the first round of its audits is appropriate. (P. 20-21)

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Comments Summary:

**Positive:**
These areas at Level 2 should also be for in-depth scrutiny

**Negative:**
HEQC trying to cover too much in 1st round
HEQC should have focused only on T&L in 1st round
Service learning should not be included in 1st round – if HEQC wants this category it should be community engagement, of which service learning is only one aspect, or a particular teaching & learning strategy
Support services should have been included
15. The HEQC’s exemplar indicators for the QM of teaching and learning are both fair and feasible. (P.22 Criterion 4)

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Comments Summary:

Negative:
They are too ambitious, too idealistic, too demanding, only manageable in the long-term
Insufficient guidance given by the HEQC

16. Within the Management of Teaching and Learning area, the HEQC has correctly identified and high-lighted areas where quality is at risk, namely short courses, partnerships, academic support and certification. (P.22-24, Criteria 4.1-4.4)

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</table>

Comments Summary:

Positive:
These are generally areas of high risk, especially academic support

Negative:
Audit should involve only those areas mentioned for Level 1
HEQC is prioritizing these areas at the expense of core functions, e.g. the T&L process itself
The HEQC should provide evidence that these are key risk areas
Peripheral, should be focused on later
There is no national policy on short courses

17. The HEQC’s exemplar indicator, which suggests that one can evaluate the impact of offering short courses in relation to success rates in whole qualifications, is realistic. (P.23, Criterion 4.1 ii)

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</table>

Comments Summary:

Negative:
Short courses tend to stand alone as quick response courses
Link bet short courses and success rates on whole qualifications does not make sense and would be impossible to research
Drop this indicator!

18. The HEQC is correct to assume that research activity and postgraduate education occurs at all HEIs and that the quality management of research should therefore be a focus area for general scrutiny at all HEIs. (P.21, 24)

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Comments Summary:
Positive:
All HEIs claim to be involved in research
National policies identify research as a core function

Negative:
Most privates and some publics are not focused on research
Research should be a mission-specific option
HEQC seems to contradict itself by making R general for all at Level 2, but mission-specific at Level 3

19. The HEQC’s criteria and exemplar indicators for the quality management of research are appropriate and feasible at my HEI. (P.24, Criterion 5)

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</table>

Comments Summary:

Positive:
Feasible

Negative:
Need more time
May not be appropriate for Technikons in 1st round

20. It is clear from the discussion document what the HEQC means by service learning programmes. (P.21, 25)

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</table>
Comments Summary:

**Negative:**
- Service learning not properly defined in HEQC doct
- No common understanding of what SL entails
- We don’t agree with the HEQC’s definition

21. **The HEQC’s emphasis on the importance of service learning, its proposed third area for general scrutiny for all HEIs, is appropriate for our context.** (P.21, 25)

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Comments Summary:

**Positive:**
- This is a neglected area in many HEIs

**Negative:**
- Service learning should not be included in the 1st round
- Service learning is of a different order to T&L
- Service learning is only a sub-category, or a strategy of T&L and R, it should not be a core function
- Will be difficult to implement because of lack of clarity on definition of SL
- SL will need to be contextualised for each HEI
- Over-emphasis on SL, should not be used as the main indicator of transformation

22. **The HEQC’s criteria and exemplar indicators for the quality management of service learning are appropriate and feasible at my HEI.** (P.25, Criterion 6)

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<td><strong>sub-total</strong></td>
<td><strong>10</strong></td>
<td><strong>52.5%</strong></td>
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</table>
Comments Summary:

**Negative:**
Criteria are too vague, too ambitious
we don't have a proper understanding of SL
Danger that Technikons will interpret experiential learning as service learning

**LEVEL 3**

23. The HEQC’s selection of programme development and review and student assessment and success as the critical focus areas for an in depth scrutiny of teaching and learning in the first round of audit is appropriate. (P.25, 26)

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</table>

Comments Summary:

**Positive:**
These are critical reference points for T&L
These can form the basis for accountability
Student assessment is the archilles heel of quality
Programme development and review are indicative of the rigour of internal processes

**Negative:**
Insufficient capacity and resources to manage all this
Focus is too broad, should be only on programme development in the 1st round
HEQC should use only Level 1 criteria for 1st round and encourage HEIs to work with the Guides to Good Practice at Levels 2 & 3
Focus should rather be on delivery methods and how student learning is facilitated
24. The implementation of a QMS to meet the HEQC’s proposed criteria for programme management, planning, approval and review is feasible at my HEI. (P.27-28, Criteria 7, 7.1-7.3)

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</table>

Comments Summary:

**Negative:**
Unsure of capacity
Should not be required in 1st round
Our basic QMS is not on a sound footing

25. The HEQC’s proposal to use additional criteria for professional/ vocational programmes and work-based learning and distance learning programmes should be supported. (P.29-30)

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Comments Summary:

**Negative:**
Professional programmes – this is a concern of Professional bodies or ETQAs, not the HEQC
Distance education programmes - need a clearer definition of DE
- criteria for DE should be applied to all programmes
26. The HEQC’s criteria and exemplar indicators for professional/vocational programmes and work-based learning and distance learning programmes are realistic and feasible. (P. 29-30, Criteria 7.4-7.7)

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<tr>
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</table>

Comments Summary:

Negative:
Many of these criteria are not relevant to all HEIs

27. The HEQC’s criteria for programme review are fair and feasible at my HEI. (P.31, Criteria 7.8-7.10)

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<tr>
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</table>

Comments Summary:

Positive: Achievable
These things should be in place

Negative: Not feasible, too idealistic
Will take time to implement
28. The HEQC’s criteria and exemplar indicators for assessment policies and practices are valid and their implementation is feasible at my HEI. (P.32-33, Criteria 8, 8.1-8.5)

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Comments Summary:

**Positive:**
We owe it to our students to develop such a system
Valid but not feasible

**Negative:**
Criteria are too specific
We need time to implement this

29. It is fair and appropriate that national benchmarks (as laid down by the DoE in its National Plan for Higher Education, 2001) be applied at the programme level. (P.34, Criteria 8.6, 8.7)

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Comments Summary:

**Positive:**
The DoE’s national plan should be implemented

**Negative:**
The HEQC is far too vague about which benchmarks and how to apply them
The DoE has provided no scientific substantiation for its NPHE benchmarks, the matter requires more debate.
The NWG found only 4 HEIs that met these benchmarks.
These should be applied at institutional level, if at all.
DoE’s benchmarks are not appropriate for all HEI contexts.
This is the DoE’s problem, not the HEQC’s.

30. My HEI has the management information capacity to enable it to assess the extent to which it is achieving the Department of Education’s benchmarks for efficiency and equity at the programme level. (P.34, Criteria 8.6, 8.7)

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Comments Summary:

Negative:
Many HEIs are struggling with their IT systems and IT staff need training.
Much reportage requires formats that differ from the way our data systems are set up.

31. (This question is applicable only to those HEIs who include research in their mission and goals).
The implementation of a system for research management and postgraduate education which would meet the HEQC’s proposed criteria is feasible at my HEI.

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Comments Summary:

Positive:
Most are realistic and feasible

Negative:
What is meant by ‘strong research focus’?
Little is happening at some HEIs
We have staffing problems at senior level

32. The HEQC’s criteria for an ‘in-depth scrutiny’ of research (P.36-38, Criteria 9.1-9.5) are sufficiently distinctive from those proposed for ‘only general scrutiny’ (p.24).

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Comments Summary:

Positive:
Balance bet the 2 seems adequate

Negative:
Same ideas are repeated
Section B: Please use a sentence or two (maximum 5 lines) to respond to the following open-ended general questions: NB Your responses to these questions will be used for research purposes only and will not be identified with any institution or individual.

1. To what extent do you think that the consequences of audit as spelt out by the HEQC are clear, acceptable and fair? (P.39)
   
   Negative:
   Outcome categories are too generic and vague, not clear what is required for a good/satisfactory/unsatisfactory judgment, consequences of the 3 grades are not made clear; its not clear how feedback will be given.

2. To what extent do you think the HEQC’s proposals for audit will result in improvement in the HE system and, in particular, protect the interests of students? (You may want to distinguish between short-term, medium-term and long-term impact in your response).
   
   Positive:
   Short-term: Will result in policy development, focus attention in neglected areas, cause the development/adjustment of IQMSs, HEQC must get it right 1st time round!
   Long-term: Effects of the HEQC will only be evident in the long-term, creation of a culture of accountability, tangible improvements if the HEQC adopts a light touch, it is in the interests of students to have an effective IQMS in place.
   
   Negative:
   Short-term: Will result in a compliance paper exercise, confusion because of a lack of clarity and information and lack of institutional capacity to drive the process, improvement will be minimal unless the CHE provides resources, T & L will suffer because staff will be over-loaded and resources diverted, it will impede the development of a quality culture
   Long-term: Effect of the HEQC will be difficult to capture empirically, compliance mode, the intention to protect the interests of students may not be realized if there is a strong accountability focus, an increased gap between have and have-not HEIs

3. What unintended consequences or side-effects do you anticipate the HEQC’s first cycle of audits, based on these proposed criteria, might have?
   
   Negative:
   Danger of superficiality, compliance mode at the expense of buy-in from academics, de-motivation, developing a QMS that lacks coherence and a rootedness in institutional culture, focusing on the wrong things, too many things, loss of creativity, collegiality and dedication that has always characterized academic life.
   Danger of negative attitudes towards QA officials and the HEQC, anger and debate around the results of audit and ranking of HEIs.
   Inability to follow up on audit findings.

4. Do you think that the HEQC has sufficiently consulted and engaged with the HE community in developing its proposed criteria for audit?
   
   Positive:
   Majority said no, but others recognized the time constraints under which the HEQC has to operate. Compared to other educational authorities, yes, yes, but too many policies not yet finalized.
   
   Negative:
   Much more could have been done, HEQC should have worked through the doct with senior managers, HEQC only listens to its supporters, circulation of docts is insufficient – we are unsure if cognisance is taken of our input, consulted and engaged, yes, but how much response is incorporated?
5. At a national level, what do you think the HEQC still needs to put in place in order for its proposed audit system to work effectively?

More clarity on the audit criteria and their application, provision of friendly guidelines rather than criteria, costing of audits, improved PR and proper communication and information systems bet HEQC & HEIs, a ‘help-line’ or ‘safe-space’ for HEIs to discuss their particular concerns with the HEQC, properly trained auditors who are provided with well-written manuals, decoupling of audits from accreditation system and reverting to ‘fitness for purpose’ model, capacity development for both HEIs and the HEQC, more resources for HEIs and the HEQC. There is a need to finalise surrounding policy docts and coordinate better with the DoE.

Institutional Issues:

6. What do you think the impact of this proposed audit system will be for HE managers and how do you think they will respond to this?

Positive:
Concrete developments at last will be welcomed, they could seize this as an opportunity to strengthen planning, quality management and improvement.

Negative:
It will overburden, over-stretch them, give them a lot of paper-work, be perceived as a burden, intrusion, causing resistance and negative perceptions of QA by academics; they will need guidelines for the development of a QMS, capacity development and resources; it will result in a compliance approach, become a managerial tool; require the redirection of resources; it’s not an important issue for HE managers right now, they could leave the QA manager to deal with it.

7. What do you think the impact of this proposed audit system will be for HE teaching staff and how do you think they will respond to this?

Positive:
It will be a wake-up call for some. Some may see it as a means of improvement, some will be pleased to have guidelines, they will appreciate that the criteria are academically valid. Depends how it is managed within the institution.

Negative:
If audit were developmental and only involved Level 1 initially, they may eventually accept it. Staff are change-fatigued, already over-stretched, over-worked; one should expect a negative attitude, grumbling and resistance; it will be resisted on grounds of academic freedom; they will need convincing, it will be seen as a managerial tool, an imposition, an administrative burden, they will resist unless undertaken gradually in a developmental context, an erosion of academic rights, it will have little impact; they lack support and capacity to implement it.

8. My HEI will be ready for an audit and confident of obtaining satisfactory outcomes within:

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Plea from merging HEIs to be given time to settle

9. What still needs to be put in place at your HEI to meet the HEQC’s audit requirements?
An institution-wide QA policy and plans that will meet the HEQC’s requirements, formalisation of QA policy, policies, a T&L strategy, implementation of QMS plan, a coherent QMS, regular systematic self-evaluation process, programme review system, systems to complete the QA cycle, committee structures for quality functions, survey and benchmarking systems, system, data management systems, more QA staff and resources, staff development and attitudinal change by mainstream staff to accept quality practices.

10. What are your HEI’s key capacity development needs in this respect?
Training in the linking of planning – budgeting – QA, research management, RPL, academic planning, ITS, training of academic managers, of QA staff, of academic staff in self-evaluation.

11. What factors are likely to hinder the implementation of a QMS that will meet the HEQC’s requirements that are beyond your and your senior managers’ control?
Poor policy integration at national level and lack of clarity and finalisation of policies impact of the mergers, system overload, lack of external capacity, eg in the HEQC, lack of resources, lack of time, lack of trained QA staff, resistance from academics, low staff morale, internal politics, financial constraints.

12. To what extent do you think that the HEQC has left sufficient interpretive space for you and your leadership to devise a QMS based on self-evaluation that will be both feasible and acceptable to academics in your HEI?

Positive:
Criteria are not over-prescriptive, sufficient space for a QMS based on self-evaluation, the law did not leave the HEQC much leeway and the HEQC does not leave us much leeway, problem lies not with the HEQC but with the academic community, Negative:
Over-emphasis on the transformation agenda which doesn’t leave much negotiable, a slide towards compliance, HEQC should have allowed HEIs more space to identify their own priorities and take own initiatives, if the HEQC focused only on Level 1 then there would be sufficient interpretative space, depends on how the HEQC uses the criteria to make judgments.

LIST OF ABBREVIATIONS:
DoE Department of Education
HE higher education
HEI higher education institution
HEQC Higher Education Quality Committee
QA quality assurance
QMS quality management system
SAUVCA NATIONAL QUALITY ASSURANCE FORUM

Questionnaire on the Proposed Criteria for the HEQC’s Programme Accreditation Cycle: 2004 – 2009 (26 September 2003) for completion at the workshop held on 6 November, 2003

Please complete the questions below at the workshop and hand your questionnaire in before leaving.

1. We¹ support the HEQC’s proposed model for programme accreditation (based on the distinctions between new and existing programmes and existing professional and existing non-professional programmes and a phased in approach to accreditation, beginning with new programmes).

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Please give reasons for your position:

Positive: We support the model for programme accreditation and the approach to phase in the model. It is feasible in terms of our institution’s quality assurance capacity. However, problems could emerge during the merger process. We’re pleased that the HEQC is starting out with new programmes. We support the model, but it must be linked to institutional capacity to manage the process. Broad support for the model but significant changes in number and prescriptiveness of the criteria is needed to allow high levels of interpretive discretion for HEIs and accreditation teams.

¹ Those involved in QA at your institution with whom you may have discussed the HEQC’s proposals prior to attending this workshop.
Negative: Phasing in should be done carefully to ensure ownership of the system, HEQC originally said that QA to be the responsibility of HEIs. Should be more developmental at first.

The model will be demanding financially and time-consuming. Danger of system overload. Reservations about the number and complexity of the criteria.

Clarity is needed on the role of professional bodies, on who should accredit professional programmes and the HEQC and professional bodies should operate on the same criteria. We need more discussion on the definition of a professional programme, e.g. not all professional programmes have professional bodies, and for many, the workplace component happens after the programme is completed.

The exact dates and timing will be key to successful implementation. Lead time is a problem, there is first the internal approval process and then the 5 step external approval process which takes over a year.

We recommend that a date be set for the differentiation between new and existing programmes – from when must we make this distinction?

Many definitional problems. It is a problem that the NAP is not yet finalized. We need clarity on definition of new programmes, professional programmes and work-based learning. Clearer definitions required e.g. of programme, new and existing. Clearer guidelines MUST be provided as to what is considered a ‘new’ programme. Highly subjective terms such as ‘significantly’ or ‘a considerable extent’ simply cannot be left to individual institutions or programme coordinators to interpret. Bedevilled by problems with programme definition, different HEIs have interpreted programmes differently, original confusion was caused by SAQA. The HEQC also seems confused, e.g. P. 20 requires programmes to be registered with SAQA, but SAQA only registers qualifications! It is simplest if there is a one:one relationship between a programme and a qualification. Until such time as there is agreement on the definition of a ‘programme’, the model is irrelevant. We use our own definition of a programme and of a new programme.

This document is not aligned with the nested approach to standards-setting as proposed in the NAP (see pp. 11 – 12 of the HEQC doct).

2. We think that the scope of the HEQC’s classification of criteria for programme aspects is fair.

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Please give reasons for your position:
Positive: Yes, they are fair, if some of the criteria are simplified and collapsed. Scope (in terms of input, process, output & impact and review) is thorough, but level is deep.
Negative: The splitting of criteria into input-process-output-review categories is of limited practical use and may serve only to increase the jargon overload. The scope is broad, but over-specified, just the criteria without the minimum requirements would suffice. Too many areas all given same weight, no prioritization.

Although in the introduction the document states that it deals with all the core functions of HEIs, service learning only has one criteria on p.39, research is not mentioned again and the rest all concern teaching and learning and its management.

There is overlap between programme output and impact and review – perhaps these aspects should be collapsed?

Scope is too broad. Too much during this developmental phase of implementation. Scope too great for the capability of both the HEQC and institutions.

There is duplication and redundancy with the audit criteria, many (as much of 30%) of the requirements / minimum standards are already dealt with in the audit criteria and should be deleted from the programme accreditation criteria. There needs to be a clear distinction between programme and institutional level. These criteria overlap with institutional level i.e. audit criteria, many should be dealt with at this level and not at programme level. The programme and audit criteria are not sufficiently synchronized, there is too much duplication.

There is confusion between internal self-evaluation and external evaluation, the former requires more detailed criteria or guides whilst the latter requires far fewer; detail should be scaled down for external review. An external panel can’t look at all this.

3. **We think that the set of criteria for programme accreditation proposed by the HEQC are appropriate:**

   a) as minimum standards for the HE system.

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Please give reasons for your position:
Positive: We believe these criteria are appropriate as minimum standards for the HE system.

Negative: The criteria need to be simplified and cut down to a more limited range of minimum standards; they could be cut down by 50%. Each on its own seems reasonable, but when put together it is a daunting list. The criteria are far too prescriptive and all-encompassing. Were they to be strictly applied, very few programmes would be accreditable nationally. Three-quarters of the programmes of a top HEI would not meet these criteria. There should be a hierarchy of criteria,
they shouldn’t all be of equal importance. The HEQC should be more selective in its criteria, some are critical and others nice to have. The standards are too high, there is minimal room for development. We need a simpler document, this is too much work, too much cost and will it improve quality? They leave little room for development/improvement, and if used as minimum standards, will lead to widespread window-dressing and a potential decrease in ‘actual quality’ (as opposed to ‘claimed quality’).

It is very difficult to get external stakeholder feedback on formative programmes. Employer surveys are very expensive, who will pay for these?

Most of the criteria are academically sound and difficult to challenge. However most of these criteria are not minimum standards but are closer to good or best practice indicators. The confusion between good practice benchmarks and minimum standards is at the heart of the problem. There is too much carryover from the Improving Teaching & Learning Resources, making the level too high. The HEQC’s misappropriation of the Improving Teaching & Learning Guides or Resources is essentially what confuses the issue. You cannot have criteria that are at once benchmarks and minimum standards. There should be a much greater distinction between minimum standards and good practice guides.

Meeting these requirements will result in a paper-chase and over-documentation, whilst missing the real issues of quality. We have developed our own ‘tool-box’ which is a workshop approach to understanding whether one’s teaching is good enough and this has proved to be a good developmental tool. But when staff saw this document it caused major panic as we don’t have all the documentation in place. This has undermined the real developmental work that we were doing.

b) as benchmarks for internal self-evaluation.

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| Positive: These criteria are OK in scope for good/ best practice criteria which we should be working towards achieving. They are fully comprehensive and exhaustive for self-evaluation. These criteria could stand as good practice benchmarks, provided we are given the discretion to use, select and interpret them as we see fit, within our own internal systems of review.

4. We believe that the HEQC has achieved the right level of specificity in its criterion statements and indicators / requirements.

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| Positive: These criteria are OK in scope for good/ best practice criteria which we should be working towards achieving. They are fully comprehensive and exhaustive for self-evaluation. These criteria could stand as good practice benchmarks, provided we are given the discretion to use, select and interpret them as we see fit, within our own internal systems of review.
Please give reasons for your position:

**Negative**: The criteria are too prescriptive, over-specified, and the effect is stultifying. This leaves little room for interpretation and use in different institutional contexts and militates against flexibility, innovation and our attempts to build a culture of continuous quality improvement. This specificity taken to the nth degree fails to recognize the importance of the context of a particular HEI. The criteria on their own would be OK, the requirements, or minimum standards should be dropped.

The evidence needed to meet the requirements is over-burdensome. In some cases the criteria take academic freedom away.

5. **We support the HEQC’s classification of programme accreditation outcomes as good (accreditation granted), satisfactory (accreditation granted conditionally) and not satisfactory (accreditation not granted).**

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Please give reasons for your position:

**Negative**: Good, satisfactory and unsatisfactory should be removed. These are norm-referenced judgments implying that the HEQC can judge how well the criteria are met, implying a value-judgement which will require extensive justification. The categories relating to accreditation status should be used on their own.

Programmes should be judged simply as accredited, conditionally accredited or not accredited.

6. **Our institution is ready to meet the HEQC’s requirements for the 3-stage accreditation process for all new programmes beginning with the candidacy stage in 2004.**

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If no, please explain why and suggest when you will be ready:

My institution will jump through whichever hoops are placed before it in order to continue to meet its mission. In order for real improvement to take place, more time is needed to refine the criteria, to debate the implications intra-institutionally, and to ensure all the necessary support structures are in place. Extensive development work will be needed to prepare our HEI to meet a more modest set of criteria. We need 5 years to prepare for this system, it should be introduced developmentally.

Yes, but only after June 2004. Applications for accreditation in 2004 are already being prepared to go to Senate and Council in May 2004. This doct is therefore too
late for 2004. The new model should not be introduced before 1 January 2005. Jan 2005 is OK provided the criteria are simplified and they must be finalised by April 2004 at the latest.

It will take one at the least person one week (full-time) to complete the paperwork for one programme. Some HEIs have over 1000 programmes.

The MBA Re-accreditation self-evaluation documentation at our HEI took 3 people 4 weeks to get it together. We had 2 MBAs and the HEQC wanted us to send all institutional level stuff twice.

Incomplete policy docts, especially the NAP prevent us from even finalizing our internal templates for programme approval.

Merger problems with unequal partners will delay us, PQM is still to be determined.

7. From 2010, assuming we are granted self-accreditation status, our institution will cope with the requirement to re-accredit all of our existing non-professional programmes in terms of cost, person-power and time.

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If no, please explain why:
Positive: Yes, but we will use only the broad criteria and not the minimum standards and we will remove redundancy and unnecessary duplication. We have decided to use these criteria as a base, programme review is a strategic direction for us for 2004. We haven’t yet contemplated the cost and person power.

Negative: NO due to resource issues and the inappropriacy of the criteria as presently formulated. The criteria and minimum requirements are too extensive and detailed for use on all programmes. We could not afford external peer review of each programme. The academic sector will not allow such a burgeoning bureaucracy.

No Comment: No comment, too little is known about the requirements for self-accreditation. Unsure, will have to re-assess once the merger processes are completed.

8. Do you have any criticisms of specific criterion statements and their requirements / indicators?

Please use the HEQC’s numbering e.g. Criterion 7 (ii)

Criterion 1: Direct link to mission statement is unrealistic. Mission statements are broad indications of intent and shouldn’t provide detail of specific programme areas. A link to the institution’s rolling plan and PQM may be more
appropriate.

1(iv): Following the nested approach to qualifications design, external academic peers will be involved in generating generic qualifications standards. This should suffice for the design stage.

1(ix): Second bullet is redundant. Not all professional programmes have a work-based component within the programme.

Criterion 2: ‘Learning materials’ unclear. This may apply more to distance learning. Could delete this criterion.

Criterion 3: Might make sense for a small single purpose provider. For multi-purpose providers need to distinguish between admission requirements at institutional level and entry requirements for particular programmes. Criteria aimed at broadening access could pose a threat to quality.

Criterion 4, 5 and 6: Could be combined. Should be benchmarks rather than minimum standards. Many of the minimum requirements are institutional level concerns and should not be required at programme level.

Criterion 4: Should make a distinction between undergraduate and postgraduate staffing issues.

4(xii): Applies only to non-accredited institutions, not applicable to public HE providers.

Criterion 7: Most of this is covered in audit criteria as it focuses on policy level issues. Rather focus on assessment practice at programme level.

7(v): Many academics haven’t yet bought into the programmes-based, outcomes-based model of curriculum, especially wrt assessment. Assessment criteria relate to the level of the course or specific assessment task, it doesn’t make sense to try to relate these to level descriptors, etc. directly – this has to be done via the programme exit level outcomes and then via the module specific outcomes.

Criterion 8 and 9: Could be combined. Change references to libraries to ‘academic information’. The requirements or indicators should be benchmarks - or at the least institutions should be able to argue that the resources will be in place if the programme is accredited; often resource provision is dependent on and follows approval.

Criterion 10: Supported if institutional level requirements are removed.

Criterion 11: Most of this overlaps with audit, the HEQC should aggregate out what applies to institutional level and what to programme level and move the institutional to audit.

Criterion 12: Should be deleted. It is not a criterion as such, more a description of process (mid-term check) and so should be in an introductory section as is for Candidacy. Careful thought must be given to the implications of a mid-term check: will a one-year qualification have a mid-term check after 6 months?

Criterion 13: Programme ‘teams’ are not appropriate at every institution and for every programme. Responsibility must rest somewhere, certainly, but it may be a head of department or programme coordinator.

Criterion 14: Most of this should be dealt at institutional and therefore audit level. Only requirements (ii) and (vi) apply to programme level, but (vi) should include numeracy and cognition as well as language skills.

Criterion 15: 15(iv) delete the brackets as this shows misunderstanding – credits are measures of time in any case – the issue is whether students are given sufficient time (i.e. credits) to attain the learning outcomes.
Criterion 16-20: These are too prescriptive and could be consolidated into one criterion. Again much is more relevant to audit.
Criterion 19: Again problem with trying to relate assessment criteria to general programme standards. This will only confuse and irritate practitioners.
Criterion 21: Assumption that work-based learning is a part of every programme is incorrect.
Criterion 22-24: Could be combined into one criterion on postgraduate programmes.
  24 (v): This is too prescriptive, rather check on institutional policies during audit.
Criterion 25: There is great confusion abut how to measure this requirement. Throughput rates should not be used as they are unreliable and depend on intake, which could be improving equity. Retention rates over time for a cohort should be used, but retention will need to be carefully defined, e.g. to take into account students’ reasons for leaving a course. This has to be done at a course/module level and then aggregated up to a qualification level. For most HEIs it is impossible to do this at programme level. This requires a very sophisticated MIS. The consequences of non-compliance need clarification: what happens if ‘equity of output’ is not achieved? Will the programme not be accredited? This criterion should be a benchmark rather than a minimum standard.
Criterion 26: Combine with assessment criteria.
Criterion 27: Highly debatable and too vocationally orientated. It is difficult to get data on student employment and the results are mostly beyond our control. How ‘job opportunities’ is defined is important. Higher education aims for employability rather than specific employment. The criterion should rather focus on whether the programme achieved what it set out to achieve, whether value was added and whether the student was transformed in the process. In addition, the outcome of the qualification may be a readiness for further study, not necessarily employment.
Criterion 27 – 29: Consolidate these. Acknowledge difference between effectiveness and validity. Remove evidence requirements from the criteria. Further it is unclear at what stage these criteria will be applied. The questions can presumably only be answered some years after the first cohort has graduated. How will that affect the accreditation status of the programme?

9. How do you think the following groups of stakeholders will respond to the implementation of the HEQC’s proposed criteria for programme accreditation and re-accreditation?
   a) Academics:
   Negative: Our experience with internal self-evaluation is that the implementation of any new process / system is time-consuming for academics. Academics are complaining constantly about the encroachment of these exercises on their time to conduct their core business (do research, improve the quality of their teaching, do community services). The danger of overload in the system (and burnout) is present. Academics don’t want to be burdened with all this. We are convinced that academics will see these criteria as an infringement on their autonomy and creativity. Most will see the criteria as too bureaucratic and stifling. This list of criteria will paralyse academics. They will
be dismayed and respond with compliance and resentment. Some academics will revolt. They will see it as an unnecessary exercise and will try to ignore it and leave it to others to sort out.

As with most recent national developments, our academics will probably be resentful of yet another attempt to quantify, standardize and bureaucratize their profession. They will be skeptical about how policy profusion and additional work will result in higher quality when they have not seen this to be the case in other systems or institutions.

By and large this will be seen as a further attempt to control academic practice and innovation from the center (i.e. Pretoria). Over-specification of criteria and minima rather than providing guidelines will exacerbate such perceptions.

The criteria are too many, too bureaucratic and over-specified. Programme directors of professional programmes feel strongly that these criteria are too prescriptive. At this level the focus should be on practice and not on rules and policies, we don’t want a template driven process of programme review, we want academics to think for themselves about how they will improve their teaching situations. We already have the Improving Teaching & Learning Resources for guidance. But these should not have become criteria, people need space for interpretation and to make the criteria meaningful to their own teaching contexts. This is the job of academic leadership, the HEQC cannot do it for them in a generic way.

This will stifle innovation and prevent academics from developing new programmes.

Likewise, the accreditation panels need space to exercise their discretion in a particular context, these criteria will cause evaluators to use a check-list approach.

The detail and comprehensiveness of these criteria show a lack of trust on the part of the HEQC in our academics.

We have a problem in our HEI in maintaining the academics’ confidence in external bodies. Our academics are losing faith in external processes. There are more and more hoops to jump through and we get pathetic feedback. We are also worried about who will be the peer evaluators and we worry that they will not gain credibility with our academics.

The document assumes that a programmes-based and outcomes-based approach exists across the system. Development is uneven, especially wrt assessment and assessment criteria.

**b) Academic managers:**

**Positive:** Informed managers will be carefully positive about the system. Others will complain. Heads of departments, ‘programme’ coordinators, registrars, academic planners and quality managers should welcome the requirement that proposals are standardized and conform to minimum
thresholds of quality. The information required by the HEQC will become essential for making internal decisions about new programmes, and will provide a sound basis on which to conduct self-evaluations and gather evidence for future audit and accreditation exercises and help to build an institutional picture. A sensible set of criteria would assist academic managers to achieve consistency in the internal approval process.

**Negative**: Managers will have to be convinced of the benefits of this new model. They will have great difficulty selling these criteria. Their roles will become increasingly unpopular. How are academic leaders and managers going to grow and develop in such a system?

A managerial approach to quality is inevitable. Their focus will be on policy generation.

Our managers feel that programme accreditation is not their problem.

Some HEIs are wondering whether they want to aim for and apply for self-accreditation status. It may be too burdensome and not worth alienating our academics for. Rather let’s wait and see if the HEQC will have the capacity to come and re-accredit all our non-professional programmes. Our managers don’t want self-accreditation status unless we can design our own system.

The HEQC has provided a grid for evaluation, but it may be too “wooden” and therefore deprive managers for being able to generate buy-in from academic on QA matters.

**Support staff** would also need to understand the criteria and buy into them. Support staff are likely to be asked to do all the work. As a QA manager my work is shifting from quality promotion to document supplier and processor.

c) **Students**:

**Positive**: Positive, they will experience even better quality teaching and learning. They will therefore participate in the new system. Students may view it favourably. A few would feel protected by the QA system. Students may support these criteria in principle but they will continue to look for a balance between good quality and good price.

**Negative**: The students’ only real concern will probably be whether their chosen course is accredited or not. The drawn-out, three phase timeframe proposed by the HEQC may prove to be a serious drawback for the successful introduction of new programmes. Students will surely be hesitant to enroll for a course where they will only know if it is accredited after they graduate. The long three-stage accreditation process may well mean that students graduate from a conditionally accredited programme. This would disadvantage them.

10. What do you think will be the likely consequences (intended and unintended) of implementing this proposed system of programme accreditation for the HE system as a whole?

**Positive**: It could lead to continuous improvement of the quality of teaching
and learning. This system could improve accountability of the system if it is followed with integrity.

**Negative:** Implementing this system without first attending to the fundamental issues will weaken rather than strengthen South African higher education; both its reputation and its effectiveness. We have accepted programme accreditation as a fait accompli, the question is how to mediate it – but it is unlikely to result in genuine engagement. The relationship between quality assurance and quality may be prejudiced in this whole exercise. These proposals are problematic if we’re aiming for improvement. We need rather to maximize local interpretive discretion. A consequence of the over-determining nature of the proposed system could be counter-productive compliance mode responses and a diminishment of the credibility of the HEQC in the eyes of academics. The possibility of a quality culture will be compromised, institutions will ‘play the game’, they will employ support staff and consultants to do the work. Resistance and possible collapse of the system. This system seems to be designed to catch people out. It will kill innovation, frustrate academics and create burgeoning internal bureaucracies.

Too bureaucratic, detracting from the academic core business, and will result in over-kill. The compliance mode is almost guaranteed to set in, maybe ably assisted by consultants.

It will result in a great deal of confusion, significant enrichment opportunities for consultants, and widespread window-dressing within institutions. Because the system is becoming so prescriptive, there is a danger that providers will get consultants to do the paperwork in order to beat the system.

What about costing, cost-effectiveness and cost-recovery? If not properly synchronized with the audit expectations these will have a huge impact on human and physical resources.

There is only a small body of people in the country who can implement these policies.

The HEQC should work more with DVCs and develop their QA capacity.

Our concerns are all focused on the incorporation of our institution into receiving institutions. It is difficult to divert attention to QA matters in an institution which has a short life-span.

**11. To what extent do you think that the HEQC is developing a coherent national QA system for HE (bearing in mind the proposed criteria for institutional audit, national programme reviews, the requirements for self-accreditation status and these proposed criteria for programme accreditation)?**

**Positive:** We need these changes to ensure that imbalances and injustices are addressed.

It should eventually result in a coherent national QA system for HE. There is coherence to a certain extent. Coherence could be improved by the publication
of one finalized document with ONE integrated document with all QA processes, systems, criteria etc. This is a fair attempt but there needs to be a developmental system alongside the accountability system. This is a step towards a coherent national system with huge additional burdens on HEIs. The HEQC is attempting to develop a coherent system but this is not yet achieved. Despite strong reservations about the desirability and achievability of combining quality improvement with accountability, I believe the HEQC is making a sincere and concerted effort to develop a coherent national system for HE. However, being a developing system has advantages as well as disadvantages: one can learn from mistakes made in other systems, but at the same time, one is tempted to gather the best from all systems and try to attain comprehensiveness and perfection – as our HEQC is trying to do. As with our Constitution, we will probably end up with the most impressive system - in theory - ever seen in the world. Whether we can afford to test it in practice, with the serious consequences of failure, remains to be seen.

Negative: There is lack of coherency between the various instruments and also overlap. The shift away from the development focus on quality improvement means that the system is no longer coherent in terms of the HEQC’s original principles. It is not so much that these criteria are wrong, it is that they should be good practice benchmarks developmentally introduced in a system which promotes ownership of quality. The criteria are useful, it is the approach that is wrong.

Ironically the linking of audit criteria with programme accreditation criteria is creating problems, rather than leading to synergy. This may be due largely to an over-the-top emphasis on centralized control, taking initiative away from academics to the extent that doubt is cast on their ability to make a professional input. Further, the developmental aspect is sorely lacking.

The linking of audit and accreditation is be-devilled the system. Because of the self-accreditation status judgment linked to audit, audit has also become accountability driven and non-developmental.

The HEQC has been very coy abut self-accreditation status, what if we don’t get it, or decide not to apply for it – how will the HEQC have the capacity to re-accredit all existing programmes?

A missing piece is a framework for development or improvement. The HEQC has no coherent strategy for improvement or theory of development. This has allowed accountability concerns to dominate. People now see the development agenda just as lip-service, no one believes in it anymore, a compliance mentality has become dominant and the development agenda has been lost.

At national level there is lack of policy alignment between the DOE, CHE and SAQA. For example SAQA is hardly mentioned in this document. It is left to us to try to put the pieces of the puzzle together. How can the system be coherent when other players, e.g. the DoE can cut across the work of the CHE/HEQC?
12. Any other comments?
We are supportive of the HEQC’s vision, but how it is going about achieving it needs interrogation.
We welcome the HEQC’s efforts, well done, but please do not punish us, rather develop us.
We like the HEQC’s high premium on the quality of programmes, but the document is too complex and has too many indicators.
The document fails to recognize and deal with the differences between HEIs and provider types. It is a difficult document to write, given the different types of provider, different interests.
We are very concerned about this document.
We don’t begin to have the capacity to meet these criteria.
This is a case of ‘too much too soon’. The HEQC is rushing into things without the necessary capacity. It seems to be paralysing the HE system in SA. There is a big gap between the transformation agenda, national policies and the systems capacity to operationalise these. In the HE sector we are change fatigued, people have had enough.
If the HEQC goes ahead with this system for programme accreditation the HEQC will lose credibility and its reputation will be damaged.
Many of the criteria will be difficult to find evidence for.
The HEQC missed their deadline for releasing this document and as a result have given HEIs a very short period to respond (too short to cater for internal consultation processes). The HEQC should provide us with a second opportunity to comment on the revised indicators, if these are kept.
With the mergers going on people are not interested in QA issues.
The absence of key policy documents means that this one gets generated in a policy vacuum. The fundamental issues which need to be finalised include:

- Ensuring sufficient quantity and quality of HEQC staff to implement the proposed system;
- Coordinating the work of the HEQC, DoE and SAQA which to date have demonstrated even less than lip-service to cooperation;
- achieving consensus regarding the definition of and approach to a ‘programme’
- Finalising the new academic policy and the new funding framework.
APPENDIX 6

SAUVCA (& CTP) Responses to HEQC Audit & Accreditation Criteria
Proposals

Source: SAUVCA 2003 (unpublished)
SOUTH AFRICAN UNIVERSITIES
VICE-CHANCELLORS ASSOCIATION

AND

COMMITTEE OF TECHNIKON PRINCIPALS

RESPONSE TO
PROPOSED CRITERIA FOR THE HEQC’S
FIRST CYCLE OF AUDITS:
2004 - 2009

APRIL 2003
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1. INTRODUCTION

In June of 2002, the Higher Education Quality Committee (HEQC) of the Council on Higher Education, released for comment, a draft document entitled ‘Institutional Audit Framework’. The approach to institutional audit described in this policy document has been widely accepted within the higher education (HE) sector. It has defined the framework within which the ‘Proposed criteria for the HEQC’s first cycle of audits: 2004-2009’ have been developed. This latter document was released for comment in March 2003 and is the focus of this report.

In order to facilitate a sectoral response to the HEQC’s audit criteria document, SAUVCA dedicated the first workshop of its National Quality Assurance Forum in 2003, to a review of the audit criteria. In order to identify areas of concern for discussion and to focus the minds of institutional quality assurance (QA) managers on the audit criteria document, a questionnaire was sent out to QA managers of all universities and technikons. All of the universities and nine of the technikons were represented at the workshop creating a body of opinion strongly representative of the entire public HE sector.

The SNQAF workshop took place on 10 and 11 April 2003. Introductory and context setting presentations were followed by five discussion sessions dealing with levels 1 and 2 of the criteria and the three sections of level 3. In each session an analysis of the questionnaire responses was presented as a lead in to discussion.

The questionnaire responses and workshop discussion provided evidence of widespread support for much contained in the proposed audit criteria document. There are however areas of concern and inevitably debate focused on these. Two types of comment were voiced. Firstly, there are ‘general’ areas of concern relating to the approach to the audit process and to the document itself. Secondly, there was more specific comment in respect of certain of the audit criteria. This report is structured accordingly. It deals firstly with the general issues and then turns to comment on specific criteria. In order to keep this report brief it does not repeat material contained in the HEQC’s ‘Institutional Audit Framework’ and in the ‘Proposed criteria for the HEQC’s first cycle of audits: 2004-2009’ and readers are advised to have these documents to hand.

2. GENERAL COMMENTS

At the outset the point needs to be made that there is widespread support for the work of the HEQC and its role in transforming the higher education landscape in South Africa. As noted earlier, there is much in the proposed audit criteria document which has general support but listing these issues would serve little purpose. The general points raised here all relate to areas of real concern on the part of QA managers who believe that institutional audit can benefit higher education institutions.
**Change in approach to audit.** The change from a ‘fitness for purpose’ to a ‘fitness of purpose’ approach raised considerable debate. The point was made that the audit criteria document contains both approaches but there are serious doubts within the QA fraternity as to whether this is possible or desirable. The fear was expressed that if ‘purpose’ or ‘mission’ is to be approved by the HEQC and its audit panels then it becomes centrally driven and institutional autonomy is compromised. The change from a ‘fitness for purpose’ to a ‘fitness of purpose’ approach raised considerable debate. The point was made that the audit criteria document contains both approaches but there are serious doubts within the QA fraternity as to whether this is possible or desirable. The fear was expressed that if ‘purpose’ or ‘mission’ is to be approved by the HEQC and its audit panels then it becomes centrally driven and institutional autonomy is compromised.

**Development agenda.** As the emphasis shifts from fitness for purpose to fitness of purpose it also shifts from a developmental mode to one of increased accountability. There is widespread opinion that the HEQC has ‘lost the development agenda’ that was promised in its founding document. Development and capacity building are much needed.

**Enlarged scope of audit.** The target areas for the first audit cycle have been extended and the task of preparing for an audit has been considerably enlarged. QA managers were almost unanimous in their opinion that the first audit cycle is now too ambitious and forces institutions to do too much too soon. This has a direct bearing on institutional levels of readiness for audit. The increased emphasis on accountability calls for much more detail in institutional self evaluation. There was a strong call to ‘get the basics right first’. It was noted that a successful audit using level 3 criteria depends on criteria at levels 1 and 2 being met and most QA managers believe that the first round of audits should be restricted to the first two levels. Even at level 2 the scope is considered by many to be too large and that short courses and service learning should be kept out of the first cycle.

**Assessing quality.** The HEQC has consistently stated that the first round of institutional audits will focus on quality management systems; that the intention is not to assess quality per se. The general consensus of opinion is that criteria at levels 1 and 2 do assess policy and systems but that some level 3 criterion statements judge outcomes and therefore quality. In the words of a technikon representative, the HEQC should decide whether this is a ‘system’ audit or a ‘product’ audit. Assuming that it is not the intention of the HEQC to assess quality directly then several of the questions asked in level 3 will need to be rephrased.

**Incomplete policy framework.** Several key policies affecting higher education institutions are not yet in place making it impossible to provide definitive comment on the proposed audit criteria. Firstly, the audit criteria are being reviewed in terms of a draft policy document issued in June 2002. The final policy framework is not yet available. Further, the HE sector has been led to expect a ‘guide to good practice’ for QA in HE. The existence of such a guide would have enabled a much better understanding of the audit criteria currently under discussion. Further, given the link between audit and
accreditation it would have been preferable if policy for both audit and accreditation was available before the details of the audit criteria were considered. Other important policy documents which are not yet available and which will have a bearing on audit criteria, are the New Academic Policy and the New Funding Framework.

**Self-accreditation.** Prior to the release of the audit criteria document, HEI’s understood that self-accreditation was to be part of accreditation policy; that self-accreditation would be largely dependent on institutional audit coming to the conclusion that adequate quality management systems were in place in an institution for it to be trusted to self-accredit its own academic programmes. The audit criteria document makes several references to ‘eventual’ self-accreditation and it appears that self-accreditation, if not off the current agenda, is not likely in the first, six-year cycle of audits. The concept of self-accreditation has had a mixed reception. Some institutions view it as an incentive, a goal towards which academics and institutions can aspire and a reward for having good quality management systems in place. Conversely, there is a body of opinion which believes that self-accreditation will perpetuate, perhaps exacerbate, the disparities which have evolved between the historically advantaged and historically disadvantaged institutions. What the HE sector does need is a clear statement from the HEQC as to its stance on self-accreditation and the extent to which the audit and accreditation processes may be linked. If self-accreditation remains a possibility, then the HEQC is urged not to take it off the agenda for the next six years. For example, an institution may undergo audit in 2005 and the outcome may be ‘satisfactory’. Two years later, having put much effort into improving quality management systems where necessary, the institution might earn a ‘good’ rating and be permitted to self-accredit its academic programmes. To have to wait a further six years for this status would demotivate the institution and unnecessarily burden the HEQC.

**Benchmarks.** There is a need for clarity in respect of benchmarks. It was noted that official documentation uses two types of benchmarks; those which relate to transformational issues and those which relate to efficiency. Further, in recent years several sets of benchmarks have been proposed. One set, proposed by the DoE in the NPHE was effectively altered by an early draft of the proposed funding formula. A second set used by the NWG does not have much credibility. The majority of HEI’s rejected the use of benchmarking and comprehensive user surveys in the first audit cycle and viewed this as being too ambitious and not practicable at this stage of development of QA in the country. Should the HEQC insist on benchmarks it should provide a list of the benchmarks it intends to use and some research based justification of the levels chosen for quantitative benchmarks. Furthermore, the use of certain benchmarks is not supported. For example, graduation rates should not be used. As currently calculated, the rate will decline in an institution with an expanding intake of students and increase in an HEI where student intake is on the wane. Further, it needs to be clearly stated how and where benchmarks will be applied: with respect to entire institutions, faculties or programmes?
**Information on audit cycle.** Institutions need to know soon where they will fall in the audit cycle and how this will be determined. Given that the first audits will take place in 2004, the institutions affected will have little time to prepare. There is strongly held opinion that those HEI’s audited say in 2006, may well get a more favourable judgment than those audited in 2004 given that the former will have far more time in which to prepare. Furthermore, if self accreditation is off the agenda for six years, there is little or no incentive for any institution to volunteer for audit in the first few years of the cycle. The HEQC needs to indicate how it will treat institutions that are involved in mergers and how the first cycle of audits will help merging institutions to achieve institutional integrity.

**Definitions.** There is no common understanding of many of the terms used in the audit criteria discussion document and it is strongly recommended that the final document is prefaced by a formal list of definitions of terms such as ‘service learning’ and ‘distance education’.

**Format.** There were complaints that the numbering of criteria is confusing and should be reworked (see below). Secondly the unevenness of the HEQC’s provision of detailed exemplar indicators for the criteria is also considered to be unhelpful and confusing.

### 3. COMMENTS ON SPECIFIC CRITERIA

The numbering of the audit criteria in the HEQC document has led to considerable confusion in discussion as there is no clear way of referring to a specific criterion. For the purposes of this document the 39 criteria have been listed and numbered in Appendix A and it is suggested that the HEQC adopts the same system in the final audit criteria document.

Comments on and questions relating to specific criteria are set out below. If a criterion is not referred to below then it may be taken as read that none of the 30 HEI’s represented at the workshop had commented on it either in writing to SAUVCA or in debate in the workshop.

1.1 The change to a fitness of purpose approach has been discussed in the previous section.

1.2 Criterion supported but it will prove difficult to provide evidence of the links referred to.

1.3 If the HEQC insists on this, QA managers would like the chance to discuss with the HEQC the benchmarks to be used and the manner in which they will be applied – see previous section.
2.2 Definition of a short course required. This is a very difficult area ‘to get a handle on’ and in which to implement an effective QMS. The relationship between short courses and the success rates in whole qualifications is not understood.

2.4 A list of the ‘academic services’ to be investigated should be provided. Some guidance as to what constitutes ‘an adequate level’ is required; similarly with ‘adequately staffed’, ‘necessary infrastructure’ and ‘adequately resourced’. On what basis will audit panels form a judgment?

2.5 This criterion is too narrowly defined. It should be broadened to include the whole process from first assessment to final certificate.

2.7 Workshop debate soon made it clear that ‘service learning’ has several different interpretations and a single, clear definition is required. The distinction between service learning, experiential learning, work-based learning and community service needs to be made clear. It is also not clear why service learning should be treated separately (and presumably differently) from other kinds of learning and why it warrants particular attention. The majority of QA managers believe that service learning should not be a primary concern in the first audit cycle.

3.3 An adequate number of suitably qualified staff. On what basis will audit panels pronounce a number to be adequate or a qualification to be suitable? At what level will such judgments be applied – institutional, faculty, programme or other? Does the HEQC accept that to continue with a programme which is inadequately staffed may be a better option than to close down the programme? Qualification levels deemed suitable may vary by department, school and faculty within an institution, between different types of institution and between similar institutions. External factors such as supply and demand also impinge directly on staff appointments. Surely it would be more appropriate to ask what policies and procedures an institution has in place to ensure that the academic staff complement is adequate to the task in hand?

3.4 There is real concern over the application of this criterion in its current form. The students entering programmes may be judged to have the potential to succeed, but many are not adequately prepared when they enter programmes. It is only through ongoing support and development programmes that their academic potential may be achieved. To lump together recruitment and selection with support and development is an error.

3.5 No justification is provided for treating professional and vocational education differently from any other form of education and this separate treatment is not supported. If this distinction is to be continued then both ‘professional’ and ‘vocational’ education will need to be defined. How would the HEQC define a BSc(Hons) in Geology – as professional, vocational or neither?

3.6 The criterion is supported but ‘work-based learning’ needs to be defined. Does this refer only to work programmes which are an integral part of an academic programme? Engineering faculties often require students to demonstrate that they have undertaken
relevant vacation employment. Although a requirement for registered students such work is not assessed as part of an academic programme. Does a ten-day field trip constitute work-based learning?

3.8 What is distance learning in this context? Modern teaching is increasingly multi- or mixed-mode. Rarely is it all face to face contact or purely distance education as in a correspondence course. The concern for the design of programmes, learning materials, technologies used, staff training and development opportunities and systems to identify inactive students should be applied to all forms of teaching and the distinction between contact and distance teaching is not supported.

Criterion 3.2 states ‘the quality requirements for programme development and delivery take account of all delivery modes (e.g. face to face, distance, mixed modes etc). This viewpoint is supported.

3.18 The use of DoE benchmarks to assess student retention and success rates at programme level is contentious. In particular there are reservations about the use of certain measures such as graduation rates as outlined in the previous section. If the HEQC insists on using national benchmarks then institutions need to engage with the HEQC over the benchmarks to be used and the manner and levels at which they will be applied.

3.20 Workshop members noted that the assessment of work-based learning is criterion referenced. This approach is supported. It raises the query as to why all forms of student assessment are not criterion referenced? In the general sections on student assessment the HEQC seems to emphasize the reliability of assessment and to ignore the validity of assessment.

3.21 The separate treatment of distance learning programmes is not supported as discussed above.

3.22 The section relating to the quality management of research raised very little comment and one can only include that both quality assurance and research managers support this section in its entirety. There were however several calls from research managers for the HEQC to produce its promised ‘guide to good practice’.

4. SUMMARY AND RECOMMENDATIONS

Comments received from individual QA managers and from institutions along with discussion at the SNQAF workshop, provide ample evidence that there is widespread support for the work of the HEQC and more specifically for its planned programme of institutional audits. QA managers are keen to see the HEQC make a success of the first cycle of audits and they are unanimous on the need for the HEQC to ‘get it right the first time’. It is with that aim in mind that the following comments are offered.
Setting aside the detailed comments outlined in the previous sections, the primary concerns of the QA fraternity relate to:

- The change in approach to audit
- The enlarged scope of audit
- The readiness of the HE sector for audit
- The links between audit and accreditation
- The proposed ‘scale of judgment’

**The change in approach to audit**, with an increasing emphasis on fitness of purpose, has reduced the developmental potential of audit and has placed a greater emphasis on accountability. Whilst there is agreement that institutions must ultimately be held accountable for the quality of all their endeavours there is concern because the anticipated emphasis in the first round of audits was to have been a developmental one. The entire audit experience can be a very positive one for HE institutions. Experience elsewhere has shown that a developmental approach to audit has encouraged institutions to undertake honest self assessments and has given them the time and space in which to effect improvements. Conversely, as the emphasis on accountability increases, institutions are less likely to expose their own weaknesses. Under these conditions they tend to move into a compliance mode and engage in window dressing. In the first cycle of institutional audits the emphasis must be a developmental one. The emphasis should be one which encourages the production of comprehensive and honest self-evaluation reports and which helps institutions to build and strengthen quality management systems.

**Enlarging the scope of audit** by adding new target areas for the first audits has considerably enlarged the task of preparing for audit. There is widespread opinion that the first audit cycle is now too ambitious and that institutions are being asked to do too much too soon. The increased emphasis on accountability calls for much more detail in terms of institutional self evaluation. In an ‘evidence-led’ self-evaluation, the level 3 criteria call for a vast amount of documentation and the readiness of institutions for audit is called into question. Both in the pre-workshop questionnaire and in discussion at the workshop the readiness of institutions for audit was queried. In the opinion of QA managers, nearly all institutions would be ready to face a development based audit as originally conceived by January 2004. When asked when institutions will be ready to face an audit on three levels as described in the HEQC’s audit criteria document, only 25% said that they would be ready in the first two years of the audit cycle. A clear majority expect to need 3 years and more.

**The lack of institutional readiness to face audit** as described in the audit criteria relates not only to the enlarged scope of the audit, but also to the lack of capacity within institutions. Questionnaire responses and workshop discussion made it clear that capacity development needs within institutions are extensive. Not only is there a dearth of relevant skills and experience but often the QA manager is the only person working full time on the establishment of quality management systems. It is doubtful whether more than a handful of institutions have allocated adequate resources to quality assurance. Planning
for the first cycle of audits must take into account capacity limits both within the HEQC and within HE institutions.

The links between audit and accreditation need to be clarified as does the HEQC’s standpoint on self-accreditation. Clearly, there are varying opinions on the wisdom of self-accreditation, particularly in a system characterized by a wide range of institutional disparities. In the final analysis, self-accreditation offers a solution to a logistical challenge and its value as an incentive cannot be denied. Whatever the final decision, the situation needs to be clarified well before the commencement of the first cycle of audits.

The proposed ‘scale of judgment’ to indicate the outcomes of audit needs to be reconsidered. Outcomes such as ‘good’, ‘satisfactory’ or ‘not satisfactory’ are unlikely to assist as an instrument for institutional development as intended. QA managers queried how the HEQC might deal with an HDI which has made considerable progress with respect to quality management systems but which may still have much to achieve. There is also a considerable body of opinion that believes that the audit judgments, like the whole audit process, should be criterion referenced. If this were done, judgment could be expressed in a series of short qualitative statements related to a set of key criteria. In this way the outcomes would facilitate institutional development. It would then be possible to indicate where institutions have ‘made a good start’ or are ‘making good progress’ and what still needs to be achieved. Judgments expressed as a series of short, criterion referenced statements would also inhibit the media from producing a ranking of institutions.

In conclusion, the following key recommendations are offered:

- The emphasis in the first cycle of audits should be a developmental one. The first audits should assist institutions to improve their quality management systems.

- The scope of audit as currently conceived should be reduced for the first audit cycle. It is suggested that levels 1 and 2 remain largely as is but that in depth scrutiny at level 3 be limited to core policies on teaching and learning and student assessment with an implementation focus only on the planning and design of programmes and assessment.

- The proposed outcomes of audit should be reconsidered as described; namely that judgments should be qualitative, criterion referenced statements as opposed to a grading system which is likely to be used for the ranking and norm-referencing of institutions.
APPENDIX A

RENUMBERED LIST OF PROPOSED CRITERIA FOR HEQC’S FIRST CYCLE OF AUDITS 2004 – 2009

LEVEL 1 – for general scrutiny only

1.1 Fitness of mission
1.2 Links between planning, resources allocation and quality management
1.3 Use of benchmarking and user surveys

LEVEL 2 – for general scrutiny only

2.1 General quality management of teaching and learning
2.2 Quality management of short courses
2.3 Quality management of exported and partnership programmes at tuition centres and satellite campuses
2.4 Quality management of academic support services
2.5 Quality management of certification
2.6 Quality management of research
2.7 Quality management of service learning

LEVEL 3 – in depth scrutiny

3.1 Quality management of programmes
3.2 Design and approval of new programmes
3.3 Staffing of academic programmes
3.4 Student recruitment, support and development
3.5 Professional and vocational education
3.6 Management of work-based learning
3.7 Mentoring systems
3.8 Distance learning programmes
3.9 Review of academic programmes
3.10 Programme review methodology
3.11 Training and support for academic review
3.12 Management of assessment
3.13 Moderating of assessment
3.14 Reliability of assessment practices
3.15 Rigour and security of the assessment system
3.16 Recognition of prior learning
3.17 Assessment training
3.18 Student retention and graduation rates
3.19 Equity and representivity in graduate output
3.20 Assessment of work-based learning
3.21 Distance learning programmes
3.22 Research management
3.23 Research quality
3.24 Research capacity development
3.25 Knowledge production and national goals
3.26 Management of postgraduate education
3.27 Effective supervision
3.28 Postgraduate capacity development
3.29 Assessment of postgraduate research
Response to the Proposed Criteria for the HEQC’S
Programme Accreditation Cycle
2004-2009

14 November 2003
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APPENDICES

A: Questions distributed prior to sector workshop
B: Questionnaire completed by QA managers
1. INTRODUCTION

In June 2002, the Higher Education Quality Committee (HEQC) of the Council on Higher Education released for comment a draft document entitled *Programme Accreditation Framework*. The approach to programme accreditation described in this document has been widely accepted within the higher education (HE) sector. It has defined the framework within which the *Proposed Criteria for the HEQC’s Programme Accreditation Cycle: 2004-2009* has been developed. This latter document was released for comment on 26 September 2003 and is the focus of this report of the South African Universities Vice-Chancellors Association (SAUVCA).

The rapid roll-out of higher education policies over the past two years has meant that institutions are perpetually in response mode. The mergers, PQM, the proposed new funding formula, Employment Equity, to name but a few, impact in expected and unforeseen ways upon the sector. The efficacy of policy will finally be measured not so much by the merit in its formulation but by the institution’s capacity to implement its vision.

The crux of institutional responses can be summed up in the words of one quality assurance manager, ‘we support the aims and objectives of the proposed programme accreditation criteria but we wish to query the implementation’. In short, the main concerns with the proposed accreditation document are with the total picture rather than with a specific frame within it. Taken one by one, it is very difficult to find fault with a criterion or its attendant minimum requirements but there are real concerns with the totality. These concerns are set out in the following two sections; the first dealing with general issues and the second with individual criteria. The comments and recommendations which follow are intended to simplify the accreditation system and indicate problem areas which require attention. Several of these ‘problem areas’ are systemic and not the fault of the HEQC, but will nevertheless impact on the proposed accreditation model and need to be highlighted.

The public higher education institutions fully support the agenda of national bodies such as the HEQC in the transformation and restructuring of higher education in South Africa. SAUVCA as a sectoral organisation and its member institutions are also conscious of the growing gap between the intentions of national policy and the ability of both public bodies and the institutions to implement that policy. There is a need for all involved to recognise that quality assurance involves a ‘culture change’ and to recognise that this is necessarily a slow process. There equally is the need to recognise that achieving quality relates not only to quality assurance and management planning but, indeed, is about reinserting knowledge production and the teaching-learning project of higher education.

In the interests of brevity, this report avoids relatively minor issues and minimizes overlap with institutional responses already submitted to the HEQC. No references are made to editorial errors nor are there proposals for the re-phrasing of criteria and minimum requirements unless a significant change in meaning is intended. Further,
where it is known that an HEI has already addressed an issue in considerable detail in its institutional response, only brief reference is made to the same issue in this report.

**Process of collation and drafting of the response —**

In order to facilitate a sectoral response to the HEQC’s programme accreditation criteria, SAUVCA’s national quality assurance forum – which since January 2003 has included representatives of the Technikons – held a workshop on 6 November 2003, attended by 24 quality assurance managers representing 21 institutions. Prior to the workshop a set of questions relating to the programme accreditation criteria (see Appendix A) was distributed to public higher education institutions (HEI’s) and quality assurance managers were requested, as far as possible, to bring institutional rather than personal views to the workshop. In addition, several institutions sent in copies of their responses to the programme accreditation criteria as submitted to the HEQC. Discussion at the workshop first focused on the more general issues addressed by the set of questions and then turned to discussion of each criterion and its minimum requirements. At the conclusion of the workshop, institutional representatives responded to a questionnaire relating to the accreditation criteria (see Appendix B). Copies of the questionnaire were also sent via e-mail to all institutions not represented at the workshop in an attempt to gain the fullest possible response. Analysis of the questionnaire responses provided additional material for this report. A draft report was first distributed to all institutional quality assurance managers for comment before the document was finalised for submission.

SAUVCA appreciates the opportunity to provide comment on the proposed accreditation criteria and the agreed extension of the time to allow for reasonable interaction within and between institutions in the formulation of viewpoints. There is no doubt that there is widespread support for the work of the HEQC across the public HE sector and this is equally true in respect of the proposed programme accreditation document. Members of the QA Forum took careful note of the letter of 26 September 2003 accompanying the proposed accreditation criteria document, which specifically called for comment on the *scope* of the proposed criteria and requested ‘suggestions for further reducing the number of criteria and simplifying the document’.
2. GENERAL COMMENT

2.1 Models and Approaches
There is widespread support for and acceptance of the HEQC’s proposed model for programme accreditation based on distinctions between new and existing, professional and non-professional programmes and the ‘phase-in’ approach. Similarly, the classification of categories for programme accreditation based on input, process, output and impact and review is regarded as a sound working model. It is recognised that devising a taxonomy in which there are no overlaps between categories is impossible given the integrated nature of the material and activities to be classified. The accreditation criteria document is well organised and well written and has been described by several QA managers as the most comprehensive by the HEQC to date.

2.2 Overview of the criteria
Taken one at a time, the criteria for the most part make good sense and equally the same can be said for the minimum requirements. However, taken all together the net result would be an accreditation system which would create a vast bureaucracy and generate considerable work volumes for quality assurance units and academics who are already overburdened with paperwork. While the intentions of the criteria and minimum standards are supported, the fear has been expressed that the number of criteria is not in a direct ratio to quality improvement and that the law of diminishing returns will come into play with 30 criteria, some of which have very comprehensive sets of minimum requirements. In the words of one of the more experienced QA managers, ‘the biggest challenge lies with existing programmes and institutions who will need time and space in which to interpret criteria in order to develop and implement effective programme review processes’.

The general consensus of opinion of QA managers at the workshop is that in an attempt to provide a fully comprehensive set of criteria and minimum standards, the HEQC has moved very close to a description of ‘best practice’. In itself this is a laudable move but it places the programme accreditation criteria and minimum standards well beyond current reality in the public higher education sector. The QA manager of one of the country’s largest institutions suggested at the workshop that more than 50% of the existing programmes in his institution would not meet the criteria as currently formulated. There seems to be little or no gap between minimum standards and best practice and the minimum standards seem to have been drawn too directly from the good practice descriptors of the Improving Teaching and Learning Resources.

The overview of institutions on this issue is clear. More than 90% of questionnaire respondents state that there is a need to reduce the number of criteria as well as the number of minimum requirements and to create a greater space between true minima and good practice. Creating this space would also leave more to the discretion of those responsible for accreditation decisions.
2.3 Defining criteria
The definition of criteria for programme accreditation (page 3, section 2) refers to teaching and learning programmes, research programmes and service learning programmes which is unnecessarily restrictive. It is recommended that the definition read as follows: ‘criteria for programme accreditation indicate the minimum standards which are necessary to support and enhance the quality of teaching and learning or criteria for programme accreditation indicate the minimum standards which are necessary to support and enhance the quality of learning programmes’.

2.4 Defining programmes
‘The proposed programme accreditation system is bedeviled by the lack of a common definition of a programme’, argues one QA manager. Definitions differ between institutions and even between faculties within institutions. This is clearly a fault of the HE system as a whole. One of the results of this situation is that some institutions are not in a position to provide data for individual programmes. In an evidence based accreditation system, this constitutes a major problem. Data are usually available per course/module, per broad qualification type (such as the BSc) and often by Faculty, but not by programme. IT managers, when asked for data on programmes, require a clear and programmable definition.

Attention was also drawn to the fact that the programme accreditation proposals use the term programme in different ways. Footnote 3 on page 1 defines a programme as a purposeful and structured set of learning experiences that leads to one or more qualifications. However, section (v) on page 19 equates a programme with a single qualification. Certainly clarity is required on the distinction between a programme and a qualification. It should also be noted that SAQA registers qualifications not programmes on the NQF as suggested in (d) on page 20. Furthermore, the HEQC’s proposals for the use of general standards (see pp. 11-12) are confusing and do not match the nested approach to standards-setting recommended in the Draft NAP.

2.5 Defining new programmes
There is support for the proposal that programmes which have been significantly changed, should be classified as new programmes. There will however have to be clarity on what constitutes ‘significant’ change or change to ‘a considerable extent’. Further, the question needs to be asked as to who makes this decision? If it is left to each institution there could well be wide variations in the interpretation of ‘significant change’ and a tendency to minimise the number of programmes classified as ‘new’ because of the accreditation implications.

2.6 Programmes and outcomes
The proposed system for programme accreditation works on the assumption that higher education in South African is programmes based with an outcomes-based approach. Desirable as this may be, the reality is quite different. The extent to which curricula across the HE system are outcomes-based from design to implementation
and assessment is unknown. General opinion amongst QA managers is that despite the formal documentation, this is more the exception than the rule.

2.7 Database of programmes
Institutional QA managers and academic planners have long lamented the absence of a reliable national database which records the educational programmes and qualifications available at South African public higher education institutions. Institutional records and those of the Department of Education often differ and the SAQA website contains remarkable errors of omission and commission in this respect. The HEQC is not responsible for this state of affairs but it is in a position to remedy the situation and to create the required database as programmes are accredited.

2.8 Providing evidence
The concept of an ‘evidence based’ accreditation system is supported. However, providing sound evidence will be very difficult in respect of certain of the minimum requirements and in some cases – such as feedback from external stakeholders – may take some years to accumulate. Another fraught area is that of measuring retention and graduation rates (see criterion 25 below). Further, there are several areas where some flexibility in interpretation will be required in order to find the right balance between sufficient evidence and overload. As the accreditation process unfolds, the nature, scope and manner of providing evidence will need to be more clearly understood.

2.9 Integrating audit and accreditation
Institutional representatives at the workshop believe that there is an opportunity better to integrate audit and accreditation systems and, at the same time, simplify the programme accreditation process. Some of the accreditation criteria and perhaps twenty to thirty percent of the minimum requirements are institution-wide issues already dealt with under the institutional audit process. In the interests of simplicity and the reduction of workloads, it is recommended that issues that apply to the institutional rather than programme level be taken out of the programme accreditation system. Dealing with such issues as part of institutional audit requirements should suffice.

2.10 Programme accreditation judgments
It is strongly recommended that the descriptions ‘good’, ‘satisfactory’ and ‘not satisfactory’ not be used in respect of programmes. These terms imply norm-referenced judgments using implicit norms. It should be sufficient to describe programmes as ‘accredited’, ‘conditionally accredited’ or ‘not accredited’.

2.11 Reactions from academics and students
Institutional representatives were asked at the workshop to comment on reactions from academic staff and students. Some of these viewpoints are presented below
although it is impossible to judge the extent to which there is support for them, given the very limited time that was available for consultation. Generally, however, there is a fear of ever more bureaucracy which stifles opportunities for innovation and responsiveness. It is evident that too much bureaucracy imposes a compliance mode of working and a growing number of academics are unhappy about the increased steering of their activities by university management and external authorities. Academics are skeptical as to whether a profusion of policy and additional paperwork will improve the quality of academic experiences for students. The view has been expressed that the proposed programme accreditation criteria will stifle the development of new programmes; that the emphasis should be less on compliance and more on the pursuit of excellence through quality. Some academics and senior managers have begun to question the value of an institution gaining self-accreditation status.

Very few student responses have been reported. Their main concern seems to be with the position of students/graduates who are in or have just completed a programme which is only conditionally or not accredited and is eventually closed down. In a one year programme (such as Honours or a coursework Masters) a mid-term check is not really feasible and students fear being left with a discredited qualification.

2.12 Costs to institutions
The question has been raised as to the costs of preparing documentation for new programmes and for the re-accreditation or self-accreditation of existing programmes. This latter task will be a major undertaking in institutions with 1000+ programmes. As yet no estimates have been presented but the programme accreditation criteria as currently proposed will add a considerable workload to staff who are already overburdened. Ideally, new QA staff will need to be appointed to assemble and process documents and to keep records but financial constraints mitigate against this. Without additional staff the most likely result will be the very slow processing of documentation and an inability to comply with all requirements. According to questionnaire respondents, more than two thirds of HEIs currently do not have the capacity to self-accredit existing non-professional programmes. An additional cost to institutions will be the time spent by their staff as peer evaluators on accreditation visits to other institutions.

2.13 A framework for development
Institutions were asked to comment on possible omissions from the programme accreditation document. None were identified in terms of accreditation criteria but the point was made that the HEQC has produced an audit framework and an accreditation framework but not a complementary development framework – one which would offer a coherent strategy for capacity building and development to support accountability demands.

2.14 Commencement date for programme accreditation
The recommendation is that the new system of programme accreditation should not be made effective before mid 2004 and that January 2005 is preferable. The reasons given are as follows: Firstly, the criteria need to be finalised at least six months before
implementation, given the lead times for processing new programmes within institutions. New programmes currently ‘in the pipeline’ have not been set up under the proposed new system and would need to be re-worked if the proposed accreditation system were introduced before mid 2004.

Secondly, there is concern that the New Academic Policy has not been finalised and the review of the NQF is still underway. Both of these issues will impact on programme planning and it is very difficult to fine tune programme accreditation criteria when working in a partial policy vacuum.

Finally, if real quality improvements are to be made in academic teaching units, more time is needed to refine the criteria, to debate the implications intra-institutionally and to ensure that all the necessary support structures are in place.

2.15 Approach to quality
It is vitally important that the work of the HEQC contributes to the growth of a quality culture – one where institutions and individuals wish to take ownership of quality. If a system such as programme accreditation is too onerous and the compliance requirements too prescriptive, there exists a real danger that the opposite will occur. Instead of developing a quality culture, academics and institutions may simply learn to ‘play the game’ i.e. employ consultants and develop standard templates to produce submissions. Quality is more important than quality assurance; if the HEQC is perceived as being too prescriptive and unrealistic in its expectations, its credibility and the quality of educational programmes will suffer.
3. COMMENT ON SPECIFIC CRITERIA

We focus our comment and recommendations here on individual criteria. As noted earlier, the request of the HEQC to make suggestions for further reducing the number of criteria and simplifying the document has been taken seriously. In the first instance (as indicated in section 2.9) we recommend that overlap between the audit and accreditation systems are minimised. Issues which are institution wide rather than programme specific would best fit into the audit system and it is recommended that such issues are removed from the proposed programme accreditation criteria and minimum requirements. If this recommendation is accepted, it would be a simple exercise for the HEQC to perform and detailed suggestions on this matter are not included in this report.

As noted earlier, the list of criteria and minimum standards is extremely comprehensive but tends towards best practice. We believe that the gap between minimum standards and best practice needs to be greater. The danger, at present, is that there is no sense of a continuum that will allow institutions to measure their progress from fulfilling minimum standards towards the achievement of excellence. In addition, and given the current higher education context, a consequence of the proposed criteria could be administrative compliance. Perhaps the best way to proceed is either to reduce the number of minimum requirements, or to identify those which are truly minimal and flag the remainder as benchmarks of good/best practice.

A related and major concern to institutions is the total volume of work that will be generated, not so much in respect of new programmes which are relatively few in number, but with regard to the thousands of existing programmes which, in all probability, will have to be re-accredited in-house. With this in mind there are several suggestions in this section for the conflation of criteria.

**Criterion 1—**
Broadly supported, although mission statements tend to be so general that it will be very difficult to show that each and every programme is designed as an integral part of an institution’s mission. A link to institutional rolling plans and programme and qualification mix may be more appropriate. Under (ix), the view is that it is unrealistic to expect work-based learning to be an integral part of all vocational/professional programmes. The work opportunities simply do not exist. Further, work based learning traditionally occurs after the award of a qualification with respect to several professional programmes (e.g. engineering and accountancy).

**Criterion 2—**
It is recommended that this criterion be deleted. Policies in respect of the development and evaluation of learning materials are usually institution wide and not programme specific and this issue is best dealt with as part of the institutional audit process.
Criterion 3—
The intentions of this criterion are clear and supported. However, putting recruitment, admission, entry requirements and actual selection processes under one heading combines too many different issues. This is perhaps one place where splitting these issues into separate criteria would be beneficial. Admissions issues refer to the institutional level and should be dealt with in the audit criteria only.

Criteria 4, 5 and 6—
It is recommended that criteria 4, 5 and 6 be conflated into one, that the minimum requirements be reduced in number and that undergraduate and postgraduate programmes are distinguished. The minima listed under these three criteria describe best practice rather than minima and some would be better located within the institutional audit system. In short, one criterion should suffice to ensure that staff appointed to deliver educational programmes are sufficient in number and suited to the task. Given the shortage of skilled people in some disciplines and geographical areas, institutions must be left some latitude to decide whether or not to offer a programme given the available human resources.

Criterion 7—
Policies and procedures in respect of internal assessment, external examining, monitoring of programmes etc. are normally institution-wide concerns and not programme specific and are best dealt with as part of institutional audits. Four of the audit criteria deal with these matters. It is recommended that this criterion be changed so that it deals only with those assessment practices which are programme specific.

Criteria 8 and 9—
The intentions of 8 and 9 are supported but these two criteria could easily be replaced with one criterion dealing with ‘infrastructure and resources’.

Criterion 10—
For the most part, programme administrative services are centralised either under the registrar or in a faculty or school office. Such services are rarely programme specific. Programme administrative services should be dealt with as part of the institutional audit.

Criterion 11—
This criterion is supported in principle, but there is considerable overlap here with the audit criteria which is unnecessary.

Criterion 12—
A mid-term check is desirable but it does not constitute a criterion. Table 1 in the Synopsis makes this clear. It classifies all of the criteria except criterion 12 which does not fit the classification. The mid-term check is an important part of the programme accreditation process and should be deleted from the list of criteria.
Criterion 13—
This is supported if programme ‘team’ is changed to programme ‘co-ordinator/s’. The idea of creating 1000+ teams in the larger institutions cannot be contemplated.

Criterion 14—
In principle supported but academic development ‘models’ are rarely programme specific. It is recommended that this criterion be re-defined to focus on academic support within programmes. Only requirements (ii) and (vi) apply to the programme level and it is recommended that (vi) should not be restricted to language development but includes reference to numeracy and cognition (i.e. cognitive academic language proficiency or CALP).

Criterion 15—
Supported, but the reference to ‘credits’ in (iv) is confusing and needs to be clarified.

Criteria 16 to 20—
These five criteria reflect best practice rather than minimum requirements and there is considerable overlap with audit criteria. The proposal to replace these five criteria with one criterion on assessment systems and practices was fully supported by QA managers.

Criterion 21—
This criterion is supported but work-based learning should not be a minimum requirement for all vocational and professional programmes. Some professional programmes – such as Law and Theology – have no professional body and do not normally incorporate work-based learning into the curriculum. In several cases work-based learning occurs only after the award of a qualification and it becomes part of a process of professional certification; as with engineers for example (see also criterion 1).

Criteria 22 to 24—
It is recommended that these three criteria are consolidated into one. Assessment practices have already been dealt with (see 16-20) and several of the minimum requirements are institution wide issues dealt with by the audit process.

Criterion 25—
This criterion is supported but its successful implementation is dependent on the establishment of agreed ways of measuring throughput and retention. The Department of Education’s current method of calculating graduation rates is subject to distortion depending on whether the number of students entering a programme is on the increase or decrease. SAUVCA and the CTP would welcome the opportunity to provide input.
on suitable measures of throughput and retention rates. Equity of output is very
difficult to manage and should not be made a minimum standard.

**Criterion 26—**
This criterion can be deleted as the certification process is subsumed under
institutional administrative services and is also dealt with in the audit criteria.

**Criterion 27—**
Supported, but the criterion needs some re-phrasing as a good many programmes
represent education for employability rather than for ‘jobs’ and desired outcomes are
not always employment related. There is also some overlap with criterion 28 and
some institutions feel that these two criteria could be combined.

**Criterion 28—**
This criterion combines the effectiveness of a programme and its validity. It is
recommended that it focuses only on the effectiveness as validation is dealt with
under programme design; this criterion can be combined with criterion 27.

**Criterion 29—**
This criterion is supported. It was noted that it will take several years of graduates in a
programme before sufficient feedback is obtained on which to form valid judgments.

**Criterion 30—**
For the most part this criterion duplicates criterion 25, other than the introduction of a
concern for cost-effectiveness in 30. It is recommended that criteria 25 and 30 be
consolidated.
4. SUMMARY AND RECOMMENDATIONS

The HEQC’s * Proposed Criteria for the Programme Accreditation Cycle: 2004-2009* is a well written, well organised and comprehensive document. It provides a description of the full range of issues that should be taken into account when judgments are formed on the quality of programmes. Taken individually, it is difficult to find fault with the criteria and attendant lists of minimum standards.

The main concerns of the public higher education institutions are with the totality of the accreditation system presented. Institutional quality assurance managers are of the opinion that in seeking comprehensiveness, the HEQC has gathered the best from many systems and that the end result has been a description of best practice rather than of minimum standards. The influence of the *Improving Teaching and Learning Resources* is understandable but it has led to minimum standards being set too high. To a large extent, best practice has become the minimum standard. The programme accreditation system proposed by the HEQC is certainly something to strive for, but in its present form, it presents a goal which is too far from current reality. Further, being so comprehensive, the proposed programme accreditation system will generate a vast amount of work. The costs in terms of human and financial resources are yet to be calculated, but may well stretch institutional capacities beyond breaking point and will certainly result in resistance from academic and administrative staff. At the same time, there is a considerable and unnecessary overlap between the programme accreditation criteria and those of the audit system.

With the above issues in mind, this report includes the following recommendations.

- Criteria which are essentially concerned with institution-wide policies and issues, rather than with specific educational programmes, should be located under the institutional audit process. In many instances this is already the case and overlap between the accreditation and audit criteria should be reduced to an absolute minimum. This action in itself would considerably reduce the workloads generated by the proposed accreditation system.

- The currently proposed sets of minimum standards for each criterion should be carefully reviewed and be split into two categories; minimum standards and indicators of good practice. The minimum standards that remain must present realistic goals in the South African context. In the long term, the list of minimum standards can be extended.

- The number of criteria can be reduced as per the recommendations in section 3 above, which would reduce the total by some fifty percent and result in a much more manageable and acceptable system.

- The opportunity needs to be created for discussion between the HEQC and the institutional representatives who will have to implement the programme accreditation system in its final form. Several of the issues raised in section 2 above (such as the need for a system wide definition of a ‘programme’) need
to be resolved before accreditation can meaningfully commence. If the commencement date for programme accreditation is set at January 2005, as we recommend, then there will be ample time for this discussion.

In the final analysis, the programme accreditation system must be workable and all concerned must be committed to making it work. The ultimate success of the programme accreditation process is dependent on the extent to which academics will engage seriously and in a rigorous manner with the accreditation criteria. The process must therefore be user-friendly to academics and institutions will need to allocate considerable resources to educate and empower staff to use the programme accreditation process as a meaningful tool for both improvement and accountability.
Appendix 1—

SAUVCA NATIONAL QUALITY ASSURANCE FORUM

Discussion Document

Please read the HEQC document (the Synopsis is attached) and consider responses to the questions below prior to attending the SNQAF Workshop on Thursday 6 November. In doing so, please consult other key QA players in your institution such as your DVC (A), Deans and other members of your unit so that your response is as far as possible an institutional rather than a personal one. The workshop will be dedicated to discussing participants’ responses to these questions. Once the debates have been aired, you will be asked to complete a questionnaire based on these questions to inform the SAUVCA response to the HEQC on this document.

1. Comment on the HEQC’s proposed model for programme accreditation based on the distinctions between new and existing, professional and non-professional programmes and a phased in approach. To what extent is this model feasible in terms of your institution’s quality assurance capacity? (See full document pp.9-11, synopsis Chapter 2).

2. Comment on the HEQC’s classification model of categories for programme accreditation based on input, process, output and impact and review, particularly in terms of scope and feasibility. (See full document pp.47-51, synopsis pp.5-6)

3. To what extent do you think that the set of criteria for programme accreditation proposed by the HEQC are appropriate
   a) as minimum standards for the HE system
   b) as benchmarks for internal self-evaluation

4. To what extent do you think the HEQC has achieved the right level of specificity in its criterion statements and requirements?

5. To what extent do you support the HEQC’s classification of programme accreditation outcomes as good (accreditation granted), satisfactory (accreditation granted conditionally) and not satisfactory (accreditation not granted)?

6. To what extent is your institution ready to meet the HEQC’s requirements for the 3-stage accreditation process for all new programmes beginning with the candidacy stage in 2004?

7. How do you think the following groups of stakeholders will respond to the implementation of the HEQC’s proposed criteria for programme accreditation...
and re-accreditation?

a) Academics?
b) Academic managers?
c) Students

8. What do you think will be the likely consequences for the HE system as a whole of implementing this proposed system of programme accreditation?

9. To what extent do you think that the HEQC is developing a coherent national QA system for HE (bearing in mind the proposals for institutional audit, national programme evaluations, the requirements for self-accreditation status and these proposals for programme accreditation)?

10. Any other comments?
Appendix 2—

SAUVCA NATIONAL QUALITY ASSURANCE FORUM

Questionnaire on the Proposed Criteria for the HEQC’s Programme Accreditation Cycle: 2004 – 2009 (26 September 2003) for completion at the workshop held on 6 November, 2003

NB This information is for research purposes only and will remain strictly confidential

Name of person completing the questionnaire:

Position:

Institution:

Please complete the questions below at the workshop and hand your questionnaire in before leaving.

1. We support the HEQC’s proposed model for programme accreditation (based on the distinctions between new and existing programmes and existing professional and existing non-professional programmes and a phased in approach to accreditation, beginning with new programmes).

YES ☐

NO ☐

---

1 Those involved in QA at your institution with whom you may have discussed the HEQC’s proposals prior to attending this workshop.
2. We think that the scope of the HEQC’s classification of criteria for programme aspects is fair.

YES ☐

NO ☐

Please give reasons for your position:

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

3. We think that the set of criteria for programme accreditation proposed by the HEQC are appropriate:

a) as minimum standards for the HE system.

YES ☐

NO ☐

Please give reasons for your position:

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________
b) as benchmarks for internal self-evaluation.

YES  
NO  

Please give reasons for your position:

__________________________________________________________________________

__________________________________________________________________________

__________________________________________________________________________

4. We believe that the HEQC has achieved the right level of specificity in its criterion statements and indicators / requirements.

YES  
NO  

Please give reasons for your position:

__________________________________________________________________________

__________________________________________________________________________

__________________________________________________________________________

5. We support the HEQC’s classification of programme accreditation outcomes as good (accreditation granted), satisfactory (accreditation granted conditionally) and not satisfactory (accreditation not granted).

YES  
NO  

Please give reasons for your position:

_________________________________________________________________
_________________________________________________________________
_________________________________________________________________

6. Our institution is ready to meet the HEQC’s requirements for the 3-stage accreditation process for all new programmes beginning with the candidacy stage in 2004.

YES ☐

NO ☐

If no, please explain why and suggest when you will be ready:

_________________________________________________________________
_________________________________________________________________
_________________________________________________________________
_________________________________________________________________

7. From 2010, assuming we are granted self-accreditation status, our institution will cope with the requirement to re-accredit all of our existing non-professional programmes in terms of cost, person-power and time.

YES ☐

NO ☐

If no, please explain why:

_________________________________________________________________
_________________________________________________________________
_________________________________________________________________
_________________________________________________________________
8. Do you have any criticisms of specific criterion statements and their requirements / indicators?

*Please use the HEQC’s numbering e.g. Criterion 7 (ii)*

9. How do you think the following groups of stakeholders will respond to the implementation of the HEQC’s proposed criteria for programme accreditation and re-accreditation?
a) Academics:

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

b) Academic managers:

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

c) Students:

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________
10. What do you think will be the likely consequences (intended and unintended) of implementing this proposed system of programme accreditation for the HE system as a whole?

_____________________________________________________________

_____________________________________________________________

_____________________________________________________________

_____________________________________________________________

11. To what extent do you think that the HEQC is developing a coherent national QA system for HE (bearing in mind the proposed criteria for institutional audit, national programme reviews, the requirements for self-accreditation status and these proposed criteria for programme accreditation)?

_____________________________________________________________

_____________________________________________________________

_____________________________________________________________

_____________________________________________________________

12. Any other comments?

_____________________________________________________________

_____________________________________________________________

_____________________________________________________________

_____________________________________________________________

THANK YOU FOR COMPLETING THIS QUESTIONNAIRE
APPENDIX 7

Report on Improving Teaching & Learning Project’s Regional Workshops

Source: Luckett 2003 (unpublished)
Workshop No.4 held at University of Stellenbosch GBS
8 & 9 October – Main Facilitator

Workshop No.5 held at University of Durban-Westville
13 & 14 October – Participant

Workshop No.7 held at Blue Waters Hotel, Durban
15 & 16 October – Resource Person

Workshop No.10 held at UNISA
29 & 30 October – Resource Person

Workshop No.13 held at WITS
3 & 4 November – Main Facilitator
Introduction
I attended 5 of the Improving Teaching & Learning Project’s (IT&LP) Workshops in various capacities, as facilitator of two, resource person for two and participant at one. I will therefore report on all 5 in an aggregated manner, indicating only where relevant the workshop (by No.) and/or the institution concerned.

1. Participants Responses to the Improving Teaching & Learning Resources

1.1. Reception & Intended Use

Positive:

1. This workshop and the IT&L Resources have softened the hard edge of accountability. The Resources give us a very useful tool for critical-thinking about our self-evaluation. The HEQC is moving us to focus on good practice rather than minimum standards. The HEQC should have sent out this Resource first to prepare the way for the Programme Accreditation document. If is far more valuable to look at the 7 areas of the Resources than to be confronted with the 39 criteria of the accreditation document. (Tech Pta)

2. These are the first purely South African resource for T&L that we have seen. The HEQC should be congratulated on producing it. However we are worried that having the HEQC name on it will make people take it too literally. Perhaps SAUVCA or a different organisation should work with people on it? (UN)

3. For the first time the HEQC is taking a developmental rather than top-down approach and attempting to enthuse us about quality. (Private)

4. We would like to take this document and use it for improvement, selectively. It has a developmental approach which we like. (WITS)

5. The integration of the Resources is well-done. It provides a generic framework for dialogue and discussion. (DIT)

6. We like the evaluative questions, good practice descriptors because they are measurable and tangible. We like the framing and strategic direction given by the Resources. Also the value placed on educational research. (DIT)

7. As a future University of Technology we felt that the Evaluative Questions were appropriate for our needs. We found the principles in the Resources general but relevant. They still need to be customized for specific contexts, people must interpret them for themselves. We will have to explain to people how to use them. If they just landed on your desk they could be understood to be prescriptive. (Tech Pta)

8. We found the evaluative questions very useful as a means of organising our thoughts. (UCT)

9. We found the evaluative questions and data sources very useful. (WITS)

10. We found the evaluative questions very useful as they are open to interpretation for each department or situation. (Vaal Triangle Tech), (Unizul)

11. We like the evaluative questions, the are flexible, comprehensive and allow us to use our discretion. They also provide us with common benchmarks. (DIT)
12. They will be useful for our self-evaluation process as we prepare for audit, but should not drive it in a literal manner. (UN)

13. We liked the emphasis on self-evaluation. (Private)

14. They will be very useful for developing our internal self-evaluation model. (Tech NG)

15. The Resources will be useful at institutional level for policy formulation, plans and as a check for self-evaluation. This will especially be useful for merging HEIs who are re-making all their policies. (Tech Pta)

16. We found the Resource pack informative and we liked the clear definitions. It helped put our concerns into perspective. It is well-researched and evidence-based and so reassured us. (DIT)

17. The document is useful as a general policy statement. But there is a difference between intellectual commitment to these things and taking them on in your heart and making it part of the world you inhabit (US).

18. The Resources are useful at Senate level for policy formulation and decision-making. (Vaal Triangle Tech)

19. They are a good checklist for policy development. (UCT)

20. The Resources spell out clearly the need for change in teaching practices. We like the emphasis on teaching being accorded the same status as research. We also support the idea of reflective teaching using self and peer evaluation. (Unizul).

21. The Resource on this was very useful for getting us to focus on the use of learning outcomes and also the idea (new and challenging to us) that teaching staff should be ‘reflective practitioners’ and be involved in the review process. The Resource also emphasizes the importance of setting and implementing improvement plans and the need for sensitivity and transparency. (Private)

22. The IT&L Resources do challenge traditional notions of teaching from within a reflective paradigm. We liked the Rationale and Discussion sections and the way they take national imperatives and debates as the starting points. (UN-UDW)

23. They will be very useful for our merger Access and Admissions committee (UN).

24. They will be useful in our programme reviews – both for designing them beforehand and afterwards for follow-up. They can be used to diagnose traditional practice. (UCT)

25. They are a good departmental resource – for HoDs. (UCT)

26. They will be useful at Faculty and Department level for guidelines for good practice. (Vaal Triangle Tech)

27. The Resources deal well with the issues and problems of diversity. The rationales are clear and good. (Unizul)

28. The references are very useful, we will follow them up. (Private)
29. Organised student bodies should have access to these Resources. They would give them an idea of what quality is and of how to benchmark provision.

30. We are pleased that the HEQC has put out the Resources because learners need protection from raw deals. (TNG)

HEQC Response:
The IT&L Resources were developed by Staff Development and Academic Development people from across the country led by KL from the University of Natal. They are intended to guide self-evaluation and their audience is academic managers, QA managers and staff development or academic development personnel. In most cases, they will need to be mediated to academics. Because they are linked to QA they tend to focus on systems for maintaining or enhancing the quality of T&L, i.e. they take a ‘manager’s gaze’ on T&L. (They were not intended to include detailed ‘how to’ tips on micro aspects of T&L). They set up ideal models of good practice. They should not be used as a checklist and are not intended to be prescriptive and should rather be used interpretively. They should also be applied selectively, depending on your institutional priorities. With respect to teaching and learning, the audit and accreditation criteria were derived from these.

Negative:
1. The document is very dense and needs a lot of unpacking (Private Provider).

2. They are too complex and technical, they should be kept flexible and easy to access. (DIT)

3. The Resources would be overwhelming to give to academic staff and the data sources are too exhaustive. (Vaal Triangle Tech)

4. The Resources assume familiarity with educational jargon, who is the audience? (UDW)

5. You need experts to interpret the Resources in an operational activity. They are not explicit enough for local level and will need a user-friendly manual to be developed alongside them. (Tech NG)

6. Translation of this document at departmental level will require contextualisation and customisation. The same applies for programme level. It is least useful for course level because it doesn’t show you how to do it. But there are aspects which are relevant to self-evaluation for an individual lecturer, provided this was contextualised by the HoD or QA manager. (Tech NG)

7. These are by definition generic, contexts and complexities are underestimated (US).

8. There is a danger that these Resources will be send to everybody. Rather they need to be mediated and inserted into existing ways of working and existing practices. We will rather repackage them into our friendly institutional documents and introduce them at critical moments when people are ready to engage. This will make them empowering rather than debilitating. (UN)

9. The people who have come to this workshop are change agents. They will have to take the Resources back and contextualise them, we can’t just hand them out as they are. (Tech Pta)
10. We would not want to use them directly, rather ‘chunk’ them up and in particular give the evaluative questions and data sources for prioritized areas to academic staff. (WITS)

11. There should be more in the Resources on the role of support structures, they are implicated in improving T&L. (Vaal Triangle Tech)

12. We have already implemented much of what is in this document. We have already used a similar approach. The trick is to get the quality process internalized by academics. (Tech Pta)

13. The Resource pack itself is very dense and has huge implications for time, staffing and resources. We will need to prioritise. Will we be penalized for prioritising and doing one area properly? (Private)

14. These resources are great but they are five-star and their volume is too great. We are already exhausted and burnt-out. Let’s just take a first bite and work with a manageable bite. The problem is that if we do this, by audit we won’t have covered all the audit requirements. But we want to do this job responsibly and authentically. (WITS)

15. They tend to be a checklist for outputs and don’t give us enough on inputs and processes. (DIT)

16. The Resources do not adequately deal with the need to change educational philosophy. We need to be told what is the latest thinking in the philosophy and methods of teaching. (Tech Pta)

17. The Resources tend to be university based, what about comprehensives and technikons? (DIT)

18. There should be more in the Resources on the role of support structures, they are implicated in improving T&L. (Vaal Triangle Tech)

19. Too much focus on academic roles, what about support and admin departments, this should be integrated in. (DIT)

20. It’s important to keep this level of good practice as the goal for self-evaluation only. In the MBA process, these kinds of criteria were used literally and the HEQC’s stated intentions were contradicted. (UN)

21. For institutional self-evaluation these Resources are fine. But the Resources on programmes militate against those who are trying to maintain the traditional discipline-based model of curriculum. We also think that the model in the Resources on self-evaluation needs to be integrated more. For example, our model has only student feedback at module level and this is fed into our programme self-evaluations which are then fed into school reviews. We only have peer review at this level. (UN)

22. We don’t like the word resources, these are rather guides or models that force you to engage and that focus the mind. They are not a resource for implementation at local level. (US)

23. These are codes of practice rather than resources – i.e. they tell us what we should do or have but not how to get there (US).
24. The Resources tend to give us end-points but not pathways. They need more on the ‘how’ not only on the ‘what’. (WITS)

25. They are not directly useable for academic staff, they are more for teaching-literate middle management. The audience for the Resources is staff developers, QA Managers etc., it should be made clear in the introduction that they need to be mediated to academic staff and that their primary use is to support self-evaluation. (UCT)

26. The HEQC assumes that full-time lecturers are the norm, we have 90% part-time staff and it is usually only administrators and managers who are full-time. Our organizations are small and we have a very high staff turn-over; we have to change and keep up with industry all the time. There is often tension between staff and management as there is between academic integrity and profit-making. We have flat management structures, less specialization and less developed career paths for staff. Private providers do not generally invest in staff development. We can’t afford separate staff development units, etc. and we can’t insist that our part-time teaching staff do a qualification teaching. We aim to employ people at the cutting edge of industry and aim to produce immediately employable students; excellent teaching is not really a focus. We therefore can’t meet the challenges demanded by the HEQC and we feel left out in the cold. The HEQC should consider private providers differently due to our different contexts. (Private Providers)

1.2. Further Development of the Resources

General:
1. Each Resource should be accompanied by a set of case studies or examples on different types of HEI, indicating how the good practice can be achieved. (UWC), (Unizul)

2. The Resources need South African examples. (DIT)

3. We also need examples of what can go wrong and on the implications of implementation, e.g. time-tableing, PQM & IJC rejections, etc. (Unizul)

4. They should remain just pointers for improvement and should be kept accessible. (UWC)

5. They should be put on the HEQC web-site, perhaps with hyper-links to make them more user friendly.

6. They would be easier to use if they were better disaggregated out – at institutional, faculty and departmental levels. (US)

7. We would like a separate reference list for each Resource. (WITS)

8. It needs a glossary of acronyms. (Private)

9. We should set up with the HEQC regional subject-based groups for benchmarking. (UWC)

10. There is no cross-institutional networking for staff and student development, the HEQC should help with this. (Unizul)
11. Gaps include Resources on e-learning, management information systems and on research systems. (UN)

Specific:

1. Programme Planning, Design & Management
   • This resource is useful to a point. We like the evaluative questions for self-evaluation. However, the policy environment is very fluid and sometimes contradictory, e.g. the New Funding Framework pushes research over teaching, the DoE wants a 75% throughput rate which may militate against quality teaching and PQMs have to be approved by the DoE rather than being responsive to stakeholders; also the NAP is still not finalised.
   • The resource has certain definitions of a programme and qualification which are not always possible to measure e.g. via throughput rates. We can measure these on qualifications and modules, but not for programmes. The definition of a programme may be too narrow.
   • There is also too much emphasis on responsiveness.

2. Programme & Course Review
   • P. 34 We need to ask who are the external stakeholders – or who should they be? Some are more powerful than others.
   • Course review is too elaborate and too demanding, it should rather be integrated into programme review as a process.
   • There is insufficient emphasis on student feedback.

3. Access and Admissions
   • It has no suggestions on how to balance equity & representivity with resources and sustainability.
   • This Resource has inadequate emphasis on Technikon admissions, it lacks a Technikon perspective.
   • It does not make a clear distinction between mature age admissions and RPL.
   • It has no reference to the admissions of international and SADC students.
   • P. 42 problems with the notion of ‘disadvantaged’: race, gender and disability are included, but what about class, one should also look at students from disadvantaged schools.
   • P.49 Government policy documentation should be part of the Sources of Data.

4. Student Development & Support
   • The Resource needs more of an implementation strategy.

5. The Assessment of Student Learning
   • This speaks directly to the way we are designing our new assessment policy. We will emphasize the need for staff development around assessment and also the need for students to take responsibility for their own learning.
   • This Resource focuses too much on one assessment model, it should give other modes of good practice.
   • It is too skewed towards the academic stream.
   • It should highlight accountability for assessment.
   • It is silent on the issue of modularization, critical for a change in assessment practice.
   • It should include something on the assessment of short courses.
   • It should include discussion on the cost factors.
   • Requirements for moderation are too prescriptive.
   • The SAQA Guidelines on Assessment should be included in the reference list.
6. Staff Development

- This resource is too technocratic, it cannot capture the spontaneity and rhythms of the classroom.
- What about other models and theories of staff development?
- This resource has a Western framework, most of the literature referenced is from the UK. What about an African model?
- We need to first ask ‘what is the job of an academic?’ and ‘what skills does an academic require?’ and to make this explicit.
- It needs a definition of professionalism. What about a professional body for HE educators?
- P.70 the changes in teaching are stated too strongly, may cause resistance.
- P.70 Mode 1 & Mode 2 knowledge production is used too uncritically, binaries are too stark. Should rather emphasise the mediator role played by academics between students and the workplace.
- P.73 No.2 Delete – equity issues are HR rather than staff development issues.
- This resource does not adequately deal with the non-traditional teacher, i.e. on contract or part-time. It should also look at the changing and diverse nature of the role of the academic.
- The qualification in HE is seen as an end point, what happens thereafter?
- There should be a stronger emphasis on resource allocation.
- Student evaluation should be introduced more positively.
- Promotion is not always possible as an incentive, rather emphasize rewards.
- It focuses too much on junior staff and so let’s senior staff off the hook.
- This Resource does not adequately deal with informal networking as a means of SD.
- An emphasis on action research in the classroom should be spelt out.
- It assumes that SD is part of an institutional process, what if it is out-sourced? This is not dealt with in the document.
- The link between self-evaluation, appraisal and staff development should be brought out more clearly.
- We need an HE tailor-made appraisal system, the HEQC should help with this.
- The document is too specific – e.g. reference to HESDI and the PGCHE will date it.

7. Postgraduate Research and Supervision

- How to grow supervisors is a key challenge that the Resource does deal with adequately.
- P.86. No.6 – use ‘under-prepared’ rather than ‘historically disadvantaged’.
- P.86 supervisor training should include diversity and interpersonal skills training.
- In Technikons research is often confidential to its industrial sponsors. This means that it is difficult to employ external examiners because the industry owns the intellectual property rights and does not want outsiders to have access to it. The HEQC should take this context into consideration in its requirements for moderation.

2. Institutional Discussions and Strategies around the Improvement of Teaching & Learning

2.1. Case Studies

Workshop 4:
City College Campus – Use of the Intranet for Student Evaluations
University of Stellenbosch – Use of WEB CT for 1st Year Chemistry Course (B134)
University of the Western Cape – Teacher-learner Interface in Nursing
University of Cape Town – Introduction of an Extended Curriculum in Science

Workshop 5:
Durban Computer College – Assisting learners with a lack of academic preparedness with the language of tuition & Staff Development
ICESA City Campus - Internships
UDW – Teaching as Cognitive Therapy
UN – Rewarding Excellent Teaching

Workshop 7:
Regent Business School – Mixed Mode Delivery
DIT – Active Learning, Groupwork and Feedback in the Language & Translation Programme
Unizul – The Development & Implementation of a New Policy for the Assessment of Students

Workshop 10:
Technikon Northern Gauteng – Project-Orientated Learning
Technikon Pretoria – Improving the Pharmacy Curriculum

Workshop 13:
Monash – Analysis of Transition Strategies for 1st year students
Midrand Graduate Institute – Teaching & Learning Internships
WITS – Graduate Entry Medical Programme, Faculty of Health Sciences
Vaal Triangle Technikon – Improvement of throughput rates in Food and Beverage Management in the Department of Hospitality and Tourism

2.2. General Issues Raised in Discussion

1. Improvement Strategies:
   - Improvements in T&L will need to have a strategy and support at senior management level.
   - Innovation requires energy and passion, which are in very short supply, people have become tired and cynical.
   - Improvement of T&L requires changes in the identities of academics and also in institutional culture, this takes time.
   - We have to deal with how people see themselves, their identities. Traditional modes of ‘belonging’ are being broken down. Change will be superficial unless individual identities are dealt with and unless people feel that they belong and are affirmed. Issues of identity and community need to be built around the curriculum and around a strong culture of teaching and learning, this is hard work, especially in a merging situation.
   - Innovation must be properly resourced to be sustained – finance, human capacity and infrastructure.
   - Incentives and rewards – promotion, status and recognition are key issues if teaching is to be promoted.
   - Buy-in only comes after success
   - Research into teaching needs to be made respectable and public, it should be the basis for policies and management frameworks on improving T&L.

HEQC:
The HEQC is trying to send signals to senior management that institutional transformation includes the transformation of T&L. We want the foot-soldiers to be supported in this.
2. Funding:
   - How will the Directorate of QP & CD support the enhancement of T&L?

**HEQC:**
The HEQC hopes to raise a considerable amount of soft funding for development projects which will be based on partnerships.

3. Tensions between Equity, Diversity and Efficiency:
   - How can we achieve these simultaneously? This requires systemic and structural issues to be addressed, a curriculum space must be provided in which deep learning and foundational competences can be acquired. These need to be integrated with the mainstream curriculum. Institutions need to be informed about students’ prior learning levels and to be accountable for throughput rates. All of this is resource intensive, efficient through-puts cost money. We don’t feel supported by the DoE or the HEQC in this AD work.

**HEQC:**
The HEQC is aware of the challenges and difficulties that arise from our environment. The HEQC wants to integrate the steering instruments, i.e., planning, funding and QA. It wants to link quality to transformation and avoid bureaucratic overkill. It is aware that both QMSs and quality per se need to be improved and that there are capacity and resource constraints to this happening.

4. Lack of policy alignment:
   - Policy-makers in Pretoria do not seem to know what the other policy-makers are doing.

**HEQC:**
The HEQC operates within the requirements of the PQM exercise. We don’t have control over funding and registration. Programmes 1st go to the DoE and then to the HEQC. There are national policy objectives which the CHE supports. The whole point of the restructuring is to clean up the size and shape of the system. However universities are unhappy with the inflexible way that the DoE has handled the PQM exercise. We meet regularly with the DoE and try to address these issues by keeping our advice and QA functions together.

Likewise the HEQC has to take into account the DoE’s throughput rate benchmarks although we recognize that this is a simplistic way of looking at throughput rates. We will look at the evidence holistically and will look at both quantitative and qualitative data.

5. Differences between universities, technikons and private providers?
   - How will the HEQC deal with differences between different types of provider? For example, technikons get less subsidy and privates get none. Our approaches to learning are different, e.g., the emphasis on experiential learning in the technikons and training for employment by privates.

**HEQC:**
We have a single set of quality requirements but we want to balance these with the differences. Your strategies will be different, but we want the same quality of output e.g., the quality of a Diploma should be the same irrespective of where it is offered. The reality is that different HEIs are in different places wrt quality. This is why the HEQC is undertaking capacity development, we believe that it is our responsibility to ensure that HEIs have assistance to meet our quality requirements. The production and dissemination of these Resources is one example of the HEQC working at this responsibility. We also understand the costs of quality and when we visit HEIs we always ask about the relationship between QA, planning and resource allocation. Further, the HEQC is hoping to negotiate access to a substantial amount of money to use for capacity development. We may be able to use this to resource HEIs to implement improvement plans.
6. Relationship between the Resources and other HEQC Instruments:

- We would like to take the Resource pack and use it for improvement, selectively. It has a developmental approach which we like. We would rather go slowly and do a good job than ‘spot’ to impress an external body. The problem is that we now also have the audit and accreditation criteria, which in our opinion go into too much depth. What would happen if we just took assessment for example and used this Resource to roll out an improvement strategy? Would we get hit in an audit for focusing only on this area? What is the status of the Resources and what is their relationship to the other 2 sets of criteria? What is the degree of discretion that the HEQC will allow us as professional academics to make our own judgment about what are the key areas for us to focus on wrt QA?

- We want to know what is the relationship between the 3 criteria documents. The Resources are meant to be developmental and voluntary, but they are almost identical to the criteria for programme accreditation. How can PA criteria be prescribed whilst the Resources are voluntary and ‘good practice’? The HEQC has made its minimum standards for both audit and especially accreditation too close to the good practice in the Resources. Likewise with the audit criteria, in the pilot audit - the requirements, which are more like best practice, were used in a check list approach. We had to gather all these data sources in about 3 days for an audit trail. We are going the QAA way of a compliance culture. The HEQC needs to leave a space for bottom-up growth and should have greater differentiation between its instruments. We should have the academic freedom to show that we are working from where we are. However, the pilot audit was also useful because the HEQC highlighted for us where our weaknesses lie – e.g. in linking planning and resource allocation.

- The HEQC promotes the model of the ‘reflective practitioner’ in the Resources, but what is the HEQC’s framework or philosophy for audit? Will this model be sustained when it comes to accountability?

- We found that the HEQC adopted a check-list approach during our pilot audit. We had to follow certain criteria, even if they were not appropriate to our institution. But when we explained this to the audit panel they did hear us. But we were left with a sense of being inadequate and that certain gaps should be filled. Of course we are still waiting for the final HEQC report, the real assessment of the value of the external pilot audit will be when we get the written report.

- We are worried that audit outcomes seem to be dependent on who you get on the audit panel. We hope that the HEQC is giving their panelists consistent training and that the work of the auditors is also evaluated.

- Wrt institutional and programme accreditation, the HEQC’s approach has been very harsh and non-negotiable.

- Our audit panel were good, they were well-prepared and professional, not all of them are politicians. But they did follow the audit criteria rather literally and the criteria are too many and over-specified.

HEQC:
We cannot give the Resource pack status in the preparation for audit, this would be problematic. The resources are simply to assist you in your own development. The audit criteria are currently being refined and reduced. Remember it is an evidence-based audit. Auditors will be trained to start with an HEI’s self-evaluation portfolio which is limited to 70 pages. Your self-evaluation and QA should be linked to your planning and this plan will be taken seriously by the auditors. But it will be critiqued by them (i.e. subject to peer review).
These peers may also be obliged to ask questions about other areas of practice which you have not attended to. In general the HEQC wants to move towards a paradigm of self-regulation, but first it must raise awareness and set out minimum standards.

7. The Role of Students in QA:
   - How should students get involved in the QA of T&L? For example, all HE students should be alerted to the existence of the Resources on the web.

HEQC
The HEQC has planned to work with student organisations and with the Graduate Development Association. We are discussing the development of a student charter based on these Resources so that students can be more explicit in their demands on providers. We want to make students aware of the questions they should be asking their institutions. However, we also do not want them to operate only as clients and customers but also as co-learners.

2.3. Priority Areas and Improvement Plans Using the Resources
At the workshops each institutional group prioritized an area for improvement in their own institution and then developed an action plan for this. I have selected the more comprehensive ones for summary here.

Assessment (WITS)
We do have policies and good innovative practices in place, but these are not widely disseminated. We also some bad practice and lecturers who are not accountable for bad practice and bad pass rates – the problem is dismissed via a deficit view of students. Challenges wrt assessment include timing (formative assessment is hard work in large classes), diverse student needs, not all lecturers use assessment criteria or make assessment demands clear to students and the quality of feedback to students is patchy. We need an intelligent debate about the range of assessment methods, we need to educate staff about assessment and its relation to learning, new staff do get training but we need a refresher course for old staff stuck in out-dated practices with no underpinning theory. We need to think very hard about rewards and incentives for the time invested in innovative teaching and assessment practice. The hearts and minds issue is key.

Academic Professional Development Strategy (UCT)
We assumed that universities have now moved to a managerial mode of governance. We need to set clear goals and outputs for teaching and align the reward system to recognize and value teaching achievements. We need to move staff from tacit craft knowledge about T&L practice to professional theory-based professional knowledge and promote the dissemination of good T&L practice. We do not have a fully developed staff development plan and its development and implementation will require strong leadership from the center – it should be a DVC responsibility - and a strategic collation within the organization. Perhaps we can develop a Teaching Charter in terms of setting out a contract of service to students. Current reward structures place a heavy emphasis on research and skew the organizational mission away from considerations of effective teaching practice. Research is easy to measure, whilst good teaching remains a hortatory goal. We don't have a clear picture of staff development needs and of what provision is available. We need to start asking hard questions about throughput rates, i.e. about the success or effectiveness of teaching. The issue of buy-in is critical, academics face now as never before multiple pressures and role overload. Academic institutions are operating in a sub-optimal environment in which there is considerable and increasing competition for scarce resources. Our appraisal systems also don't sufficiently take teaching into account and our evaluations are not properly followed up. We concluded that we will need a small core of local change champions complemented by exogenous champions (but we don’t think that the HEQC is necessarily the obvious partner in this, nor SAUVCA). ‘What catches my DVC’s attention is resources’, perhaps the HEQC could help here via a
partnership model that includes funding incentives. At Faculty level we are planning T&L Interest Groups and the mentoring of new staff. At Departmental level we need follow up action on performance appraisal. Innovation is best done through collaborative efforts with whole departments rather than with individuals on a generic course. We therefore need to build professional teaching capacity at departmental level.

Teaching-Learning Contracts (UWC)
UWC is committed to widening access, lifelong learning, to accommodating part-time adult learners and to offering a responsive, relevant curriculum. We need to establish contracts, explicit expectations and responsibilities, between teachers and learners, both parties need to be more responsible. Our communication with students must be much clearer and begin at orientation. Staff will have to find creative ways to enforce the contracts. Learning outcomes and assessment criteria should be part of the contract, as should the links between our programmes and employment opportunities. This will also entail staff development, especially the training and rewarding of staff to support the needs of second language students. We need resource allocation, the provision of academic development across the curriculum and the evaluation and reward of improved/ good teaching practice. We will take this plan back to our next strategic planning cycle.

Programme Planning (UN-UDW)
Our priorities in this area are systems development wrt monitoring throughput rates, systems for academic planning and programme development and approval and technology for institutional research and management information. Currently our module template is being electronified. But finalisation of our programme template is bedeviled by lack of finalisation of national policy, e.g. NQF levels, the NAP. Also the merger has caused debates about credit-rating systems. We have guidelines for school and programme reviews which have been piloted. We have to redevelop our system for programme management due the merger. Roles and responsibilities are not yet clear. We need to look at committee structures, our joint PQM and approval process. We don’t yet have a unified and functional MIS, we need to develop an institutional research and data-tracking system.

Student Development (UN-UDW)
We need institutional research on access and success. We need clear written policies on academic planning for our new HEI. From 2004 we have agreed to aim to register 50% African students and 20% from financially disadvantaged backgrounds. We need to develop entrance testing, the integration of financial aid and residence places with academic places. Registration and payment procedures should be electronically managed. We also need a system of curriculum advising. All this needs to be evaluated and student feedback must be gathered. We need to develop a culture of learning in the residences and also to focus on 2nd year students as well as first years. We do have pockets of good practice, the size of the new university is a challenge – how to take this to scale without losing what is good?

Postgraduate Supervision (Tech Pta)
As a future University of Technology we felt that the Evaluative Questions were appropriate for our needs. We will first need to re-visit our mission and vision using a participatory process. We will then need to write generic norms and guidelines for PG supervision using the Resources to guide us and building on what already exists. We found the principles in the Resources general but relevant. We would have to run an awareness and advocacy process and tell people how to use the guidelines that we develop from the Resources. Currently we have inconsistency in the application of research policy in different Faculties and departments. We would like to see training for all novice supervisors to be compulsory as well as mentoring them in departments by our Research professors who do not have clearly defined roles at Faculty and department levels. Our research supervision is also weakened by lack of communication between academic and administrative staff. We also need to make the rights and responsibilities of students clearer and to improve our research infrastructure for
them e.g. we should develop a thesis template to guide them. We also need to develop a database for monitoring PG student feedback. We also need to ensure that the B.Tech curriculum adequately prepares students with research methods and skills.

Course Review (Privates)
The Resource on this was very useful for getting us to focus on the use of learning outcomes and also the idea (new and challenging to us) that teaching staff should be ‘reflective practitioners’ and be involved in the review process. The Resource also emphasizes the importance of setting and implementing improvement plans and the need for sensitivity and transparency. The challenge to us is implementation and getting academic buy-in. We will need staff training in QA. This in only a small aspect of QA and yet even this seems to be overwhelming to us. we plan to workshop this aspect of the pack with academic staff, they should read and understand the rationale. Then we need a change management process going. We will involve top management and get a plan and policy in place.

Commitment to Teaching, Buy-in & Ownership by Academics (US)
The status of teaching must be raised, affective factors such as attitudes and motivation must be attended to, there should be a symbiosis between teaching and research. We need to ask questions about pass rates. Course materials should be developed and the staff, time and money for this must be made available. Successful innovation should be recognized and rewarded.

3. Evaluation of the Workshops

Audience and Design

1. The purpose of the workshop was not clearly explained.

2. The wrong people attended the workshop – it was about the management of teaching at a system level. For this you need senior management to attend. But the design of the workshop was far too low and insufficiently challenging for them.

3. The level of the workshop was too basic, it could have been done in a day.

4. The HEQC should have been more specific about which areas are to be tackled in the workshops. They could add value in that they provide a space for authentic institutional work to occur, but this requires the right people to be here. We value learning from other institutions, but we should all be working on the same area.

5. The workshops assumed that we want/ need to change teaching-learning practice in our institutions and that we are in a position (at least collectively) to do so. In our case, neither of these assumptions held.

6. The participants here are mostly QA and AD types. The HEQC should send these resources to DVCs and Deans and ensure that they engage with them. For the merger, the Joint Academic Task Team and Joint Merger Office should be made to engage with these.

7. The case studies used up a lot of time and did not relate to the rest of the programme.

8. We found the programme too prescriptive and therefore unhelpful. Luckily the facilitator made it more open-ended and it was ultimately useful.
9. We already have many innovations in place, we don’t want to change anything yet. The university has done well to put the right things in place. We rather want to know how well things are working and to have them evaluated. We think our current systems are good, they may just need tweaking. We are more concerned with the lack of policy alignment in our external environment – e.g. the DoE is not supporting teaching, but rather research.

Organisation
We received confirmations of attendance too late, so money was wasted as we booked for too many people.

4. Suggestions to the HEQC for Taking the Process Forward

1. The HEQC should workshop this document with senior management or we will reach a ceiling with implementation. Senior management must be brought in on this or it will be under resourced and innovations will fail to be sustained as usual.

2. We are grateful to the HEQC for creating these linkages between privates and publics. The HEQC should continue to encourage the development of partnerships.

3. We would like the HEQC to continue to provide a forum where HEIs can exchange ideas and share good practice. The HEQC shouldn’t just provide this pack. It should help us with practical workshop and also with resources. Once the Resources are finalized, the HEQC should run a workshop to unpack each specific area.

4. The HEQC should provide help to HEIs on the ‘how to’ issues. This should include incentive funding.

5. We need an agreed national qualification and career pathway for HE educators. The HEQC should assist in organising this.

6. The HEQC should develop centers of excellence for certain areas of T&L or for the T&L of certain disciplines.

7. The HEQC should provide web-based support with questions and answers on T&L matters linked to the Resource pack.

8. The IT&T Resources should be the gold standard. We need much lower and fewer minimum standards which are more reasonable because they are non-negotiable.

9. We don’t have a framework for development and good practice from the HEQC. We need a nuanced document. The early HEQC was more subtle and understanding, what is happening as it begins to operate?

10. We would like to ask the HEQC leadership how they want QA to be taken up by the sector – do they want compliance or development led by carrots? What is their real direction – quality promotion or accountability?
5. Conclusions
This report aims to evaluate the primary objectives of the Improving Teaching & Learning workshops which were stated as:

1. To introduce the draft Resources to the HEIs for use, adaptation and further development, and to get feedback on how the HEQC should improve and develop them further
2. To engage managers and academics in discussion, analysis and planning around the improvement of teaching and learning. (Workshop hand-out).

From my observations during the 5 workshops I attended, the first objective was successfully met. Overall there was a positive response to the Resources from participants who engaged well and enthusiastically on how they could adapt and interpret the Resources for use in their own institutions. Participants also provided useful feedback and criticisms of the Resources which the HEQC can use for their improvement and further development. Some of the criticisms and suggestions can be addressed in the short-term in a final round of editing, this is particularly the case for the detailed comments on specific Resources. Improvement in layout and presentation can also be addressed in the short-term. Other more fundamental issues that were raised such as major gaps that require new Resources to be written, the need for examples and case studies, web-site development and the inappropriateness of the Resources for particular institutional types will require further development and investment by the HEQC and are likely to be addressed only in the medium-term depending on the HEQC’s priorities and resources.

In my opinion, the observations captured in this report suggest that the second objective was only partially achieved. The main reason for this was that very few senior managers attended the workshops and those who did generally did not stay throughout. This meant that plans for improving the management of teaching and learning made during the workshops were generally made by practitioners from academic development, staff development or quality assurance units. These people have the expertise to formulate such plans but lack the power to effect them in their institutional contexts. This led to some frustration on the part of participants, for without the presence of senior managers, their efforts failed to be authentic and may or may not ‘go anywhere’ once they return to their institutions. The HEQC’s intention to initiate a dialogue about improving teaching and learning management between staff at different levels within institutions was perhaps over-ambitious. The programme, which lasted one and a half to two days and which was structured on a gradual learning process was, in my opinion, too basic, too long, too slow and too prescriptive to attract senior managers (at all or for long). In addition there are other factors beyond the control of those who conceptualized the workshops, such as the fact that teaching and learning remains a ‘Cinderella’ low status area in HE, and senior managers are over-stretched, especially those involved in re-structuring processes. The workshops were also held rather late in the academic year when people are generally tired and pressured. A two-pronged strategy – one for practitioners such as these workshops and another briefer, more targeted approach for senior management – may have worked better. It may still be possible for the HEQC to adopt such an approach and to follow up these workshops with brief visits to institutions where the Resources and improvement plans are presented to senior managers for consideration.

However, it is also apparent that most of those who did attend the workshops found them a useful exercise, not only to engage with the Resources and to discuss improvement plans with their colleagues, but engagement with HEQC officials and other institutions was clearly also appreciated (see for example the debates under General Issues Raised in Discussion). The idea of putting merger partners into the same workshops was also found to be beneficial by most participants concerned.
Finally, two personal observations: Firstly the varying levels of debate and needs and concerns of different institutions and contexts highlighted the enormous differences and diversity across the South African HE system. In particular, the needs and interests of private providers are clearly very different from those of the public institutions. This emphasized for me the difficult nature of the HEQC’s task – the establishment of a single QA system for all institutional types. This means that inevitably, whatever the HEQC does, it will not be appropriate for some providers. In the short-term flexible interpretation and application of the HEQC’s criteria will help and the long-term the HEQC may need to consider adapting and tailoring its ‘one-size-fits-all’ system to accommodate these differences.

My second observation as already been mentioned and relates to the low status of teaching and learning in the HE system. Most people who attended the workshop were junior members of staff and most of them were women (about 80% according to my observations). There is also a perception amongst some of the participants that the HEQC is reproducing this phenomenon and is investing more of its energies in its ‘high stakes’ formal audit and accreditation activities which are more strongly linked to accountability (and to power) than in the development of teaching and learning. This perception could be corrected once the next phase of the Improving Teaching & Learning Project comes into operation and gains a stronger profile. Furthermore, raising the status of teaching is obviously a long-term system-wide project and the HEQC should not be expected to effect this on its own. However, if the HEQC is committed to improving teaching and learning in the system, this is clearly an issue that it should address.
## Appendix: Attendance at the Workshops

### Workshop No.4: Total = 36

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#### Private Providers (4)
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**Private Providers (14)**

**Workshop No.7: Total = 36**

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### Private Providers (7)
APPENDIX 8

HEQC Documents

Source: HEQC (2003d, 2003e, 2003a)
Extracts from HEQC (2004c, 2004a, 2004d, 2004b)
PROPOSED CRITERIA FOR THE HEQC’s FIRST CYCLE OF AUDITS:
2004-2009

March 2003

Discussion Document

The Higher Education Quality Committee is a permanent committee of the Council on Higher Education
Didacta Building, 211 Skinner Street, Pretoria, 0002; PO Box 13354, The Tramshed, 0126; Telephone: +27 12 392 9119; Fax: +27 12 392 9110
EXECUTIVE SUMMARY

1. Legislative authority for audits

The Higher Education Quality Committee (HEQC) of the Council on Higher Education (CHE) has statutory responsibility to conduct institutional audits as indicated in the Higher Education Act of 1997. Audits are the responsibility of the HEQC also in terms of being recognised by the South African Qualifications Authority (SAQA) as the Education and Training Quality Assurer (ETQA) for the higher education band.

2. Nature of the audit

The audit does not seek to measure the actual quality of the outputs in relation to teaching and learning, research and service learning. Rather, the audit seeks to:

(i) Establish the nature and extent of the quality management system in place at the institution – what policies, systems, available resources, strategies and targets exist for the development and enhancement of quality in the core functions of higher education.

(ii) Evaluate the effectiveness of the quality management system on the basis of evidence largely provided by the institution itself. The requirement to provide indicators of success and evidence of effectiveness, takes the audit beyond a checklist of policies and procedures.

3. Objectives of the audit

According to the Institutional Audit Framework (p. (iii)), the general objectives of audits are, inter alia, the following:

(i) To enable a higher education institution to assure itself, its stakeholders and the HEQC that its policies, systems and processes for the development, maintenance and enhancement of quality in all its educational offerings are functioning effectively.

(ii) To enable providers and the HEQC to identify areas of strength and excellence as well as areas in need of focused attention for improvement in the short, medium and long term.

(iii) To provide for consistency in quality management across the higher education sector and generate a national picture of the role of quality management in the transformation of higher education. It will also enable the HEQC to make a
judgement on the overall status of quality management in higher education and monitor system level improvement.

The above general objectives of audits apply to the first cycle of audits. In addition, there are some specific objectives for the first cycle of audits. These are the following:

(i) The HEQC intends to signal clearly to the higher education community the institutional areas in need of systematic attention in order to ensure an acceptable level of quality provision and to indicate certain key audit areas for in depth attention. The audit criteria which are developed in this document will be a key instrument for evaluating the effective alignment between institutional quality objectives and the quality management systems in place to achieve them.

(ii) The first audit cycle will have a common set of quality requirements for all higher education institutions. The main target areas and the levels of scrutiny will apply to all audited institutions. This will enable the HEQC to obtain baseline information in the targeted areas from all higher education institutions. Such information will:

- Facilitate capacity development and improvement programmes by the HEQC and other roleplayers.
- Facilitate a more differentiated approach to audit in the second cycle, allowing for lesser or greater areas and levels of scrutiny, depending on the demonstrated effectiveness of internal quality management systems. The eventual granting of self-accreditation status to institutions will also depend to a great extent on the information available on internal quality management systems.
- Identify and disseminate good practices in quality management through all the sectors.

4. Scope of the audit

The audit will encompass the following areas and levels of enquiry:

At Level 1, general scrutiny of:

- The fitness of the mission of the institution in relation to local, national and international contexts (including transformational issues).
- The links between planning, resource allocation and quality management.
- The use of benchmarking and user surveys.
At Level 2, general scrutiny of:

- The quality management of the core functions – teaching and learning, research and service learning. The scrutiny of teaching and learning will include, *inter alia*, the quality management of short courses, exported and partnership programmes, programmes offered at tuition centres and satellite campuses, academic support services, and the quality of certification.

At Level 3, in depth scrutiny of quality management arrangements for:

- Programme development and review.
- Student assessment and success.
- In the case of institutions with a strong research mission, research quality management, as well as postgraduate education, will be scrutinised in depth.

The scope of the audit as set out above is represented diagrammatically in Figure 3 on page 15.

ACRONYMS

CHE  Council on Higher Education
DoE  Department of Education
ETQA  Education and Training Quality Assurer
HEQC  Higher Education Quality Committee
NQF  National Qualifications Framework
PQM  Programme and Qualification Mix
RPL  Recognition of Prior Learning
SAQA  South African Qualifications Authority
SET  Science, Engineering and Technology
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SECTION A: BACKGROUND TO THE DEVELOPMENT OF THE AUDIT CRITERIA

1. INTRODUCTION

The Higher Education Quality Committee (HEQC) is a permanent committee of the Council on Higher Education (CHE), which was established by the Higher Education Act, 1997 (Act No. 101 of 1997). In terms of the Act, the specific functions of the HEQC are to accredit programmes of higher education, audit the quality assurance mechanisms of higher education institutions and promote quality in higher education.

As indicated in the Institutional Audit Framework, the HEQC planned to develop audit criteria for the focus areas specified in that document and consult on the criteria. Criteria, according to which judgements can be made about quality and quality management, constitute a crucial component in the execution of the HEQC’s functions, fulfilling the dual purpose of serving as evaluative instruments for the HEQC’s audit and accreditation activities, as well as setting broad benchmarks for quality management in higher education. It is hoped that they will enable the institution to analyse and reflect on its quality management arrangements and guide the production of the institutional self-evaluation report.

The following general points of departure are appropriate in the development of the criteria:

(i) Criteria should be developed with due attention to the social and educational context within which the HEQC’s activities will take place.

(ii) Criteria should be developed for the higher education sector as a whole, in line with the vision of a single, coordinated higher education system. The same quality requirements should apply to any institution that claims to provide higher education. A measure of flexibility should, however, be built into the criteria to allow for the necessary diversity relating to issues such as institutional mission, scope of work, etc.

(iii) The criteria should be useful for institutions in developing and enhancing the quality of provision in a way that advances the achievement of national goals and priorities in higher education in South Africa. They should serve diagnostic as well as improvement purposes in respect of the core functions of the institutions.

(iv) The criteria should be formulated in a broad way to indicate the key
elements in institutional quality management rather than narrow prescriptions for particular processes and methodologies of quality management. For example, reviewing programmes on a regular basis is proposed by the HEQC as a criterion for continuous quality improvement, but details of the review activity are not stipulated. Many of the key elements encapsulated in the criteria already constitute good practice in quality management systems at many higher education institutions both nationally and internationally.

This document puts forward proposals for criteria to be used during the first cycle of HEQC audits (2004-2009). For the first cycle, the HEQC intends using a targeted approach, rather than attempting to cover all potential audit areas in equal depth. This approach is deemed crucial in view of numerous systemic and institutional considerations.

In recognition of the real danger of system overload, the amount of scrutiny that institutions are able to handle needs to be carefully balanced against the requirements and legal obligations of the HEQC. Further, in view of the present higher education institutional quality landscape, for example, the vast differences in quality between higher education institutions and the concomitant level of preparedness for internal and external quality management processes, it seems prudent to aim for a targeted phasing in of the HEQC’s audit system. This will afford institutions the opportunity not only to acquaint themselves with the HEQC’s approach to audits, but also to develop or strengthen the necessary internal structures, processes and procedures for quality provision.

The findings from the first cycle of audits will be carefully reviewed by the HEQC and fully integrated into preparations for the second cycle of audits. The HEQC decisions about the scope, level and focus of the second cycle of audits will be informed by systemic and institutional performance. The broad intent in the next cycle will be to relate the scope and level of scrutiny to the level of institutional attainment in effectively managing internal quality assurance. This will allow for a more differentiated approach to audit in the second cycle, involving lesser or greater levels of scrutiny in the same or new areas of focus. Where evidence exists of effective internal systems being in place, institutions can expect lesser levels of scrutiny. Such evidence could also be the basis on which self-accreditation status could eventually be granted. The first audit cycle, which will have a common set of quality requirements for all higher education institutions, will thus provide baseline information in the targeted areas, on the basis of which a more differentiated audit approach could be implemented in the second cycle. The baseline information will also provide a foundation for capacity development and improvement programmes by the HEQC and other roleplayers.

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1 The HEQC’s proposed criteria were developed on the basis of research and analyses of audit requirements in a range of national and international quality assurance agencies. Part of the research was undertaken by the Centre for Higher Education Studies and Development of the University of the Free State. The criteria also drew on the research of the team that was involved in the Improving Teaching and Learning Project of the HEQC.
The audit criteria will focus on an institution’s policies, systems, strategies, processes and activities for quality management in respect of the core functions of teaching and learning, research and service learning. The audit will include looking at the existence of policies and systems, widespread knowledge about them, and their effective use in promoting, developing and improving quality. Sampling and audit trails will be used to follow up on institutional claims about quality management systems in place. The requirement to provide indicators of success and evidence of effectiveness take the criteria beyond a checklist of policies and procedures. However, it is recognised that the actual achievement of quality requires not only effective quality management systems, but professional competence and the commitment of all those involved in teaching and learning, research and service learning.

Important to note is the reality that an audit system for South African higher education will have to take broader transformation imperatives into account. Audit criteria will have to deal with how higher education institutions are engaging with the legacies of inequity, lack of opportunity and poor quality provision in many parts of the system. They will also have to address the adaptability, responsiveness and innovativeness of institutions in relation to new knowledge and skills requirements and new modalities of provision. Ultimately, they will have to enable or encourage an institution to demonstrate that it is improving continuously as a teaching, research and social institution and that it is socially responsive without compromising its intellectual identity as a higher education institution.

Section A of this document deals briefly with a number of issues as background to the development of the HEQC’s audit criteria. These issues relate, firstly, to the scope and focus of audits as set out in the Institutional Audit Framework, as well to the references to audit criteria in that document. Secondly, contextual issues are discussed which are of importance for the development of the audit criteria. Thirdly, a variety of other pertinent issues are dealt with, including the following:

(i) Definition of the audit criteria.
(ii) The quality cycle approach as an evaluative paradigm for audits and for the formulation of audit criteria.
(iii) Level of specificity of the audit criteria.

2. THE SCOPE AND FOCUS OF AUDITS AS INDICATED IN THE INSTITUTIONAL AUDIT FRAMEWORK

According to the Institutional Audit Framework\(^2\) (Audit Framework, for short) (p. 8), the scope of HEQC audits will cover the broad institutional arrangements for assuring the quality of teaching and learning, research and service learning programmes, as well as

other specified areas. Governance, finances and other institutional operations will not be a focus, except in relation to their impact on the above areas.

More specifically, the audit target areas are the following (Audit Framework, p. 8):

(i) Policies, systems, structures, resources and activities to support and enhance the quality of teaching and learning.
(ii) Policies, systems, structures, resources and activities to support and enhance the quality of research (if pertinent to the institutional mission).
(iii) Policies, systems, structures, resources and activities to support and enhance the quality of service learning programmes, including co-operative education programmes (if pertinent to institutional mission).
(iv) The integration of quality management with institutional planning and resource allocation.
(v) Stakeholder and/or expert surveys on the quality of provision.
(vi) Benchmarking standards and good practice in respect of effective quality systems (against institutional, national and international benchmarks).

The following teaching and learning areas will be addressed (Audit Framework (p. 9):

- Staff development policies, plans and activities.
- Student access and development – policies, plans and activities.
- Programme development and review - Internal quality management arrangements for:
  a) New programmes.
  b) Updating and monitoring of existing programmes.
- Student assessment, throughput and completion rates.

3. THE DEVELOPMENT OF AUDIT CRITERIA AS ENVISAGED IN THE INSTITUTIONAL AUDIT FRAMEWORK

The Audit Framework contains several references to criteria which will serve as the basis for judgments on quality in the course of an audit.

According to the Audit Framework (p. 7), the HEQC will use as a starting point criteria relating to an institution’s own specification of mission and objectives. It is assumed that institutional missions will take national imperatives into account, as articulated in the Education White Paper 3: A Programme for the Transformation of Higher Education,
the Higher Education Act, the National Plan for Higher Education, the Human Resource Development Strategy, and other policy frameworks.

In developing the audit criteria, the HEQC will operate within the requirements for institutional efficiency set by the Department of Education (DoE) and institutional governance structures (*Audit Framework*, p. 7).

With respect to quality management for effective teaching and learning, research and service learning, the *Audit Framework* (p. 7) alludes to the fact that the HEQC has initiated a number of national projects to generate criteria for quality management, for example the Teaching and Learning project. The HEQC will also take into account institutionally set requirements and guidelines for teaching and learning, research and service learning.

4. CONTEXT FOR THE DEVELOPMENT OF AUDIT CRITERIA

4.1 Introduction

It is of paramount importance that the HEQC’s audit criteria are fully contextualised within the circumstances of South African higher education, while also taking into account international trends and benchmarks. The criteria cannot be taken over simply from other contexts and/or quality assurance agencies. They are clearly dependent on and linked to a number of contextual issues, which of necessity shape and mould their development and use.

The following contextual issues are addressed in this section:

(i) National policy and other regulatory frameworks.
(ii) National benchmarks.
(iii) Institutional quality landscape.
(iv) Institutional mission and goals.
(v) Partnerships.
(vi) International comparability.

This is represented in Figure 1.
4.2. National policy and other regulatory frameworks

4.2.1 National policy

National policy relating to higher education[^1] provides not only the broad conceptual and legislative context for the HEQC’s work, but also have clear implications for the development of the HEQC’s audit (and accreditation) criteria. The criteria have to be consonant with national policy documents on issues such as the purposes of higher education, national needs and challenges, issues like access, standards, etc. The criteria are, in fact, one of the main vehicles for giving practical effect to these policies.

4.2.2 HEQC policy and frameworks

4.2.2.1 The *Founding Document*

The criteria have to be informed by the HEQC’s own policy positions as expounded in its *Founding Document* and other documents, for example, its views on the nature and

definition of quality in higher education, accountability and improvement, ways of dealing with the historical legacy of apartheid in the higher education system, etc. For example, according to the *Founding Document* (p. 14), the HEQC will develop a quality assurance framework and criteria based on:

- Fitness for purpose in relation to specified mission within a national framework that encompasses differentiation and diversity.
- Value for money as judged in relation to the full range of higher education purposes as set out in the White Paper. Judgements about the effectiveness and efficiency of provision will include but not be confined to labour market responsiveness and cost recovery.
- Transformation in the sense of developing the capabilities of individual learners for personal enrichment, as well as the requirements of social development and economic and employment growth.”

The *Founding Document* also states (p. 14) that the criteria will be located within a “fitness of purpose” framework based on national goals, priorities and targets.

The *Founding Document* thus provides a diversity of “lenses” for looking at quality management. This multi-faceted view necessitates a diversified range and levels of criteria with which to test quality management systems.

4.2.2.2 The Institutional Audit Framework and Programme Accreditation Framework

The audit criteria have to be developed within the context of the *Audit Framework* document and its definition of audit (*Audit Framework*, p. 4). At the same time, the audit criteria cannot be developed in isolation from the accreditation criteria as envisaged in the *Programme Accreditation Framework*. In the end, the two sets of criteria, although differentiated in focus, should together constitute a meaningful and coherent instrument for the HEQC’s quality related responsibilities. This is further necessitated by the fact that institutional self-evaluation status will take audit findings into consideration as a key measure of institutional quality capacity and achievement.

4.3 National benchmarks

The development of the criteria should take the national benchmarks set by the DoE for institutional efficiency into consideration. These include increasing enrolments and graduate outputs in general and in specified areas, increasing research productivity and improving the diversity profile of graduates. These benchmarks pertain to efficiency as well as to the transformation requirements of the higher education system.
4.4 **The institutional quality landscape**

The following aspects regarding the institutional quality landscape have to be taken into account when developing the audit criteria. The issues are briefly mentioned without discussion.\(^4\)

(i) **Restructuring of the higher education system:** Formal arrangements for quality management are being introduced in an environment where the entire higher education landscape is being restructured. Much attention will be devoted by institutions in the following years to restructuring issues, including mergers, which could be to the detriment of quality provision. On the positive side, quality concerns could be used to help shape and build the new higher education system.

(ii) **Maintenance of standards in a competitive environment:** There is a strong pressure for attaining, maintaining and improving standards in institutions, in a difficult climate of declining funding, rising expectations, changing priorities and increased competition between different higher education sectors and institutions.

(iii) **Available expertise:** The implementation of national policies for quality management in higher education is a complex matter which will require the combined efforts of the relatively small number of knowledgeable people in the field of quality management in South Africa, as well as capacity development initiatives for this purpose.

(iv) **Differences in quality among institutions:** There are, for historical and other reasons, many differences in the quality of provision among institutions, as well as between programmes within institutions. The development of benchmarks for an acceptable level of quality provision becomes critical.

(v) **Different interpretations of quality management:** Different histories and interpretations of quality management exist in various higher education sectors. Technikons and agricultural colleges have focused largely on minimum standards, programme evaluation and statutory compliance, whereas the universities favoured a developmental approach in which self- and peer evaluation was based on fitness for purpose, relating to the institution’s mission and goals. The private provider sector has indicated a strong interest in the quality requirements of vocational education. A common understanding of and approach to quality issues are needed, which will of necessity have an influence on the development of the criteria.

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4.5 **Institutional mission and goals**

The mission and goals of an institution provide the overarching context within which its core educational activities ought to take place (“fitness for purpose”). Institutional missions and goals have themselves to be determined in relation to the needs of the local and national context within which the institution finds itself (“fitness of purpose”). One of the functions of the audit criteria would be to evaluate the quality dimension of this link between mission and goals and an institution’s local and national context. The criteria can help to ascertain the extent to which an institution’s core educational activities, i.e. teaching and learning, research and service learning, are informed and directed by its mission and goals in a way that enhances quality in all these core functions.

In addition to the above, institutional missions and goals have to be congruent with the purposes of higher education in general. They should also be appropriately responsive to international developments and trends in higher education.

4.6 **Partnerships**

Partnerships in higher education provision can greatly facilitate the effective utilisation of academic expertise and human resources, especially in specialised fields at the postgraduate level. Such partnerships include collaboration between and among institutions on a regional basis, between the public and private provider sectors and between universities and technikons. Within an environment where higher education co-operation is encouraged, the criteria will have to address the quality requirements of collaborative provision of higher education, to ensure that responsibility for quality and quality management is clearly assigned and monitored.

4.7 **International comparability**

International trends and requirements are important benchmarks for developing the HEQC’s criteria, in order to ensure institutional reputation in a global higher education market and the production of graduates and diplomates who are internationally competitive, marketable and respected.

5. **DEFINITION OF AUDIT CRITERIA**

Before developing proposals for audit criteria, it is important that a clear understanding
is reached as to the exact meaning of the term “criteria” within an audit context. A survey of the literature shows a proliferation of terms indicating levels of quality, for example, “standards”, “minimum standards”, “threshold standards”, “criteria”, “minimum criteria”, “benchmarks”, “good practice”, “best practice”, “requirements”, “minimum requirements”, etc. Several options for the use of terms like “criteria” and “standards”, which are the most important categories for the purposes of this document, present themselves, all with further possible permutations.

For the HEQC, the term “criterion” is expressed as a general statement on quality requirements within a defined area. The definition in Figure 2 is proposed for the use of the term “criteria” within an audit context:

**Figure 2: Definition of “criteria” within an audit context**

Within an audit context, criteria are expressed in the form of statements regarding the requirements for institutional policies, systems, structures, resources and activities which, in the HEQC’s view, support and enhance the quality of teaching and learning, research and service learning.

The definition of criteria would have a different focus in an accreditation context, where it would refer more specifically to programme requirements.

6. **THE QUALITY CYCLE APPROACH AS AN EVALUATIVE PARADIGM FOR AUDITS AND FOR THE FORMULATION OF AUDIT CRITERIA**

The HEQC plans to use the “quality cycle” approach to quality management as an evaluative paradigm for audits and for the formulation of audit criteria. It could be argued that the basic activities within this model could profitably be used as the key elements of a quality management framework. These activities are policy development, implementation, evaluation/review and improvement.

Within this model, planning in general institutional terms and in relation to particular areas constitutes a major component, leading first to the formulation of policy. This step has to be followed by the effective implementation of policy requirements in relation to outcomes, timeframes and resources. As a next step, evaluation and review are undertaken of policy and implementation against certain parameters, standards or
indicators. On the basis of review findings, improvement of practice follows, which is
effected by re-planning and re-prioritisation, where necessary. It is assumed that
planning on the basis of relevant information accompanies all steps in this cycle.
Efficient and effective quality management systems are those which include the four
basic activities in an integrated and repeated cycle.

Within a quality management framework, it could be assumed that the above four
activities take place at all management and academic leadership levels within institutions,
in a complex set of relationships and sequences. The four activities could, in fact, be
regarded as constituting elements of a quality cycle, the efficiency and integratedness of
which should be tested in audits. The audit criteria should provide the means of testing
these in relation to specific target areas. Audit panels could raise questions regarding any
or all steps in the quality cycle with regard to all the target or criterion areas.

7. LEVEL OF SPECIFICITY OF THE AUDIT CRITERIA

The level of specificity of the criteria has important consequences for their
interpretation and use in practical audit situations. Criteria can be devised in a number
of ways and formulated on different levels of generality, ranging from general to more
specific and detailed.

On the general level, for example, quality management mechanisms in specific target
areas (teaching and learning, research, etc.) could be evaluated (by the institution
internally or by an external body, such as the HEQC) by using the four basic steps or
categories of activity indicated above. One possible evaluative question could focus on
how the institution knows how well it is doing in planning, implementing, reviewing and
improving with regard to quality management of the target areas. This question could
be broken down into smaller evaluative questions. The following are a few examples of
such questions:

(i) How efficiently do you (= the institution) contribute to the implementation
of national policy in the target areas? On the basis of what indicators or
evidence do you know this?

(ii) How efficiently are you engaged in the systematic collection, interpretation
and use of data/information/evidence in the target areas? On the basis of what
indicators or evidence do you know this?

(iii) How well are you progressing towards your vision, mission, further goal
formulation, etc. with regard to the target areas? On the basis of what
indicators or evidence do you know this?

5 These examples are derived from the report of the CHESD (see footnote 3), pp. 205-6, in which general, meta-
level criteria in the format of evaluative questions are proposed.
(iv) Do you know how well the quality management procedures/mechanisms in the target areas and their evaluation compare with those in other institutions? On the basis of what indicators or evidence do you know this?

It is clear, however, that audit criteria in the above general format can access only certain levels of information. Responses to such questions could also be very general and vague, or more extensive than what is required by the audit panel for its purposes.

One could also use more specific criteria. For example, if the area of staff development is audited as part of the broad area of teaching and learning, one could define sub-areas dealing with staff recruitment, selection and promotion, which would provide more detailed information on staff development.

Criteria of this nature would have the advantage of making the requirements for audit target areas more explicit, thereby clarifying the basis for self- and external evaluation and also promoting justifiable audit judgments. It would also provide a solid and explicit basis for the training of auditors.

The HEQC intends using both types of criteria in its audits during the first audit cycle, depending on the level of scrutiny of specific target areas. In the case of those areas where only general scrutiny is intended, general criteria would be the most suitable. In the case of areas which will be scrutinised in depth, more specific criteria are indicated. In practical audit situations, a combination of the two types of criteria could facilitate balanced audit judgments.
8. **THE HEQC’s OBJECTIVES FOR THE FIRST CYCLE OF AUDITS**

Before detailing the proposals for the criteria, it is necessary to indicate the objectives of HEQC audits both in general terms, as indicated in the *Audit Framework*, as well as for the first cycle.

According to the *Audit Framework* (p. (iii)), the general objectives of audits are, *inter alia*, the following:

(i) To enable a higher education institution to assure itself, its stakeholders and the HEQC that its policies, systems and processes for the development, maintenance and enhancement of quality in all its educational offerings are functioning effectively.

(ii) To enable providers and the HEQC to identify areas of strength and excellence as well as areas in need of focused attention for improvement in the short, medium and long term.

(iii) To provide for consistency in quality management across the higher education sector and generate a national picture of the role of quality management in the transformation of higher education. It will also enable the HEQC to make a judgement on the overall status of quality management in higher education and monitor system level improvement.

The above general objectives of audits apply to the first cycle of audits. In addition, there are some specific objectives for the first cycle of audits. These are the following:

(i) The HEQC intends to signal clearly to the higher education community the institutional areas in need of systematic attention in order to ensure an acceptable level of quality provision and to indicate certain key audit areas for in depth attention. The audit criteria which are developed in this document will be a key instrument for evaluating the effective alignment between institutional quality objectives and the quality management systems in place to achieve them.

(ii) The first audit cycle will have a common set of quality requirements for all higher education institutions. The main target areas and the levels of scrutiny will apply to all audited institutions. This will enable the HEQC to obtain
baseline information in the targeted areas from all higher education institutions. Such information will:

a. Facilitate capacity development and improvement programmes by the HEQC and other roleplayers.

b. Facilitate a more differentiated approach to audit in the second cycle, allowing for lesser or greater areas and levels of scrutiny, depending on the demonstrated effectiveness of internal quality management systems. The eventual granting of self-accreditation status to institutions will also depend to a great extent on the information available on internal quality management systems.

c. Identify and disseminate good practices in quality management through all the sectors.


Figure 3 below gives a diagrammatic representation of the selected target areas, the levels of engagement and the focus of investigation.
Figure 3: Scope, level and focus of audits in the first audit cycle (2004-2009)

TARGET AREAS FOR THE FIRST CYCLE OF AUDITS

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<td>(i) Fitness of mission in relation to local, national and international contexts</td>
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<tr>
<td>(including transformational issues)</td>
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<td>(ii) Links between planning, resource allocation and quality management</td>
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<td>(iii) Use of benchmarking and user surveys</td>
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<tr>
<th>LEVEL 2</th>
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<tbody>
<tr>
<td>ONLY GENERAL SCRUTINY</td>
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<tr>
<td>(i) Teaching and learning</td>
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<td>(ii) Research</td>
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<td>(iii) Service learning</td>
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<tr>
<th>IN DEPTH SCRUTINY</th>
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<tbody>
<tr>
<td>Teaching and</td>
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<tr>
<td>Programme development and review</td>
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<tr>
<td>Student assessment and success</td>
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<tr>
<td>Research</td>
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<tr>
<td>ONLY INSTITUTIONS WITH A STRONG RESEARCH MISSION</td>
</tr>
<tr>
<td>(i) Quality management of research</td>
</tr>
<tr>
<td>(ii) Quality management of postgraduate education</td>
</tr>
</tbody>
</table>
With regard to Figure 3 above, the following should be noted:

(i) With regard to the different levels indicated, it is presumed that all higher level governance and management structures have final accountability for all quality related arrangements at lower levels.

(ii) The scrutiny of research quality management can occur at two levels. All institutions will have general scrutiny of quality management systems for research and postgraduate education. Institutions with a specified research mission will have in depth scrutiny in this area.

(iii) In Level 3, the in depth scrutiny applies to broad institutional level quality management arrangements for programme development and review and student assessment and success. In order to test the effectiveness of these arrangements, audit trails will be followed into a selection of programme areas.

10. A PROPOSAL FOR CRITERIA FOR THE FIRST CYCLE OF AUDITS

10.1 Introduction

This section proposes audit criteria for the first cycle of HEQC audits, taking into account the specific scope, level and focus of these audits as set out in Section 9 above.

10.2 Level of the proposed criteria

As indicated, the HEQC intends using a combination of general and more specific criteria in its audit activities.

General criteria will be used for the following target areas:

(i) The target area (10.3.1 below) comprising the following:
    - Fitness of mission in relation to local, national and international contexts (including transformational issues).
    - Links between planning, resource allocation and quality management.
    - Use of benchmarking and user surveys.

(ii) The target area (10.3.2 below) consisting of the following:
    - Overall quality management of teaching and learning. This will include, inter alia, a look at the quality management of short courses, exported and partnership programmes, programmes offered at tuition centres and satellite campuses, and certification. Where appropriate, attention will also be paid to quality management in place for particular modes of delivery, e.g. distance learning and particular types of educational programmes, e.g. professional and vocational education.
    - Quality management of research.
    - Quality management of service learning.
More detailed criteria will be used in the case of those target areas which will be scrutinised in depth during the first cycle of audits. The relevant target areas are the following:

(i) Programme development and review; and student assessment and success (10.3.3 below).
(ii) Research (only in the case of institutions with a specified research mission) (10.3.4 below).

10.3 Proposed criteria for target areas in the first audit cycle

In this section, audit criteria are proposed for each of the target areas in the first cycle of audits. A brief rationale for the inclusion of the particular target area is provided.

Institutions are required to supply both qualitative and quantitative (statistical) data, where applicable, with reference to the issues dealt with in the criteria, as well as an analysis and interpretation of these. Over a period of time, data on institutional performance with regard to specific audit areas will assist the HEQC in monitoring systemic quality management and enable the institution to monitor its improvement trajectory.

10.3.1 Fitness of the mission of the institution in relation to the local, national and international context (including transformational issues), links between planning, resource allocation and quality management, use of benchmarking and user surveys

10.3.1.1 Rationale

The fitness of the mission of an institution, as a key concept in directing its core activities, has to be determined in relation to the local and broader national context. In this, the transformational role that institutions are required to play within the national higher education agenda, is of key importance. A range of policy and legislative
instruments have laid down transformational purposes and objectives for higher education. These include increased equity and access opportunities for marginalised groups, greater responsiveness to local, regional and national needs in and through teaching and research, producing a highly skilled workforce as well as an enlightened citizenry, and increasing the pool of basic and applied knowledge to enhance understanding and applications. Furthermore, the fitness of mission has to be related to international benchmarks, where appropriate, in order to establish broad comparability with reputable institutions of higher learning abroad.

The success of quality management at institutions is, to a considerable extent, dependent on the integration of quality management mechanisms with institutional planning and resource allocation. Quality management mechanisms need to be fully integrated with institutional planning from the highest level downwards. Similarly, financial planning should ensure adequate resource allocation for the development, implementation, review and improvement of quality and quality management mechanisms at all levels of the institution, but specifically in relation to the core activities of teaching and learning, research and service learning.

Benchmarking institutional performance against other institutions nationally and internationally is a useful source of information for continuous self-improvement through application of good practice. At this point, the HEQC is interested in the extent to which benchmarking is occurring and the internal and external reference points for such benchmarking.

User surveys are an important instrument in evaluating the effectiveness of institutions in chosen areas, on the basis of utilising information from different stakeholders. Examples are student satisfaction surveys, graduate tracking surveys, and employer satisfaction surveys.

10.3.1.2 Criteria

The criteria in Table 1 are proposed for this target area.
Table 1: Criteria for: (i) the fitness of the mission of institutions in relation to the local, national and international contexts (including transformational issues), (ii) links between planning, resource allocation and quality management, and (iii) use of benchmarking and user surveys

| Criterion 1: |
| SUB-AREA: FITNESS OF THE MISSION OF INSTITUTIONS IN RELATION TO LOCAL, NATIONAL AND INTERNATIONAL CONTEXTS (INCLUDING TRANSFORMATION ISSUES) |
| CRITERION: The institution has a clearly stated mission and purpose with goals and priorities which are fit for its local, national and international context and which adequately provide for transformational issues. There are effective strategies for the realisation of these goals and priorities. Human, financial and infrastructural resources are available to give effect to these goals and priorities. |

In order to meet this criterion, the following are examples of what would be expected:

(i) Engagement with local, regional, national and international imperatives (including national policy frameworks and objectives) in order to establish the fitness of the mission of the institution. Involvement of internal and external stakeholders in this process

(ii) Adequate attention to transformational issues in the mission of the institution.

(iii) The translation of the mission into a strategic plan with clear timeframes and resources for the achievement of goals and targets in its core functions.

(iv) Allocated responsibilities at senior management level for implementation and monitoring.
Criterion 2
SUB-AREA: LINKS BETWEEN PLANNING, RESOURCE ALLOCATION AND QUALITY MANAGEMENT.
CRITERION: Quality related objectives and mechanisms are fully integrated into institutional planning. Financial planning ensures adequate resource allocation for the development, implementation, review and improvement of quality at all levels of the institution, and specifically in relation to the core activities of teaching and learning, research and service learning.

In order to meet the criterion, the following are examples of what would be expected:

(i) Key quality improvement priorities in the core functions of teaching and learning, research and service learning are aligned with the strategic goals of the institution.
(ii) Institutional planning includes quality assurance and quality improvement prioritisation and target setting at all critical junctures.
(iii) Adequate resource allocation is made through financial planning for the development, implementation, review and improvement of quality and quality management mechanisms at all levels.

Criterion 3
SUB-AREA: USE OF BENCHMARKING AND USER SURVEYS
CRITERION: The institution engages in benchmarking and utilises user surveys in the process of planning and priority setting for quality development and improvement.

In order to meet the criterion, the following are examples of what would be expected:

(i) Benchmarking against internal and external reference points is conducted on a regular basis for purposes of improvement and establishing institutional reputation and competitive edge.
(ii) User surveys are conducted on a regular basis to obtain feedback for quality improvement from a range of appropriate stakeholder constituencies, e.g. graduate tracking surveys, employer satisfaction surveys, etc..

10.3.2 Quality management of core functions: (i) teaching and learning (including quality management of short courses, exported and partnership programmes, programmes offered at tuition centres and satellite campuses, academic support services, and certification), (ii) research and (iii) service learning
10.3.2.1 Rationale

Efficient management of the core functions of teaching and learning, research and service learning is crucial to ensure the quality of these functions at the point of delivery. In order to do this, the necessary structures, processes and procedures have to be in place. In this, middle management, including deans and heads of academic support services, play a key role. Well-managed teaching and learning activities are central to judging institutional success and effectiveness with regard to the majority of the student population.

As far as research is concerned, it is assumed that some measure of research activity is underway at all higher education institutions (e.g. to inform teaching), though research may not be an integral part of the institutional mission. It is also assumed that postgraduate education is being undertaken at institutions that do not have a research mission. The quality management of those research activities needs to be included in the institutional quality management system.

As far as service learning is concerned, a number of institutions are already offering programmes (or planning to) which address social development needs in and through teaching and research. This trend is an important indicator of the transformatory relationship between the institution and the communities it seeks to serve through its core activities. The quality management of such socially responsive programmes will have to ensure equivalent standards of teaching and learning to other programmes within the institution.

Given the increase in the number of short courses, their quality should be ensured and mechanisms should be set up to evaluate the impact of offering these courses in relation to whole qualifications and the mission of the institution. This is particularly necessary since the HEQC intends delegating responsibility for the quality of short courses to institutions themselves, on the basis of demonstrated internal systems to manage the quality of short courses. The quality of programmes offered beyond our borders, and programmes offered in partnership with other institutions, as well as those at tuition
centres and satellite campuses, has to be equivalent to those offered in South Africa and at the main campuses of institutions. The quality of academic services has to be ensured in order to render efficient support for academic provision. Lastly, the processing and issuing of certificates, as well as security measures to avoid fraud or illegal issuing of these certificates, is a crucial element in ensuring the credibility of an institution’s qualifications.

10.3.2.2 Criteria

The criteria in Table 2 below are proposed for this target area.

Table 2: Criteria for the quality management of teaching and learning (including the quality management of short courses, exported and partnership programmes, programmes offered at tuition centres and satellite campuses, academic support services, and certification)

<table>
<thead>
<tr>
<th>Criterion 4</th>
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<tbody>
<tr>
<td><strong>SUB-AREA:</strong> GENERAL QUALITY MANAGEMENT OF TEACHING AND LEARNING</td>
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<tr>
<td><strong>CRITERION:</strong> Clear and efficient arrangements are in place for the management of teaching and learning in a way that ensures and enhances quality.</td>
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</tbody>
</table>

In order to meet the criterion, the following are examples of what would be expected:

(i) A well-developed academic plan which is implemented efficiently, articulates well with the institutional mission and strategic goals and is adequately resourced.

(ii) Quality management mechanisms for ensuring and enhancing the quality of teaching and learning at both undergraduate and postgraduate levels.

(iii) Key quality improvement priorities are set in areas of need with appropriate resources, timeframes and indicators of success.

(iv) Staff development policies promote the professional competence of academic staff and attend especially to the development needs of new personnel.

(v) Mechanisms are in place for promoting access to students from marginalised groups, inter alia, through the provision of academic development programmes.

(vi) There is a system in place for storing and updating detailed information about students in order to inform policy, planning, implementation and review at all levels.
Criterion 4.1
SUB-AREA: QUALITY MANAGEMENT OF SHORT COURSES
CRITERION: The institution has a quality management system in place for the effective management of short courses.
In order to meet the criterion, the following are examples of what would be expected:

(i) Policies and mechanisms are in place to record and quality assure all short courses offered by the institution. These policies and mechanisms are widely known at the institution.

(ii) Mechanisms exist to evaluate the impact (both positive and negative) of offering short courses in relation to –

- The mission of the institution.
- The success rates in whole qualifications.

<table>
<thead>
<tr>
<th><strong>Criterion 4.2</strong></th>
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<tbody>
<tr>
<td><strong>SUB-AREA:</strong> QUALITY MANAGEMENT OF EXPORTED AND PARTNERSHIP PROGRAMMES, AND PROGRAMMES OFFERED AT TUITION CENTRES AND SATELLITE CAMPUSES</td>
</tr>
<tr>
<td><strong>CRITERION:</strong> Clear and efficient arrangements are in place to manage the quality of exported programmes, programmes offered in partnership with other institutions, and programmes offered at tuition centres and satellite campuses.</td>
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</table>

In order to meet the criterion, the following are examples of what would be expected:

(i) Quality management mechanisms are in place to ensure that exported programmes are of equivalent quality to those offered in South Africa.

(ii) Compliance with the national quality criteria and other requirements of the importing country.

(iii) Clear allocation of quality management responsibility for all partnership programmes.

(iv) Quality management mechanisms to ensure that programmes offered at tuition centres and satellite campuses are of equivalent quality to those offered at the main campus.

<table>
<thead>
<tr>
<th><strong>Criterion 4.3</strong></th>
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<tbody>
<tr>
<td><strong>SUB-AREA:</strong> QUALITY MANAGEMENT OF ACADEMIC SUPPORT SERVICES</td>
</tr>
<tr>
<td><strong>CRITERION:</strong> An adequate level of academic services (e.g. library and learning materials, computer support services, etc.) is in place to support teaching and learning objectives and needs.</td>
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</tbody>
</table>
In order to meet the criterion, the following are examples of what would be expected:

(i) Academic services are geared towards supporting the needs and learning objectives of teaching and learning, research and service learning. Efficient structures and procedures ensure the integratedness of academic provision and academic support.

(ii) Academic services are adequately staffed and the necessary infrastructure is in place. The institution provides development opportunities for support staff to update their expertise and to keep abreast of developments in their field.

(iii) Academic services are adequately resourced in order to fulfill their functions properly.

**Criterion 4.4**
**SUB-AREA: QUALITY MANAGEMENT OF CERTIFICATION**
**CRITERION:** Clear and efficient arrangements are in place to ensure that the integrity of certification processes is not compromised.

In order to meet the criterion, the following are examples of what would be expected:

(i) Effective mechanisms to quality assure the processing and issuing of certificates.

(ii) Effective security measures to avoid fraud or illegal issuing of certificates.

Table 3 below proposes criteria for the quality management of research. It is important to note that institutions which do not specify research as part of their mission but have a large number of postgraduate students will be subject to the more detailed criteria requirements indicated under the heading, Criteria for the management of postgraduate education (9.3.4.2 (ii) below).

**Table 3: Quality management of research**
Criterion 5
SUB-AREA: QUALITY MANAGEMENT OF RESEARCH
CRITERION: Clear and efficient arrangements are in place for the management of research functions and processes in a way that ensures and enhances quality, and increases research participation, research productivity and research funds.

In order to meet the criterion, the following are examples of what would be expected:

(i) A research plan which indicates the role and nature of research conducted at the institution, which is implemented efficiently and adequately resourced.
(ii) Appropriate and effective strategies are implemented for research development, including capacity development for new researchers.
(iii) Appropriate and effective strategies are implemented for postgraduate education, including postgraduate supervision.

Table 4: Quality management of service learning

Criterion 6
SUB-AREA: QUALITY MANAGEMENT OF SERVICE LEARNING
CRITERION: Clear and efficient arrangements are in place for the management of programmes which have a service learning component in a way that ensures and enhances quality.

In order to meet the criterion, the following are examples of what would be expected:

(i) Service learning programmes are integrated into institutional and academic planning, as part of the institution’s mission and strategic goals.
(ii) Adequate resources and enabling mechanisms (including incentives) are in place to support the implementation of service learning, including staff and student capacity development.
(iii) Review and monitoring arrangements are in place to gauge the impact and outcomes of service learning programmes on the institution, as well as on other participating constituencies.

10.3.3 Programme development and review; and student assessment and success
**Focus:** In depth scrutiny

10.3.3.1 **Rationale**

In the *Audit Framework*, the HEQC had identified teaching and learning as a critical focus area for its quality related activities. This choice of focus was to ensure the centrality of teaching and learning issues in the restructuring and transformation of higher education. The HEQC set up an Improving Teaching and Learning Project to support and strengthen capacity in this core area of institutional responsibility. The Project identified a range of activity areas within the scope of teaching and learning, all of which are not focus areas for the audit.

The HEQC has identified two activity areas for in depth scrutiny in the first audit cycle. They are: (i) Programme development and review and (ii) Student assessment and success. These two areas represent the start and end point of the teaching and learning process. The HEQC believes that systematic institutional attention to these two areas, validated by the audit process, covers a number of critical teaching and learning dimensions not addressed in depth in this first audit cycle, e.g. staff and student development.

Within an audit context, the nature and arrangements for institutional planning, design and management of academic programmes are important indicators of the effectiveness of educational provision. Effective procedures in this area could ensure that programmes meet the needs of students and other stakeholders, are intellectually credible, and enable ongoing improvement in design and delivery. The same applies to professional and work-based learning in vocational programmes, where the monitoring of teaching and learning arrangements in the workplace is critical to ensuring the credibility of qualifications. The effectiveness of institutional programme management is also an important consideration, amongst others, in the eventual awarding of self-accreditation status to institutions by the HEQC.

Student assessment and success is a central indicator of teaching and learning
effectiveness. The transformation goals of widening access, improving retention and throughput rates and producing graduates with appropriate knowledge and skills, can be supported and directed by an effective assessment system. Although the curriculum may target skills, knowledge and attitudes appropriate to the goals of social and economic transformation, if assessment procedures fail to prioritise and test these competences, students are unlikely to acquire the intended learning outcomes. Finally, assessment has a critical influence on the quality of teaching and learning and can be used as a powerful point of leverage for change and improvement in education.

10.3.3.2 Criteria

(i) Criteria for programme development and review

This section proposes a number of criteria for programme development and review. The criteria in Table 5 below are proposed for programme development. At this point, only criterion statements in a few areas are indicated for illustrative purposes.

<table>
<thead>
<tr>
<th>Table 5: Criteria for programme development</th>
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6 This paragraph draws on the HEQC’s Teaching and Learning Project, Report on Assessment Report No. 5), 2002.
**Criterion 7**
**SUB-AREA: PROGRAMME MANAGEMENT**
**CRITERION:** The planning and administration of academic programmes are conducted within the framework of an effective programme quality management system. Responsibility and lines of accountability are clearly allocated. Management information systems are used to record and disseminate information about the programme, as well as facilitate review and improvement.

In order to meet the criterion, the following are examples of what would be expected:

(i) Dedicated structures and line managers who have responsibility for the quality management of academic programmes.
(ii) Clearly defined procedures, time frames, reporting and communication arrangements.
(iii) Capturing and continual updating of all necessary information about programmes in the management information system (including their registration and accreditation status). Relevant aspects of this information are regularly available to staff and students.

**Criterion 7.1**
**SUB-AREA: DESIGN AND APPROVAL**
**CRITERION:** There are clear systems and procedures for the design and approval of new programmes, courses and modules.

In order to meet the criterion, the following are examples of what would be expected:

(i) Programme planning and budgeting are aligned.
(ii) Programme planning and approval are linked to the operationalisation of the institution's/academic unit's mission and goals, Teaching and Learning Plan (as appropriate) and agreed ‘Programme and Qualification Mix’ (PQM) (as appropriate). This is used as a criterion for the internal approval of new programmes.
(iii) The quality requirements for programme development and delivery take account of all delivery modes (e.g. face to face, distance, mixed modes, etc.).
(iv) Regional considerations are accounted for in the planning (and offering) of programmes.
(v) Specified procedures and realistic time frames for the design and approval of academic offerings and guidelines for academic staff and programme teams to work from.
(vi) Approval is done on the basis of transparent criteria, by an institutional authority that is independent of the programme team. Consistency of standards across the institution is monitored.
(vii) Where appropriate, programme teams consult with external stakeholders such as professional bodies, potential employers, government departments and local communities about the nature of their programmes, to ensure that graduates meet employability requirements and labour market needs in both the short and long-term.

**Criterion 7.2**
**SUB-AREA: STAFFING**
**CRITERION:** An adequate number of suitably qualified academic and support staff is available to deliver the programmes on offer.

**Criterion 7.3**
**SUB-AREA: STUDENT RECRUITMENT, SELECTION, SUPPORT AND DEVELOPMENT**
**CRITERION:** The institution uses effective student recruitment, selection, support and development procedures to ensure that sufficient numbers of adequately prepared students enter and succeed in the programme.

Apart from the above, the following additional criteria for programme development apply in the case of professional and vocational education (Table 6)

**Table 6: Additional criteria for programme development in the case of professional and vocational education, including work-based learning**

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7 This section draws on the publication of Brennan, J. and Brenda, L. 1996. *A review of work based learning in higher education*. Quality Support Centre, Department of Education and Employment.
Criterion 7.4  
SUB-AREA: CHARACTERISTICS AND NEEDS OF PROFESSIONAL AND VOCATIONAL EDUCATION  
CRITERION: The characteristics and requirements of professional and vocational education are accounted for in the development of the programme.

In order to meet the criterion, the following are examples of what would be expected:

(i) The programme promotes an understanding on the part of the student of the specific occupation for which he/she is being trained.
(ii) The programme has a balance of theoretical and practical or applied knowledge. The student masters the techniques and skills which are required by a specific profession or occupation.
(iii) Work-based learning forms an integral part of the curriculum and placement in a work-based environment is regarded as an essential component of the programme.
(iv) All relevant stakeholders, including employers and professional bodies (where applicable) are involved in the development of the programme.

Criterion 7.5  
SUB-AREA: MANAGEMENT OF WORK-BASED LEARNING  
CRITERION: The management of work-based learning is done efficiently in order to promote quality in all the components of the programme.

In order to meet the criterion, the following are examples of what would be expected:

(i) Effective policies, processes and procedures are in place for the management of work-based learning and are consistently applied across the institution.
(ii) Learning contracts are utilised as a means by which the student, the higher education institution and the employer can negotiate, approve and assess the objectives and outcomes of the learning process. The roles of the various parties involved in work-based learning, i.e. the institution, students, mentors and employers, are clearly spelled out in the contract.
(iii) Regular and efficient communication takes place between the institution, students, mentors and employers involved in work-based learning.
(iv) A system is in place (both institutional and at the place of employment) to record the contents and progress of the student’s learning experience in the workplace.
(v) Monitoring of work-based learning is done regularly and systematically. Feedback is utilised for improving the practice of work-based learning.
Criterion 7.6
SUB-AREA: MENTORING SYSTEM
CRITERION: An effective mentoring system provides support for the student in the workplace.

In order to meet the criterion, the following are examples of what would be expected:

(i) The mentoring system is educative, i.e. it enables the student to recognise strengths and weaknesses in his/her work, to develop existing and new abilities, and to gain knowledge of work practices.
(ii) The mentoring system is supportive, i.e. it offers opportunities to nurture and develop students.

Apart from the above, the following additional criterion applies in the case of distance learning programmes (Table 7).

Table 7: Additional criterion for distance learning programmes

Criterion 7.7
SUB-AREA: DISTANCE LEARNING PROGRAMMES
CRITERION: The necessary structures, processes and procedures are in place to ensure quality provision in the development and implementation of distance learning programmes.

In order to meet the criterion, the following is an example of what would be expected:

(i) The design of the programme ensures explicit and reasoned coherence between, on the one hand, the aims and intended learning outcomes of the programme and, on the other, the scope of the learning materials and the strategies for teaching at a distance.
(ii) The institution has tested systems and technologies for materials development and delivery for distance learning.
(iii) Learning materials, teaching and learner support strategies, and modes of assessment are designed (and reviewed regularly) in order to give students enrolled at a distance a reasonable chance of achieving intended exit level outcomes.
(iv) Training and development opportunities are provided for staff to be able to design, deliver and review programmes offered at a distance.
(v) Systems are in place to identify inactive students and support them timeously.
The criteria in Table 8 are proposed for *programme review*.

**Table 8: Criteria for programme review**

<table>
<thead>
<tr>
<th>Criterion 7.8</th>
<th>SUB-AREA: QUALITY MANAGEMENT OF ACADEMIC PROGRAMME REVIEW</th>
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<tr>
<td>CRITERION:</td>
<td>Clear and effective procedures are in place (including internal and external peer review) to evaluate programmes on a regular basis. Review findings are disseminated appropriately and utilised for staff development, curriculum improvement and increasing student access.</td>
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<tr>
<th>Criterion 7.9</th>
<th>SUB-AREA: REVIEW METHOD</th>
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<tr>
<td>CRITERION:</td>
<td>The method and processes for programme and course/module review are credible and consistent, and allow for the triangulation of information and data in order to produce a valid outcome.</td>
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<th>Criterion 7.10</th>
<th>SUB-AREA: TRAINING AND SUPPORT FOR ACADEMIC REVIEW</th>
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<tbody>
<tr>
<td>CRITERION:</td>
<td>The institution provides academic managers and teaching staff with training and support to ensure the rigour and consistency of the review process.</td>
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(ii) **Criteria for student assessment and success**

The criteria in Table 9 below are proposed for *student assessment and success*. At this point, only criterion statements in specified areas are indicated for illustrative purposes.

**Table 9: Criteria for student assessment and success**
Criterion 8
SUB-AREA: MANAGEMENT OF ASSESSMENT
CRITERION: The institution has an assessment policy and clear and effective procedures for its implementation. The policy and its procedures ensure academic and professional standards in the design, approval, implementation and review of assessment strategies for programmes and modules, and for the qualifications it awards.

In order to meet the criterion, the following are examples of what would be expected:

(i) Guidelines or regulations for the following: formative assessment, provision of feedback to students, weighting of class marks (continuous assessment) and examinations, security procedures, disciplinary and appeals procedures, regulations for marking, grading, aegrotats, supplementary examinations, condoned passes, etc.

(ii) Responsibility allocated for the implementation of institutional assessment policy to faculties and departments/schools. The assessment decisions by the committees/boards at these levels are validated by expert peers.

(iii) At the programme and course/module level, assessment is systematically and purposefully used both to generate data for summative purposes (grading, ranking, selection, predicting) and also for formative and diagnostic purposes, such as providing timeous feedback to inform teaching and learning.

(iv) Effective monitoring of assessment practices takes place at the management level.
Criterion 8.1  
SUB-AREA: MODERATION SYSTEM  
CRITERION: The institution has efficient internal and external procedures to moderate and validate its assessment procedures and results, in order to ensure their reliability and to ensure the integrity of the qualifications it awards.

Criterion 8.2  
SUB-AREA: RELIABILITY OF ASSESSMENT PRACTICES  
CRITERION: The principles, procedures and practices of assessment are explicit, fair and consistently applied throughout the institution.

Criterion 8.3  
SUB-AREA: RIGOUR AND SECURITY OF THE ASSESSMENT SYSTEM  
CRITERION: Assessment is conducted rigorously within a framework of institutional/faculty/professional rules and regulations governing assessment. Security arrangements in relation to recording and documenting assessment decisions are in place to ensure the credibility of outcomes.

Criterion 8.4  
SUB-AREA: RECOGNITION OF PRIOR LEARNING (RPL)  
CRITERION: The institution has a policy and effective procedures for recognising prior learning and for assessing current competence.

Criterion 8.5  
SUB-AREA: ASSESSMENT TRAINING  
CRITERION: The academic staff responsible for official decisions on assessment are appropriately trained, experienced and competent to assess. The institution offers its teaching staff development opportunities in order to improve and professionalise its assessment practices.
Criterion 8.6
SUB-AREA: EFFICIENCY, GRADUATION AND RETENTION RATES
CRITERION: Student retention and graduation rates in programmes are in line with the Department of Education’s benchmarks stipulated in the *National Plan for Higher Education* 2001, and other requirements set by the institution itself.

Criterion 8.7
SUB-AREA: EQUITY AND REPRESENTIVITY IN GRADUATE OUTPUT
CRITERION: Programmes are achieving increasing equity in access, retention and success rates for graduates in line with the *National Plan for Higher Education*, 2001.

Apart from the above, the following additional criterion for student assessment and success applies in the case of professional and vocational education (Table 10).

**Table 10: Additional criterion in the case of professional and vocational education**

<table>
<thead>
<tr>
<th>Criterion 8.8</th>
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<tbody>
<tr>
<td>SUB-AREA: ASSESSMENT OF WORK-BASED LEARNING</td>
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<tr>
<td>CRITERION: The assessment of work-based learning is conducted efficiently and with clear criteria.</td>
</tr>
<tr>
<td>In order to meet the criterion, the following are examples of what would be expected:</td>
</tr>
<tr>
<td>(i) Academics as well as workplace-based assessors (for example mentors and/or supervisors), provide an input into assessment, depending on the specific nature of the task to be assessed.</td>
</tr>
<tr>
<td>(ii) The criteria for assessment are clearly spelled out, depending on the purposes of the assessment within the workplace environment. Assessment tasks are developed in a manner that advances the required competences.</td>
</tr>
</tbody>
</table>

The following additional criterion applies in the case of the assessment of *distance learning programmes* (Table 11).
Table 11: Additional criterion for assessment of distance learning programmes

<table>
<thead>
<tr>
<th>Criterion 8.9</th>
</tr>
</thead>
<tbody>
<tr>
<td>SUB-AREA: DISTANCE LEARNING PROGRAMMES</td>
</tr>
<tr>
<td>CRITERION: The policies and procedures for assessment take into account the particular contexts and requirements of distance education students.</td>
</tr>
<tr>
<td>In order to meet the criterion, the following is an example of what would be expected:</td>
</tr>
<tr>
<td>The institution can demonstrate that formative and summative assessment procedures for distance learning programmes are appropriate for the delivery mode and the circumstances in which the programmes are studied.</td>
</tr>
</tbody>
</table>

10.3.4 Research

NOTE: The criteria in this section are only applicable in the case of institutions with a specified research mission.

Focus: In depth scrutiny.

10.3.4.1 Rationale

The White Paper (1997) and the National Plan for Higher Education place strong emphasis on the need to develop research capacity and increase research productivity to ensure both open-ended intellectual inquiry and the application of research activities to social development. However, the current capacity, distribution and outcomes of the higher education research system, including graduate throughput rates, remain cause for concern. The Department of Education has set an increase in postgraduate enrolments and research outputs as a strategic goal for the South African higher education system. The HEQC includes research quality management in its audit system to ensure that research as a core function of higher education is conducted within an integrated quality
framework and that it is included in institutional planning and resource allocation for a key mission area indicated by the institution.

10.3.4.2 Criteria

(i) Criteria for the quality management of research

Table 12: Criteria for the quality management of research

<table>
<thead>
<tr>
<th>Criterion 9</th>
</tr>
</thead>
<tbody>
<tr>
<td>SUB-AREA: RESEARCH MANAGEMENT</td>
</tr>
<tr>
<td>CRITERION: The institution has a research management system that allows for planning, implementation and monitoring of researcher participation, research output and growing the pool for the funding of research.</td>
</tr>
</tbody>
</table>
In order to meet the criterion, the following are examples of what would be expected:

(i) A research policy that makes provision for differentiated support for the different types of research (e.g. basic, strategic and applied) and for the different stages of the research cycle (proposal development, evaluation, funding, reporting, dissemination).

(ii) A research information system that monitors research production and researcher participation throughout the institution.

(iii) Indicators to evaluate the effectiveness of the research management system.

(iv) Strategies in place to increase research funding.

**Criterion 9.1**

**SUB-AREA:** RESEARCH QUALITY  
**CRITERION:** The institution has policies, criteria and procedures to allocate resources, based on internal and external peer review.

**Criterion 9.2**

**SUB-AREA:** RESEARCH CAPACITY DEVELOPMENT  
**CRITERION:** The institution has policies, structures and programmes that are conducive to the development of new researchers, with due attention to race and gender considerations.

**Criterion 9.3**

**SUB-AREA:** KNOWLEDGE PRODUCTION AND NATIONAL GOALS  
**CRITERION:** The institution has a research policy that encourages and supports collaborative and problem solving research at the local/regional/national level and the dissemination of research outcomes to potential users.

(ii) **Criteria for the quality management of postgraduate education**

The specified audit criteria in Table 13 below are proposed for the quality management of postgraduate education. In the case of Criterion 2 (for the sub-area: Effective Supervision), an example is given of indicators in that sub-area.

**Table 13: Criteria for postgraduate education**
**Criterion 9.4**  
**SUB-AREA: MANAGEMENT OF POSTGRADUATE EDUCATION**  
**CRITERION:** The institution has policies, structures and procedures for supporting and improving postgraduate education.

**Criterion 9.5**  
**SUB-AREA: EFFECTIVE SUPERVISION**  
**CRITERION:** The institution has policies, systems and regulations to support and monitor postgraduate supervision.
In order to meet the criterion, the following are examples of what would be expected:

(i) The institution has regulations governing the relationship between supervisors and postgraduate students. There are clear mechanisms for complaints and appeals.
(ii) The institution has monitoring mechanisms to check the progress of postgraduate students.
(iii) The institution has available codes of practice or guidelines for supervision.
(iv) Training and development opportunities for new supervisors are available.

<table>
<thead>
<tr>
<th>Criterion 9.6</th>
</tr>
</thead>
<tbody>
<tr>
<td>SUB-AREA: CAPACITY DEVELOPMENT</td>
</tr>
<tr>
<td>CRITERION: The institution has policies, structures and resources to support postgraduate development</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Criterion 9.7</th>
</tr>
</thead>
<tbody>
<tr>
<td>SUB-AREA: ASSESSMENT OF POSTGRADUATE RESEARCH</td>
</tr>
<tr>
<td>CRITERION: The institution has clear criteria and procedures to assess Honours, Masters and PhD theses which are based on external examination</td>
</tr>
</tbody>
</table>

11. USE OF CRITERIA IN AUDIT JUDGMENTS

The HEQC intends using a scale of judgement to indicate the outcomes of audit investigations, in order to make the level of outcomes more explicit. This is done for reasons of transparency, but is also intended as an instrument for institutional development, within the framework of the HEQC’s formative approach to quality management.

A variety of models present themselves for representing the final audit outcomes. The model that is proposed here involves classifying audit outcomes, using the categories of good, satisfactory, and not satisfactory. The criteria will be used by audit panels to arrive at a decision regarding the final audit outcome. The following is proposed in this regard:

(i) Where the HEQC criteria are fully met, the final audit outcome is classified as good.
(ii) Where the HEQC criteria are generally met, the final audit outcome is
classified as *satisfactory*.

(iii) If the HEQC criteria are generally not met, the final audit outcome is classified as *not satisfactory*.

Where an institution demonstrates the use of innovative quality management systems and procedures that go beyond the HEQC’s requirements, it will be commended as an example of excellent practice in quality management.
HIGHER EDUCATION QUALITY COMMITTEE

PROPOSED CRITERIA FOR THE HEQC’s PROGRAMME ACCREDITATION CYCLE: 2004-2009

26 September 2003

Discussion Document
EXECUTIVE SUMMARY

1. **Purpose of the document**

   This document sets out for consultation and comment the HEQC’s proposals for criteria for the accreditation of higher education programmes in the cycle: 2004-2009.

2. **Relevant issues for the development of criteria for programme accreditation**

   The following issues are regarded as relevant for the development of criteria for programme accreditation:

   **(i) Policy and higher education context**

   National policy and other regulatory frameworks (e.g. the HEQC’s *Founding Document* and framework documents), national benchmarks, the institutional quality landscape, institutional missions and goals, partnerships and international comparability.

   **(ii) The model for programme accreditation as indicated in the *Programme Accreditation Framework***

   The underlying principles and key elements of the programme accreditation model as set out in the HEQC discussion document *Programme Accreditation Framework*. This includes, for example, the distinction between new and existing programmes, between professional and non-professional programmes, and the use of standards and criteria.

   **(iii) Level of specificity of criteria for programme accreditation**

   Level of specificity of the criteria for programme accreditation, i.e. general vis-à-vis specific criteria. Specific criteria are preferred in order to clarify the basis for self- and external evaluation, promote justifiable programme judgments, and provide a solid and explicit basis for the training of programme evaluators.

3. **General objectives of HEQC programme accreditation**

   The general objectives of the HEQC with regard to programme accreditation are indicated in the *Programme Accreditation Framework* (p. 11), namely -

   **(i) To identify and grant recognition status to programmes that can satisfy the HEQC’s minimum standards for provision, or demonstrate their potential to do so in a stipulated period of time.**

   **(ii) To protect students from poor quality programmes through accreditation and re-accreditation arrangements that build on reports from self-evaluation and external**
evaluation activities, including HEQC audits, and other relevant sources of information.

(iii) To encourage and support providers to institutionalise a culture of self-managed evaluation that builds on and surpasses minimum standards.

(iv) To utilise all available quality assurance capacity and experience in a co-operative approach to accreditation.

The following objective applies in addition to those specified in the Programme Accreditation Framework:

(v) The cultivation of a culture of innovation and continuous improvement in higher education. This implies the implementation of innovative measures by institutions to move beyond the minimum requirements set by the HEQC.

4. The objectives of the programme accreditation cycle: 2004-2009

In addition to the general objectives of programme accreditation (see 3 above), the following objectives apply to the programme accreditation cycle: 2004-2009. The HEQC intends to:

(i) Specify clearly, through the proposed common set of programme accreditation criteria, the minimum standards that it expects of all higher education programmes.

(ii) Evaluate applications from higher education institutions for the accreditation of new programmes against the proposed criteria for new programmes.

(iii) Re-accredit existing programmes, where applicable, utilising the proposed criteria for existing programmes.

(iv) Conduct national reviews of selected programme areas (such as the present HEQC MBA review), utilising the proposed criteria for existing programmes.

(v) Obtain by means of (ii) – (iv) above, together with data from the DoE and SAQA, a clear picture of the state of higher education programmes, in order to facilitate capacity development and improvement programmes by the HEQC and other role-players.

(vi) Identify and disseminate good practices in programmes throughout the higher education sector.

(vii) Utilise data obtained through the HEQC’s programme accreditation and re-accreditation, national programme reviews and audits, as well as data from other sources (e.g. the DoE and SAQA), in considering applications from higher education institutions for the awarding of self-accreditation status in Phase B of the programme accreditation cycle.

(viii) Utilise data obtained to undertake informed and systematic planning for the programme accreditation cycle: 2010-2015.

5. Programme accreditation activities in the cycle: 2004-2009

1 See section 5 of the Executive Summary below.
The HEQC’s programme accreditation activities during the cycle: 2004-2009 are structured into two subsequent periods, namely 2004-2006 (Phase A) and 2007-2009 (Phase B). These activities are as follows (audit activities during this cycle are also indicated, as these form an integrated system together with programme accreditation):

(i) Phase A (2004-2006)

(a) Full-scale audits commence, except at merging institutions, where provision is made for a three-year “settling-down” period. The HEQC will undertake visits to merging institutions in the first year after the merger has been officially gazetted, in order to ascertain institutional preparations for institutional and programme quality management.

(b) New programmes are accredited, in order to ensure that only programmes of good quality enter the higher education system.

(c) Most existing programmes will not be re-accredited by the HEQC. Non-professional programmes will be re-accredited eventually by self-accrediting HEIs.

(d) Self-accreditation status will not be granted. However, institutions intending to apply for self-accreditation status in Phase B (2007-2009) can use this opportunity to develop the necessary structures, processes and procedures for self-accreditation.

(e) National reviews of programmes (such as the HEQC’s present MBA review), which may be linked to accreditation decisions, continue in selected programme areas. The number of review areas per annum could be increased, depending on the need and the HEQC’s internal capacity and resources.

(ii) Phase B (2007-2009)

(a) Audits continue at all institutions, including at merged institutions.

(b) Accreditation of new programmes continues at all institutions.

(c) Institutions can now apply for self-accreditation status. This status will be granted on the basis of satisfactory evidence of the quality of their internal quality management systems and programme quality.

(d) Re-accreditation of existing programmes will generally not be conducted by the HEQC, except if an institution performs consistently poorly in the accreditation of new programmes, during audits in those areas which will be scrutinised in depth, namely programme development and review, student assessment and performance, and research (in the case of institutions with a

---

2 See Phase B under (ii) below.
specified research mission), and in re-accreditation of existing programmes through national reviews.

Full-scale re-accreditation of existing programmes will commence only at the beginning of the next quality assurance cycle (2010-2015). This applies to re-accreditation of existing non-professional programmes of institutions without self-accreditation status, which will be conducted by the HEQC, and re-accreditation of existing professional programmes, together with statutory ETQAs, in a range of co-operation modalities.

The HEQC could undertake selective re-evaluations of existing non-professional programmes in institutions which apply for self-accreditation status, in cases where this is deemed necessary by the HEQC.

6. Proposed criteria for programme accreditation

The proposed criteria for programme accreditation are classified in two major categories, namely criteria for new programmes and for existing programmes, in line with the programme accreditation model set out in the Programme Accreditation Framework. Within these categories, a further distinction is made between criteria relating to:

- Programme input.
- Programme process.
- Programme output and impact.
- Programme review.
<table>
<thead>
<tr>
<th>ACRONYMS</th>
<th>Full Form</th>
</tr>
</thead>
<tbody>
<tr>
<td>CHE</td>
<td>Council on Higher Education</td>
</tr>
<tr>
<td>DoE</td>
<td>Department of Education</td>
</tr>
<tr>
<td>ETQA</td>
<td>Education and Training Quality Assurer</td>
</tr>
<tr>
<td>HEQC</td>
<td>Higher Education Quality Committee</td>
</tr>
<tr>
<td>NAP</td>
<td>New Academic Policy</td>
</tr>
<tr>
<td>NPHE</td>
<td>National Plan for Higher Education</td>
</tr>
<tr>
<td>NQF</td>
<td>National Qualifications Framework</td>
</tr>
<tr>
<td>PQM</td>
<td>Programme and Qualification Mix</td>
</tr>
<tr>
<td>SAQA</td>
<td>South African Qualifications Authority</td>
</tr>
</tbody>
</table>
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1. **Introduction**

The Higher Education Quality Committee (HEQC) is a permanent committee of the Council on Higher Education (CHE), which was established by the Higher Education Act, 1997 (Act No. 101 of 1997). In terms of the Act, the HEQC has responsibility to accredit programmes of higher education, audit the quality assurance mechanisms of higher education institutions and promote quality in higher education.

In order for the HEQC to execute the above responsibilities, the development of criteria for its audit and accreditation system constitutes a crucial component. The criteria not only have to serve as evaluative instruments against which judgements can be made about quality management and assurance, but also set broad benchmarks for quality management and assurance in higher education. The criteria should enable institutions to analyse and reflect on their quality management and assurance arrangements and guide the production of their institutional self-evaluation report.

The HEQC released in March 2003 a discussion document on audit criteria, titled *Proposed criteria for the HEQC’s first cycle of audits: 2004-2009*. The audit criteria dealt with standards expected of institutional policies, systems, structures and activities for the quality management of teaching and learning, research and service learning. The present document deals with proposals for criteria for programme accreditation and indicates the standards which the HEQC requires with regard to higher education programmes. Programme accreditation criteria are intended to be used by -

(i) Higher education institutions in applying for accreditation of new programmes or re-accreditation of existing programmes.

(ii) HEQC programme evaluators in evaluating applications for accreditation of new programmes or re-accreditation of existing programmes.

(iii) Higher education institutions as guidelines for follow-up activities after HEQC decisions on accreditation or re-accreditation of their programmes.

(iv) Members of the public, in particular students, as indicators of the standards that the HEQC sets for programme quality and educational effectiveness.

The audit and accreditation criteria are intended to constitute together a meaningful and coherent instrument for the HEQC’s quality related responsibilities as integral and mutually reinforcing parts of one quality assurance system. This intended symbiosis should be especially evident in the presentation and evaluation of evidence in institutional applications.

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3 A programme is understood as a purposeful and structured set of learning experiences that leads to one or more qualifications. Accreditation is the recognition status granted for a stipulated period of time to a programme after an evaluation indicates that it meets or exceeds minimum thresholds of educational quality (*Programme Accreditation Framework*, p. 22).

4 A new programme is one which has not existed before or is a programme that has been significantly changed, i.e. when its purpose, outcomes, field of study, mode or site of delivery has been changed to a considerable extent.

5 Existing programmes are programmes leading to qualifications that are registered on the NQF and have been accredited by the Universities and Technikons Advisory Council (AUT), SAQA or the HEQC.
for awarding self-accreditation status. The HEQC’s decision about self-accreditation status will be informed, in each instance, by evidence deriving from audit visits, together with a representative range of programme and other information. Self-accreditation status is one of the HEQC’s major instruments for moving the higher education system towards a greater measure of self-regulation. A credible system of institutional self-accreditation for existing programmes will eventually lessen the amount of direct external HEQC scrutiny and restore the responsibility for quality assurance of programmes to institutions, where it belongs. A more detailed exposition of the requirements for self-accreditation status will be released by the HEQC at a later stage.

The following general points of departure are appropriate in developing criteria for programme accreditation. The criteria should be:

(i) Developed with due attention to the social and educational context within which the HEQC’s activities take place.

(ii) Developed for the higher education sector as a whole, in line with the vision of *Education White Paper 3: A programme for the transformation of higher education*, 1997 of a single, coordinated higher education system. Quality is, in fact, the only instrument at national level which can bring about a coordinated system for public and private providers alike. A measure of flexibility should, however, be built into the criteria to allow for diversity relating to issues such as institutional mission, scope of work, etc.

(iii) Useful for institutions in developing and enhancing the quality of provision in a way that advances the achievement of national goals and priorities in higher education in South Africa. They should serve diagnostic as well as improvement purposes in respect of the core functions of institutions, viz. teaching and learning, research and service learning.

It should also be noted that the proposed criteria for programme accreditation will function as an integral part of the HEQC’s accreditation system and specific programme accreditation model. It is, therefore, strongly suggested that the criteria should be read in close conjunction with the final version of the HEQC’s *Programme Accreditation Framework*.

With regard to the intended scope and depth of scrutiny of the HEQC’s programme accreditation system, the real danger of system overload has to be borne in mind and the amount of scrutiny that institutions are able to handle needs to be carefully balanced against the requirements and legal obligations of the HEQC. Apart from this, vast differences in

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6 Self-accreditation status is applied for and attained for a period of six years after an HEQC evaluation has found the institution to satisfy its audit requirements, successfully manage institutionally arranged internal and external programme evaluations and on the basis of other relevant information supplied by the Department of Education (DoE), the South African Qualifications Authority (SAQA), etc. Self-accreditation status will allow institutions to accredit their own non-professional programmes for the duration of the period of self-accreditation.
quality exist between higher education institutions and the concomitant level of preparedness for internal and external quality management processes differs considerably. Many institutions are also in the process of merging, which have implications for their preparedness for internal and external programme evaluation.

In the light of the above, the HEQC has decided that accreditation activities will be phased in gradually in two subsequent phases during the cycle: 2004-2009. The same applies also to HEQC audit activities. Details of this process are provided in Section 4.2 below. The findings from the 2004-2009 cycle will be carefully reviewed by the HEQC and fully integrated into preparations for the next accreditation cycle.

It is important to note that a quality assurance system for South African higher education have to take broader transformation imperatives into account. Both audit and programme accreditation criteria have to deal with how higher education institutions are engaging with the legacies of inequity, lack of opportunity and poor quality provision in many parts of the system. They will also have to address the adaptability, responsiveness and innovativeness of institutions in relation to new knowledge and skills requirements and new modalities of provision. Ultimately, they will have to enable or encourage institutions to demonstrate that they are improving continuously as teaching, research and social institutions and are socially responsive without compromising their intellectual identity as higher education institutions.

2. **Definition of criteria for programme accreditation**

The HEQC views criteria for programme accreditation as indicators of the minimum standards required for programmes. More formally, the criteria can be defined as follows:

Criteria for programme accreditation indicate the minimum standards which are necessary to support and enhance the quality of teaching and learning, research and service learning programmes.

It should be noted that, although programme accreditation criteria express minimum standards, institutions should constantly strive to attain higher levels of quality than the minimum.

3. **Relevant issues for the development of criteria for programme accreditation**

The following issues are relevant to the development of criteria for programme accreditation:

(i) Policy and higher education context.
(ii) Model for programme accreditation as indicated in the *Programme Accreditation Framework*.
(iii) Level of specificity of the criteria.
3.1 Policy and higher education context

Criteria for programme accreditation have to be fully contextualised within the circumstances of South African higher education, while also taking into account international trends and benchmarks. The criteria cannot be taken over simply from other contexts and/or quality assurance agencies. They are clearly dependent on and linked to a number of contextual issues, which of necessity shape and mould their development and use.

The following are some contextual issues which are addressed in this section:

(i) National policy and other regulatory frameworks.
(ii) National benchmarks.
(iii) Institutional quality landscape.
(iv) Institutional mission and goals.
(v) Partnerships.
(vi) International comparability.

This is represented in Figure 1.

**Figure 1: Policy and higher education context**
3.1.1. National policy and other regulatory frameworks

3.1.1.1 National policy

National policy relating to higher education provides not only the broad conceptual and legislative context for the HEQC’s work, but also have clear implications for the development of the HEQC’s criteria for programme accreditation. The criteria have to be consonant with national policy on matters such as the purposes of higher education, national needs and challenges, issues like access, standards, etc. The criteria are, in fact, one of the main vehicles for giving practical effect to these policies.

3.1.1.2 HEQC policy and frameworks

(i) The Founding Document

The criteria have to be informed by the HEQC’s own policy positions as expounded in its Founding Document and other documents, for example, its views on the nature and definition of quality in higher education, accountability and improvement, ways of dealing with the historical legacy of apartheid in the higher education system, etc. For example, according to the Founding Document (p. 14), the HEQC will develop a quality assurance framework and criteria based on:

- Fitness for purpose in relation to specified mission within a national framework that encompasses differentiation and diversity.
- Value for money as judged in relation to the full range of higher education purposes as set out in the White Paper. Judgements about the effectiveness and efficiency of provision will include but not be confined to labour market responsiveness and cost recovery.
- Transformation in the sense of developing the capabilities of individual learners for personal enrichment, as well as the requirements of social development and economic and employment growth.”

The Founding Document also states (p. 14) that the criteria will be located within a “fitness of purpose” framework based on national goals, priorities and targets.

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The *Founding Document* thus provides a diversity of “lenses” for looking at quality assurance. This multi-faceted view necessitates a diversified range of criteria with which to evaluate the quality of programmes.

(ii) **The Programme Accreditation Framework and the Proposed Criteria for the HEQC’s First Cycle of Audits: 2004-2009**

The criteria for programme accreditation have to be developed within the context of the *Programme Accreditation Framework*. This will be discussed in more detail in 3.2 below. At the same time, the criteria for programme accreditation cannot be developed in isolation from the audit criteria as in the *Proposed Criteria for the First Cycle of HEQC’s Audits: 2004-2009*.

### 3.1.2 National benchmarks

The development of the criteria should take the national benchmarks set by the DoE for institutional efficiency into consideration. These include increasing enrolments and graduate outputs in general and in specified areas, increasing research productivity and improving the diversity profile of graduates. These benchmarks pertain to efficiency as well as to the transformation requirements of the higher education system.

### 3.1.3 The institutional quality landscape

The following aspects regarding the institutional quality landscape have to be taken into account when developing the criteria for programme accreditation. The issues are briefly mentioned without any in depth discussion.

(i) **Restructuring of the higher education system**: Formal arrangements for quality management are being introduced in an environment where the entire higher education landscape is being restructured. Much attention will be devoted by institutions in the following years to restructuring issues, including mergers, which could be to the detriment of quality provision. On the positive side, quality concerns could be used to help shape and build the new higher education system.

(ii) **Maintenance of standards in a competitive environment**: There is a strong pressure for attaining, maintaining and improving standards in institutions, in a difficult climate of declining funding, rising expectations, changing priorities and increased competition between different higher education sectors and institutions.

(iii) **Available expertise**: The implementation of national policies for quality management in higher education is a complex matter which will require the combined efforts of the relatively small number of knowledgeable people in the

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8 This section draws on the report of the Centre for Higher Education Studies and Development (CHESD), titled *Report on the CHESD/HEQC Audit Manual Project, 2002*, pp. 198-201.
field of quality assurance in South Africa, as well as capacity development initiatives for this purpose.

(iv) **Differences in quality among institutions**: There are, for historical and other reasons, many differences in the quality of provision among institutions, as well as between programmes within institutions. The development of benchmarks for an acceptable level of quality provision becomes critical.

(v) **Different interpretations of quality management**: Different histories and interpretations of quality management exist in various higher education sectors. Technikons and agricultural colleges have focused largely on minimum standards, programme evaluation and statutory compliance, whereas the universities favoured a developmental approach in which self- and peer evaluation was based on fitness for purpose, relating to the institution’s mission and goals. The private provider sector has indicated a strong interest in the quality requirements of vocational education. A common understanding of and approach to quality issues are needed, which will of necessity have an influence on the development of the criteria.

3.1.4 **Institutional mission and goals**

The mission and goals of an institution provide the overarching context within which its core educational activities ought to take place (“fitness for purpose”). Institutional missions and goals have themselves to be determined in relation to the needs of the local and national context within which the institution finds itself (“fitness of purpose”). The criteria can help to ascertain the extent to which an institution’s core educational activities, i.e. teaching and learning, research and service learning, are informed and directed by its mission and goals in a way that enhances quality in all these core functions.

In addition to the above, institutional missions and goals have to be congruent with the purposes of higher education in general. They should also be appropriately responsive to international developments and trends in higher education.

3.1.5 **Partnerships**

Responsible partnerships in higher education provision can greatly facilitate the effective utilisation of academic expertise and human resources, especially in specialised fields at the postgraduate level. Such partnerships include collaboration between and among institutions on a regional basis, between the public and private provider sectors, between universities and technikons, and between higher education institutions and industry / companies. It also includes collaboration between institutions across national borders. Within an environment where higher education co-operation is encouraged, the criteria for programme accreditation will have to address the quality requirements of collaborative provision of higher education, to ensure that responsibility for quality and quality management is clearly assigned and monitored.
3.1.6 **International comparability**

International trends and requirements for the internationalisation of programmes are important benchmarks for developing the HEQC’s criteria for programme accreditation, in order to ensure programmes which have good reputation in a global higher education market and which produce graduates and diplomates who are internationally competitive, marketable and respected.

3.2 **The model for programme accreditation as indicated in the *Programme Accreditation Framework***

The criteria for programme accreditation have to be embedded in the broad framework for accreditation as set out in the *Programme Accreditation Framework*. Pertinent aspects of this framework are briefly discussed below.

3.2.1 **Objectives of the programme accreditation model**

The following general objectives of the HEQC’s programme accreditation model are indicated in the *Programme Accreditation Framework* (p. 11):

(i) To identify and grant recognition status to programmes that can satisfy the HEQC’s minimum standards for provision, or demonstrate their potential to do so in a stipulated period of time.

(ii) To protect students from poor quality programmes through accreditation and re-accreditation arrangements that build on reports from self-evaluation and external evaluation activities, including HEQC audits, and other relevant sources of information.

(iii) To encourage and support providers to institutionalise a culture of self-managed evaluation that builds on and surpasses minimum standards.

(iv) To utilise all available quality assurance capacity and experience in a co-operative approach to accreditation.

The following objective should be added to the above:

(v) The cultivation of a culture of innovation and continuous improvement in higher education. This implies the implementation of innovative measures by institutions to move beyond the minimum requirements set by the HEQC.

3.2.2 **Underlying principles of the programme accreditation model**

According to the *Programme Accreditation Framework* (p. iv), the principles underlying the HEQC’s accreditation model are the following:

(i) The model presumes strong accountability within the context of a developmental trajectory and requires the observance of minimum standards and requirements. The stipulation of minimum standards is intended to protect
students from poor quality programmes, safeguard the credibility of qualifications and facilitate articulation between programmes and providers.

(ii) External expert evaluations by academic peers constitute a fundamental component of the accountability requirements of the model.

(iii) The achievement of self-accreditation status by a provider will lessen HEQC scrutiny of non-professional programmes and place quality assurance responsibility for the re-accreditation of existing programmes with the institution itself. Self-accreditation status will be awarded by the HEQC upon application by an institution, if it has a good track record of audit and programme evaluations, together with satisfactory evidence from other sources.

(iv) Co-operation with other Education and Training Quality Assurers (ETQAs) in the case of professional and work-related programmes will be based on a range of partnership models, depending on the nature of the provider and the level of the programme or qualification.

3.2.3 The programme accreditation model's approach to quality assurance

The HEQC’s model for programme accreditation is premised on a distinction between new and existing programmes. Within existing programmes, a further distinction is made between professional and non-professional programmes.

Although the model starts with clear accountability requirements for minimum standards and external evaluation, it intends moving the system towards a self-accreditation philosophy that strongly embraces an institutionally managed evaluation system.

In the case of new programmes, the emphasis is on accountability through evaluation activities that are mainly external. There is also a strong improvement trajectory which is facilitated by a gradual build-up towards the accreditation phase through the candidacy and mid-term check phases, which provide opportunities for incremental development and improvement.

In the case of existing programmes, the emphasis is on sustained improvement through institutionally managed evaluation. This will allow institutions which can clearly demonstrate reasonably effective internal quality management systems to take the initiative and responsibility for programme re-accreditation on the basis of trust in their commitment to continuous quality maintenance and improvement. External accountability will be satisfied through HEQC scrutiny linked to institutional audits and programme-related information from sources such as the DoE and SAQA. Within the audit cycle, institutions will be free to arrange the timeframes and approaches to programme evaluation and accreditation activities, subject to HEQC guidelines. In this way, the HEQC intends moving the higher education system towards a greater measure of self-regulation.

3.2.3.1 New programmes

New programmes are required by the HEQC to undergo a three-step evaluation process that includes a candidacy phase, a mid-term check and a final accreditation phase. The
three phases provide also development and improvement opportunities for the proposed programme(s), gradually building up to final accreditation. All three phases will be mandatory for new private institutions which want to offer new programmes. Existing public and private institutions may not be required to undergo all the steps of the HEQC’s requirements.

The methodology followed in each phase will include programme self-evaluation and peer review, based on the self-evaluation report. At least one site visit is mandatory for accreditation, but such site visits may occur in any or more than one phase of the process. The HEQC reserves the right to implement all or only some of the steps of the accreditation process.

In all three phases, development opportunities will be available for providers if programmes are found to be problematic, on the expectation that these providers have the ability to remedy the problem areas and attain minimum standards within a stipulated period of time.

(i) The candidacy phase

In this phase, the HEQC/and other co-operating ETQA will focus on evaluating the evidence submitted by an institution on its capacity and institutional support to start offering a programme. The evidence presented on the arrangements for the quality of teaching and learning for a specific programme will also be scrutinised. If a programme satisfies the HEQC’s requirements for the candidacy phase, it will receive provisional accreditation for that programme.

Institutions should only apply for the accreditation of new programmes if all legislative requirements have been met, or if the institution can demonstrate that it has the potential to meet these requirements.

(ii) Mid-term check phase

This phase constitutes a performance and compliance check midway through the programme to ensure that the institution has implemented the stated programme plan and has identified and addressed areas for urgent attention. This step provides an early warning system (to the institution and to the HEQC) about problem areas as well as an opportunity for appropriate developmental support, where necessary.

(iii) Accreditation phase

Within one year of the first cohort of students having graduated from a new programme, the institution must demonstrate compliance with conditions set by the HEQC during the previous phases (where applicable). It must also supply to the HEQC the success rates at the different year levels and throughput rates for the whole programme, a self-analysis of the strengths and weaknesses of the quality of the programme against the HEQC criteria and an improvement plan. The award of accreditation will be valid for a maximum of six
years, depending on the duration of the new programme. Until a successful outcome in the third phase of the accreditation process, programmes will be designated as having “provisional accreditation”.

3.2.3.2 Existing programmes

According to the Programme Accreditation Framework (pp. 16-18), existing programmes will be re-accredited as follows:

(i) Non-professional programmes

Non-professional programmes will be re-accredited by the provider, if granted self-accreditation status by the HEQC. Institutions can apply for self-accreditation status for a period of six years, which will depend on the assessment made by the HEQC Accreditation Committee of the reports of both the institution’s self-evaluation and external evaluation of programmes and departments, the results of the HEQC’s institutional audit reports, a sample of HEQC programme evaluations, information provided by the DoE, SAQA, other ETQAs, and any other related reports. Institutions should work towards attaining self-accreditation status as part of an institutionally driven improvement trajectory.

If self-accreditation status is not achieved by the provider, the HEQC will undertake re-accreditation of the institution’s non-professional programmes.

(ii) Professional programmes

Existing professional programmes in which statutory bodies are involved, have to satisfy all the statutory and other professional requirements for licensure and professional practice. Depending on DoE and SAQA policies and regulations, including co-operation agreements entered into by the HEQC with statutory professional councils, which include compliance with conditions set by the HEQC, such statutory bodies may, therefore, be involved in the re-accreditation of an existing professional programme or qualification. The model of collaboration agreed upon by the HEQC and the individual bodies will determine the nature of their involvement.

3.2.4 Standards and criteria in the Programme Accreditation Framework

The Programme Accreditation Framework represents standards as follows (p. 18):

Table 1: Standards as represented in the Programme Accreditation Framework

<p>| General provider standards (HEQC) | HEQC’s institutional efficiency standards, linked to those of the DoE as well as the institution’s own governance structures (e.g. in the area of infrastructural capacity). |</p>
<table>
<thead>
<tr>
<th>General programme standards (HEQC)</th>
<th>Relating to quality management standards developed by the HEQC.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Specific programme/qualification standards</td>
<td>Relating to standards registered on the NQF and/or the requirements of the relevant ETQAs or statutory professional councils and/or programme standards set by institutions⁹, as well as level descriptors and qualification descriptors in the proposed New Academic Policy.</td>
</tr>
</tbody>
</table>

General provider or institutional standards relate to the HEQC’s standards for institutional structures, processes and procedures for the management of quality. These standards are informed also by the DoE’s requirements.

General programme standards are the HEQC’s standards which apply across all higher education programmes and are informed also by policies of the DoE, SAQA and by the New Academic Policy (NAP)¹⁰. The present document makes proposals for such general programme criteria and standards.

Specific programme/qualifications standards relate to standards for specific programmes or qualifications, such as for the MBA, MBChB, etc. Statutory professional councils are also involved in setting standards for professional programmes.

### 3.3 Level of specificity of criteria for programme accreditation

The level of specificity of the criteria has important consequences for their interpretation and use, for example in accreditation visits, institutional self-evaluation and the training of programme evaluators. Criteria can be devised in a number of ways and formulated on different levels of generality, ranging from general to more specific and detailed.

The HEQC has opted to use specified criteria for programme accreditation, in order to make its requirements for programme areas explicit. This should clarify the basis for self- and external evaluation and promote justifiable programme judgments¹¹. It would also provide a solid basis for the training of programme evaluators.

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⁹ The accreditation system presupposes that a standards generating process for qualifications and programmes is operative and that standards exist on which judgments can be based. The HEQC supports the notion of standards setting for qualifications and programmes in terms of the “nested approach” proposed in the New Academic Policy. The final version of the New Academic Policy is expected to provide detail on the process of standards design, standards setting and standards registration and clarity on the roles of the various authorities involved. The resolutions following the proposals of the NQF Study Team will determine the context and system in which the HEQC will have to operate.

¹⁰ The NAP still has to be finalised.

¹¹ In the Proposed Criteria for the First Cycle of HEQC Audits: 2004-2009, the HEQC proposed both general and specific criteria. The two types of criteria correlate with the depth of scrutiny during audits, i.e. either general or in depth scrutiny at specified levels in an institution.
4. **The HEQC’s programme accreditation cycle: 2004-2009**

The criteria which are proposed in this document are intended for use in the programme accreditation cycle: 2004-2009, within the framework of the HEQC’s accreditation model discussed in 3.2 above. Before discussing the contents of the criteria, the general objectives of programme accreditation and those of the programme accreditation cycle: 2004-2009, as well the intended accreditation activities during this cycle, should be briefly indicated.

4.1 **General objectives of HEQC programme accreditation**

The general objectives of the HEQC with regard to programme accreditation are indicated in the *Programme Accreditation Framework* (p. 11), namely -

(i) The HEQC intends to signal clearly to the higher education community, through the programme accreditation criteria, the minimum standards that it expects of all higher education programmes. The criteria will also provide explicit benchmarks against which institutions can measure their existing programmes, develop new programmes and develop or maintain the necessary internal mechanisms to ensure their quality. Institutions should constantly strive to attain higher levels of quality than the minimums specified in the criteria.

(ii) The common set of quality requirements for all higher education programmes which will be used in the cycle 2004-2009 will enable the HEQC to obtain baseline information on higher education programmes. Such information will -

a. Provide a clear picture of the state of higher education programmes, thus facilitating capacity development and improvement programmes by the HEQC and other role-players.

b. Enable the HEQC to identify and disseminate good practices in programmes throughout the higher education sector.

c. Constitute part of the evidence, together with data derived from audit outcomes and other sources, for the granting of self-accreditation status to institutions that apply for it.

d. Enable the HEQC to do informed and systematic planning for the next programme accreditation cycle.

4.2 **Objectives of the programme accreditation cycle: 2004-2009**

In addition to the above general objectives of programme accreditation, the following objectives apply to the programme accreditation cycle: 2004-2009. The HEQC intends to:

(i) Specify clearly, through the proposed common set of programme accreditation criteria, the minimum standards that it expects of all higher education programmes.
(ii) Evaluate applications from higher education institutions for the accreditation of new programmes against the proposed criteria for new programmes.

(iii) Re-accredit existing programmes, where applicable\textsuperscript{12}, utilising the proposed criteria for existing programmes.

(iv) Conduct national reviews of selected programme areas (such as the present HEQC MBA review), utilising the proposed criteria for existing programmes.

(v) Obtain by means of (ii) – (iv) above, together with data from the DoE and SAQA, a clear picture of the state of higher education programmes, in order to facilitate capacity development and improvement programmes by the HEQC and other role-players.

(vi) Identify and disseminate good practices in programmes throughout the higher education sector.

(vii) Utilise data obtained through the HEQC’s programme accreditation and re-accreditation, national programme reviews and audits, as well as data from other sources (e.g. the DoE and SAQA), in considering applications from higher education institutions for the awarding of self-accreditation status\textsuperscript{13}.

(viii) Utilise data obtained to undertake informed and systematic planning for the programme accreditation cycle: 2010-2015.

4.3 Programme accreditation activities in the cycle: 2004-2009

The HEQC’s programme accreditation activities during the cycle: 2004-2009 are structured into two subsequent periods, namely 2004-2006 (Phase A) and 2007-2009 (Phase B). These activities are as follows (audit activities during this cycle are also indicated, as these form an integrated system together with programme accreditation):

(ii) **Phase A (2004-2006)**

(a) Full-scale audits commence, except at merging institutions, where provision is made for a three-year “settling-down” period. The HEQC will undertake visits to merging institutions in the first year after the merger has been officially gazetted, in order to ascertain institutional preparations for institutional and programme quality management.

(b) New programmes are accredited, in order to ensure that only programmes of good quality enter the higher education system.

(c) Most existing programmes will not be re-accredited by the HEQC. This will be done eventually by self-accrediting HEIs.

(d) Self-accreditation status will not be granted. However, institutions intending to apply for self-accreditation status in Phase B (2007-2009) can use this opportunity to develop the necessary structures, processes and procedures for self-accreditation.

\textsuperscript{12} See footnote 1 for conditions under which existing programmes will be re-accredited in the cycle: 2004-2009.

\textsuperscript{13} See section 4(i)(c) and 4(2)(c) below for more details on self-accreditation status.
(c) National reviews of programmes (such as the HEQC’s present MBA review), which may be linked to accreditation decisions, continue in selected programme areas. The number of review areas per annum could be increased, depending on the need and the HEQC’s internal capacity.

(ii) Phase B (2007-2009)

(a) Audits continue at all institutions, including at merged institutions.

(b) Accreditation of new programmes continues at all institutions.

(c) Institutions can now apply for self-accreditation status. This status will be granted on the basis of satisfactory evidence of the quality of their internal quality management systems and programme quality.

(d) Re-accreditation of existing programmes will generally not be conducted by the HEQC, except if an institution performs consistently poorly in the accreditation of new programmes, during audits in those areas which will be scrutinised in depth, namely programme development and review, student assessment and performance, and research (in the case of institutions with a specified research mission), and in re-accreditation of existing programmes through national reviews.

Full-scale re-accreditation of existing programmes will commence only at the beginning of the next quality assurance cycle (2010-2015). This applies to re-accreditation of existing non-professional programmes of institutions without self-accreditation status, which will be conducted by the HEQC, and re-accreditation of existing professional programmes, together with statutory ETQAs, in a range of co-operation modalities.

The HEQC could undertake selective re-evaluations of existing non-professional programmes in institutions which apply for self-accreditation status, in cases where this is deemed necessary by the HEQC.

5. Classification model for programme aspects and criteria

The proposed criteria for programme accreditation could be classified in numerous ways. The HEQC will use programme input, process, and output and review as a classification model, since it closely reflects aspects typically involved in programmes.

Programme input comprises activities, resources, conditions etc. which should take place/ be available or present with a view to the actual offering of the programme. This includes programme aspects such as programme design, student recruitment, staffing, learning resources, etc.
Programme process includes activities which have to do with or take place as part of the delivery of the programme as such. This includes programme aspects such as management, teaching and learning interactions, assessment, etc.

Programme output and impact includes what is delivered and attained by the programme, for example, student throughput and output, representivity in output, etc.

Programme review comprises activities which have to do with the evaluation of the programme in terms of various aspects, such as its attainment of outcomes, curriculum alignment, graduation and retention rates, use of results of review as input, etc.

The above model does not always allow categorisation of programme aspects and their criteria into watertight compartments. A case in point is programme management, which has a policy aspect, which would properly be classified under input, but also entails a range of activities which have to do with the delivery of the programme. On the whole, however, the model offers a useful classificatory grid.

The proposed criteria for programme aspects will be classified as follows under the input, process, output and impact, and review categories.

Table 2: Classification of criteria for programme aspects under input, process, output and impact, and review

<table>
<thead>
<tr>
<th>CRITERIA FOR PROGRAMME ASPECTS</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>INPUT</strong></td>
</tr>
<tr>
<td>Programme design</td>
</tr>
<tr>
<td>Student recruitment, admission and selection</td>
</tr>
<tr>
<td>Staffing</td>
</tr>
<tr>
<td>Policies and procedures for student assessment</td>
</tr>
<tr>
<td>Venues and IT infrastructure</td>
</tr>
<tr>
<td>Library resources</td>
</tr>
<tr>
<td>Programme administrative services</td>
</tr>
<tr>
<td>Postgraduate policies and procedures</td>
</tr>
<tr>
<td><strong>PROCESS</strong></td>
</tr>
<tr>
<td>Programme coordination</td>
</tr>
<tr>
<td>Student academic development</td>
</tr>
<tr>
<td>Teaching and learning interactions</td>
</tr>
<tr>
<td>Student assessment</td>
</tr>
<tr>
<td>Work-based learning</td>
</tr>
<tr>
<td>Postgraduate studies</td>
</tr>
<tr>
<td><strong>OUTPUT AND IMPACT</strong></td>
</tr>
<tr>
<td>Student retention and throughput rates</td>
</tr>
<tr>
<td>Equity of outcomes / representivity</td>
</tr>
<tr>
<td>Integrity of certification</td>
</tr>
<tr>
<td>Employment data / external acknowledgement</td>
</tr>
</tbody>
</table>
## Review

<table>
<thead>
<tr>
<th></th>
<th>Attainment of outcomes</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Curriculum alignment</td>
</tr>
<tr>
<td></td>
<td>Stakeholder feedback</td>
</tr>
<tr>
<td></td>
<td>Retention and throughput rates, equity and representivity in output</td>
</tr>
<tr>
<td></td>
<td>Use of results of review</td>
</tr>
</tbody>
</table>

The proposed programme accreditation criteria for the cycle: 2004-2009 are listed in Appendices 1 and 2 below, using the above categories. It should be noted that the criteria apply equally to programmes at main campuses, satellite campuses and tuition centres. They apply to contact as well as distance education programmes. Where necessary, conditions pertaining to distance education specifically are indicated. The criteria apply also to exported and partnership programmes. In the case of exported programmes, the quality requirements of the importing country have to be complied with as well.

### 6. Use of criteria in judgements on programme accreditation

Higher education programmes will be evaluated against the criteria proposed in this document. The HEQC intends using a scale of judgment in order to indicate the outcome of programme evaluation, in order to make the level of the outcome explicit. The following classification is proposed within the framework of the HEQC’s programme accreditation model, differentiating between new and existing programmes and phases of accreditation (in the case of new programmes).

**Table 3: Use of criteria in judgements on the outcome of programme accreditation**

<table>
<thead>
<tr>
<th>1. NEW PROGRAMMES</th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) Candidacy phase</td>
<td>Criteria fully met</td>
<td>Good</td>
<td>Provisionally accredited</td>
</tr>
<tr>
<td></td>
<td>Criteria only generally met</td>
<td>Satisfactory</td>
<td>Provisionally accredited</td>
</tr>
<tr>
<td></td>
<td>Criteria generally not met</td>
<td>Not satisfactory</td>
<td>(Conditional)</td>
</tr>
<tr>
<td>(b) Mid-term check phase</td>
<td>Criteria fully met</td>
<td>Good</td>
<td>Provisional accreditation extended</td>
</tr>
<tr>
<td></td>
<td>Criteria only generally met</td>
<td>Satisfactory</td>
<td>Provisional accreditation extended</td>
</tr>
<tr>
<td></td>
<td>Criteria generally not met</td>
<td>Not satisfactory</td>
<td>(Conditional)</td>
</tr>
</tbody>
</table>

17
### (e) Accreditation phase

<table>
<thead>
<tr>
<th>Criteria fully met</th>
<th>Criteria only generally met</th>
<th>Criteria generally not met</th>
</tr>
</thead>
<tbody>
<tr>
<td>Good</td>
<td>Satisfactory</td>
<td>Not satisfactory</td>
</tr>
</tbody>
</table>

| Accredited Accredited (Conditional) Not accredited |

### 2. EXISTING PROGRAMMES

<table>
<thead>
<tr>
<th>Criteria fully met</th>
<th>Criteria only generally met</th>
<th>Criteria generally not met</th>
</tr>
</thead>
<tbody>
<tr>
<td>Good</td>
<td>Satisfactory</td>
<td>Not satisfactory</td>
</tr>
</tbody>
</table>

| Accredited Accredited (Conditional) Not accredited |

If the quality of a programme generally exceeds the HEQC’s requirements, it will be commended as an example of excellence.
APPENDIX 1

PROPOSED CRITERIA FOR NEW PROGRAMMES

NOTE: The following should be noted:

(i) As indicated above, a new programme is one which has not existed before or is a programme that has been significantly changed, i.e. when its purpose, outcomes, field of study, mode or site of delivery has been changed to a considerable extent.

(ii) Criteria are proposed below for the candidacy, mid-term check and accreditation phases for applications for new programmes, as set out in the HEQC’s Programme Accreditation Framework. The proposed criteria are to be read in close conjunction with the Programme Accreditation Framework14.

(iii) The criteria should be used as the basis for an institution’s self-evaluation in each of the three phases and will be used by the HEQC in the evaluation of submissions from institutions in each of the phases in the programme accreditation cycle 2004-2009.

(iv) Institutions are required to supply both qualitative and quantitative (statistical) data, where applicable, with reference to the issues dealt with in the criteria, as well as an analysis and interpretation of these.

(v) It should be noted that the HEQC normally requires an accredited programme first to establish itself before the next higher level programme in the same field can be applied for. However, if an institution satisfies all the criteria for the mid-term check phase of the programme (see below), application could be made for the next higher level programme in the same field. For example, application could be made for a master’s programme in a field of study once the honours programme in the same field of study has satisfied all the criteria in the mid-term check phase.

(vi) Apart from the proposed criteria below, programmes are required to comply with the following national requirements:

(a) Public providers: The proposed programme should be part of the institution’s ‘Programme and Qualification Mix’ (PQM), as approved by the DoE.

(b) Private providers: The provider should have applied for registration to the Department of Education in terms of the requirements of the Higher Education Act, 1997 (Act No. 101 of 1997) and the Regulations of the Department of Education (2002).

(c) The programme should meet the requirements of the New Academic Policy, in keeping with national and international standards. This includes:

14 A summary of some important aspects of the Programme Accreditation Model is provided in 3.2 above.
• General qualification standards as specified in the level descriptors (e.g. Level 7 for a degree).
• Qualification type descriptors (e.g. for a bachelor’s degree).
• Generic qualification standards (e.g. for the B Sc).
• Specific qualification standards (e.g. the B Sc (Geology)).

(d) The programme should be registered by SAQA on the NQF.
(c) The stipulations of the Labour Relations Act and conditions of service should be adhered to with regard to recruitment and employment of staff.

I. CANDIDACY PHASE

In order to fulfill the HEQC’s requirements for the candidacy phase of a new programme, an institution has to provide evidence that it has the potential and capability to offer the programme, i.e. the required input resources, conditions, etc. This includes aspects such as programme design, student recruitment and admission, staffing, etc.

Secondly, the institution has to submit a plan with details regarding the implementation of the programme. The plan should specify the following:

(i) Implementation phases for the proposed programme and attached time-frames.
(ii) How progress will already be made during implementation towards meeting the criteria for programme progress (especially teaching and learning interactions), output and impact, and review in the accreditation phase of the new programme.
(iii) Budgetary allocations for each implementation phase.
(iv) Person-power for managing the implementation.

The criteria for programme input which are dealt with below are classified in areas, their relevant aspects and numbers of the corresponding criteria in Table 4 below:

Table 4: Classification of criteria for programme input into areas, relevant aspects and numbers of corresponding criteria

<table>
<thead>
<tr>
<th>AREAS</th>
<th>RELEVANT ASPECTS</th>
<th>CRITERION</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Programme design</td>
<td>(a) Relation to institution’s mission and planning</td>
<td>Criterion 1</td>
</tr>
<tr>
<td></td>
<td>(b) Needs of students and other stakeholders</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(c) Intellectual credibility</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(d) Coherence</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(e) Articulation</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(f) Characteristics and needs of professional and vocational education</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(g) Learning materials development</td>
<td></td>
</tr>
<tr>
<td>2. Student recruitment, admission</td>
<td>(a) Recruitment documentation</td>
<td>Criterion 3</td>
</tr>
<tr>
<td></td>
<td>(b) Legislative issues</td>
<td></td>
</tr>
</tbody>
</table>
and selection | (c) Widening of access  
| (d) Equity  
| (e) Assumptions of learning  
| (f) Professional needs  
| (g) Capacity of the programme

3. Staffing | (a) Qualifications  
| (b) Teaching experience  
| (c) Assessment competence  
| (d) Research profile  
| (e) Staff development  
| (f) Size and seniority  
| (g) Diversity  
| (h) Full-time and part-time staff  
| (i) Time and activities

4. Student assessment | (a) Internal assessment  
| (b) External examination  
| (c) Security  
| (d) Explicitness and level of assessment criteria  
| (e) Validity and reliability of practices  
| (f) Recording of results

5. Venues and IT infrastructure | (a) Suitable and sufficient venues  
| (b) Venue allocation  
| (c) Office space and access to computers  
| (d) Sufficient and suitable technology  
| (e) Training in technology  
| (f) Access to technology  
| (g) Maintenance of technology

6. Library resources | (a) Integration into curriculum  
| (b) Size and scope  
| (c) Management and maintenance  
| (d) Student support  
| (e) Access

7. Programme administrative services | (a) Provision of information  
| (b) Management information system  
| (c) Dealing with a diverse student population  
| (d) Identification of active students  
| (e) Communication systems

8. Postgraduate policies, regulations and procedures | (a) Policies, regulations and procedures  
| (b) Equity and access  
| (c) Preparation of students

The criteria below are proposed for programme input areas.
1. **Programme design**

The high quality conceptualisation and design of a programme is an important first step towards achieving high quality educational provision. Effective design policies and procedures should ensure that programmes meet the needs of students and other stakeholders and are intellectually credible. In the case of professional and work-based learning in vocational programmes, input from stakeholders such as industry and professional bodies is critical. The clear definition of the purpose of a programme and its exit-level outcomes provide also key reference points against which the effectiveness of the programme and the performance of its students can be evaluated at a later stage.

**CRITERION 1:** *The proposed programme is designed as an integral part of the institution’s mission and planning, meets the needs of students and other stakeholders and is intellectually credible. It is designed coherently and articulates well with other programmes.*

In order to meet the criterion, the following is required **at minimum:**

(i) The proposed programme falls within the institution’s mission and goals and was approved by the appropriate institutional structures, including Senior Management.

(ii) Provision is made for the proposed programme in the institution’s planning and resource allocation processes.

(iii) The proposed programme’s design, learning outcomes, degree of curriculum choice, expected completion time, teaching methods and modes of delivery cater for the learning needs of its target student intake. The competences expected of students successfully completing the proposed programme are made explicit.

(iv) The proposed programme outcomes meet national or regional labour market, knowledge or other socio-cultural needs. All relevant stakeholders, including employers and professional bodies, where applicable, were involved in the development of the proposed programme. This includes academic peers from outside the institution.

(v) The proposed programme’s design maintains an appropriate balance of theoretical, practical and experiential knowledge and skills. It has sufficient disciplinary content and theoretical depth, at the appropriate level, to serve its educational purpose.

(vi) The proposed programme’s modules or courses are coherently planned with regard to contents, level, credits, purpose, learning outcomes, rules of combination, relative weight, etc.

(vii) Assessment tasks are coherently linked to specified learning outcomes. Integrated assessment strategies are employed at key exit points from the proposed programme.

(viii) The proposed programme is designed also to offer learning and career pathways to students with opportunities for access and articulation with other programmes within and across institutions, where possible.

(ix) In the case of **professional and vocational education,** in addition to (i) – (viii) above, the proposed programme has to cater for the characteristics and needs of professional and vocational education. This means -
Criteria for new programmes: Candidacy phase

• The proposed programme is designed to promote an understanding on the part of the student of the specific occupation for which he/she is being trained.
• The proposed programme has a balance of theoretical and practical or applied knowledge. Techniques and skills are mastered which are required by a specific profession or occupation.
• Work-based learning forms an integral part of the curriculum and placement in a work-based environment is an essential component of the proposed programme.

**CRITERION 2** There is an implemented policy for development and evaluation of learning materials and their alignment with proposed programme goals and underpinning philosophy.

In order to meet the criterion, the following is required at minimum:

(i) Learning material for the proposed programme was developed and evaluated in terms of its underpinning teaching and learning philosophy, the required learning outcomes, and their appropriateness for the target learners. The materials encourage the critical and reflective approach to learning.

(ii) Academic staff are trained, where necessary, for the development of learning materials.

(iii) There is proper acknowledgement of the source of all quotations and no breach of local or international copyright laws.

2. **Student recruitment, admission and selection**

Recruitment needs to be done as part of the marketing of the proposed programme, using recruitment literature and other means which accurately provide the necessary information in terms of the academic calendar, admissions policies, completion requirements and academic standards.

The promotion of equity of access and outcomes and the redress of past inequalities through ensuring that student, graduate and staff profiles reflect the demographic composition of South African society is one of the DoE’s strategic objectives for the transformation of the higher education system (NPHE: 2001: 3.2). A participation rate of the 20-24 year old cohort of at least 20% should be achieved over the next 10-15 years. Institutions are urged to establish targets and strategies to ensure equity in the demographic composition of their student bodies. Equity targets should also ensure that black and women students are selected and placed in those programmes where they are currently under-represented.

However, in the medium-term, the DoE wants to focus on improving the efficiency of the system in terms of improving graduation and retention rates, especially the disproportionately high black student failure and drop-out rates, by means of comprehensive, sustained, high quality curriculum interventions.
CRITERION 3. Recruitment documentation will inform potential students of the proposed programme accurately and sufficiently, and will not be misleading. Admission and selection of students will be regulated within equity-driven enrolment targets. Admission criteria are commensurate with the assumptions of learning stipulated. Due regard is paid to the needs of the particular profession in the case of professional and vocational programmes.

In order to meet the criterion, the following is required at minimum:

(i) Advertising and promotional materials contain accurate, sufficient and not misleading information regarding the proposed programme with regard to admission policies, completion requirements and academic standards. Marketing and advertising will be done according to DoE and SAQA regulations.

(ii) Legislation regarding admission, for example, matriculation exemption, age exemption, etc., is adhered to. Equity targets are clearly stated and the plans to attain them.

(iii) The proposed programme’s admission criteria are in line with the NPHE’s goal of widening access to higher education. Provision is made, where possible, for flexible entry routes to the proposed programme, including recognition of prior learning (RPL).

(iv) Admission requirements are in line with the degree of complexity of the learning required in the programme.

(v) Selection criteria are explicit and account for ‘representivity in enrolment’ (NPHE 2001: 3.2) and contribute to ‘broadening the social base of students’ (NPHE 2001: 2.4).

(vi) In the case of professional and vocational programmes, the needs of the particular profession are taken into account in the quality of students admitted, the structure of the curriculum and the number of students trained.

(vii) The number of students selected will not exceed the available capacity to offer a quality programme. The number of students enrolled will be balanced against the intended learning outcomes of the programme and will take into account the modes of delivery of the programme and its components (modules /courses).

3. Staffing

Staff competence and effectiveness are critical for institutional performance. An institution should provide incentives and resources for its staff to meet their own professional goals and to contribute to the realisation of the institution’s mission. Staff development should also be an integral part of an institution’s human resource development strategy and practice and is essential to respond to the challenges currently facing professionals in higher education. These include:

- Transformation of the education system in the post-1994 era.
- Dealing with ‘non-traditional students’.
- New understandings about teaching and learning.
• Demands of the knowledge society, which include capacity-building in research, academic management and leadership, as well as in teaching and information technology.

**CRITERION 4:** The academic staff responsible for the proposed programme are suitably qualified and have sufficient teaching competence. Their assessment competence and research profile are adequate for the nature and level of the programme. The institution and/or other recognised agencies provide opportunities to academic staff to enhance their teaching and assessment competencies and to support their professional growth and development.

In order to meet the criterion, the following is required **at minimum:**

(i) Academic staff for undergraduate programmes have relevant academic qualifications higher than the exit level of the programme, but at minimum a degree. Academic staff for postgraduate programmes have relevant academic qualifications at least on the same level as the exit level of the programme. At least 50% of the academic staff for postgraduate programmes have relevant academic qualifications higher than the exit level of the programme. The qualifications of the academic staff were awarded by recognised higher education institutions.15

(ii) The majority of full-time academic staff have two or more years’ teaching experience in a recognised higher education institution.

(iii) The majority of academic staff have teaching experience in areas pertinent to the proposed programme.

(iv) The majority of academic staff in professional programmes have relevant professional experience.

(v) Academic staff are competent to apply the assessment policies of the institution.

(vi) The majority of the academic staff responsible for the proposed programme have at least two years’ experience of student assessment at the exit level of the proposed programme.

(vii) Academic staff members have research experience through their studies toward higher education qualifications.

(viii) The area(s) of research of some of the academic staff members are relevant to the subject areas of the proposed programme.

(ix) The research profile of the staff complement of postgraduate programmes includes recognised research outputs.

(x) The institution and / or other recognised agencies provide orientation and induction opportunities in which new staff members participate. Experienced staff make use of educational development opportunities provided by the institution and other recognised agencies.

(xi) Staff development is provided to enhance lecturers’ and tutors’ skills for working with and developing curricula that are responsive to student diversity, especially under-prepared and second language students at both undergraduate and postgraduate levels.

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15 For a definition of the term “recognised higher education institution”, see the Glossary.
(xii) There is ongoing professional development and training of staff as assessors in line with the SAQA requirements.

**CRITERION 5:** The academic and support staff complement is of sufficient size and seniority for the nature and field of the proposed programme and the size of the student body to ensure that all activities related to the programme can be realised. The inclusion of academic staff members who contribute to the diversity of the staff complement is encouraged. An appropriate ratio exists between full-time and part-time appointments to ensure the stability of the programme.

In order to meet the criterion, the following is required at minimum:

(i) The staff: student ratio expressed as full-time equivalents is suitable for the nature and field of the proposed programme and number of enrolled students.

(ii) Though junior staff or part-time tutors may act as facilitators of learning, the learning is designed by qualified and experienced academic staff.

(iii) The leader of the proposed programme team is preferably a full-time academic staff member of the institution.

(iv) Junior and part-time staff and tutors are trained, where necessary, and monitored by full-time academic staff.

(v) Appropriate administrative procedures exist for the selection, appointment, induction and payment of part-time academic staff members and tutors.

(vi) The academic staff complement is such that it ensures that students are exposed to a diversity of ideas, styles and approaches.

(vii) The stipulations of the Labour Relations Act and conditions of service are adhered to with regard to recruitment and employment of staff.

(viii) Where appropriate and as required by the nature of the proposed programme, sufficient support staff dedicated to the proposed programme are available (in addition to institutional support staff).

(ix) Support staff are adequately qualified for their duties and their knowledge and skills are regularly updated.

(x) For large distance learning programmes, sufficient administrative and technical staff are employed to handle the specialised tasks of registry, dispatch, management of assignments, record-keeping, and administrative support to students.

**CRITERION 6:** Contractual arrangements relating to the time and work of academic staff ensure that all programme quality assurance (policies, implementation, review and improvement of practice), teaching, research, learning support, materials development, assessment, monitoring of part-time staff (where applicable), counselling and administrative activities related to the proposed programme are realised.

In order to meet the criterion, the following is required at minimum:

(i) Specific and sufficient time is formally allocated to academic staff member work schedules to fulfil their responsibilities related to the proposed programme.

(ii) The time slots and mode(s) of contact (personal, electronically) for consultation with academic staff will be made known to the students.
4. **Policies and procedures for student assessment**

Student assessment and success is a central indicator of teaching and learning effectiveness. The transformation goals of widening access, improving retention and throughput rates and producing graduates with appropriate knowledge and skills, can be supported and directed by an effective assessment system. Although the curriculum may target skills, knowledge and attitudes appropriate to the goals of social and economic transformation, if assessment procedures fail to prioritise and test these competences, students are unlikely to acquire the intended learning outcomes. Finally, assessment has a critical influence on the quality of teaching and learning and can be used as a powerful point of leverage for change and improvement in education.

Student assessment encompasses activities which have to do mainly with the delivery of the proposed programme and as such belongs more properly to programme process issues. This section deals only briefly with the policies and procedures for student assessment which have to be in place with a view to the delivery of the proposed programme and should be read in close conjunction with Criteria 24-28 under Programme Process.

**CRITERION 7:** Policies and procedures exist for internal assessment, external examination, monitoring of student progress, rigour and security of the assessment system, explicitness of assessment practices, validity and reliability of assessment practices and recording of assessment results.

In order to meet the criterion, the following is required at minimum:

(i) Policies and procedures exist for internal assessment of students by academic staff responsible for teaching a course / module in terms of a system that includes internal moderation.

(ii) Policies and procedures exist for external examination of students' learning achievements by appropriately qualified personnel who are appointed in terms of clear criteria and procedures and who conduct their responsibilities in terms of clear guidelines.

(iii) Policies and procedures are in place to monitor student progress.

(iv) Policies and rules are in place to ensure the security of the assessment system, especially with regard to plagiarism and other misdemeanours.

(v) Assessment criteria are explicit and commensurate with the level of the qualification and aligned with the requirements of the NAP, SAQA, and (where appropriate), professional bodies.

(vi) Policies and procedures exist to ensure the validity and reliability of assessment practices.

(vii) Policies exist for secure and reliable recording of assessment results.

5. **Venues and IT infrastructure**

Suitable and sufficient venues for teaching and learning, e.g. lecture, seminar and reading rooms, and, where appropriate, laboratories and clinical facilities, are indispensable for
quality teaching and learning in a programme. Proper venue allocation ensures smooth running of classes and, where appropriate, codes for clinical conduct and laboratory practice and safety should be in place, for example in natural science programmes. Suitable office space and access to computers are essential for full-time faculty to perform their duties.

**CRITERION 8:** Suitable and sufficient venues, IT infrastructure and access to software are available, providing favourable conditions for quality teaching and learning, research and student support.

In order to meet the criterion, the following is required **at minimum:**

(i) Suitable and sufficient venues are available at all official sites of learning where the proposed programme will be offered, including teaching and learning venues and, where appropriate, laboratories and clinical facilities. Venues are properly furnished and equipped with the educational and technological apparatus necessary to offer the proposed programme. Where appropriate, codes for clinical conduct and laboratory practice and safety exist.

(ii) Venue allocation and time-tabling are carefully planned to accommodate the needs of students on the proposed programme. In the case of remote students, special care is taken to place suitable sites of learning close to where students live / work.

(iii) Suitable office space and access to computers are provided for full-time faculty.

(iv) Sufficient and suitable IT infrastructure form part of the planning of the programme and is available at all sites of learning, as determined by the programme outcomes. IT infrastructure includes reasonably recent hardware models (computers and printers) and reasonably recent versions of industry standard software and databases required by the programme.

(v) Staff and students are trained in the use of technology required for the programme.

(vi) There is access to IT infrastructure for students who take courses after hours and on weekends.

(vii) The IT infrastructure for the programme is properly maintained. A financial plan exists for the maintenance and continuous upgrading of the infrastructure.

6. **Library resources**

Library resources which are sufficient in size and scope are essential to complement the curriculum, provide incentives for individual learning and support professional and scholarly activities of staff and students involved in the proposed programme. Adequate library support is important also for off-campus students, and student access to the library, research and computing facilities is essential on weekends and outside of normal working hours.

**CRITERION 9:** Sufficient, relevant and up to date library resources are available to students in the proposed programme.

In order to meet the criterion, the following is required **at minimum:**
Criteria for new programmes: Candidacy phase

(i) Library resources are integrated into the programme curriculum in a systematic manner.
(ii) Library resources are sufficient in size and scope to -
   (a) Complement the curriculum.
   (b) Provide incentives for students to learn according to their own needs, capacity and pace.
   (c) Support appropriate professional and scholarly activities of the staff and students involved in the proposed programme.
(iii) Policies exist for the proper management and maintenance of library resources, as well as for their continuous renewal and expansion. These policies are integrated into the institution’s financial plan.
(iv) On and off-campus students have adequate library support and access to library, research and computing facilities are available on weekends and outside of normal working hours.

7. Programme administrative services

Programme administrative services fulfil an important role in providing information to students in the programme regarding curriculum issues, venues, time tables, access to the library and IT facilities, availability of academic and support staff and student support services. Administrative services also include a management information system of records of students in the programme. Programme administrative staff have to be able to deal with a diverse student population.

CRITERION 10: Efficient programme administrative services and staff are in place.

In order to meet the criterion, the following is required at minimum:

(i) The proposed programme’s administration services make provision for -
   (a) Student enquiries about the proposed programme.
   (b) Accurate and sufficient information regarding venues, time-tables, access to library and IT facilities, availability of academic and support staff for student consultations and student support services.
   (c) A reliable management information system of records of the students in the programme, including admission, progression, grades/marks, fees and graduation.
(ii) Programme administrative and support staff are able to deal with the needs of a diverse student population.
(iii) Proper processes are in place for the identification of active students, particularly in distance education programmes.
(iv) There is a system that monitors student performance in order to ensure timely identification of at risk students. Strategies exist for advising students about ways to improve their chances of success and for referral to appropriate academic development programmes. Rules for re-admission to programmes are clear, defensible and sensitively applied.
8. **Postgraduate policies, procedures and regulations**

The DoE (NPHE 2001: 5.3) has set an increase in postgraduate enrolments and outputs as a strategic goal for the higher education system. It suggests that, in the next 5 years, the system should improve the efficiency of its postgraduate outputs so that master’s graduates constitute 6% of the annual output of graduates and doctoral graduates constitute 1%. Those institutions that plan to increase their postgraduate enrolments and outputs will have to attend to additional demands such as research funding, staff development, improving the quality of undergraduate output and the development of a research-conducive infrastructure and culture.

Postgraduate supervision and research training is a core academic activity for most higher education institutions world-wide. Traditional approaches to postgraduate supervision are increasingly being replaced by more pragmatic and efficient approaches which are based on explicit accountability and contractual requirements for students and supervisors, an emphasis on research skills training and on the employability of the graduate.

In order to ensure the quality of the input dimension of the proposed postgraduate programme, explicit policies and procedures have to be in place, as well as proper admission and selection criteria.\(^{16}\)

**CRITERION 11: Appropriate postgraduate policies, procedures and regulations are in place for the proposed programme that are in keeping with the institution’s research policy, if applicable.**

In order to meet the criterion, the following is required at minimum:

(i) Appropriate policies, procedures and regulations are in place for the proposed postgraduate programme which are communicated to and understood by all postgraduate students, academic and administrative staff and implemented consistently across the institution. Areas covered by the policies, regulations and procedures include:

- Admission arrangements.
- Selection criteria.
- Rules of progression.
- Selection and development of supervisors.
- Supervision and reporting arrangements.
- Assessment and examination requirements.
- Mechanisms to deal with plagiarism and fraud.
- Mechanisms to deal with student complaints and appeals.

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\(^{16}\) Criteria for process aspects of postgraduate programmes are indicated in Section 6 below under Criteria for Programme Process.
(ii) Equity and access concerns are responsibly built into selection criteria and protocols through RPL and alternative assessment protocols, including a combination of interviews, presentations, references and portfolios of previous work.

(iii) Selection criteria are in place to ensure that students admitted to particular research programmes are adequately prepared to undertake the required research. Provision is made for additional research training, language and writing skills development and support for under-prepared students, both prior to and during the research process.
II. MID-TERM CHECK PHASE

This phase constitutes a compliance and performance review midway through the programme. This has the following purposes:

(i) To ensure that the institution has addressed the areas indicated by the HEQC for urgent attention when the candidacy submission was approved.

(ii) To review the performance of the institution with regard to the implementation of the programme, as set out in the implementation plan submitted in the candidacy phase. This step provides an early warning system (to the institution and to the HEQC) about problem areas, as well as an opportunity for appropriate developmental support, where necessary.

(iii) To evaluate the progress of the institution towards meeting the criteria for programme process, programme output and impact, and programme review in the accreditation phase of the new programme.

CRITERION 12: The institution provides evidence that it complies with conditions set by the HEQC when the candidacy submission was approved. The implementation of the programme implementation plan is on schedule and considerable progress has been made with regard to meeting the criteria for the accreditation phase of the programme.

In order to meet the criterion, the following is required at minimum:

(i) Evidence is provided by the institution that it has addressed all the conditions and concerns communicated by the HEQC when the candidacy submission was approved. Convincing substantiation for any deviances from the conditions set by the HEQC is provided by the institution.

(ii) The implementation of the programme is on schedule as set out in the approved programme implementation plan. Convincing substantiation for any deviances from the implementation plan is provided by the institution.

(iii) Considerable progress has been made towards meeting the criteria for programme process (especially with regard to teaching and learning interactions), programme output and impact, and programme review in the accreditation phase of the new programme.
III. ACCREDITATION PHASE

Within one year of the first cohort of students having graduated from the new programme, the institution must demonstrate compliance with conditions set by the HEQC during the candidacy and mid-term check phases (where applicable). The institution should also provide convincing substantiation for any deviances from the conditions set by the HEQC.

The institution must also conduct a self-evaluation of the strengths and weaknesses of the programme against the HEQC's criteria for programme input indicated above for the candidacy phase, as well as the HEQC's criteria for programme process, programme output and impact, and programme review, which are outlined in Sections A, B and C, respectively, below. Against this background, a programme improvement plan must be submitted to the HEQC, which addresses all deficiencies which became apparent during the self-evaluation.

The following criteria are proposed for programme process, programme output and impact, and programme review.

A. CRITERIA FOR PROGRAMME PROCESS

The criteria for programme process which are dealt with in this section are classified in areas, relevant aspects and numbers of the corresponding criteria in Table 5 below:

**Table 5: Classification of criteria for programme process in areas, relevant elements and numbers of the corresponding criteria**

<table>
<thead>
<tr>
<th>AREA</th>
<th>RELEVANT ASPECTS</th>
<th>CRITERION</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Programme coordination</td>
<td>(a) Mandate and responsibilities of programme team</td>
<td>Criterion 13</td>
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<td></td>
<td>(b) Student input and participation</td>
<td></td>
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<tr>
<td>2. Student academic development</td>
<td>(a) Responsiveness to student needs</td>
<td>Criterion 14</td>
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<td></td>
<td>(b) Curriculum development</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(c) Availability and accessibility of academic development programmes</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(d) Multilingualism and language development</td>
<td></td>
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<tr>
<td>3. Teaching and learning interactions</td>
<td>(a) Balance and mix between teaching methods</td>
<td>Criterion 15</td>
</tr>
<tr>
<td></td>
<td>(b) Teaching methods and nature of learning material</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(c) Design and use of learning materials</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(d) Design and use of instructional and</td>
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</table>

For the purposes of the accreditation phase, all occurrences of the phrase “proposed programme(s)” in the Input Phase have to be interpreted as “programme(s)”. 
The following criteria are proposed for the different areas.

1. **Programme coordination**

The programme has to be coordinated by a programme team in order to ensure that the purposes and outcomes of the programme are met. Opportunities should exist for student input and participation in some of the activities of the programme team.
CRITERION 13: The programme is coordinated by a programme team to ensure that its intended purposes and outcomes are met.

In order to meet the criterion, the following is required at minimum:

(i) A programme team is established and operates within the framework of an agreed-upon mandate and defined procedures and responsibilities.

(ii) The responsibilities of the programme team include -
   (a) Programme design.
   (b) Ensuring that all conditions for delivery of the program are met.
   (c) Day-to-day coordination of programme delivery.
   (d) Review and evaluation of the programme.
   (e) All aspects of the programme quality management system.
   (f) Monitoring expenditure in terms of the programme budget.

(iii) Opportunities exist for student input and participation in relevant activities of the programme team.

2. Student academic development

Student academic development plays an important role in addressing the social imperative for greater access and equity. The higher education landscape is at present being transformed to reflect more accurately the demographics of the country. Apart from this, the Department of Education aims to increase the participation rate in higher education of the 20-24 year cohort to 20% within the next ten to fifteen years (NPHE 2001: 2.2).

Student academic development can also play a role in improving the efficiency of the higher education system by increasing retention and graduation rates, as well as the number of students completing postgraduate qualifications, especially with regard to under-prepared students from historically under-represented groups. The multilingual nature of South African society also poses a major barrier for students studying in a second or third language at tertiary level.

The following criteria are proposed for this area:

CRITERION 14: Academic development models promote national education goals, are appropriate for and responsive to the needs of students and staff and are implemented in academic programmes and teaching and learning activities by means of curriculum innovation in a way which is integrated with / integral to students' mainstream studies. Academic development programmes are available and accessible to students and address students' language needs with regard to the language of instruction.

In order to meet the criterion, the following would be required at minimum:
Criteria for new programmes: Accreditation phase

(i) Academic development models address equity targets, student profile, prior learning, levels of language proficiency, specific disciplinary skills and general academic demands of curricula adequately.

(ii) Curriculum development initiatives and assessment methods are responsive to the needs of the student body and the availability and scope of academic development programmes are communicated to students.

(iii) Student development initiatives are well integrated into the mainstream academic programmes of the institution, whether through ‘stand alone’ programmes or through extended or enriched curricula.

(iv) There are procedures for referral to academic development programmes. Placement of students in academic development programmes is based on clearly communicated selection criteria.

(v) Opportunities for development in the language of learning are available in the institution and are integrated with mainstream curriculum content.

(vi) Curriculum design at programme and course/module level includes strategies for language development within the context of enhancing students’ use of disciplinary discourse and skills.

3. Teaching and learning interactions

Teaching and learning interactions should be based on sound well-motivated insights into the processes of teaching and learning. The learning facilitation methods used have to be appropriate to ensure achievement of the purposes and outcomes of the programme.

CRITERION 15: Teaching and learning methods and learning materials are appropriate to ensure the achievement of the purposes and outcomes of the programme.

In order to meet the criterion, the following is required at minimum:

(i) Recent insights into the principles and practices of instructional design are put into practice, including an appropriate balance and mix between different teaching methods, fitness of teaching methods for the nature of the learning material, design and use of learning materials, and design and use of instructional and learning technology.

(ii) Suitable learning opportunities are provided to ensure the acquisition of the knowledge, skills and attitudes specified in the programme outcomes.

(iii) Learning opportunities are provided to ensure that theory is put into practice.

(iv) Learners are able to meet the learning requirements of the programme (as expressed in the credits of courses or modules) within the stipulated time.

(v) Learners are provided with guidance as to how the integration of subjects, courses or modules contributes to the learning outcomes of the programme.

(vi) There is active student involvement in the teaching and learning process.
4. Student assessment

The rationale for criteria for student assessment is provided under Programme Input, Section 4, Policies and procedures for student assessment, and is not repeated here. This section deals with the delivery of student assessment as such.

The proposed criteria are indicated below.

**CRITERION 16:** Assessment is an integral part of the teaching and learning process and is recognised and used as a key motivator of learning to inform teaching practice and to improve the curriculum.

In order to meet the criterion, the following is required at minimum:

(i) Assessment is systematically and purposefully used both to generate data for summative purposes (such as grading, ranking, selection, predicting) and also for formative purposes (such as providing timeous feedback to inform teaching and learning).

(ii) The assessment approach(es) used in the programme are in general characterised by a recognition of assessment as a key motivator of learning and an integral part of the teaching and learning process.

(iii) Assessment data are used diagnostically to inform teaching and assessment practice and to improve the curriculum.

**CRITERION 17:** Students’ learning achievements are internally assessed by the academic staff responsible for teaching a course/module in terms of a system that includes internal moderation.

In order to meet the criterion, the following is required at minimum:

(i) The academic staff who teach a course/module are responsible for designing, running and marking both formative and summative student assessments, for recording results and for feedback to students.

(ii) Internal moderation is conducted to provide a reliability check on the marking process and to provide developmental feedback to staff on their assessment practice.

(iii) For summative assessment, and especially where more than one marker is involved, at least 50% of the final marks are moderated (i.e. checked for reliability) via a system of internal moderation

(iv) Procedures are followed to receive, record, process, and turn around assignments within a timeframe that allows students to benefit from formative feedback prior to the submission of further assessment tasks.

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18 Traditionally this has been done after the marking is completed, by another academic, who did not teach on the course, usually from the same department. But for large classes, it is acceptable and more efficient for the marking team, led by the course convenor, to work together and compare and moderate each other's marking as the marking proceeds.
**CRITERION 18:** Students' learning achievements on the exit level of a qualification are externally examined by appropriately qualified people who have been appointed in terms of clear criteria and procedures and who conduct their responsibilities in terms of clear guidelines.

In order to meet the criterion, the following is required at minimum:

(i) For summative assessment, external examiners are appointed for the exit level at which a qualification is awarded.

(ii) External examiners are appointed in terms of clear criteria, including that -
   (a) They are recommended by the examining department, and should be independent experts in their fields.
   (b) They have qualifications at least on the same level as the qualification being examined.
   (c) Where possible in the particular discipline, external examiners are changed every three years and reciprocal arrangements are avoided.
   (d) External examiners are approved by Senate and are responsible to Senate.

(iii) The institution provides documentation on the curriculum and continuous assessment, as well as guidelines or a format to assist external examiners in the completion of their reports.

(iv) Completed external examiners reports are returned to the lecturer concerned and also to the programme coordinator or head of department/school. Where problems are raised, these are discussed with the lecturer concerned and the academic manager ensures that agreed improvements are effected.

(v) External examiners are required to approve the final marks list for the qualification concerned.

(vi) External examiners are expected to comment on -
   (a) The validity of the assessment instruments in relation to the specified learning outcomes, ideally prior to their implementation.
   (b) The quality of student performance and the standard of student attainment across the spectrum of results in relation to the learning outcomes, relevant generic qualification standards and international academic/professional standards.
   (c) The reliability of the marking process.
   (d) Any concerns or irregularities with respect to the observation of institutional/professional regulations.

**CRITERION 19:** The level of challenge of assessment is appropriate to the level on which the qualification is pegged. Assessment practices are effective and reliable in measuring and recording student attainment of the intended learning outcomes.

In order to meet the criterion, the following is required at minimum:

(i) Assessment criteria are commensurate with the level of the qualification, aligned with the requirements of the NAP, SAQA and, where appropriate, professional bodies, and are made explicit to staff and students.
Criteria for new programmes: Accreditation phase

(ii) Learning activities and the required assessment performances are both aligned with learning outcomes at the programme and the modular level.

(iii) Learning outcomes for a programme/module and their link to assessment criteria and judgements are clearly stated and communicated to students.

(iv) Assessment procedures are effective in measuring student attainment of the intended learning outcomes.

(v) There is at least one integrated assessment procedure for each qualification which is a valid test of the key purposes of the programme.

(vi) A range of assessment tasks and methods ensure that all learning outcomes are validly assessed.

(vii) A system is in operation for maximising the accuracy, consistency and credibility of results regardless of who is assessing, including:
   (a) Consistency of marking.
   (b) Concurrence between assessors and external examiners on the nature and quality of the evidence which indicates achievement of learning outcomes.

(viii) Students’ assessment records are reliable and secure. Assessment data is accessible to academic coordinators, administrators, teaching staff and students, as appropriate.

CRITERION 20: The assessment system is rigorous and secure.

In order to meet the criterion, the following is required at minimum:

(i) Institutional/faculty/professional rules governing assessment are published and clearly communicated to students and relevant stakeholders.

(ii) Evidence is provided to demonstrate that these rules are widely adhered to.

(iii) Breaches of assessment regulations are dealt with effectively.

(iv) Students are provided with information and guidance on their rights and responsibilities regarding assessment processes (for example, definitions and regulations on plagiarism, penalties, terms of appeal, supplementary examinations).

(v) Student appeals procedures are explicit, fair and effective.

(vi) There are published, clear and consistent guidelines/regulations for -
   (a) Marking and grading of results.
   (b) Aggregations of marks and grades.
   (c) Progression and final awards.
   (d) Compensation and/or condonement of RPL.

5. Work-based learning

Work-based learning forms an essential part of many professional and vocational programmes. The coordination process of work-based learning should be efficient and contribute to the purposes of the programme.

CRITERION 21: The coordination of work-based learning is done efficiently in all components of the programme.
In order to meet the criterion, the following would be required at minimum:

(i) Effective processes and procedures are in operation for the coordination of work-based learning.

(ii) Regular and efficient communication takes place between the institution, students, mentors and employers involved in work-based learning.

(iii) A recording system (both institutional and by the employer) keeps record of the contents and progress of the student’s learning experience in the workplace.

(iv) Monitoring of work-based learning is done regularly and in a systematic regular fashion. Feedback is utilised for improving the practice of work-based learning.

(v) The mentoring system enables the student to recognise strengths and weaknesses in his/her work, to develop new and existing abilities, to gain knowledge of work practices

6. Postgraduate studies

The rationale for criteria for postgraduate studies is given in Section 8 under Programme Input. Apart from policies for postgraduate studies which are discussed there, the process of postgraduate studies should also of a good quality.

**CRITERION 22:** The postgraduate programme is managed properly and offers opportunities for students to develop research competence.

In order to meet the criterion, the following is required at minimum:

(i) A senior academic is allocated responsibility to coordinate research programmes, monitor the progress of postgraduate students and oversee assessment procedures.

(ii) A senior academic is allocated responsibility to coordinate structured master’s programmes, monitor the progress of postgraduate students and oversee assessment procedures.

(iii) Monitoring and review of this system takes place regularly and includes student feedback on the quality of their learning experience, supervision and support infrastructure.

(iv) Training is provided in research skills, including guidance on research design and methodology.

(v) Training is provided in language, writing and numeric skills, where required.

(vi) Employment-related skills are developed, where appropriate.

**CRITERION 23:** Research is properly assessed.

In order to meet the criterion, the following is required at minimum:
Criteria for new programmes: Accreditation phase

(i) Exit level outcomes and assessment criteria (including an understanding of the quality of research achievement required) are clearly communicated to students on commencement of studies.

(ii) At least one examiner external to the institution per dissertation/thesis is appointed.

(iii) Examiners are appointed on the basis of qualifications, experience, expert knowledge in the research area and independence.

(iv) The institution provides clear guidelines to external examiners on the standard/quality of research achievement required, on the nature of their task and on institutional examining regulations.

(v) Without undermining the principle of assessment by academic judgement, assessment decisions are made transparently and students are afforded reasonable access to information (e.g. examiners’ reports).

(vi) There are appeal mechanisms for students and opportunities for them to defend their theses (e.g. through an oral defence).

(vii) Higher degree committees or similar structures consider examiners’ reports qualitatively and make considered decisions about examination outcomes.

CRITERION 24: The selection and appointment criteria for postgraduate supervisors are acceptable to the research community in the area of study. The institution provides guidelines which make explicit the role and responsibilities of both the supervisor and the student and other matters that are relevant to the performance of research.

In order to meet the criterion, the following is required at minimum:

(i) The supervisor has a qualification in a relevant field of study at the same level as (or higher than) the exit level of the postgraduate programme he/she is supervising.

(ii) The supervisor has a relevant and appropriate research track record, as well as experience, expertise and peer recognition in the relevant field of study.

(iii) The selection and appointment criteria for supervisors are strictly applied.

(iv) In the case of inexperienced or new supervisors, training opportunities are provided and joint supervision is explored as an option.

(v) The guidelines for supervisors specify the following:

- Nature, format and expected turn-around time regarding work submitted to the supervisor.
- Forms of assessment, and communication of feedback to the student.
- The periodicity of contact between student and supervisor, the schedule for the submission of progress reports, and written work.
- Research ethics, code of conduct, regulations on plagiarism and intellectual property rights.
- Examination and qualification requirements.
C. CRITERIA FOR PROGRAMME OUTPUT AND IMPACT

Programme output should be carefully monitored with regard to the efficiency of the programme in student retention and throughput rates. Programme outputs are also important in terms of representivity with regard to race and gender in conformity with national goals in this regard. The integrity of the certification processes for the qualification obtained through the programme should not be compromised.

The classification of criteria for Programme Output and Impact in areas, relevant aspects and the number of the corresponding criteria is indicated in Table 6:

**Table 6: Classification of criteria for Programme Output and Impact in areas, relevant elements and numbers of the corresponding criteria**

<table>
<thead>
<tr>
<th>AREAS</th>
<th>RELEVANT ELEMENTS</th>
<th>CRITERION</th>
</tr>
</thead>
</table>
| 1. Student retention and throughput rates, equity of outcomes / representivity | (a) Access to information  
(b) Systems, procedures and processes  
(c) Justification of race and gender profile  
(d) Composition of qualifying and entering class | Criterion 25 |
| 2. Integrity of certification      | (a) Mechanisms to quality assure processing and issuing  
(b) Mechanisms to avoid fraud or illegal issuing | Criterion 26 |
| 3. Programme impact                | (a) Employment data  
(b) External acknowledgement of programme quality | Criterion 27 |

**CRITERION 25.** Student retention and throughput rates are sustained at acceptable levels and are monitored. The programme is achieving ‘equity of outcomes’ or representivity in output (NPHE 2001: 3.2).

In order to meet the criterion, the following is required at minimum:

(i) Programme coordinators have access to accurate information on the retention and throughput rates for the programme.

(ii) Programme coordinators have systems, procedures and processes in place to ensure that retention and throughput rates are satisfactory and communicated to the relevant authorities.
Criteria for new programmes: Accreditation phase

(iii) The race and gender profile of the programme output can be justified in relation to the historical profile of its field and in relation to institutional equity targets.

(iv) The composition of the qualifying class increasingly resembles that of the entering class.

**CRITERION 26:** Clear and efficient arrangements ensure that the integrity of certification processes for the qualification obtained through the programme is not compromised.

In order to meet the criterion, the following is required at minimum:

(i) Effective mechanisms quality assure the processing and issuing of certificates for the qualification obtained through the programme.

(ii) Effective security measures avoid fraud or illegal issuing of certificates for the qualification obtained through the programme.

**CRITERION 27:** The programme has succeeded/attempted to have an impact on job opportunities for students and in alleviating shortage of expertise in relevant fields.

In order to meet the criterion, the following is expected at minimum:

(i) Graduates / diplomates from the programme managed to find employment in the field of study of the programme or in a related field, or there is evidence that the programme attempted to have an impact on job opportunities for students.

(ii) Conscious efforts are made to get the programme acknowledged in the workplace / community and by other institutions.
D. CRITERIA FOR PROGRAMME REVIEW

The internal review of programmes by an institution is an important step in the quality assurance of programmes. Programme review is assumed to include course/module review, which should ideally be conducted while the course or module is being taught, so that problems or gaps identified can be addressed while learners still have the opportunity to derive the maximum benefit from the learning experiences being made available to them. The key findings of course reviews can be collated and aggregated in order to inform a comprehensive review of the programme of which the course/module is a part.

Since the review of programmes/courses/modules is a key component of the institutional quality management system, procedures need to be in place to ensure that insights derived from internal reviews are acted upon and plans for improvement are implemented. When students and other stakeholders provide feedback on the programme, those responsible for offering the programme, course or module need to have access to the data and need to be provided with the opportunity to respond to it.

The classification of criteria for programme review in areas, relevant aspects and the number of the corresponding criteria is indicated in Table 7:

**Table 7: Classification of criteria for programme review in areas, relevant elements and numbers of the corresponding criteria**

<table>
<thead>
<tr>
<th>AREA</th>
<th>RELEVANT ASPECTS</th>
<th>CRITERION</th>
</tr>
</thead>
</table>
| 1. Attainment of outcomes, curriculum alignment, judgment by peers | (a) Internal academic evidence  
(b) External examiners reports  
(c) Alignment and updating of curriculum  
(d) Revision of learning material  
(e) Judgment by expert peers | Criterion 28 |
| 2. Stakeholder feedback, use of results of review | (a) Student and recent graduates feedback  
(b) Employer / professions / community feedback  
(c) Programme team feedback  
(d) Development and implementation of improvement plans  
(e) Support by resource provision and staff development | Criterion 29 |
CRITERION 28. Students are attaining the intended exit-level learning outcomes/ critical outcomes/ general cognitive skills/ graduate attributes specified by the provider in the design of the programme. The curriculum of the programme is properly aligned and regularly updated and expert peers/ professional bodies are satisfied with the relevance and quality of learning achieved by students on the programme.

In order to meet the criterion, the following would be required at minimum:

(i) Academics involved in the programme ensure, monitor and evaluate learning outcomes.
(ii) External examiners’ reports provide evidence that qualifying students are attaining the intended range of specified exit-level learning outcomes.
(iii) Programme content and teaching and learning methods are aligned with entry requirements, levels of student preparedness, exit-level outcomes and assessment methods and criteria.
(iv) There are mechanisms to allow for the periodic revision of learning material in the light of ongoing feedback from learners and tutors and advances in knowledge and research.
(v) The learning outcomes for the programme are judged by expert peers (and professional bodies, where applicable) to meet disciplinary/ professional standards.

CRITERION 29: There is positive feedback from internal and external stakeholders on the programme. The feedback and results of the programme review/ evaluation are used to effect improvements in the programme’s design and delivery and to develop further the educational expertise of academic staff.

In order to meet the criterion, the following would be required at minimum:

(i) Student/ graduate opinion indicate that the majority of students are satisfied with the programme and with its delivery and assessment practices in
particular. Where student dissatisfaction has been expressed, the teaching staff concerned have interpreted this, resulting in efforts to address/improve the situation.

(ii) Student/graduate opinion indicate that the majority of students are satisfied with the way teaching and support staff for the programme perform their duties. Where student dissatisfaction has been expressed, appropriate steps have been taken to address/improve the situation.

(iii) Opinion surveys of external stakeholders indicate satisfaction with the programme’s curriculum and with the competence of its graduates. Where stakeholder dissatisfaction has been expressed, efforts have been made to address/improve this.

(iv) Staff who teach on the programme are satisfied with the leadership and management of the programme provided by their department/school/faculty.

(v) Feedback and results of the review are used to develop and implement improvement plans.

(vi) Improvement plans are supported by resource provision and staff development.

**CRITERION 30:** Student retention and throughput rates are sustained at acceptable and cost-effective levels and are monitored. The programme is achieving ‘equity of outcomes’ or representivity in graduate output (NPHE 2001:32).

In order to meet the criterion, the following would be required at minimum:

(i) Programme coordinators -
   - Have access to accurate information on the retention and throughput rates for the programme.
   - Monitor retention and throughput rates on a continuous basis.
   - Take appropriate steps to ensure that retention and throughput rates are satisfactory and report their actions to their superiors.
   - Review the cost-effectiveness of a programme by considering costs, retention and throughput rates, and quality.

(ii) The programme can justify its race and gender profile in relation to the historical profile of its field and in relation to institutional equity targets.

(iii) The composition of the qualifying class increasingly resembles that of the entering class with regard to race and gender.
Criteria for existing programmes

APPENDIX 2

PROPOSED CRITERIA FOR EXISTING PROGRAMMES

NOTE: The following should be noted:

(i) The criteria below are proposed for existing programmes. As indicated, existing programmes are programmes leading to qualifications that are registered on the NQF and have been accredited by AUT, SAQA or the HEQC.

(ii) The criteria will be utilised as the basis of an institution’s self-evaluation of existing programmes for purposes of re-accreditation by the HEQC, or in applying for self-accreditation status to the HEQC. The same criteria will be used by the HEQC in the evaluation of existing programmes.

(iii) Existing programmes will mostly not be re-accredited in the programme accreditation cycle: 2004-2009. For exceptions, see 4.3 above.

(iv) Institutions are required to supply both qualitative and quantitative (statistical) data, where applicable, with reference to the issues dealt with in the criteria below, as well as an analysis and interpretation of these.

The criteria for existing programmes are identical to those for new programmes as far as the categories of programme input, programme process, programmes output and impact, and programme review are concerned and are not repeated here. Readers are referred to the corresponding sections under New Programmes in Appendix 1. The tables below provide a summary of the corresponding programme areas, relevant aspects, number of criterion and page number(s).

1. Programme input

Table 8 Classification of criteria for programme input into areas, relevant aspects and numbers of corresponding criteria

<table>
<thead>
<tr>
<th>AREAS</th>
<th>RELEVANT ASPECTS</th>
<th>CRITERION</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Programme design</td>
<td>(a) Relation to institution’s mission and planning</td>
<td>Criterion 1</td>
</tr>
<tr>
<td></td>
<td>(b) Needs of students and other stakeholders</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(c) Intellectual credibility</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(d) Coherence</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(e) Articulation</td>
<td></td>
</tr>
</tbody>
</table>

19 It should be noted that, in the case of existing programmes, the phrase “proposed programme(s)” in the category “Programme Input” for new programmes has to be interpreted as “programme(s)”. 

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### Criteria for existing programmes

<table>
<thead>
<tr>
<th>Criterion</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>2. Student recruitment, admission and selection</td>
<td>(a) Recruitment documentation (b) Legislative issues (c) Widening of access (d) Equity (e) Assumptions of learning (f) Professional needs (g) Capacity of the programme</td>
</tr>
<tr>
<td>3. Staffing</td>
<td>(a) Qualifications (b) Teaching experience (c) Assessment competence (d) Research profile (e) Staff development (f) Size and seniority (g) Diversity (h) Full-time and part-time staff (i) Time and activities</td>
</tr>
<tr>
<td>4. Student assessment</td>
<td>(a) Internal assessment (b) External examination (c) Robustness and security (d) Explicitness and level of assessment criteria (e) Validity and reliability of practices (f) Recording of results</td>
</tr>
<tr>
<td>5. Venues and IT infrastructure</td>
<td>(a) Suitable and sufficient venues (b) Venue allocation (c) Office space and access to computers (d) Sufficient and suitable technology (e) Training in technology (f) Access to technology (g) Maintenance of technology</td>
</tr>
<tr>
<td>6. Library resources</td>
<td>(a) Integration into curriculum (b) Size and scope (c) Management and maintenance (d) Student support (e) Access</td>
</tr>
<tr>
<td>7. Programme administrative services</td>
<td>(a) Provision of information (b) Management information system (c) Dealing with a diverse student population (d) Identification of active students (e) Communication systems</td>
</tr>
<tr>
<td>8. Postgraduate policies, regulations and procedures</td>
<td>(a) Policies, regulations and procedures (b) Equity and access (c) Preparation of students</td>
</tr>
</tbody>
</table>
## Criteria for existing programmes

### 2. Programme process

**Table 9**: Classification of criteria for programme process in areas, relevant elements and numbers of the corresponding criteria

<table>
<thead>
<tr>
<th>AREA</th>
<th>RELEVANT ASPECTS</th>
<th>CRITERION</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Programme coordination</td>
<td>(a) Mandate and responsibilities of programme team</td>
<td>Criterion 13</td>
</tr>
<tr>
<td></td>
<td>(b) Student input and participation</td>
<td></td>
</tr>
<tr>
<td>2. Student academic</td>
<td>(a) Responsiveness to student needs</td>
<td>Criterion 14</td>
</tr>
<tr>
<td>development</td>
<td>(b) Curriculum development</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(c) Availability and accessibility of academic development programmes</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(d) Multilingualism and language development</td>
<td></td>
</tr>
<tr>
<td>3. Teaching and learning</td>
<td>(a) Balance and mix between teaching methods</td>
<td>Criterion 15</td>
</tr>
<tr>
<td>interactions</td>
<td>(b) Teaching methods and nature of learning material</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(c) Design and use of learning materials</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(d) Design and use of instructional and learning technology</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(e) Suitable learning opportunities</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(f) Learning opportunities and practice</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(g) Available time to meet learning requirements</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(h) Guidance on integration of programme components and outcomes</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(i) Student involvement</td>
<td></td>
</tr>
<tr>
<td>4. Student assessment</td>
<td>(a) Purposes of assessment</td>
<td>Criterion 16</td>
</tr>
<tr>
<td></td>
<td>(b) Internal assessment and moderation</td>
<td>Criterion 17</td>
</tr>
<tr>
<td></td>
<td>(c) External examination</td>
<td>Criterion 18</td>
</tr>
<tr>
<td></td>
<td>(d) Assessment and level of qualification</td>
<td>Criterion 19</td>
</tr>
<tr>
<td></td>
<td>(e) Efficiency and reliability of assessment and recording of results</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(f) Recording of assessment results</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(g) Rigour and security of the assessment system</td>
<td>Criterion 20</td>
</tr>
<tr>
<td>5. Work-based learning</td>
<td>(a) Coordination</td>
<td>Criterion 21</td>
</tr>
<tr>
<td></td>
<td>(b) Communication</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(c) Recording system</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(d) Monitoring</td>
<td></td>
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</tbody>
</table>
Criteria for existing programmes

<table>
<thead>
<tr>
<th>AREAS</th>
<th>RELEVANT ELEMENTS</th>
<th>CRITERION</th>
</tr>
</thead>
<tbody>
<tr>
<td>6. Postgraduate studies</td>
<td>(a) Management of the postgraduate programme</td>
<td>Criterion 22</td>
</tr>
<tr>
<td></td>
<td>(b) Development of research competence</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(c) Assessment</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(d) Selection, appointment and training of supervisors</td>
<td>Criterion 23</td>
</tr>
<tr>
<td></td>
<td>(e) Role and responsibilities of supervisors and post-graduate students</td>
<td>Criterion 24</td>
</tr>
</tbody>
</table>

3. Programme output and impact

Table 10: Classification of criteria for Programme Output and Impact in areas, relevant elements and numbers of the corresponding criteria

<table>
<thead>
<tr>
<th>AREAS</th>
<th>RELEVANT ELEMENTS</th>
<th>CRITERION</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Student retention and throughput rates, equity of outcomes / representivity</td>
<td>(a) Access to information</td>
<td>Criterion 25</td>
</tr>
<tr>
<td></td>
<td>(b) Systems, procedures and processes</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(c) Justification of race and gender profile</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(d) Composition of qualifying and entering class</td>
<td></td>
</tr>
<tr>
<td>2. Integrity of certification</td>
<td>(a) Mechanisms to quality assure processing and issuing</td>
<td>Criterion 26</td>
</tr>
<tr>
<td></td>
<td>(b) Mechanisms to avoid fraud or illegal issuing</td>
<td></td>
</tr>
<tr>
<td>3. Programme impact</td>
<td>(a) Employment data</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(b) External acknowledgement of programme quality</td>
<td>Criterion 27</td>
</tr>
</tbody>
</table>


4. Programme review

**Table 11:** Classification of criteria for programme review in areas, relevant elements and numbers of the corresponding criteria

<table>
<thead>
<tr>
<th>AREA</th>
<th>RELEVANT ASPECTS</th>
<th>CRITERION</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Attainment of outcomes, curriculum alignment, judgment by peers</td>
<td>(a) Internal academic evidence (b) External examiners reports (c) Alignment and updating of curriculum (d) Revision of learning material (e) Judgment by expert peers</td>
<td>Criterion 28</td>
</tr>
<tr>
<td>2. Stakeholder feedback, use of results of review</td>
<td>(a) Student and recent graduates feedback (b) Employer / professions / community feedback (c) Programme team feedback (d) Development and implementation of improvement plans (e) Support by resource provision and staff development</td>
<td>Criterion 29</td>
</tr>
<tr>
<td>3. Retention and throughput rates, equity and representivity in output</td>
<td>(a) Access to information on retention and throughput rates (b) Monitoring of retention and throughput rates (c) Ensuring satisfactory retention and throughput rates (d) Review of cost-effectiveness of programme (e) Justification of race and gender profile (f) Composition of qualifying and entering class</td>
<td>Criterion 30</td>
</tr>
<tr>
<td>Term</td>
<td>Definition</td>
<td></td>
</tr>
<tr>
<td>-------------------------------</td>
<td>-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>Academic development</td>
<td>Curriculum strategies employed in teaching and learning to enhance the quality of teaching and learning and the academic performance of particularly under-prepared students.</td>
<td></td>
</tr>
<tr>
<td>Accreditation</td>
<td>Recognition status granted for a stipulated period of time to a programme after an evaluation indicates that it meets or exceeds minimum thresholds of educational quality. In the case of applications for new programmes, accreditation is the final phase in the accreditation process and is preceded by the candidacy and mid-term check phases, each of which has its own requirements.</td>
<td></td>
</tr>
<tr>
<td>Applied competence (SAQA definition)</td>
<td>The ability to put into practice in the relevant context the learning outcomes acquired in obtaining a qualification.</td>
<td></td>
</tr>
<tr>
<td>Assessment (SAQA definition)</td>
<td>The structured evaluation of a person’s ability to demonstrate acquisition and application of the outcomes of a programme of learning, leading to the award of a qualification.</td>
<td></td>
</tr>
<tr>
<td>(i) Integrated assessment (SAQA definition)</td>
<td>A form of assessment which permits the learner to demonstrate applied competence and which uses a range of formative and summative assessment methods.</td>
<td></td>
</tr>
<tr>
<td>(ii) Criterion referenced assessment</td>
<td>Student performance is judged against pre-specified criteria or standards. It tends to place emphasis on measurable competencies.</td>
<td></td>
</tr>
<tr>
<td>(iii) Diagnostic assessment</td>
<td>Used to predict student performance and academic potential, often used in placement testing.</td>
<td></td>
</tr>
<tr>
<td>(iv) Formative assessment</td>
<td>Used to improve learning and to give feedback to students on their progress. Serves needs intrinsic to the educational process.</td>
<td></td>
</tr>
<tr>
<td>(v) Norm-referenced assessment</td>
<td>Student performance is compared with that of peers in the same class or cohort. Is associated with the averaging of scores and the grading of students.</td>
<td></td>
</tr>
<tr>
<td>Credit (SAQA definition)</td>
<td>That value assigned to a given number of notional hours of learning. One SAQA credit equals ten notional learning hours. 120 SAQA credits are equivalent approximately to one year of full-time study.</td>
<td></td>
</tr>
<tr>
<td>Core learning (SAQA definition)</td>
<td>That compulsory learning required in situations contextually relevant to the particular qualification, and “core” has a corresponding meaning.</td>
<td></td>
</tr>
<tr>
<td>Course/module review</td>
<td>Internal quality assurance procedures that a provider undertakes</td>
<td></td>
</tr>
</tbody>
</table>
to monitor and reflect on the outcomes of the education it provides through course/modules. The findings of course reviews should feed into the reviews of the programmes of which they are a part.

<table>
<thead>
<tr>
<th>Criteria for programme accreditation</th>
<th>The minimum standards which are necessary to support and enhance the quality of teaching and learning, research and service learning programmes.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Examination (SAQA definition)</td>
<td>A written, oral or practical assessment, as the case may be, in accordance with general education policy. Also supplementary and re-examination, continuous evaluation, and the evaluation of experiential learning.</td>
</tr>
<tr>
<td>Exit survey</td>
<td>An exit survey is conducted at the end of a learner’s contact with a provider, usually when he/she graduates. An exit survey asks a range of questions including about the learner’s experience of the programme, the strengths and weaknesses of the programme from the learner’s perspective, how useful the learning was, whether the learner has already secured employment or whether the learner plans to study further.</td>
</tr>
<tr>
<td>Fundamental learning (SAQA definition)</td>
<td>That learning which forms the grounding or basis needed to undertake the education, training or further learning required in the obtaining of a qualification and “fundamental” has a corresponding meaning.</td>
</tr>
<tr>
<td>Moderator (SAQA definition)</td>
<td>A person, apart from the examiner, that is appointed by the provider to be responsible for ensuring the standard of the examination and its accompanying marking framework and response exemplars, and for marking a representative sample of examination responses.</td>
</tr>
<tr>
<td>Notional hours of learning (SAQA definition)</td>
<td>The learning time that it is conceived it would take an average learner to meet the outcomes defined, and includes concepts such as contact time, time spent in structured learning in the workplace and individual learning.</td>
</tr>
<tr>
<td>Outcomes (SAQA definition)</td>
<td>The contextually demonstrated end products of the learning process.</td>
</tr>
<tr>
<td>(i) Exit level outcomes (SAQA definition)</td>
<td>The outcomes to be achieved by a qualifying learner at the point at which he or she leaves the programme leading to a qualification.</td>
</tr>
<tr>
<td>(ii) Critical outcomes (SAQA definition)</td>
<td>Those generic outcomes determined by SAQA, which inform all teaching and learning, including but not limited to:</td>
</tr>
<tr>
<td>(iii) Specific outcomes (SAQA definition)</td>
<td>Contextually demonstrated knowledge, skills and values, which support one or more critical outcomes.</td>
</tr>
<tr>
<td>----------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------</td>
</tr>
</tbody>
</table>

**Programme**

A purposeful and structured set of learning experiences that leads to one or more qualifications. In an outcomes-based system, a programme can be defined as a purposeful and coherent combination of units of learning (modules or unit standards) expressed in an outcomes-based format that lead to one or more qualifications.

**(i) Existing programme**

Programmes leading to qualifications that are registered on the NQF and have been accredited by the Universities and Technikons Advisory Council (AUT) or SAQA or the HEQC.

**(ii) New programme**

A programme which has not existed before or a programme which has been significantly changed, i.e. when its purpose, outcomes, field of study, mode or site of delivery has been

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a) Identifying and solving problems in which responses display that responsible decisions using critical and creative thinking have been made.

b) Working effectively with others as a member of a team, group, organisation, community.

c) Organising and managing oneself and one’s activities responsibly and effectively.

d) Collecting, analysing, organising and critically evaluating information.

e) Communicating effectively using visual, mathematical and/or language skills in the modes of oral and/or written persuasion.

f) Using science and technology effectively and critically, showing responsibility towards the environment and health of others.

g) Demonstrating an understanding of the world as a set of related systems by recognising that problem-solving contexts do not exist in isolation.

h) Contributing to the full personal development of each learner and the social and economic development of the society at large, by making it the underlying intention of any programme of learning to make an individual aware of the importance of:

   i. Reflecting on and exploring a variety of strategies to learn more effectively.

   ii. Participating as responsible citizens in the life of local, national and global communities.

   iii. Being culturally and aesthetically sensitive across a range of social contexts;

   iv. Exploring education and career opportunities.

   v. Developing entrepreneurial opportunities.
### Programme evaluation
The external quality assurance procedures undertaken to make an independent assessment of a programme’s outcomes or to validate the findings of an internal programme review.

### Programme review
The internal quality assurance procedures that a provider undertakes to monitor and reflect on the outcomes of its academic programmes.

### Recognised higher education institution
(i) The higher education institution has formal approval in terms of the Higher Education Act, 1997 (101, 1997) to operate as public or as private institution of higher education in South Africa.

(ii) In the case of foreign institutions, the institution has formal approval by an official body, set up or recognised by that country’s government, to operate as an institution of higher education in that country and to award higher education qualifications. Adequate quality assurance mechanisms and human resources exist in that country to safeguard academic standards of qualifications.

### Recognition of prior learning
A means of recognising what individuals already know and can do.

### Staff development
Building the capacity of higher education staff to fulfil their professional roles effectively.

### Qualification
The formal recognition and certification of learning achievement awarded by an accredited provider. In the outcomes-based approach intrinsic to the NQF, a qualification signifies and formally certifies the demonstrated achievement by a learner of a planned and purposeful combination of learning outcomes, at a specified level of performance.

### Service learning
Service learning is learning which takes place as a structured and integral part of an academic curriculum and programme and is directed at specific community needs. It could be credit-bearing (and assessed accordingly), may be work-based, or take other forms.

### Specialised learning
That specialised theoretical knowledge which underpins application in the area of specialisation and “specialisation” has a corresponding meaning.
HEQC COMMUNIQUE TO HIGHER EDUCATION INSTITUTIONS AND OTHER STAKEHOLDERS

The Higher Education Quality Committee (HEQC) of the Council on Higher Education (CHE) wishes to communicate to higher education institutions (HEIs) and other stakeholders a number of decisions taken by its Board with regard to the following issues:

2. Short courses, registration of assessors and recognition of prior learning (RPL).

1. Broad outlines of the HEQC’s audit and accreditation activities in the quality assurance cycle: 2004-2009

The HEQC is at present preparing for its quality assurance activities in the cycle 2004-2009, which includes the development of a variety of policy instruments and operational mechanisms. Policy development revolves mainly around the development of criteria for the audit and accreditation systems, finalisation of the audit and accreditation frameworks, compilation of a series of targeted manuals, and the development of policies for quality promotion and capacity-building. This, together with the finalisation of operational issues, will lay the foundation for the HEQC’s cycle of audits and accreditation (2004-2009).

The HEQC has decided that it will gradually phase in its quality assurance activities in the cycle 2004-2009, mainly in view of the current fluid higher education quality landscape. Audit and programme accreditation activities will be phased in two periods, namely Phase A (2004-2006) and Phase B (2007-2009).

(i) Phase A (2004-2006): During this phase, the following audit and programme accreditation activities will take place:

(a) Full-scale audits will commence, except at merging institutions, where provision is made for a three-year “settling-down” period. The HEQC will conduct limited, scaled-down visits to merging institutions within the first year after the merger has officially commenced, in order to discuss arrangements for institutional and programme quality management and consider what support can be provided. Details of the visit will be negotiated between the HEQC and the institutions.

(b) New programmes¹ will be accredited, in order to ensure that only programmes of good quality enter the higher education system.

¹ A new programme is one which has not existed before or which has been significantly changed, i.e. when its purpose, outcomes, field of study, mode of site of delivery, and/or 50% or more of the credits of the programme have been changed.
(c) Unless there are problems regarding institutions quality arrangements, most existing programs will not be re-accredited by the HEQC. This will be done eventually by self-accrediting HEIs. Self-accreditation status will not be granted during Phase A. However, institutions intending to apply for self-accreditation status in Phase B (2007-2009) can use this opportunity to develop the necessary structures, processes and procedures for self-accreditation.

(d) National reviews of programs (such as the HEQC’s present MBA review), which may be linked to accreditation decisions, will be undertaken in selected program areas. The number of review areas per annum could be increased, depending on the need and the HEQC’s internal capacity.

(ii) Phase B (2007-2009): The following quality assurance activities will take place during this period:

(a) Audits will take place at all institutions, including merged institutions.

(b) Accreditation of new programs will continue.

(c) Institutions can now apply for self-accreditation status, depending on the readiness of their internal quality assurance systems and satisfactory information on the quality of their programs.

(d) Re-accreditation of existing programs will generally not be conducted by the HEQC, except if an institution performs consistently poorly in the accreditation of new programs, in the re-accreditation of existing programs through national reviews and in level three (programme development and review; student assessment) scrutiny during audit visits. Full-scale re-accreditation of existing programs will commence only at the beginning of the next quality assurance cycle (2010-2016). This applies to re-accreditation of existing programs of institutions without self-accreditation status, which will be conducted by the HEQC, and re-accreditation of existing professional programs that need to meet statutory registration requirements, together with statutory professional councils, in a range of co-operation modalities.

Selective re-evaluations of existing non-professional programs could be undertaken during Phase B by the HEQC in institutions which apply for self-accreditation status, in cases where this is deemed necessary by the HEQC.

More details on self-accreditation status and the respective roles of audits and program evaluation will be provided in the HEQC’s final Programme Accreditation Framework, which will be released shortly.

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2 Existing programs are programs which lead to qualifications that are registered on the NQF and have been accredited by the Universities and Technikons Advisory Council (AUT), the South African Qualifications Authority (SAQA), or the HEQC.
2. Short courses, registration of assessors, recognition of prior learning (RPL), MOUs and Processing New Programme Applications

The HEQC has taken the following decisions with regard to SAQA requirements for short courses, registration of assessors, RPL and MOUs with other ETQAS and professional bodies.

2.1 Short courses

SAQA has indicated that it would like all short courses which are offered by HEIs to be quality assured by the relevant Education and Training Quality Assurors (ETQAs). In its recent Regulations, the Department of Education indicated that it recognised only the HEQC as the ETQA for higher education. The HEQC could, therefore, either quality assure short courses itself, or delegate this responsibility to other ETQA’s or bodies under the appropriate conditions.

Given the large number of short courses on offer and the present need to concentrate on quality assurance of whole qualifications and institutional quality management mechanisms, the HEQC is of the view that the responsibility for quality assurance of short courses should be delegated to HEIs themselves. The HEQC has commissioned a report to investigate what could be suitable arrangements for such delegation so that there is an appropriate balance between responsiveness on the part of institutions and the assurance of quality. The HEQC will examine, in the course of its audit visits, institutional arrangements for recording and quality assuring short courses and has developed proposals for criteria in this regard.

The HEQC is aware that, in certain fields, accreditation of short courses by an ETQA is a condition for the higher education institution to access learnership funds. The report that the HEQC has, commissioned will consider this matter and advise how this can best be accommodated within the delegation arrangement planned by the HEQC. The report will disseminated to all HEIs and a workshop will be held to discuss and finalise arrangements for the quality assurance of short courses.

2.2 Registration of assessors

According to the SAQA Criteria and Guidelines policy document (October 2001, pages 30-31), SAQA expects each ETQA to be responsible for the registration of assessors for the NQF registered standards and qualifications for which it has been accredited.

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3 As defined by SAQA, short course any programme less than 120 credit points.
However, SAQA also adds that this responsibility can be delegated to constituent providers, and in respect of the powers of ETQAs to devolve this function to constituent providers, assessors could also be registered at provider level, where the provider would be accountable to the ETQA for assessments and achievements.

The HEQC recognizes the importance of assessment and the need for competent assessors, but does not support the position that assessors in higher education need to be registered, and the CHE has made an input to the Study team on the NQF in this regard. The HEQC has decided to reaffirm this position and to highlight the need to focus rather on appropriate training of assessors. Responsibility for ensuring that assessors have the requisite competencies and necessary training to undertake assessment in higher education will be delegated to HEIs. The HEQC’s audits will provide the opportunity to scrutinize institutional arrangements for assessor choice and training and criteria have bee developed in this regard.

2.3 Recognition of prior learning

The HEQC is required by SAQA to indicate its position on RPL in higher education. The HEQC’s supports RPL as a mechanism to enhance access to HEIs. It is of the opinion that institutions themselves should develop and implement policies on RPL and should pay particular attention to the quality dimensions of successful RPL programmes. The HEQC’s proposed criteria for institutional audit include criteria for RPL both at the level of programme development and student assessment.

Given the fact that audit criteria pertaining to short courses, training of assessors and RPL can only be tested in institutional audits within a six year cycle, the HEQC needs interim information on institutional arrangements for quality assurance, in order to be able to delegate responsibility to HEIs in these areas. By the end of September 2003, institutions will be requested to provide information on these three areas, in order to enable the HEQC to delegate responsibility and/or take other appropriate steps.

2.4 Relationships with Other ETQAs and Statutory Professional Bodies

According to the Higher Education Act and regulations, the HEQC, is charged with the overall responsibility of quality assurance and promotion but may delegate these to quality assurance bodies capable of undertaking these functions on the HEQC’s behalf. In a recent study conducted by the HEQC, 64 national bodies (statutory professional bodies, ETQAs, professional associations) were identified to be associated with quality assurance functions. However, to avoid the problem of bodies having entirely different systems and interpretations of quality assurance which could be in variance with the HEQC’s approach to quality assurance and promotion, the HEQC developed a framework and criteria to guide it in its decision-making on delegation and the development of MOUs with these bodies so as to ensure alignment with the HEQC’s systems. This process is to be completed by the end of 2003 and appropriate interim arrangements of co-ordination are being made on a case by case basis.

2.5 Processing of New Programmes
All new programmes have to satisfy the different requirements of SAQA, HEQC and DOE. Many institutions have complained that the processing requirements were often cumbersome and confusing. A joint SAQA, DOE and HEQC task team was established to streamline the process. In the next month a joint communication by all three organisations will be issued about the new processing format.


3.1 Introduction

The HEQC would like to provide feedback to HEIs and other stakeholders who submitted comments on the discussion document *Proposed Criteria for the HEQC’s First Cycle of Audits: 2004-2009*. The following issues are dealt with here:

- The process followed in addressing the comments.
- The extent of responses received.
- The major areas or trends that were identified through the analysis of the comments received.
- The HEQC Board decisions, the underlying rationale for the decisions with regard to HEQC policy, as well as the Board’s response to other issues identified in the comments.

3.2 Process followed and responses

The HEQC discussion document was released to HEIs and other stakeholders for comment in the middle of March 2003, with a request for feedback by 14 April 2003. An extension was subsequently granted till 15 May 2003, at the request of some institutions. The following institutions and stakeholders submitted comments by 15 May 2003.

<table>
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<tr>
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<td>Universities</td>
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<td>Private Providers</td>
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<td>SETAs</td>
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<tr>
<td>Individuals</td>
<td>1</td>
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<tr>
<td>University and technikon umbrella organisations</td>
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</table>

An interim analysis and report on the comments was made and submitted to the HEQC Board on 6 May 2003. The report identified some preliminary emerging trends and issues in the comments. The following decisions were taken:

1. The final report on the comments received would be tabled at the meeting of the HEQC Executive Committee (EXCO) meeting on 4 June 2003, taking into account the outstanding comments and any substantive issues not captured by the interim report.

2. The draft audit criteria that would be used for the pilot audits later in 2003. The audit criteria for use in the first audit cycle: 2004-2009 would thereafter be finalised in
September 2003 after considering the findings of the pilot audits and stakeholder comments.

3.3 Decisions by the HEQC

After considering the final analysis and report on comments on the audit criteria document, the HEQC has formulated its decisions as follows.

The HEQC has given serious attention and due consideration to the comments provided by the stakeholders and the substantive issues that have been raised. One of the proposed outcomes of higher education reform is developing a single co-ordinated high quality system. Quality, for which the HEQC has responsibility together with other agencies and the institutions themselves, is one of the policy drivers to steer the system towards this outcome. One of the key challenges is how the HEQC should implement this policy driver within a young and often inexperienced private higher education system, increasing international calls for free trade in higher education, an ever expanding transnational provision of “cherry picked programmes” in business and IT and a historically fragmented public higher education system of uneven quality in South Africa.

A key challenge in developing the criteria was to find a balance between competing imperatives, for example, between minimum standards of quality and continuous improvement of quality and innovation. What follows below is a brief commentary on the decisions taken in the key areas identified in the responses. It is divided into eight broad areas:

- The audit criteria in general.
- The purpose of and approach to audit.
- The scope of audits.
- The implementation of audits and readiness of institutions for audits.
- The decision-making process and consequences of audits.
- Audits, programme accreditation and self-accreditation status.
- Definitions and clarifications.
- General comments.

3.3.1 The audit criteria in general

The audit criteria appeared to be generally acceptable and in accordance with internationally accepted quality assurance practices. Concerns raised include the substantive issues dealt with in sections below, as well as issues like the evidence to be provided for the various criteria, their nature (minimum standards or good practice statements), whether the criteria enforce uniformity and restrict institutional flexibility, whether there are too many criteria to allow for a meaningful self-evaluation or not, etc.

The Board’s reaction to the substantive issues is provided below. With regard to other issues, it has asked the Secretariat to propose institutional data sources for the criteria, and to revise the criteria in view of the comments submitted. This includes providing greater clarity on the nature of the criteria, as well as attention to criteria that may be over- or under-specified. The Board also reaffirmed that the criteria would be used in a context-sensitive manner in the conduct of the audits.

3.3.2 The purpose of and approach to audit
The comments indicate that there is broad support for the indicated purpose and approach to audit of the HEQC. However, there is concern about an appropriate balance between a developmental and an accountability-oriented approach in the first cycle of audits. Many comments refer to a perceived shift towards an accountability-driven approach on the part of the HEQC. This is linked to concerns about infringement on academic freedom and institutional autonomy.

A second area of concern, on which there was divided opinion, is on the balance between “fitness for purpose” and “fitness of purpose”. A third concern is about the appropriate balance between facilitating equity and ensuring quality.

The HEQC Board considered the implications of promoting only a developmentally orientated audit. However, the consequence of such an approach would be that there would be no possibility of meeting other policy obligations such as on short courses, RPL and assessor training and granting self-accreditation status to institutions on the basis of meeting explicit quality criteria. On the other hand, the HEQC has to ensure that HEI autonomy and responsibility for developing quality management systems that are appropriate to their contexts are not undermined. The Board concluded that it was unhelpful to juxtapose accountability and development and they should not be seen as mutually exclusive, but rather as two necessary and important imperatives that must be pursued simultaneously and kept in balance.

Secondly, the HEQC is of the opinion that the national audit process cannot ignore national transformation goals, as these have implications for enhancing and/ or jeopardising quality in HEIs. Audits should, therefore, consider both fitness for and fitness of purpose. The HEQC’s emphasis on fitness of purpose with relation to institutional mission, does not imply that it expects an uncritical conformity in the manner in which institutional mission statements respond to national policy goals. Moreover, the HEQC respects the institutions autonomy to develop its own mission. Among other institutional determined imperatives, the mission statement should, also reflect institutions’ engagement with the challenges of the national policy environment in a manner which is appropriate to the context and nature of each institution. In the main the HEQC will confine the audit to – are there effective systems to monitor the implementation of the mission and the mission’s relationship with the national policy environment, particularly the institutions performance and monitoring with regard to national target such as research output, equity, redress and student throughput rates.

Thirdly, the HEQC affirms the importance of finding a balance between the demands of equity and quality. However, audit criteria have to address how HEIs are engaging with the legacies of inequity, lack of opportunity and poor quality provision in particular areas of the higher education system. They also have to address the adaptability, responsiveness and innovations of institutions in relation to new knowledge and skills requirements and new modalities of provision.

Lastly, the HEQC is of the view that the criteria are in line with the definitions of quality adopted in its Founding Document. These include:

- Transformation in the sense of developing the capabilities of individual learners for personal enrichment, as well as requirements of social development and economic and employment growth. Besides transforming individuals, higher education institutions need to engage with national goals and policies. Hence, the fitness of purpose is important.
- Fitness for purpose in relation to specified mission within a national framework of differentiation and diversity.
• Value for money judged in relation to the full range of higher education purposes set out in the White Paper. Judgements about effectiveness and efficiency of provision will include but not be confined to labour market responsiveness and cost recovery.

3.3.3 The scope of audits

The comments on the criteria indicate acceptance of levels one and two of the criteria, but serious misgivings about the inclusion of level three in the first cycle of audits. Some concerns were raised also about the ambitiousness of the criteria in general (especially the intent of level three), as well as the inclusion of some aspects in level two.

The HEQC is of the opinion that it should signal clearly to HEIs its expectations concerning the extent of the arrangements that should be in place in a properly functioning internal quality management system, and should give an indication of problematic areas in the higher education sector. With regard to the inclusion of criteria at level three, it should be remembered that the granting of self-accreditation status to institutions depends on well-functioning internal quality management mechanisms, which are evaluated by audits, together with programme information. If level three were to be excluded, this would considerably weaken the evidence for self-accreditation. However, the Board has requested the Secretariat to find the appropriate means to evaluate evidence for the audit criteria at this level.

The HEQC will also pay attention to the manner in which the criteria at level three are currently formulated, so as to make it clear that the focus of the audit criteria falls on the effectiveness and appropriateness of the institution’s quality management system in the specified areas and not on issues of quality itself.

It must be remembered that the date and scope of an audit will be negotiated between the institution and the HEQC, with due consideration of the institutional context.

3.3.4 The implementation of and readiness for audit

General questions were raised about the readiness of the HEQC and HEIs for the first audit cycle and the practicalities around implementation.

The Board noted the concern expressed about the readiness and capacity of the HEQC and institutions. The HEQC wishes to inform institutions that it would be remiss to plan systems and implementation without duly considering delivery capabilities. This is an issue that is under constant review and appropriate arrangements will be made to ensure effective delivery. Further, the HEQC has prioritised institutional capacity-development programmes, as well as detailed briefings for institutions. Finally, the HEQC has decided to place merging institutions in the second phase of the first audit cycle, in order to allow for a “settling down” period (see Section 1 above for a more detailed exposition).

3.3.5 The decision-making process and consequences of audits

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4 Level 1 refers to
Greater clarity was requested in the responses on how audit judgments would be reached and the consequences of audits. Concern was expressed about the danger of ranking institutions and inconsistency in audit panels on the interpretation of criteria.

The Board reiterated its position that institutions would not be ranked. Training programmes for auditors would address issues of how audit judgements are to be best reached.

3.3.6 Audits, programme accreditation and self-accreditation status

The comments indicated that there was a lack of clarity among HEIs about the distinction between audit and programme accreditation. There was also a lack of clarity about what constituted institutional self-accreditation status, and how it was to be attained. There was also divergence of opinion, for various reasons, about whether self-accreditation should be available in the first cycle.

In Section 1 above, an exposition was given of the outlines of the HEQC’s audit and accreditation activities for the quality assurance cycle: 2004-2009. More details on self-accreditation status and the respective role of audits and programme evaluation will be provided in the HEQC’s finalised Programme Accreditation Framework, which will be released shortly.

3.3.7 Definitions and clarifications

Comments were made about the need to provide clear definitions of various terms, for example, “service learning” and its implications for institutions, as well as for greater clarity about certain statements. A glossary of terms was suggested, as well as attention to certain editorial and stylistic issues.

The Board has undertaken to address these concerns. Particular attention will be paid to developing clear definitions of key terms in the revision of the audit criteria.

3.3.8 General comments

A number of general comments were made that relate to the further development and implementation of the audit system. The Board noted the concerns and will address them in appropriate ways.

One specific comment was the request to make the Teaching and Learning Guides to Good Practice available. The Board wishes to indicate that the guides to good practice are currently in preparation and will be made available to institutions in due course.

A second specific comment was that many national policy documents have not been finalised, and may yet impact on the audit criteria. The HEQC is mindful of this fact and has the opportunity to engage with these documents through the advisory function of the CHE. The fact that pilot audits will begin in late 2003 and the first audit cycle in 2004 however necessitates the speedy development of the audit criteria. The criteria will be reviewed when the national policy documents that are currently in progress are finalised.

FINAL COMMENTS BY THE HEQC

The HEQC is greatly pleased that there is great consensus on the importance of quality and widespread support for the work of the HEQC and its potential to impact on the transformation of higher education. The audit and programme accreditation processes are intended to benefit
not only higher education, but also to have an impact on the reconstruction of South Africa at large.

The HEQC is committed to a higher education system that is in large measure self-regulatory and where institutions take major responsibility for quality. However it must be stressed that the HEQC itself operates within diverse national policy and regulatory frameworks and is itself accountable to a range of stakeholders. The HEQC must therefore give due attention to a spectrum of often competing interests and innovate policies, frameworks and systems that provide for both accountability and continuous improvement and development of quality.

The HEQC commends the engagement of Heist and stakeholders with its policy and other documents. It is fundamentally important that all higher education stakeholders continue to critically engage with the HEQC’s work and support the development of effective audit and accreditation systems. The HEQC commits itself to continue to work purposefully and consultatively in the interest of improving the quality of higher education and through this contributing to the economic, social, cultural and intellectual development of our society.
Framework for Institutional Audits

Higher Education Quality Committee
The Higher Education Quality Committee is a permanent committee of the Council on Higher Education

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of the South African Qualifications Authority (SAQA) Act and its regulations.\(^4\) According to the regulations, the functions of ETQAs are to:

- Accredit constituent institutions for specific standards or qualifications registered on the NQF;
- Promote the quality of constituent institutions and monitor their provision;
- Evaluate, assess and facilitate moderation amongst constituent institutions, register constituent assessors for specified registered standards or qualifications in terms of the criteria established for this purpose and take responsibility for the certification of constituent learners;
- Co-operate with the relevant body or bodies appointed to moderate across ETQAs including, but not limited to, moderating the quality assurance on specific standards or qualifications for which one or more ETQAs are accredited;
- Recommend new standards or qualifications, or modifications to existing standards or qualifications, to the National Standards Bodies (NSBs) for consideration;
- Maintain a database acceptable to SAQA;
- Submit reports to SAQA in accordance with its requirements; and
- Perform such other functions as may from time-to-time be assigned to it by SAQA.\(^5\)

The Board of the HEQC determines policy and procedures for the quality assurance work of the HEQC and has final responsibility for approving audit and accreditation reports. It makes its judgements independently of other national agencies but seeks to complement their work where issues of quality and standards are involved. The judgements are based on evaluation reports from peer and expert review panels.

### 1.2 Restructuring and Transformation Context

In South Africa, where the higher education system had been characterised by decades of fragmentation, uneven provision and racial segregation, the challenges of higher education transformation are part of the demands for social and economic justice that are at the core of the agenda for democratic change in South African society. The restructuring of public higher education to produce a more just, effective, efficient and responsive system has been underway at systemic and institutional levels for a number of years. Developments in higher education also encompass the growth of the private provider sector (including a small number of foreign providers) and its associated challenges of building quality in a relatively new sector of higher education provision and of improved articulation with the public higher education sector.

Specific quality-related goals facing the South African higher education sector include increased access and equity opportunities for previously marginalised groups, especially

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\(^4\) Regulations under the South African Qualifications Authority Act No. 58 of 1995.

women and black students and staff; greater responsiveness to local, regional and national
needs in and through teaching and research; improved institutional efficiencies leading to
increased throughput, retention and graduation rates in academic programmes; increasing the
pool of black and women researchers, as well as the pool of basic and applied knowledge
to enhance understanding and social application. The mergers and incorporations in public
higher education bring the additional challenge of developing new institutions whose
academic functions and products are characterised by improved quality and standards.

The work of the HEQC, including its institutional audit activities, will be conducted
within the context of ongoing reform and restructuring in order to produce a transformed
higher education system of high quality which is able to address the complex knowledge
development needs of South African society. Institutional audits will take account of the
continuing uneven development that characterises the South African higher education
sector, and will seek to assist institutions in identifying effective approaches to quality
management.

Audits will also address quality-related issues pertaining to the adaptability, responsiveness
and innovativeness of institutions in the production of new knowledge and skills, and
the utilisation of new modalities of provision. In addition, audits will seek to evaluate
institutional initiatives to produce a vibrant intellectual culture both within the institution and
in society, and act as an incubator of new ideas and cutting edge knowledge as part of the
national system of innovation.
Criteria for Institutional Audits

Higher Education Quality Committee

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(ii) Links between planning, strategic choices, resource allocation and quality management.

(iii) Institutional planning which includes:
  - Quality management prioritisation and target-setting at all critical decision-making levels.
  - Goal-setting and allocation of responsibilities for developmental issues.

(iv) Adequate resource allocation through financial planning for the development, implementation, review and improvement of quality management mechanisms at all relevant levels.

(v) Regular review of the effectiveness and the impact of the integration of the objectives and mechanisms for quality management with institutional and financial planning.

2.2 Teaching and Learning, Research and Community Engagement

2.2.1 Teaching and learning

Criteria for the support and enhancement of the quality of teaching and learning are divided into two categories:

(i) General quality-related arrangements for teaching and learning; and
(ii) Programme development, management and review as well as student assessment and success.

2.2.1.1 General quality-related arrangements for teaching and learning

Efficient and effective institutional arrangements to support and assure the quality of teaching and learning are crucial to facilitate quality, especially at the point of delivery. In order to achieve this, appropriate policies, strategies and procedures have to be in place. The quality of academic services also requires attention in order to ensure that academic provision is appropriately supported.

Given the increase in the number of short courses offered in higher education, mechanisms are necessary to ensure their quality and to evaluate the impact of these courses on student success rates for whole qualifications and on the mission of the institution.

The quality of programmes offered by South African higher education institutions beyond the borders of South Africa has to be equivalent to those offered in South Africa. Programmes offered in partnership with other institutions, as well as those at tuition centres and satellite campuses, have to be of equivalent quality to those offered at the main campuses of institutions.

The processing and issuing of certificates, as well as security measures to avoid fraud or the illegal issuing of these certificates, is a crucial element in ensuring the credibility of an institution's qualifications.
Table 2

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<th>Area</th>
<th>Sub-Areas</th>
<th>Criterion</th>
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<td>Programmes offered at tuition centres and satellite campuses</td>
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<td>Certification</td>
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CRITERION 3
The arrangements for the quality assurance of and support for teaching and learning enhance quality and allow for its continuous monitoring.

In order to meet this criterion, the following would be expected:

(i) An academic planning framework which articulates well with the institutional mission and strategic goals, and is adequately resourced.
(ii) Quality management systems and initiatives for teaching and learning at both undergraduate and postgraduate levels.
(iii) Key quality improvement priorities with regard to teaching and learning with appropriate resources, time-frames and indicators of success.
(iv) Ongoing discussions and initiatives on new approaches to and innovations in teaching and learning.
(v) Staff development policies and strategies which promote the professional competence of academic staff and give particular attention to the development needs of new personnel.
(vi) Mechanisms which promote access to students from previously disadvantaged groups, for example, through the provision of academic development programmes.
(vii) A system which stores and updates relevant student information in order to inform policy, planning, implementation and review of teaching and learning.
(viii) Regular review of the effectiveness of systems of quality assurance and support of teaching and learning.

CRITERION 4
Academic support services (e.g. library and learning materials, computer support services, etc.) adequately support teaching and learning needs, and help give effect to teaching and learning objectives.
### Areas Relevant aspects Criterion

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<th>Relevant aspects</th>
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#### 3.1.1 Programme design

**CRITERION 1:** *The programme is consonant with the institution’s mission, forms part of institutional planning and resource allocation, meets national requirements, the needs of students and other stakeholders, and is intellectually credible. It is designed coherently and articulates well with other relevant programmes, where possible.*

In order to meet the criterion, the following is required at minimum:

(i) The programme is consonant with the institution’s mission and goals and was approved by the appropriate institutional structures, including Senate/equivalent structure. Provision is made for the programme in the institution’s planning and resource allocation processes.

(ii) The programme meets the national requirements pertaining to programmes which are at present being developed within the context of the NQF.

(iii) Learning outcomes, degree of curriculum choice, teaching and learning methods, modes of delivery, learning materials and expected completion time cater for the learning needs of its target student intake. Competences expected of students who successfully complete the programme are made explicit.
(iv) The design maintains an appropriate balance of theoretical, practical and experiential knowledge and skills. It has sufficient disciplinary content and theoretical depth, at the appropriate level, to serve its educational purposes.

(v) The design offers students learning and career pathways with opportunities for articulation with other programmes within and across institutions, where possible.

(vi) Modules and/or courses in the programme are coherently planned with regard to content, level, credits, purpose, outcomes, rules of combination, relative weight and delivery. Outsourcing of delivery is not permitted.

(vii) There is a policy and/or procedures for developing and evaluating learning materials and ensuring their alignment with the programme goals and underpinning philosophy. Where necessary, members of the academic staff are trained to develop learning materials.

(viii) Programme outcomes meet national and/or regional labour market, knowledge or other socio-cultural needs. The requirements of professional bodies are taken into consideration, where applicable. Relevant stakeholders, including academic peers from outside the institution, and employers and professional bodies where applicable, are involved in the development of the programme.

(ix) The characteristics and needs of professional and vocational education are catered for in the design of the programme, where applicable. This includes the following, in addition to (i) – (vii) above:

- The programme promotes the students' understanding of the specific occupation for which they are being trained.
- Students master techniques and skills required for a specific profession or occupation.
- Work-based learning and placement in a work-based environment form an integral part of the curriculum, where possible.

(x) In the case of institutions with service learning as part of their mission:

- Service learning programmes are integrated into institutional and academic planning, as part of the institution's mission and strategic goals.
- Enabling mechanisms (which may include incentives) are in place to support the implementation of service learning, including staff and student capacity development.

### 3.1.2 Student recruitment, admission and selection

**CRITERION 2:** Recruitment documentation informs potential students of the programme accurately and sufficiently, and admission adheres to current legislation. Admission and selection of students are commensurate with the programme’s academic requirements, within a framework of widened access and equity. The number of students selected takes into account the programme’s intended learning outcomes, its capacity to offer good quality education and the needs of the particular profession (in the case of professional and vocational programmes).

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4 In some professional fields of study, work-based learning traditionally occurs after the award of the qualification, for example, in accountancy.
APPENDICES 9.1 – 9.6

Interview Schedules
Interview Schedule for CHE/ HEQC Officials (general)

Name _________________________, (position) _________________________
held at ___________________________________________
on _________________________

1. What is your own evaluation of the Improving Teaching & Learning Resources? How useful have they been to the HEQC? How do you hope they will be used by HEIs?

2. Where do you see the IT&L Project going next?

3. The HEQC is now in the phase of operationalising its conceptualization of quality – in practice what does this mean in terms of the values that you have mentioned elsewhere as being in tension?
   e.g.  accountability v. improvement
        equity v. development
        state steering v. academic freedom, innovation & diversity

4. What are the implications for a national QA system of the idea of inserting the public good into HE? If HE is a key player in the formation of civil society, what does this imply for the degrees of state intervention and institutional autonomy within a national QA system?

5. I think that the HEQC’s task is complicated by having to regulate both the private and the public sectors, do you agree?

6. What do you think are the key resources required and the key conditions necessary for successful implementation of the HEQC’s QA system, including the linking of audit and accreditation?
7. What do you believe to be the mechanisms that will really effect change in everyday teaching and learning practice in HE institutions?

8. To what extent does the HEQC have control over these conditions and mechanisms? What changes are needed in the system in order for the HEQC’s QA system to operate effectively?
Interview Schedule for HEQC Officials (specific)

Name ______________________ (position) _____________________________

held at ________________________________

on _____________________________

A: General

1. What has been the general response of the HE community to the Audit Criteria discussion document?

2. Are there any substantial changes that the HEQC is likely to make as a result of the responses?

3. What do you think are the key values that underpin the HEQC’s work?
   To what extent do these values differ from those of typical academics?

4. Are you confident that the HEQC has sufficient resources and capacity at its disposal to run institutional audits and to accredit programmes across the system – as it is required to do by law?

5. Do you think that the HEQC’s approach to linking audit and accreditation is going to work? What will it take?

6. What do you think are the key conditions for successful implementation of the HEQC’s QA system?

7. What do you believe to be the mechanisms that will really effect change in everyday teaching and learning practice in HE institutions?
8. To what extent does the HEQC have control over these conditions and mechanisms? What changes are needed in the system in order for the HEQC’s QA system to operate effectively?

B: Improving Teaching & Learning Resources:

1. To what extent were the Guides useful in writing the criteria for audit? for accreditation?

2. What are their shortcomings?

3. In what ways can I improve them?

4. How do you suggest that they be revised to complement the audit and accreditation criteria documents?
Interview Schedule for Academic Managers

Name _____________________________, (position)____________________________

held at _________________________________

on _________________________

The macro-question is: To what extent you believe the HEQC’s policy instruments (the two Framework Documents, the Proposed Criteria for Audit and Accreditation, the proposals for self-accreditation, the MBA Review, supported by the Improving Teaching & Learning Resources) are valid, acceptable, feasible and potentially effective?

1. Do you think that the policy instruments that the HEQC has produced so far are based on adequate expertise?

2. To what extent are the the HEQC’s policy instruments implementable in your context/ institution?

3. What are the resource implications of implementation?

4. What are the constraints to successful implementation in your own institution? And to what extent can you overcome these?

5. How do you intend to mediate the HEQC’s demands in the internal quality management system you are setting up for your institution?

6. How do you think academics are going to respond to the implications for them of the HEQC’s requirements?

7. What (if any) underlying paradigm/ value / worldview clashes exist between the HEQC’s conceptualization and operationalisation of quality in HE and your own / and those of the academics in your institution?

8. To what extent do you think the HEQC’s policy instruments will fulfill their purpose – namely to ensure accountability and improve the quality of HE provision? In your own institution? Country-wide?

9. Any other comments related to the national QA project and your management of quality at your institution?

THANK YOU
Interview Schedule for Quality Assurance Managers

Name _____________________________, (position)____________________________

held at ___________________________________________

on         _________________________

The macro-question is: To what extent you believe the HEQC’s policy instruments (the two Framework Documents, the Proposed Criteria for Audit and Accreditation, the proposals for self-accreditation, the MBA Review, supported by the Improving Teaching & Learning Resources) are valid, acceptable, feasible and potentially effective?

1. Do you think that the policy instruments that the HEQC has produced so far are based on adequate expertise?

2. Who do you think should have been involved in the HEQC’s policy development process?

3. To what extent are the HEQC’s policy instruments implementable in your context/institution? What are the constraints to successful implementation?

4. How do you think academics are going to respond to the implications for them of the HEQC’s requirements?

5. What (if any) underlying paradigm/value/worldview clashes exist between the HEQC’s conceptualization and operationalisation of quality in HE and your own/and those of the academics you work with?

6. How do you intend to mediate the HEQC’s demands in the internal quality management system you are setting up for your institution?

7. To what extent do you think the HEQC’s policy instruments will fulfill their purpose – namely to ensure accountability and improve the quality of HE provision? In your own institution? Country-wide?

8. Any other comments related to the national QA project and your institutional QA work?
   (If you are in a management position, please comment on resource implications).

THANK YOU
Interview Schedule for Academics

Name ________________________________ Position _________________________

held at ________________________________________

on _______________________________________

The macro-question is ‘To what extent do you think that the HEQC’s policy instruments and processes are acceptable, legitimate, feasible and potentially effective’?

1. What is your position, in principle, with respect to being accountable to the government for the quality of the programmes you teach on? To what extent do you agree with the idea of an external quality assurance agency, established by the Department of Education, assuring and maintaining quality in the higher education system?

2. What was your experience of the HEQC’s workshop?

3. What did you learn from it?

4. To what extent do you think that the HEQC’s Improving Teaching & Learning Resources will be used and have an impact on teaching and learning at your institution?

5. Do you think that the HEQC’s policy instruments and processes adequately take into account the interests and concerns of academics on the ground?

6. What are the consequences, costs and risks of the HEQC’s policies for you and your academic work?

7. Do you have any recommendations for the HEQC in terms of winning legitimacy or ‘buy-in’ for its external quality assurance requirements from academics?

8. What criteria would you set for yourself to measure improvement in your own teaching programmes? How do you think quality assurance should be carried out in order to effect improvements in teaching and learning?

9. In what ways, if any, do the values and assumptions that underpin the HEQC’s policy instruments differ from your own with respect to the quality of higher education provision?

10. Any other comments?

THANK YOU
Interview Schedule for MBA Academics

The macro-question is ‘To what extent do you think that the HEQC’s policy instruments and processes are acceptable, legitimate, feasible and potentially effective?’

1. What was your involvement in the MBA re-accreditation process?

2. What is your position, in principle, with respect to being accountable to the government for the quality of the programmes you teach on? To what extent do you agree with the idea of an external quality assurance agency, established by the Department of Education, assuring and maintaining quality in the higher education system?

3. In practice, did you gain anything useful or valuable from the self-evaluation process undertaken in preparation for the HEQC’s site-visit?

4. What was your experience of the HEQC’s site-visit?

5. What did you learn from it?

6. Do you think that the HEQC’s evaluation instrument and process adequately takes into account the interests and concerns of academics on the ground?

7. To what extent do you think that the HEQC’s instrument for the Re-accreditation of MBAs is realistic and feasible in terms of the demands it makes on academics?

8. What are the consequences, costs and risks of the HEQC’s policies for you and your academic work?

9. To what extent do you think the HEQC’s instrument and process will be effective in assuring the quality of MBAs around the country? And in improving the quality of teaching and learning on MBAs?

10. Do you have any recommendations for the HEQC in terms of improving the process?

11. How do you think quality assurance should be carried out in order to effect improvements in teaching and learning?

12. In what ways, if any, do the values and assumptions that underpin the HEQC’s policy instruments differ from your own with respect to the quality of higher education provision?

13. Any other comments?

THANK YOU
How do you understand the HEQC’s conceptualization of quality?

We did not accept offers from overseas QAAs to design our QA system. We have tried to understand quality in our own context and have made significant progress. We have defined quality in a way that captures our own context as a developing country, that is distinct from 1st World countries, e.g. for us quality includes individual and social transformation.

The HEQC is now in the phase of operationalising its conceptualization of quality – in practice what does this mean in terms of the values that you have mentioned elsewhere as being in tension?

- fitness of purpose v. fitness for purpose
- accountability v. improvement
- equity v. development
- state steering v. academic freedom

Both fitness of and fitness for purpose are important for us – national goals should frame institutional missions, following Castells, we see HE to be the motor of national development. So context is very important e.g. in developing countries human intellectual capacities tend to be concentrated in HEIs (this is not the case in developed countries) thus the role of HE in national development takes a different meaning. The way we have defined quality is highly appropriate to our context.

With respect to the choices you mentioned, it is not the case that we are only confronting these paradoxes at the implementation stage – they were always there from the outset and manifest themselves sharply in our HE system. In the enterprise of creating a national QA system we have to keep both poles in balance. If one or other is fore-grounded at a particular time, that is a strategic decision, rather than one of principle. Contestation around these tensions is healthy. We need to hold the balance over time and take a long view – it will shift with different actors giving different emphases and readings. Over the last 2 years we have quite deliberately and explicitly had a lead in phase – up to 2003 – as a process of policy and system development and consultation. We are about to move into implementation phase and this will test whether our conceptualization is adequate. Of course none of the policy instruments will stay the same, they will be refined over time, we will learn as we go.

I think that the HEQC’s task is complicated by having to regulate both the private and the public sectors, do you agree?

Whilst it is true that the systems differ in terms of scale and roles and logics, but the HEQC wants to create a single system. We can’t leave the private sector to market forces, people are too quick to say that the market sorts quality out – this is an ideology and a decontextualised approach that assumes that people have perfect knowledge to make rational choices. In a 3rd World context such as ours (where hopefully the vast majority of students will be 1st generation black students), there are severe limits to how much the market can inform people. I don’t think that market forces even determine where white students choose to study – they tend to go by perceptions and reputations. We should note our context, we are an ex-colony and a peculiar society with a very imperfect market which also creates needs. We can’t leave quality to market forces in our context.

With respect to the public sector, those who go on about academic freedom are nostalgic for the past where surprisingly the government had a very laissez faire approach to HE, with very little accountability required. Now the relationship between HE and the state needs to be re-thought, we need a stronger social contract and people need to re-think old notions of academic freedom and institutional autonomy. Just as the professional councils have always been accepted as a means of quality assurance, so the HEQC wants to assure and protect the
public. Academic freedom and institutional autonomy should be protected, and there is no reason why QA should be seen to interfere with the academic enterprise.

**What are the implications for a national QA system of the idea of inserting the public good into HE? If HE is a key player in the formation of civil society, what does this imply for the degrees of state intervention and institutional autonomy within a national QA system?**

With respect to ‘inserting the public good into HE’ – we don’t want a QA system which is an onerous burden on academics and one that does not add value, we need to be vigilant about this and we understand that their work is already difficult. Academics need to read our documents and become more informed. We are trying to balance multiple constituencies of which the academics are only one. We have to think in terms of national interest, keeping in mind all stakeholders. Once we have established the frameworks, systems and criteria, our goal is to move towards a chain of self-regulation and validation. HEIs should have their systems in place at all levels of the institution, right down to programme level. Our job should be simply to validate these systems, moving to a light touch and focusing more on improvement. We don’t want a panoptican approach, HEIs should self-regulate themselves. We want HEIs to be proactive in this, we want an evidence-based system in which HEIs produce evidence to validate their claims.

**Do you think that the HEQC’s approach to linking audit and accreditation is going to work? What will it take?**

This link is a testimony to what we have achieved, others in the developed world are now interested in our innovation. The challenge for us now is to develop an adequate management information system (we are currently investing R2 million in a data-base). We will need to bring multiple sources of information and using triangulation of data, bring it all together to make decisions about granting self-accreditation status. This will require skilled personnel.

**What do you think are the key conditions for successful implementation of the HEQC’s QA system?**

With respect to capacity, our problem is not intellectual capacity, it is middle management for QA, we have no Masters programme on QA, we have had to build the system and grow the people. We recognize that this middle management level is the engine room, these are the people who will make the system happen – these capacities are lacking across our society.

**What do you believe to be the mechanisms that will really effect change in everyday teaching and learning practice in HE institutions?**

We grew up with a theory of struggle, but not a theory of transformation. We are lacking in implementation and construction skills. In the Size & Shape document we spoke about ‘pulleys and levers’ for change. We need to ask what these are for QA. I think of the criteria for audit and accreditation as the levers and we now need the pulleys, i.e. examples of and the promotion of Good Practice – we need the Guides to Good Practice. As I’ve said we are trying as far as possible to create an environment of self-regulation for HEIs, quality can only be built by HEIs – over time we aim to lessen and change the criteria (the emphasis on accountability) and change the balance by increasing the focus on good practice (and emphasise improvement). Centralized intervention is only a last resort, it is not our aim, rather our goal is self-regulation. I can understand that in practice an HEQC official may err on the side of intervention, we also need to get the right balance within the organization. If people think we want to control them they have the wrong picture, they must hold onto the macro-picture.
HEQC 2 4/6/2003

1. What is your own evaluation of the Improving T&L Resources? How useful have they been to the HEQC? How do you hope they will be used by HEIs?

Are you talking about this version of them, or are you talking about the whole project?

Ja. Let’s talk about the whole project and then come down to this particular version of the Resources.

Well I’m reluctant to comment on this particular version because I only glanced at it at the beginning of the workshops …so you know, I would need to make a better determination of this version. But I’m just sorry that it’s taken so long to get the Resources to this state and made available to the education community, especially since we’ve had so many people co-operate in its production. Many people will find it useful for the kinds of things that they are doing. But we’re trying to develop all of the elements of a national QA system – it’s been a balancing act in terms of our own planning …it clearly has been a valid project in terms of our own planning… but our formal responsibilities for audit and accreditation and their pilot testing have had to come first. So in a sense because this is an area of responsibility which doesn’t have this formal pressure, as it were, it’s taken longer than it should have. But I’m really very pleased that it’s back on the agenda because we still think that it is and should remain a flagship project for the HEQC because even though there is the perception that we are now only looking at accountability issues …and by the way …I don’t believe it’s as simple as that. From the point of view of our interest in helping to support the development of QA, I think that this is a critical area for us to give attention to in a sustained way - not a kind of one off. That’s why I would think that we’re really hoping to get a better sense of what are the institutions themselves saying [a] about how they would like to use the Resources and [b] to see how can we support their ideas for using them. We want to see whether we can connect what we do next with the ways in which institutions want to use them so that we can then provide support…. And again to come back to the old issue - we can’t do all of the things that are required in terms of the teaching and learning project … we can’t do all the capacity development that this project might require. So there again we have to pick up on issues of the partnerships and so on. Hopefully this will become clearer after this round of workshops.

How useful have the Resources been to the HEQC?

You know I think enormously useful. They gave us a chance to give substance to the very early HEQC commitment to wanting the core activities of higher education – teaching, learning & research - to be at the heart of our quality assurance process. So you know this project, the teaching and learning project, (and the research project that the we are busy with at the moment) have been the substance of the HEQC’s commitment, as it were, to the issues of teaching and learning. And now we are increasingly trying to see how the community service dimension can be developed. You know I think reviewing the pilot audits will also enable us to have clearer
reflections in our heads. Because you could see the service learning issues ...as part of the teaching and learning sphere at the one level but we’re also hearing from institutions that they don’t want the community dimension to be ignored. So we have to find a way of connecting community service, service learning and teaching learning. We still have to understand how to connect community service with service learning because we are seeing service learning as one dimension of community service which links with teaching and learning. These are things we’ll have to sort out hopefully after we’ve reflected a little bit on the pilot audits. We also have to sort out the differences between experiential learning and service learning. But even experiential learning as you know is at the moment covered in our programme accreditation criteria. So the next task is to ask how do we align the criteria because we’ve gone much wider in the criteria than these Resources in order to take into account experiential learning and all of that. So how do we actually align these documents (the Resources, audit and accreditation criteria) so that institutions can use the Resources in order to strengthen their systems in a developmental sense and at the same time prepare for audit and accreditation? We have to make sure that those elements are in one place if you want people to use this for planning.

Do you know what we’ve done apropos RPL (the recognition of prior learning), short courses, registration of assessors and moderation? We’ve written a letter to all institutions asking them to tell us what arrangements have they made for these things, to what extent they have policies in place, to what extent these policies are being implemented and who has responsibility for monitoring and oversight. So we are expecting this information sometime before the end of the year. Because we said that we would delegate these things to institutions. But we can’t delegate unless we actually see what kind of systems they have put into place. So we did not want to develop micro-level criteria for all these areas but rather to leave it to the institutions. The trouble is that some of these areas are reporting areas for us to SAQA and we can’t tell SAQA that we’re delegating them to the institutions unless we actually know what is going on in the institutions, and then we check on these in the audits. You know we can check on those arrangements that the institutions say that they have in the course of evaluation, hence our pilot audit had questions about short courses.

In response to your question “How useful have the Resources been to the HEQC?” The question is still premature as it strikes me that the Resource is establishing a conversation nationally and also within the HEQC around teaching and learning with a view to raising our own conceptions, levels or awareness and assumptions around teaching and learning and making them explicit. With regard to the context of South Africa in terms of transformation around teaching and learning issues it is raising a national conversation and so I think they’ve been extremely useful to us at the HEQC. How we hope they will be used by HEIs is really with a view to establishing this national conversation and understandings nationally around teaching and learning. So that when we do go into institutions for audits for example we have an understanding of how they are approaching teaching and the Resources will also inform our own work. They will also be part of steering the quality of the institutions, steering in terms of raising questions about practice.

You know it’s quite possible that in the course of audits when we’re looking at the management of teaching and learning (as you know levels two and three have to do with the management of teaching and learning) that we could say to senior
management as a follow up question ‘have you seen the HEQC Resources on teaching and learning?’ ‘Do you know if anyone is using them?’ or ‘Is there an institutional decision to strengthen teaching and learning using these?’ We’re not saying this is a platform but we are saying here is one resource. So we could simply see whether the institutional managers are aware that there is such a resource and try to get a sense of whether they know it and whether it’s being used, after all we have put out a Resource book. Of course how they use it is up to them, depending on the level of struggle at the different institutions and how they are institutionalizing good practices in teaching and learning and on how it fits with issues already on the ground. So we are hoping that it will have some of that kind of catalyzing effect and will be taken up hopefully in creative ways. I mean what would really be good is for people to say in our context we experience the teaching and learning environment like this and we think that that’s an important dimension that these Resources cover and so in our context we are doing x, y and z.

Where do you see the IT&L Project going next?

Kathy you know I think it’s a bit premature to speak about where the project’s going next because clearly we want to use the feedback from the workshops to make a decision.

I think the most that can be said is the wish to facilitate in the sector thinking about good practice in this area. And getting people to talk to one another and so lift the general level of quality and promote the national agenda within these teaching and learning areas.

The HEQC is now in the phase of operationalising its conceptualization of quality – in practice what does this mean in terms of the values that you have mentioned elsewhere as being in tension?

- e.g. fitness of purpose v. fitness for purpose
- accountability v. improvement
- equity v. development
- state steering v. academic freedom, innovation & diversity?

Well the reality check of the pilot audits is clearly increasing our sense of the complexity of the issues. And particularly introducing quality assurance during a major restructuring exercise which has both opportunities and drawbacks. We have heard this concern expressed by institutions about ‘fitness of purpose’ but that was always there in the Founding Document. I mean it was never that we suddenly made a shift from ‘fitness for purpose’ to ‘fitness of purpose’ in the institutional audit criteria document, because in the founding document it says all of these different understandings of quality exist within the ‘fitness of purpose’ the approach. So I don’t see this as going backwards. It is also a pity that we have been depicted at meetings as a straying into – or transgressing - institutional autonomy itself. I think without a proper understanding of what the HEQC was doing … In relation to ‘fitness of purpose’ we said that the audit is about getting institutions to reflect on all the claims that they make in relation to quality. Why should the fitness of purpose issue not be a subject of audit reflection? Why should one simply take that for granted and move beyond that? Because currently institutions are developing new missions as part of the process of institutional restructuring. The focus on the fitness of mission then is
not about making a judgment - you know, that this mission is wrong or this mission is right - but much more on asking about how was this mission defined? What processes were followed? Who were the participants in the process of defining the mission? I mean all the old clichés about ownership and those kind of things. And then how is this mission being translated into a whole range of initiatives lower down the system? So the focus on the ‘fitness of purpose’ has to do with making decision-makers at institutions talk about how they connect their mission to everything else that they are doing. So we don’t see this as an attempt to prescribe to institutions. What we’re trying to understand is how the institutions interpret the national priorities or international priorities into their missions. And who’s been involved in the process all that kind of stuff. So I don’t see any, any tension at all between the two. But clearly these are messy issues. But in the way in which we have tried to conceptualise the criteria I don’t see how it can be misunderstood. But of course it does depend on auditors’ understandings and in our audit training we have attempted to make very clear to auditors what is it we are talking about when we’re looking at missions and ‘fitness of purpose’.

Let’s look at accountability versus improvement.

You know here Kathy, there is a tension that all quality assurance systems have to find a balance. It’s also not a choice between the one side or the other. And it seems to me that introducing self-accreditation status into the system has upped the accountability stakes even within the context of audit which is usually supposed to be, as you know, largely developmental. But the way in which we’ve done the pilot audit, we’ve told the auditors to concentrate on the improvement issues, to look at the self-evaluation and the evidence for improvement. Where is the institution itself saying that it has areas of improvement and what are its improvement plans and how can we then reinforce and support that. And then apart from that what are other areas that the panel would’ve identified as in need of improvement. As you know these are the things that could benefit teaching and learning or any of the core functions. And we have said that in the first three or four years there’s not going to be any self-accreditation. This will give us a chance to concentrate on the improvement dimension. And also we have indicated (and we still have to spell that out more clearly) that the self-accreditation status issue will be decided on by a different committee, not by the audit panel. Audit is only one source of information for the committee that decides on self-accreditation. So if you have a separate committee it’s much easier to manage and if you have separate criteria that you’re looking at - it could be done entirely on the basis of documents you know like evaluations, programme accreditation information - or you could do a one-day visit if you wanted to verify something. But those are all things that we still have to iron out. We want to link audit to self-accreditation but also keep it separate so as not to confuse the objectives of audit. Self-accreditation could be granted by a sub-committee of the accreditation committee, but it can’t be the audit committee. The paper we gave in July indicates that we want to link the processes but we also want to keep the integrity of the process separate as it were.

Also Kathy one thing I should mention in terms of improvement: what we are thinking of now is once we have finalized the audit document is to make it available early next year to the institutions. And then say to institutions you have a seven or eight month period of time in which to start thinking about your institutional systems
in relation to the audit requirements. And then to have a whole range of capacity
development and other activities during this period. We will ask institutions what
steps they need to take to prepare for audit. We will have audits only towards the end
of the year. So basically we will initiate an improvement phase without plunging
immediately into audits. All institutions will have this period of time in which to
actually get their systems aligned to the audit requirements and I think that will help.
Even next year with all the mergers and the restructuring and so on. So I think it will
give people a breathing space and if we run workshops on a regional basis on the
requirements of the audit I think that will also help. So we think we’ve got the
improvement or development issue on track. We have not lost sight of it, as it were.

**I think that the HEQC’s task is complicated by having to regulate both the
private and the public sectors, do you agree?**

We have no option, it is a legislative requirement. And again you know it’s going to
be a difficult balancing act between looking at the requirements of the specific sectors
but making sure that we draw them in to a common set of commitments to quality in
higher education. Because you can’t always pretend that everyone is in the same place
as it were or that they have the same understanding. And I think that the issue we are
trying to engage private providers on is what’s the balance between this being an
educational institution and a commercial institution. You know how do you think
about quality in relation to those different kind of imperatives. But of course you
know the public sector is also privatizing to a large extent…. They are also looking
for their market share of students and so on. So you know in some respects you can’t
make this clean distinction any longer between public and private service providers.

**What do you think are the key conditions for successful implementation of the
HEQC’s QA system?**

Well you know it’s both internal to the HEQC and the external environment as well.
For the HEQC internally clearly it’s making sure we have a budget that will enable us
to implement the system but also you know the staff capacity development issues
have to be taken on board as well. We must have the staff and staff capacity to do
this. And then externally we would very much like to see the planning for QA-
which is the argument we’ve been making from the start of our one day visits -
inserted much more concretely into institutional planning and resourcing. Private
institutions quite rightly will say that now you’re asking all of these kinds of things,
where is the extra money going to come from? And as you know many institutions
have set up new QA units and very often they have only one struggling individual
sometimes trying to do the job half-time. So there are issues of resources and capacity
at the level of institutions as well. And then I think just ensuring that all the
complications around the mergers and the restructuring don’t delay the QA process.
And also that they are also separated as issues that come from the DoE and not from
the HEQC and the CHE. You know we sometimes get caught up in some of the
complications around other national agencies and other national actors. And I’m not
sure that we can completely avoid this - it’s simply that we need to be very visible as
the HEQC, we need to be very clear about what our objectives are and how they link
to the objectives of other players but how they are also sometimes separate and
distinct. So you know it’s these kinds of things which I think are going to be quite
difficult. And for me the really important thing, as you know I’ve said before, is how
do we make sure that we get the benefits of quality assurance and not the worst horrors and nightmares of quality assurance. You know we must avoid bureaucratization, and the compliance approach. Because I really think that particularly in terms of teaching and learning you know there are huge challenges facing the institutions, particularly in a context where restructuring takes attention away from the core functions of higher education. So from that point of view I’m hoping that the QA system can keep attention on the core functions. But how to do that without the added layer of bureaucracy, the added complications, the added sense of burden, that people are on about? And then the thing that I should have mentioned which is both an internal and external requirement is the development of reliable management information systems because we are not going to get very far both internally and externally unless we have this capacity. We won’t be able to judge improvement and progress without reliable information. And we all know it’s not just about the gathering of data it’s about the sensible gathering of data and the sensible use of data. How to use the things that you gather and not just accumulate a lot of data? Because we won’t be able to make judgments and we won’t be able to judge improvement unless we have reliable information…So I think that’s going to be very critical.

What do you believe to be the mechanisms that will really effect change in everyday teaching and learning practice in HE institutions?

Well the audit and accreditation criteria will obviously concentrate the mind. But there are a number of signals from above from senior decision-makers and resource allocation that indicate serious commitment. And it’s not just about policy documents obviously, it’s about making the resources available and it’s the visible monitoring of teaching and learning practices and related things. So it’s a whole range of things…and real things. So I think that the institutional planning platform is going to be quite critical which includes resource allocation and identifying people who are responsible for these areas.

And then I think the issue of acceptance is very important because I don’t think you can just instruct people, just as I don’t believe you can just legislate quality from the HEQC in Pretoria. You know similarly HE management can’t just legislate improvements in teaching learning practice. So we have to provide incentives, good teaching awards and those kinds of things.

Development and training opportunities for people are also important. But you know I really would like to see these workshops feeding more concretely back into the institutions because otherwise it’s only strengthening individuals or giving individuals a good sense about themselves, it’s not building the institutional capacity.

But I think certainly it’s getting the balance right between the carrot and the stick but I think much more carrot in relation to teaching and learning - you know I don’t know how one does that in an environment where everyone is tired. How do you get people excited about teaching?

How do you get students to get excited about it? Some one made the point in the workshop about student pressure. Of course you’ve got to be very careful that this client mold - where students proclaim that they’re not happy with something – doesn’t
take over. They should be aware of their rights, and I think that clearly students are becoming much more aware of their rights in terms of quality - but also on their responsibilities. They need some means of comparison, how can they understand good teaching and learning practice? But I would like to be a little more optimistic about students, they should understand that it’s a hard world out there that they have to go into and they should want to equip themselves as best as possible.

I think also we really need to keep putting pressure on the professional councils via these MOUs. We really need to get them committed to teaching and learning and pedagogy and good teaching practice. It’s not just about the registration of practitioners, if they want an increased role in quality assurance then they will have to have some decent views on teaching and learning issues. We’re also hoping that some of this kind of stuff will get into the SETA discourse, and that’s going to be quite a challenge. You know we use different discourses - we use the discourse of registration of practitioners or training but people don’t recognize teaching and learning as being at the heart of all these different discourses. So if we can create a common discourse around teaching and learning. And of course it would help enormously if we could tap into the Skills Levy.

Finally I sometimes wonder whether things like having a role model would help. Would it not be nice to have some of your senior managers put in to teach courses. It would send a good signal especially if they participated in some of these teaching and learning workshops and agreed that they needed them and found them useful. Decision-makers play such an important role. If DVCs (Academic) were there, people would come and the status of teaching and learning would be elevated.
What has been the general response of the HE community to the Audit Criteria Discussion Document?

People think things are becoming bureaucratized, but what does this mean? Do they think the criteria are unrealistic? I will present the HEQC’s response at the QA Managers Forum this week – we had to go back to the Founding Document where we spell out a ‘fitness of’ and ‘fitness for purpose’ understanding of quality. At the same time the system is not integrated – we have to work towards a unified integrated system.

Are there any substantial changes that the HEQC is likely to make as a result of the responses?

What are these? Why is the HEQC accommodating these changes?

If not – are there any major responses/ concerns that the HEQC is ignoring?

Why?

See my response at QA Managers’ Forum.

What do you think are the key values that underpin the HEQC’s work?

To what extent do these values differ from those of typical academics?

Our goal is to move the whole system towards a self-managed and self-regulated HE system with internally driven QA systems. We have to do this for both sectors, remember that quality is the only driver that deals with both the public and private sectors – it is the only driver that can work towards a single, coordinated system. We can’t separate the public and private sectors because of political pressures – in fact it would be against the Constitution to do so, we could be taken to court for treating publics and privates differently. Furthermore the push through GATT towards creating free-trade for HE goods and services means that there is global pressure on all developing countries to allow private provision. QA is the only legitimate barrier that there is to hold this process in check. We can’t have different public and private regimes. On what basis should privates have a tougher regime? This means that we can’t take a development driven approach, privates will then simply cherry-pick and students will get hurt in the process. There is a double jeopardy for students who enter private provision. Firstly the nature of the qualification is often lousy, e.g. these are usually commerce or IT qualifications yet they provide no worked-based learning, no e-mail or internet connectivity and no links to the labour market. They have dubious entry requirements and are cheap, but don’t lead to jobs for students. Secondly, private provision is pre-dominantly in the IT, business and management sector (which is cheap to offer) and which skews the HR development of SA. This doesn’t add to the productive capacity of the country and is not where we need development. As a result students often remain unemployed after getting these qualifications. An example is De Montfort College with 500 students and only 1 full-time staff member. The consequence is that HE becomes devalued in the labour market and from the outside we look like a banana republic.

We therefore need a strong accountability regime. Even in our very good universities, not all the requirements are met, because we have defined quality as having academic standards and as promoting equity. These institutions often fail to satisfy the ‘fitness of purpose’ criterion. So again quality becomes a policy driver. So from an accountability point of view both our strongest and our weakest HEIs don’t deliver on our construct of quality.

We can’t go on endlessly doing development work from no baseline. Then those with no quality will be let in and those without equity will carry on – we can’t give them 20 years to
get there, students are suffering. There is no trade-off between equity and development, this is only in the minds of academics and QA managers. I know that the pragmatic QA in HE literature says that there is always a trade-off between accountability and improvement. This may be true in developed countries such as Holland, where there is a well-established system without huge social disparities, here QA just keeps the system on a continuous improvement trajectory. So don’t underestimate the nature of society and how it differs in the 1st World. We need to understand the context of quality and the meaning of ‘fitness of purpose’ for our context and once this is established, then design instruments to measure ‘fitness for purpose’. So we first need to deal with transformation and inequality and from there move the system towards self-regulation. So we will start off with a system that needs strong external evaluation as an important tool for measuring and getting minimum standards in place. We need a QA system that emphasizes the duality of accountability and development and their inter-relatedness. We will do development work, but people must first do self-evaluations repeatedly, leading to a culture of self-assessment and ultimately towards self-accreditation. We will measure everyone with the same yard-stick from zero-based assumptions. We will build a legitimate system based on the same criteria, and then later leave it to run itself.

Do you think that the HEQC’s approach to linking audit and accreditation is going to work? What will it take?

We can’t grant self-accreditation based on an audit system alone. We will need other evidence which we will get from applications for accreditation for new programmes, national review data such as the MBA review, (we will have touched on every major domain within 5 years and give us a sense of all Faculties in the system), audit information, including 5-yearly programme evaluations and also the planning information from the DoE. This will all be processed into an integrated portfolio which includes a further self-assessment on the quality of the HEI’s QMS. This will then go to a separate Accreditation Committee which will conduct site-visits. It will look for evidence of the effectiveness of the self-evaluations. This self-accreditation system will begin in the second half of the first 6 year cycle, i.e. from 2007 onwards.

What do you believe to be the mechanisms that will really effect change in everyday teaching and learning practice in HE institutions?

Our programme accreditation criteria will be very important for really getting to grips with quality at the chalk-face. Here we have stated what are the essential ingredients, the minimum standards, what is absolute for guaranteeing quality. We have 63 criteria, we tried to trim them down, we will try to bring them down to about 40. Yet the distance education people wanted us to add more and at our staff meeting, after complaining about the length, people added 5 more! From our experience of working with private providers, I know that we have to be very explicit about the basis for our judgments on quality, they want to know the bottom-line and won’t hesitate to take us to court. So we have to spell out in the basics in tangibles. Private providers will apply our criteria literally and if we don’t specify something, they won’t do it.

With respect to specifying good practice, I don’t believe that context is king, this leads to relativism. We now have a massified HE system and we need a reasonable way to deal with it. We don’t want over-regulation and we can’t have laissez-faire. The regulatory framework must be linked to the basic purposes of HE, i.e. good T&L and research and community service. There is a consensus on these, if you have all 3 you must do them properly. We will use peer review, both academics and people from the labour market. Remember that
academics are not the only stakeholders in HE, there are also students, the market, employers and society. We have to act on their behalf as well.

**Guides:**

To what extent were the Guides useful in writing the criteria for audit? for accreditation?

Yes, they were useful, Jan and Herman both drew on them extensively in writing the criteria. They gave us a stock of material and parameters to work from, they gave us a framework and a starting point. We had to work out what were the permutations to get minimum thresholds from good practice descriptors. Although the IT&LP was driven by university types, the products are not necessarily linked to that context, they are applicable across the board.

**What are their shortcomings?**

Their shortcomings were a result of earlier problems because there was no clarity on their purpose. The IT&LP got confused about what was the HEQC’s purpose. Mala had been informed by reading and the international literature when she initially set up the project with you to work on the improvement trajectory. It was only when the reality of the system started confronting us that suddenly we realized that we had to re-think our earlier positions, so the debate was shifting. I was working on the accreditation of privates and I warned Mala against taking a warm fuzzy developmental approach. John didn’t want me to intrude in the audit deliberations and as a result our work had become compartmentalized. We then realised that the system was complex and had to be integrated. Mala and Sheila had originally wanted a developmental, audit-type approach and this was latched onto by the QA types, including the IT&LP Working Group. But we had to change this, I opposed this approach arguing that we couldn’t go on indefinitely trying to improve the system. So while these changes were happening internally in the HEQC, the IT&LP was working with AD and Staff Development types who have a voluntarist notion of change, who want to win over people gradually through an evolutionist approach. I saw the original proposal with case studies, action research and grounded practices approaches. I thought this was all airy-fairy stuff and that it wouldn’t work. The group was too scared to generalize, they should have been bolder and stated up front what are the good teaching theories. They should have been bolder on good teaching practice. The philosophy of the IT&L WG was causing fuzziness within the HEQC. There was emerging pressure on those developing criteria for accreditation to produce hard criteria. We needed to get these out of the IT&L WG, but it was hard to move the group towards a new orientation. As a result the product they produced was mixed. But despite their irrational behaviour, what the IT&LP WG did do was to build a sense of community with HE people and it showed people that the HEQC is serious about T&L. I’ve had discussions recently with Ian Scott (one of the WG members) and he now acknowledges that the accreditation criteria have finally put teaching and learning at the center of HE concerns, AD has finally been mainstreamed. So the issues for the AD community have now moved from development to QA, thanks to the accreditation approach.
In what ways can I improve them?

I’ve recently had discussions with CACE on the importance of understanding the actual social context from which students come and on what it takes for them to learn. I taught a UDW when it began opening up to African students. They had huge language and conceptual difficulties, but were strong on political activism and on cooperative learning and on oral work. So I had to find a way to build on this. I had to shape the context of the class – so I held ‘meetings’ with them rather than classes and they learnt through this mode.

So what does this mean for editing the Guides?

Try to build in what we have learnt as South Africans, what it means to teach in large under-resourced classes with diverse learners. This pedagogy should be surfaced. We need generalisable norms, but try to bring the context of our learners to the foreground, CACE is doing a lot of this. An important point of departure is the stimulation of innovation.

How do you suggest that they be revised to complement the audit and accreditation criteria documents?

Don’t worry too much about that, we will check for inconsistencies.
What has been the general response of the HE community to the Audit Criteria discussion document? Are there any substantial changes that the HEQC is likely to make as a result of the responses?
What are these? Why is the HEQC accommodating these changes?
If not – are there any major responses/concerns that the HEQC is ignoring? Why?

I have some general idea but we have to look at the actual summary of the responses. It would only be from memory, which isn’t very reliable, but I’ve got some general ideas.

Ok. Do you want to say what they are?

Well, one of the responses is that they (HEIs) can’t make a judgment until they’ve seen the whole audit process. But actually that was mainly the response to the audit framework document. We now have to align all these documents, so they talk to each other and that’s what’s happening now. The response to the audit documents is that they think we’re a bit ambitious in the depth and the scope, even though we’ve limited the scope to teaching programme development and review and assessment and research. Yet within that we’re still too ambitious. We may well slim those down. So that’s quite an interesting response. I hadn’t foreseen that because I thought already it’s leaving out very large areas of institutional functions. With other responses, what you have to do is separate the responses which have to do with flaws in the document itself from real issues. There are many flaws in the document in terms of its presentation for example it didn’t explain that the audit wouldn’t involve going to every program and department, it would involve a sampling for evidence at most, and that wasn’t clear in the document. So some of the institutions responded in quite a mistaken way to straw persons. And so you should separate those responses from the substantive responses based on a real understanding of the document.

Just one further issue, I was interested in was service learning, because that became an issue in the SAUVCA debate.

This was another flaw. There was no definition. We sort of wrote a few and then we hadn’t decided on one and so that got left out by accident.

And are you keeping it in there as an important indicator of transformation?

On one level we are saying if you have it you must do it well, show us how you do it well and how you know you are doing it well, and on a second level we are not saying you must have it everywhere but if it’s in your mission, why are you not doing it? Thirdly, recognise its potential for building values, citizenship, relevant research, because there’re all sorts of spin-offs of service learning, if it’s well-done there’s also the research component….So if you see its benefits do you plan and resource it properly, do a proper environmental analysis of where it could work? It is already built into a whole lot of programs, from medicine to architecture, but it’s built in in different ways in technikons and universities. But we are saying it is on the national agenda, it’s important to have it there, but not to say it’s a ‘must have’ at this phase.

What do you think are the key values that underpin the HEQC’s work? To what extent do these values differ from those of typical academics?
Our values are those in the White Paper around the transformation of higher education. We work within the national policy framework. We want to see that we have a consistently good higher education system, you know, with people striving for excellence that at least will achieve a minimum level of quality so that students aren’t cheated. That will serve the national interest as recognising the major national policy goals, including goals such as the national human resource development plan. Also to help steer and position the higher education system using quality as a lever with respect to the international trends that we’re at the mercy of. Otherwise we’d be at the mercy of globalisation and be swamped by very dubious foreign and private providers.

We talked earlier about the tensions between development and equity. Do you see these as tensions or do you think it is possible to hold them together?

Yes, it is economic development, equity and democracy. And those are not necessarily related. You could have equity without democracy. So you could say the Nazi party did quite a bit for equity in Germany – once they’d slaughtered off all their opponents...And democracy and development certainly don’t go together. In fact the Asian tiger phenomenon clearly demonstrates that a state’s answer to capitalism is very effective but democracy is compromised. So the point is we’re attending to all three at the same time, which is historically quite unusual it’s a tall order.

Are you happy with working within a received transformation agenda? As you say, it’s already been defined in the White Paper and the NCHE and in the Higher Education Act. Is that OK, or is it problematic for you?

The HEQC is an independent statutory body and it’s adopted the White Paper as its policy framework, but naturally you then need to interpret and develop and revisit and look into it as different contexts evolve. So the HEQC has an independent voice in that respect. And it is developing its own policy documents and discussion documents, where it’s involved in expanding the transformation vision in relation to other actors in the system.

So you’re saying that the HEQC has this space to develop and extend policy, despite the fact that you are funded by the DoE.

Our funding comes direct from the treasury and at least half of it comes from donors and quite a chunk from private provider accreditation. But now we’re in a development space. The donor money is rapidly drying out. Once we’ve passed the development phase, the donor money will dry up, they made that clear.

Do you foresee any potential clashes between what I’d call typical academic values and the values that drive the HEQC? Where do you think there is going to be value conflict in the HEQC’s work?

I don’t think the academic community is monolithic. I think the values embedded in the HEQC work have expression in many places in the academic world. There are multiple agendas in HEIs and academic values are multi-layered. So, it’s like a hidden curriculum. I counted with my 1st year sociology students at least 6 hidden agendas. You know, dagga – workers had theirs, the politicoss had theirs, … So there were a number of hidden agendas. And some were aligned with the state’s while other’s were aligned with the opposition. So, similarly, academic values are many-layered. I think that there are powerful general perceptions which the majority of academics cluster around quality assurance. This is one of the biggest challenges for the HEQC - to help academics involved to get beyond the perception that we are simply an added burden. You know, they need to see quality for what it
is, in its global context. For example, they don’t realise that in fact the IT department is failing because several of their colleagues are moon-lighting and running a private provider down the road.

**And the whole issue of academic freedom? I think that viewing QA as a threat to academic freedom is one of the typical powerful perceptions that you mentioned. How do you think the HEQC is going to address this issue?**

I’ve been thinking about this and I think that probably some research needs to be done to identify the real threats to academic freedom versus the encroachment on academics’ time that QA requires, this is what mostly upsets academics. The majority of people I speak to have time constraints because of the dual pressure of teaching and research and family and having to make an extra buck doing consulting…Which is actually in itself an interesting issue. You know if you compared the actual life of an academic in South Africa against international benchmarks you would see that they don’t work that hard. They have long holidays, which are not in other countries, that kind of thing. But they fill their time one way or another and for us to encroach on their time upsets them in a number of ways. They are then annoyed and call it ‘a threat to academic freedom’, but in most cases I think that they’re annoyed because of trespasses on their time. And they cloak that with some shallow notion of academic freedom. Of course, some genuinely link the whole quality thing to a notion of the state interfering in some profound way with their freedoms. That’s another category of academics. And they’re writing papers about it and that we have to focus on intellectually.

**And linked to that, John, is the issue of a conflict between ‘fitness of purpose’ and ‘fitness for purpose’. I don’t know if that came out in the responses to the audit criteria, it was a big issue in the SAUVCA workshop?**

Well, we’ve evolved our own understanding on this. We clearly now see that ‘fitness of purpose’ should be upfront and open, recognising the political economy and the social roots of our education and the social context. But, even more than that, the global context. If we had a *laissez-faire* approach to ‘fitness of purpose’, we would fail on two counts: a) we would not have paid attention to national goals for the system – there’s a new democracy and there’s the desperately underdeveloped schooling system and b) we would be at the mercy of international and globalisation forces. If we turn it around and develop a high quality HE system, we could then give a boost to economic development by bringing in foreign students and exporting our education, rather than being at the receiving end.

**OK. So you feel that the HEQC has conceptually managed to keep these two approaches together.**

Yes and this relates also to accountability and development or improvement. As with ‘fitness of’ and ‘for purpose’, to dichotomise either of those two sets of theorems is unhelpful. The HEQC Board has discussed this and they now see these things being inter-related and not dichotomies, as strengthening one another. But they’re under-pinned by a set of values that the HEQC shares with academics and with the government. We want a diverse system, we want innovation, we want universities and academics to take the full responsibility for quality and not have it imposed…So these are all fundamental. But that doesn’t mean that the system isn’t strategically steered or that systems should be put into place and developed to support quality learning and teaching and research. But people want to counter-pose those things. It’s like centralisation is being assumed when you can devolve and co-ordinate and manage without necessarily being centralised.
Are you confident that the HEQC has sufficient resources and capacity at its disposal to run institutional audits and to accredit programmes across the system – as it is required to do by law?

Do you think that the HEQC’s approach to linking audit and accreditation is going to work? What will it take?

Well, that’s precisely why we have a different take on the ‘fitness of purpose’, because we’re not Australia and there, there is hardly a private provider. And all their universities more or less have quality management systems in place. Whereas here we have vast disparities in resources and quality, within the public, within the private and between the public and private. So the same thing applies to ‘fitness of and fitness for purpose’. We’re saying there’s a need in South Africa for much harder accountability because you must either accredit a programme or not. The audit will be largely developmental but still a strong accountability exists. And to answer the resource thing, I think if we are clever and share information between the 4 systems of audit, accreditation, national evaluations of programs and self-accreditation - by cleverly relating them we could streamline the system and make it much more efficient. Now what’s interesting is when we started talking about this 2 years ago, the international trends were the other way, you know, towards a ‘(light-touch?) developmental approach. There’s now a great interest in our system and many more countries are beginning to look at accreditation.

Really? I remember Graham Webb saying exactly this time last year that audit should be developmental and only look at systems, it shouldn’t look at quality per se and that this is a totally different philosophy to accreditation, when you judge quality per se.

Well that’s a wrong perception. I think he agrees that you need evidence to test the systems, and that evidence must come from the actual operation of those systems. So it must ‘taste’ the quality per se in order to come to a proper judgment about the system. But you do so in indirect ways. So if an institution says they use external examiners in a certain way then you might ask for the minutes of the meeting as an example. But you can’t make a pronouncement that the quality of their 1st year courses is good, rather that their management of the external examiners is good. You have evidence, based on actually looking at the quality of the operation, that the indications of the systems are good.

So you’re saying you do need to test the quality per se in order to do a good job of auditing an institution?

Ja. That’s why the SAUVCA QPU collapsed, because they clearly backed off that and then came a-cropper on one university, which spectacularly failed after a positive audit report. That killed them because their whole system was then exposed as being without a proper foundation. But then the trick is to make the institutions partners in the process instead of opponents, so they themselves want to be rigorous and look at evidence. Without that you’re really batting on a losing wicket.

What are the key conditions for the successful implementation of this HEQC system where audit and accreditation are linked?

One condition is that we win over the academics and the institutions so that they see the value of doing QA and they understand the value of consciously planning for quality improvement. The alternative is that you let a student in, you don’t actually worry about the quality, then it’s
up to the student to make his way through the system, and when the student fails, you take no responsibility for this …And you blame the victim…

**How do you think the IT&L Resources have/do contribute/d to the HEQC’s suite of policy instruments?**

QA by the HEQC is one of three mechanisms for steering the HE system, these are planning, funding and QA. But note that QA is the only mechanism that deals with both the public and the private sectors. Then the HEQC has developed 4 instruments for its QA system. These are: audit, accreditation, national evaluations and self-accreditation. The IT&L Resources have been very important in the development of this system. Firstly they have contributed to a growth of the HEQC’s understanding of what quality is, and so the discourse around the content of quality has become richer. Secondly, they are a tool for institutions to use to build their internal quality systems and to refine their self-evaluation instruments in line with the HEQC requirements. Thirdly they will impact on actual quality itself, leading to better designed programmes, assessment systems, etc.

**What specific further developments do you plan on the IT&L Resources?**

I announced at a planning meeting recently that we will go back to our original plan of putting exemplars on a web-site. This could be interactive and could have strong links with international groups. We would need a template, annotated bibliographies, a list of contact people etc. linked to the good practice exemplar. This would require staff, editing etc. I’m not sure how sustainable this is, we are dependent on donor funding at present. We want to institutionalise the HEQC so that is becomes based on government funding, quality promotion is a statutory requirement and so must have government funding.

I would like to set up a mechanism for monitoring the use of the IT&L Resources – via interviews, Quality Assurance Managers comments etc.

We also need a community of people to fill in the gaps in the Resources. I would also like to start debates and activities around each of the focus areas of the Resources, e.g. a take one area per month and run a conference on assessment.

Of course we haven’t yet finished processing all the data we gathered from the workshops, this will add to this list.

**How do you think the IT&L Resources will contribute to improving T&L in HEIs?**

This is a tentative response. I would hope that they will help build bridges between managers and academics leading to more effective interaction between leading to the development of institutional cultures of quality. They can also be used as a checklist that people can use to spot the gaps in their policies and practices, they may find whole areas that are undeveloped through looking at the Resources. I also think that they are particularly important for self-evaluation, they should help people refine their instruments e.g. for the development and review of programmes and for staff development.

**What is your informal evaluation of the IT&L Workshops?**

We’ve run 14 workshops in all regions of the country. In 2 or 3 of them senior managers found them to be underpowered and not useful. But if they stayed to the second day they
seemed to find it improved. After Mala’s intervention we redesigned the workshop and refined the goals to focus on the planning and management of teaching and learning and on getting comments on the IT&L Resources. We also refined the activities to that both managers and academics could benefit. This revised programme worked well, and with the weaker HEIs the old design also worked well. In fact the weaker HEIs are using the Resources more fully as they need help and their AD people tend to have more clout.

What have you learnt from the workshops for your work at the HEQC?

I found it inspiring to work with ordinary academics, not just with AD, QA and management people. I found that especially those from disadvantaged or weak HEIs had very good insights on good practice in their contexts. For example, I have now invited people from Venda to come and address our QA Forum. There was also synergy on the case studies which gave me a window on the range of practices and also on who is doing good work, even the privates had good stuff to contribute. I think that it’s a great pity that my colleagues were too busy to attend the workshops, they were important for broadening our understanding of good practice and for promoting quality. Mark Hay is now concerned to link the quality promotion activities with audit preparation. I was also struck by the difference in sophistication between HEIs, there is potential for the strong HEIs to help the weak if only we could sort out regional politics. Inter-institutional links should be set up, and importantly they should not be understood to be only one way, disadvantaged HEIs have experience in handling under-prepared students. But I also found the arrogance of the strong urban HEIs astonishing.

How are you thinking of taking the IT&L Project, or more broadly, that of your Directorate forward after these workshops?

We’re busy working on the Framework document for quality promotion. A very important component will be a partnership model, we will give national leadership and facilitate and support, but we can only do a small amount of actual capacity development, so we will need to set up partnerships to help build internal quality management systems. We are not planning on bringing in consultants but rather involving the regional consortiums, SAUVCA and the CTP and the Quality Assurance Managers’ Forum. HEQC officials will explain the criteria around say the audit framework and people must then decide how to take these into their internal systems. We will see this as helping HEIs prepare for audit, the IT&L Resources will be held up as a resource to use in this process. So we want a model of engagement and partnerships. We will hold a 2 day workshop with QA Managers to help us design these workshops which will be run on a regional basis. A regional workshop costs about R200 000 as the host institution also contributes. We also hope to establish international links and to get SADC countries involved – Namibia and Mocambique have already asked if they can attend our QA Managers’ Forums.

How do you understand the relationship of your portfolio/ directorate to the other functions of the HEQC (accreditation and audit)?

This is an important issue. Mala has warned me that we cannot become too diffuse in our approach to quality promotion. The real basis for our existence is to support the other Directorates, so our relationship with the other Directorates and their functions is key. For example we are responsible for auditor and accreditation evaluator training. We need to be clever and use our limited resources well by working with the other Directorates and by developing intellectual leadership around quality and on teaching & learning, e.g. on institutional QA systems, programmes and good practice in teaching and learning. The HEQC is strong in its ability to do this. We want to provide leadership to enable people to meet and then go beyond our minimum criteria. For example, say an Engineering programme in an historically white institution does not take experiential learning seriously, we will now give
muscle to some one on the programme to do so and so to develop transformational things, to make quantum leaps towards transformation.

**What is your ‘theory of change’ with respect to assisting institutions to improve the quality of their teaching and learning practices?**

Firstly leadership and building the capacity of leaders is very important. We need to provide the environment, conditions and resources for them to take transformation forward. We must create an environment in which they can institutionalise good teaching and learning practice. We are also going to start a student literacy project on quality. We want to empower students to understand what they can expect from their institutions in terms of quality. We also want to engage practitioners. So both top-down and a bottom-up strategies are required.

Secondly for change to happen the external environment is a critical factor, you can’t have revolutionary universities in an apartheid context. We need an open system, you can’t starve HEIs of resources e.g. by only funding applied research. The HEQC will feed its observations from QA activities to the CHE which will then advise the Minister of Education. But we do need to have a distance from the DoE.

Regarding transformation, different groups will have different interpretations of what this means. We take our meaning from the White Paper, i.e. broad national goals as laid out in the WP such as contributing to an economically strong competitive nation, developing a responsive and meaningful HE curriculum and contributing to social justice and producing critical citizens and contributing to the public good. But all of this is expensive – because transformation must be linked to the curriculum, e.g. the development of service learning. Teaching and learning has its critical side, e.g. one could push the notions of deep versus surface learning (I know AD types would like this). But we also need good solid subject teaching across the country, the system would then be effective and produce people who are technically competent and knowledgeable and this would result in the economic transformation of the country. If you add critical thinking and citizenship to solid teaching we will get the transformation we want. But this won’t look after equity. Black kids need access to a decent basic undergraduate education. So check-lists such as those in the T&L Resources won’t be a bad thing for weak HEIs – to hlep them get their core business on track. But of course all this is difficult to implement in the context of the mergers.
We will focus particularly on the Audit Directorate. Firstly then, how have people responded to requests to become auditors and how have they responded to the actual process of auditor training?

We received probably close to one hundred nominations mainly by institutions for their members to be proposed for auditor training. In July this year, 2003, we trained fifty auditors. The response of the auditors was very enthusiastic, very participative and keen to understand what’s at stake - the high stakes of building one integrated, co-ordinated higher education sector. The pilot auditors were likewise very enthusiastic and keen and there was a tremendous response, commitment and dedication from them considering that there’s no remuneration - it’s purely their participation for the public good. They had to read enormous amounts of documents and then spend between three and five days - I would say between 14 and 18 hours per day working on the pilot audits. So there was tremendous responsiveness from our pilot auditors. And they acted very professionally in the process. We’re still waiting to see the impact’s it’s had on the institutions and the responsiveness of the institutions. There were three pilot institutions. From our side there was a very positive response. They really co-operated in providing documentation, making members of the institution available for interviews and so on. But we have to wait and see from the researchers we have employed what the impact has been on the institutions that were involved in the pilot audits. Of course we need to remember that the pilot audits themselves have no immediate consequences simply because they are pilots. And so the stakes were not too high for institutions, apart from possibly their own pride and reputation as an institution.

Did you notice any distinctions between institutional types in terms of responses to the pilot audits?

No! No there were no notable distinctions in terms of responses. What was notable was the varied approaches to the same reality. All three institutions prepared very different portfolios based on their self-assessment. And all three responded in various ways. But I think this simply reflects the distinction between a technikon, a university and a private provider and their different missions as institutions. And that’s where the value of the criteria lies. The criteria provide a common touch base for all institutional audits.

Can you predict at this stage to what extent the proposed audit criteria worked as an instrument? And what sorts of changes do you anticipate will be made to the document?

Our impression is that the criteria are relatively comprehensive but in terms of running an audit we will have to be creative about the ways we use the criteria and possibly collapse some of the criteria. We will aim to reduce the number of criteria to make the audit more manageable in the long term. But remember that it’s a developmental process and therefore you don’t want to eliminate too many of the criteria in the beginning because of the potential benefits to the higher education sector as a result of giving institutions the opportunity to interact with the criteria in a formalised manner.

In terms of HEQC policy formulation was there anything else that the pilot audits threw up?
The frames of reference are essentially in place. The strength of the HEQC has been that we have been careful to do two things. One is to consult widely with the sectors, to engage people and to engage the different stakeholders of the sector. Secondly the HEQC has attempted to have a sufficiently intelligent philosophical and epistemological basis on which to found its quality assurance system. One that avoids being too technicist or too mechanical or too bureaucratic and with a deep appreciation of the complexities and challenges faced by higher education institutions. At the same time we’re trying to raise the bar generally with regard to quality assurance.
What has been the general response of the HE community to the Proposed Criteria for the HEQC’s 1st Cycle of Audits?

My impression is that there is a general acceptance of the criteria as being in line with international practice. But there are problem areas, especially in the level 3 criteria. The main area of contention is the ‘fitness for purpose’, versus the ‘fitness of purpose’ debate. But I think generally the document’s acceptable with certain reservations.

Are there any substantial changes that the HEQC is likely to make as a result of the responses? What are these? Why is the HEQC accommodating these changes? If not – are there any major responses/ concerns that the HEQC is ignoring? Why?

Well, I think the HEQC’s response is that they don’t agree with all the comments and all the criticisms. I think as far as Level 3 is concerned, they might want to look at the re-formulation of some of the criteria, but I think they regard this level as quite important – that there should be a Level 3, especially with a view to self-accreditation, because a substantial part of that decision will depend on the audits, together with program information. So, if one scaled down the Level 3 criteria our information source for self-accreditation judgments becomes weak. So, I don’t think there will be substantial changes. I think it will be basically left to the secretariat to look at the formulation of the criteria, at the definitions. But I don’t think the basic philosophy is going to change. The whole idea of tasting quality as well as just looking at the quality management systems is quite strong in the audit philosophy. This is the whole point of the Level 3 criteria. We may need to take some of the actual judgments about quality itself, not quality assurance, out, but only to a certain extent. But one would first have to see how much of it is directed at quality and how much at quality assurance. But I’ve had a look at it again, and there’s some truth in that observation. Some of it is quality. I also think there’s stuff in the Level 3 criteria that belongs on the accreditation side. I think some of the criteria could go across to accreditation. I think it will be very useful, before we send out the programme criteria, to actually weigh up the two types of criteria and compare them, because I think it’s part of an integrated system. And I think it’s much easier once you’ve got those two sets to actually compare them.

Also we must remember that the universities are not used to being scrutinised, as you know. I think the technikon people have had it for years. But we’re talking about the reaction of the institutions today. Did you know that the HEQC Board recently approved a phased in approach. No existing programmes will be accredited for the 1st 6 years and merging institutions will only be audited from 2007. So this should help acceptance of the HEQC’s policies.

What do you think are the key values that underpin the HEQC’s work? And then after that I’ll ask whether you think there is a conflict of values between the HEQC and academics.

Well, I think one of our starting points was that criteria should be embedded within the national policy framework, and I think that’s what we’ve tried to do. So that the document relates to stuff like transformation, articulation, improved access and all that - all the
principles of the White Paper, the Higher Education Act and all the relevant policy documents. Also, the policy documents from the Department of Labour and the SAQA documents. So it’s not just educational policy documents. But the whole starting point was saying that if you develop criteria they have to be firmly embedded within the whole national policy framework, as far as it relates to higher education specifically. Now of course one would have to see whether we were successful in that. So I think basically one could take the key values in the SAQA documents, the principles of SAQA, the principles embedded in the White Paper and the National Plan for HE - our starting point was really to frame it within that context. So I think that in short I could say that the key values of HEQC’s work would be those that are derived from national policy.

To what extent do these values differ from those of typical academics?

Well, I think the typical academic is a subject specialist. So, I think that type of person is involved in promoting his own field of study, doing his research and that type of thing. I think many of the national values of course border on the political side. So I would think that the typical academic wouldn’t necessarily be interested in the transformation type of thing, in widening access and all that. I think it would depend on the person’s political disposition. But I would think that the HEQC has a much broader type of transformation agenda. I think a typical academic, as a subject specialist, would not necessarily be adverse to those principles, but maybe they wouldn’t be as much in focus as they are in the HEQC’s work. For example, we’ve got certain things in the criteria that I spoke to Prem about. For example, if one talks about through-put rates, we just took it over from the DOE, saying that they’ve got to have these percentages. I said to Prem maybe we should just think about it within the confines of one institution, that one should formulate it in a way that it is related to quality or academic standards. This type of thing could mean that the normal academic regards the HEQC as a real nuisance. But other academics will say, no we’ve had these things for years. I think that that will be the attitude of the really good ones. The others might be a bit scared.

Are you confident that the HEQC has sufficient resources and capacity at its disposal to run institutional audits and to accredit programs across the system – as it is required to do by law?

This is a difficult question. Saleem said to me at the Christmas party last year that they were going to advertise eleven more posts in the HEQC. I think that is part of the answer. I think they realised themselves that they haven’t got the capacity. I think a lot of progress has been made, but I would think they need more people that are very competent, because it’s a big system. It was interesting – I don’t know if you know, I spent a few years at SERTEC, about 5 years, and that whole programme accreditation system, which comprised 15 technikons and 12 colleges, was run by 4 people. 27 institutions and 4 people. And it was programme accreditations on a 4 year cycle so it’s a lot of site visits. Look, there were many problems, I’m not saying it was a wonderful system, but I’m just saying, I think if you have a few people who really know their job it’s amazing what you can do. So I think if you can develop your internal mechanisms to a very high degree of efficiency, it could be done with the number of people that we have here. But, I mean, many people here are on a steep learning curve, so at the moment I think you need more people. When I got to CERTEC it had been running already for 9 years, so it’s a totally incomparable type of situation. But once things are running and you’ve got people who really know their job then it’s different.
Do you think that the HEQC’s approach to linking audit and accreditation is going to work? What will it take?

This link is not a very deep link, because what happens is, they basically keep the two systems apart. They only come together in self-accreditation. So it’s not an integrated system, the elements aren’t shared. Of course the audit and the accreditation systems should be complementary and at the moment with the audit criteria, you have some program relevance in there as well. But I think it’s basically linked only at self-accreditation. There you’re taking information from two systems and you say, ok, if you self-accredit an institution, what information do you derive from the audits? What do you derive from program accreditation? The audit trails may be one of those areas where you have, let’s say, systems that become more closely related. But we’ve talked about audit trails and one of the problems is to identify certain areas, it would still be at a very general type of level. It won’t go down deep into the program level. One of the problems is, of course, that if you go and do an audit at an institution, and there’s a possibility of doing audit trails, it actually means in practice that everybody in the institution has to be on the alert, just in case they want to go into that programme. I think the latest thing that I heard from Prem was that even if they identify areas for audit trails, it will be at a very general type of level, it won’t really go into the programme aspects. That’s the way I understood it. But I’m not sure. I’m really uncomfortable with audit trails. Not that it won’t be useful, but just on the practical reality side. I would think, you know, if one does an audit and if you identify an area you’d like to explore, I said to Prem, well, why don’t you just tell the institution, “Listen, we’ve identified this area”, and they need to give you more information, and give a kind of rationale for what they are doing about it. So that you don’t have to investigate it on the day of the audit. So it’s a practical type of thing. So basically I would argue that with audits you identify problem areas. And subsequent to that you follow up on certain things, but not as part of the audit.

Ok. So the implementation of audit trails are still a bit of a question mark in terms of the integrated model.

Ja. I think they definitely want to retain a specific format. My impression is that they aren’t 100% clear about that. But there definitely are ideas about it and there’s no idea of taking it out of the system.

What do you think are the key conditions for successful implementation of the HEQC’s QA system?

I really have little response to that. I would think that it depends on both the HEQC and the institutions. And I think that the HEQC’s documents and the whole communication strategy has to be acceptable – not acceptable in all respects, but I think if the documentation is clear, if the institutions know exactly what is going on, if the operational side of the HEQC is really up and running, I think that we’d make it easier for institutions to accept it. If the communication strategy of the HEQC is developed to such an extent that you portray yourself as beneficial to the system and not a nuisance we need to be seen to be professional and value-adding.

I think for successful implementation on the institutional side we need capacity development, which is partly being done by the HEQC. You know, I think the document that we talked about will give the impression that we don’t want to overwhelm the system, that we are sensitive to the overload of the system - this could make it easier for an institution to accept. And I think, on the institutional side, once you’ve got the QA officers in place and some
systems going it will be much easier to implement. But I think there’s a lot of convincing that has to be done. Capacity-building, quality promotion, all that. At the last Director’s meeting we talked about the communication strategy. You’ve got these things that you want to communicate, how do you go about it? How do you really soften your approach and make your audience receptive?

To what extent does the HEQC have control over these conditions and mechanisms?

I don’t think the HEQC has control over everything. I mean, between HEQC and SAQA and the DoE it’s clear that there are some conflicting things. I think that this shows that it hasn’t got the final control. And I don’t think the Department would ever give the HEQC control because it’s their responsibility. But I think the HEQC has some control over its specific area – it should have that and it should exercise that in a wise way.

Do you think it’s quite possible that the HEQC will be able to do a good job and come out with a good reputation?

I think so. You know, I haven’t been in institutions for quite some time. Before I started working here I heard many negative things about the HEQC. So how will pervading that through the system work, I can’t say. I think the Technikon sector welcomed the HEQC because many felt it was going to be a new and better dispensation after SERTEC. But I think once the visits start they’ll start moaning and groaning. It’s a nuisance basically. I think when you’re in the HEQC you would like to idealise your work as being beneficial and saving the system. But I think there’s quite a different perception on the other side. But I mean many very good academics have been doing their own thing. I think they rightly feel, who’s this quality bureaucrat coming to tell us how to do our job? Maybe it’s not a wise position to take, but I think some people will take note.

What do you believe to be the mechanisms that will really effect change in everyday teaching and learning practice in HE institutions?

Well, I think awareness of what could be done. For example, if one looks at the criteria and mirrored oneself against the criteria, I think it could be useful. I would think that the criteria in the HEQC documents, if they are brought to the attention of the normal academic maybe they would find useful stuff in there. I think if one could convince them that what is in there is really beneficial to what they’re doing, I think that would be the real thing to try to attain. That they believe that what the HEQC does would be beneficial to their teaching. It’s interesting – I read a report from Kallie Strydom. There’s a sentence in there that I’ve often thought about. The sentence says: ‘There’s no proof in any literature on quality assurance that audits have actually improved teaching and learning at institutions’. I think that would be one of the things that one would want to monitor. I believe that the accreditation of programmes is the real test of things. I would like to see whether audits really have an effect. One would like to think so. Apparently it hasn’t been researched, but I would really like to think that there is an impact.
Guides:

To what extent were the Guides useful in writing the criteria for audit? for accreditation?

I think they were very useful and we basically worked from those criteria. I don’t think without out the Guides it would have been possible to produce the audit criteria because it had to be done in a very short period of time. And it was an excellent source of information because you can always refine it, you can always say, ok, this isn’t useful. But I think in general it was a very important source of information. With the accreditation stuff, I had the same experience. I also think that Jan Botha drew quite extensively on them. And I checked those because I was interested in them. What I’m doing at the moment is I’m working through international stuff that I didn’t have time for with the audits. Benchmarks. I just wish I had more time for that. But I’ve got a huge pile of documents. We used the Guides as the basis and then added to them from the international stuff.

What are their (the Guides) shortcomings and gaps?

Well, as I say, I think it’s very very useful stuff. I think when I read it I had the impression that it was university-related and written by a university person. I had the feeling that areas, for example work-based learning and professional programmes did not get adequate attention because of the university context. So in the audit criteria we build in some criteria for those. I wouldn’t agree with the argument that the private providers should be all that different. I would think most of the stuff also applies to the private provider. I mean, if they offer the same types of programmes...So what one had to do when one looked at the Guides was to say, at what level are these formulated? I wasn’t part of that process. Of course Prem and co. had to look at the criteria from an accreditation perspective and say, ok, are we now dealing with the good practice descriptors what is the bare minimum? But I don’t think that’s a shortcoming. I think also in writing the audit criteria, most of what you had was actually very basic stuff. I think there were some areas where one thought, ok maybe this is a descriptor of a high level established institution. But I thought most of what you had there were things that actually should be in the criteria.

In what ways can I improve them? How do you suggest that they be revised to complement the audit and accreditation criteria documents?

Much of what is in the Guides has now been taken up in the accreditation criteria. But there remains a big area where you tell people how to put them into practice, This is the key, you are saying to HEIs here are generic benchmarks and also this is how to implement them practically. As I said, most of the content of the Guides has now been built into the audit and especially accreditation criteria. So their purpose to develop criteria was achieved. But if the Guides could also advise on implementation then they would remain useful to institutions.
APPENDIX 9.8

Interviews with Academic Managers
The macro-question is: To what extent you believe the HEQC’s policy instruments (the two Framework Documents, the Proposed Criteria for Audit and Accreditation, the proposals for self-accreditation, the MBA Review, supported by the Improving Teaching & Learning Resources) are valid, acceptable, feasible and potentially effective?

I got involved as Dean of A. You know A as it’s properly called, where A was has been and still is obviously a key player in it all that as you know what’s happened at B is that we have decided [a] to try to make QA a very wide ranging responsibility so we’re trying to avoid the obvious difficulties of locating it in a very particular unit which then does everything and the thing doesn’t get disseminated properly. So we’re trying to do that. And P’s original HEQC policy was saying it’s everybody’s responsibility. We’re still trying to see that there are three elements that are very important to us in all of this. One is overall executive control and driving and that seems to be the person P so it is a DVC portfolio, we’re trying to make sure it’s properly located there. I think there have been difficulties in practice with how hands on he can be. You know we have felt at A that we would’ve liked him to be more hands on. But it’s probably not realistic. Then the second part is that we do see the actual operation of the QA system as being properly an administrative responsibility of the institution. That is an administrative executive function so it must be driven from there as a properly organised and accountable administrative function of the institution, so therefore that aspect of it is housed in Planning. And the person with direct responsibility for it is the Academic Planning Officer. And the QA co-ordinator falls under her. And they really are responsible for running this. Making sure that things happen but they are expected to call on other parties in terms of the ways the systems are developed and particularly there is the Quality Assurance Working Group. And I suppose formally my role in this came because I was chairing the Quality Assurance Working Group for effectively eighteen months or so. No it’s now reverted, P, when he became DVC and the whole DVC team settled down it was at that point that it was right and proper for the overall QA function to move into C. But there were various transitional arrangements which included my chairing role as Dean of A for that period and that’s how I got involved at this level. And QAWG has representation from the major constituencies including Faculties, a member of A, the registrar. And then A has a strongly developmental role. And if you like, I mean there’s some kind of mirroring here of the HEQC structure itself, where you’ve got the overall leadership of it you’ve got the divisions of audit and accreditation in that sense they are probably administrative functions here. And then I suppose we would see ourselves very much in the role of the quality promotion division. With that kind of function that runs alongside but it’s partly, you know, we see our responsibility as also helping to develop the systems, our own internal systems, rather run them but help to develop them. So A has been responsible, really particularly through Rob Moore and some of my work, we’ve been responsible for putting together the basic QA system at B. Staff development - is still in some flux at B. The overall responsibility for academic staff development lies with another DVC, C. HR is very involved through the Executive Director of HR, Dave Vermeulen and you know at B has had a very arms-length relationship with academic staff development particularly in relation to teaching and learning for a long time, having had a bad history of it. So it was a poisoned chalice which people were not too keen to pick up. Anyway it’s been moving along and last year again as Dean of A I took the responsibility of forming what was then an ad hoc professional development working group comprising A, HR, research, development and the academics association. And we have taken it upon ourselves to develop an agenda for academic professional development - very much linking or trying to link the academics’ careers together. So research development as well as the teaching…stuff and also we are gradually getting into more the development of academics as administrators and as managers… but the idea is to try and link all those things. And we
are now working directly under the auspices of C and building up to a big proposal to Senate in the first half of next year where a lot of these systems will be formalised in many ways for us. We certainly see that quality assurance is very closely linked to our area of quality improvement and development… we see that very closely linked with academic staff development and through its various manifestations. So in fact have just formed a new unit in A, so new that it doesn’t have a name. But it was an informal grouping of people under the Dean’s office, established for a couple of years now which included QA quality development stuff and academic staff development. So it’s now in the process of becoming an independent A unit alongside AEP, multi media education group all those other… units in A.

I’m continuing to chair the professional development working group so I will have some role. And of course there’s Nan, the new Dean as well as the real staff development professionals, Suellen and Rob. And we’ve been given a new post which we will try to fill at some point, and then other people from various areas of A, there are three other academic staff in that grouping. I won’t go into detail now about why, you have various capacity development capabilities in old adult education people and they still do a lot of other stuff as well besides what we would see as conventional staff development… but they will be drawn more and more into that because people from other areas of A will be drawn in, Jeff Jarwitz for example who’s an AEP person but has a lot of skills in these areas. So that’s the structure and it looks a bit messy but in fact I think that we all know what we’re meant to be doing. And now we’ll see it through as we’re rolling out our new programme review, well it’s actually programme come departmental kind of research unit review. So we speak of ‘units in review’ which will be organised on what makes sense, pragmatically. So if the area that’s being reviewed is computer science for example then we would look at, depending on how things work out, if the programme is closely associated with a department, then we would be almost certain to review programme and department together, so all facets of the department. And if there were a particular research unit attaA to that department, it would probably get reviewed at the same time. But then there are big programmes I’m thinking of the MBChB for example that cuts across departments and Schools (the Health Science Faculty does have a system of Schools). So you know we’re quite pragmatic about what we choose as the unit of review. Everything has to be reviewed, all academic units of whatever kind have to be reviewed, once every six years I think… so we’ll come at those pragmatically. And we’ve seen now that A sees its own developmental role in that process as being three fold: a) assisting with preparation for review which will build up to helping us prepare the whole institution for audit in due course. b) And then of course during the review it is possible but not mandatory for an A person to be on the review panel. The review panel is at least 50% external. c) And then we’re thinking an increasingly important role for us would be in the follow up. And that closely links to various forms of our existing work in any case….struggling I mean we need to put all this lot together and in practice we will see if it can work but that’s the idea.

Do you think that the policy instruments that the HEQC has produced so far are based on adequate expertise?

Ja, I actually think they haven’t done badly at all. Given that the caveat that we are at a very early stage on this. I’ve no doubt that holes are going to be found in them and so on. We’ll learn as we go along. But generally I think that I found the documents quite reasonably well thought out. And since they are mostly still drafts there has been at least theoretically lot of time for consulting. And since they’re not final finals (nothing ever is in South Africa) it is difficult to make completely summative statements on this. But I must say so far I’ve been impressed with their willingness to consult and generally their stuff has been well produced. There are differences in opinion about things and I think if I have a criticism of it, and the people and therefore the process that’s being evolved it is that, as I think we saw in the IT&L project, I wonder if there’s a tendency to be over prescriptive which comes from, I suspect, the lack of experience of the people who are involved. They seem unable to leave things open and I think that is a difficulty, it shows an insecurity on the part of well, the likes of all of us, really. And I do think that is a little bit troubling and we see it in reflected in many of the
documents. So perhaps an over rigidity which comes from a system that isn’t mature. It hasn’t had the knocks yet. So I’m concerned about that.

Who do you think should have been involved in the HEQC’s policy development process?

I think that a layer of people that have not been dealt with it is the Dean… and to some extent the HOD level. These are absolutely critical levels for implementing policy, for understanding it, for getting on board and I think that by in large we’ve seen people at the DVC sort of level, we’ve found a lot of those involved and then you know people who are interested in the process lower down like QA and AD type people or other professionals. By in large we haven’t seen large numbers of Deans or HOD’s consulted and I think they are still very much out of the loop. They play a crucial role at institutions like this and that I think is one of the big issues that we will have to deal with.

To what extent are the HEQC’s policy instruments implementable in your context/institution? What are the constraints to successful implementation?

Again you’ll appreciate I’m speaking very much from the developer’s point of view. So I would say that generally I do see the policy documents as being really very useful tools for development purposes by-in-large. It seems to me that they’ll really overall help us in our development task. That’s been a very big concern for us all along, as you’ll recall in the IT&L project very, very much a concern. So yes the overall comment is that they are potentially at any rate very useful tools for that. I think there are two constraints possibly three that are themes of everything I’m likely to say. Because, let’s face it, we’ve seen nice ambitious plans before in the system and they haven’t materialised. You know sometimes it can be worse off. Firstly it seems to me that the starting point is that in an institution this there is no belief at the grassroots in professional approaches to their educational function. The Cambridge conference that we were at I thought made a very nice distinction between ‘professional knowledge of the field’ and what they called ‘craft knowledge’. And presumably you’re familiar with that kind of idea. But I think people by in large depend on craft knowledge. It’s not in any way explicitly evidence-based. And because there are many black boxes in it, we tend to have difficulties when things go wrong, in being able to analyse why they are going wrong. So there isn’t that evidence-based professional knowledge. And by in large people are very resistant to and they don’t believe there is a need for professional knowledge. I’m making a general statement but I think all over the world that this kind of problem does exist. In a sense there’s an anti-professionalism that is abroad in the institution, in the sense that people would’ve seen this not only is an intrusion on their ‘academic freedom’ but also see it as an intrusion on their own capacity to do things, it’s unwelcome, “we don’t need this stuff”. So they are anti it. So now the big question for us always is, I firmly now believe that we have to have a much more evidence-based analytical base for what we do otherwise we cannot deal with the evident problems, and I think that… it’s very obvious to me is that the key developmental question for us is ‘how do we overcome that anti-professionalism that is around?’ And I think that the HEQC policy instruments can be a way towards that, if the system works properly. And what is a big danger I think is a fundamental belief amongst the academic community that this stuff isn’t for real that a) it’s one of these kind of state inventions to torture the academy and b) there is not capacity either at the central level meaning the DoE or HEQC or really at the institutional level to enforce it, to carry the thing through. So it hasn’t moved centre stage for academics, they don’t see that their well-being is dependant on getting to grips with the stuff. They are basically in a denialist phase if you ask me and are hoping or believing that it will go away. I’m saying this now at some length because I actually think it is a theme that runs through in my responses to all of your questions. But it’s going to be extremely important for the system to show that this stuff is of importance not only I hope in a compliance, a mindless compliance sense, but that actually that these things are important for ones career development for their job satisfaction, that they
will be recognised and rewarded and that they will be understood. That people’s individual knowledge, and there is considerable craft knowledge around the place, is not at odds with professional knowledge and these things can be developed together. And that people will therefore be appreciated in what they do and good work will be genuinely understood and promoted in this area. And if these things don’t happen then I think we could well see, as we’ve seen in other areas, that the developmental work that we’re so keen on doing actually gets set back.

I’ll tell you a story in relation to this, that and I have no personal experience of this, I’m told by our people here in Engineering where they are familiar with this kind of accreditation process in Engineering through ECSA, the professional council. A huge amount of work was done here by people who have very high developmental credentials, a couple of them AD people, not… in the faculty itself. A lot of the really hard work going on getting the criteria thoroughly examined and worked on and so on, when the actual audit happened the ECSA panel that came really had very little understanding on the teaching and learning side of all of this. They only questioned things extremely superficially and it therefore looked to the people who were being reviewed that they had done an awful lot of work that was not really appreciated at all. And it pulled the carpet out from under the developers’ feet. So you then get deep cynicisms setting in and the next time you come to do any of this, it’s going to be a lot harder than it was before, because nobody will believe that the system has the capacity really to understand these positions. The window really closed. That horribly sets us back. So I think that the real capacity of the HEQC to get at departmental level is very important. And at this point I am officially being very cautious about it because I don’t want to put too many eggs into one basket if it’s going to have the bottom falling out of it or something of that sort. I just have a very strong belief, Kathy, that people take things seriously themselves when they are taken seriously by the system. I’m fresh from the UK now, so seeing the effects of the Research Assessment Exercise there, it’s been extraordinarily negative for the teaching and learning side, the message is going out ‘this is what counts’. It’s not a clean message even in that it’s interpreted differently in different institutions. Some are just giving up. So I won’t go into that but it’s that kind of notion that what is really taken seriously is where people’s identity, stature, reputation, etc. can be in fact be enhanced by getting involved with this kind of work, rather than a set back as we’ve seen the message quite often is. And I think B is at a critical juncture in all of this, trying to decide how it’s soul is going to go. It’s really contested in a deep way and the messages we get from the centre, from Pretoria is going to be very important to us.

The second issue relating to credibility is the audit process itself. So it is the nature of the audit process and the capacity of the auditors themselves (and you’ll see I’m strongly influenced by my experience in the auditor training workshops that we had). We have got to get that right! I think it’s probably not overstressing things to say that the way things work out is going to depend very largely on the quality of the auditors and their preparation, i.e. the way they use the criteria, for example. And we do not want a repeat of the ECSA kind of operation. And I’m worried about that! I think my experience of the auditor preparation workshops was that we have a long way to go in preparing people. There’s just no maturity, there’s no depth, or very little depth that is available to us at this point. In this country you’ve got a supporting metaphor, one that often sits in my mind here when I think about in my own work really too, when you’ve got a team game which is really what we’re all about - there are certain roles and positions that are not in the public eye very much, you don’t see the function of a particular kind of player I’m thinking of rugby now a prop forward or something…their role is not obvious except to the people who really know the game. And if you are a player and you do not have confidence in your selectors who, then you are not going to play your proper role as a prop forward you won’t be content with it, you’ll try to play to the gallery etcetera to get noticed. Whereas in fact, if you have confidence in your selectors you will be free to fulfil your own role in it’s most intrinsically correct valuable way. I mean I feel that very strongly in our work. If our Executive do not have a proper understanding of what it takes to do developmental work which it shouldn’t be an island as it were, it’s value often is in not being visible at all, getting other people to believe
that it’s their ideas but if that is then held against you they’d say well what have you been doing we can’t see what you’ve been doing. It completely changes the nature of people’s relationship with the work and how they do it. You’ve got to have confidence in the system. And I think that for me, that is strongly the case with our audit teams and the whole audit process. We have got to rapidly develop a situation that we can have confidence in, where institutions will be able to trust that genuinely good work is genuinely understood. But often its nuanced it takes time, we’re not looking for quick-fix solutions or papering over cracks and so on. That is going to be the biggest job.

And then there will be a deeply cynical playing of the system. As you know when we did the Needs analysis last year for the IT&L Project, I was amazed at just how cynical institutions could be. You know, when they heard we were from the HEQC window dressing stuff came out so often and it’s very hard to get through that. You’ve got to be very professional about it, very knowledgeable about it to be able to break through those barriers and to get the confidence of the system. That it is genuinely about development and not about finding sticks to beat institutions, particularly with the old racial divides in mind. And I was not convinced of this in the auditor preparation workshop people latA onto things because they were not confident themselves, in the role play situations, they latA onto things that they felt they could use to beat up the institutions. You know and old prejudices came out, it’s all too easy just to launch into some stuff and focus only on staff and equity problems in the historically white institutions. And people are just going to shut up shop if the HEQC panels come in on an ideological trip. So that’s the biggest concern I think. We’ve got the tools that are reasonable tools, they will be developed further, no doubt about that, and we’re not a mature system and we shouldn’t expect everything to be in place. It’s the way those tools are now used that is going to determine the next ten years worth of QA and development, so I’m quite concerned that we get off to a good start. At the same time you can’t be too bland because otherwise people think that they can get away with murder. So it’s going to be very critical to get the right people onto the panels, the right mix on the audit panels and not to try to do too much. Because trying to do too much trying to deal with thirty five criteria is completely impossible. You’ll end up with a ridiculously superficial approach. And all along this has struck me this is so much like assessment, good assessment theory applies here. Somebody said once the problem with quality stuff is that it sometimes looks horribly like a research project with a very poor methodology. Superficial and simply an inappropriate methodology that is designed to get superficial poor findings out of it. And we’ve got to be very, very careful, it is research, it’s about assessing, and we need to avoid all the assessment traps of just assessing the superficial, assessing the accessible the readily assessable. We have to avoid all those assessment traps. I mean you did a lot of work on this in fact fantastic I thought really nice theoretical work on this at the beginning of the IT&L Project when you were grappling with evaluation paradigms and so on. It was very important stuff, good thinking and we should pick that up again.

What are the constraints to successful implementation in your own institution? And to what extent can you overcome these?

So I’ve said a bit about academics. I think the implications of what I’ve said for question 4 are pretty clear. It’s going to be a question of what’s in it for them in an important way. I don’t just mean superficial things like money and so on. It must be seen to be taken seriously. And I think I could make the remark that in this respect I do worry although I see the sense in focusing on teaching and learning in this coming round of audits, I think the artificial dichotomies between the teaching and learning and the research side are going to be tricky. I don’t know how we do this in practice but I have a sense that again it tends to compartmentalise stuff in a way that is dangerous.
What (if any) underlying paradigm/value/worldview clashes exist between the HEQC’s conceptualisation and operationalisation of quality in HE and your own/and those of the academics you work with?

I think again I’ve spoken a lot about that. So for myself here I basically find myself sympathetic and supporting the HEQC approach that combines a ‘fitness of’ and ‘fitness for purpose’ approach. I think it’s unavoidable in our set-up. So conceptually I’m certainly happy with that. But I am concerned with confusion of roles. But how do you deal with this? Because it strikes me that the Department of Education really should be playing the major role in ‘fitness of purpose’ in working with institutions. There are contradictory messages here and we’re getting contradictory messages from the Minister himself which is not really the topic of research here. But I think there are policy differences—we know there are policy tensions and that’s another whole story. But I think exercises like the PQM exercise must be brought in line with what the HEQC is trying to do and I think that the auditors struggled hugely with the ‘fitness of purpose’ approach because the audit panels had to work that out. It was really difficult! How do you go to the University of Pretoria and say ‘well we kind of feel dubious about your mission’? I mean it’s such dangerous stuff. The worry for me is that inexperienced people again would latch onto stuff like that, so Pretoria must be vulnerable by definition, as it were, in terms of some aspects of it’s mission, ‘So let’s get into that.’ And I think that sort of thing worries me a great deal cause it’s amateurish and you can’t afford a superficial amateurish kind of approach.

Again it’s implementation you see. Conceptually I don’t have a problem with it, but how it is done, not only by the HEQC, but how it is done in relation to the DoE and it’s various policies. I mean the way the Rolling Plans work out through the PQM. So we have difficulties at a number of levels in actually operationalizing all of this. And I think you know that stuff would undermine the process a lot in the minds of academics. And I said I think not many academics accept this kind of approach at all, so it’s going to be even more important to try and get it right.

How do you intend to mediate the HEQC’s demands in the internal quality management system you are setting up for your institution?

It seems to me the clue, the key, to this is to ensure that things are taken seriously. I can’t see any other way. We don’t want to have to get into the situation where we hold the external threat over academics as a means of enforcing development internally. A bit of that of course …is always a good thing. It’s a useful thing to have, I should say. But you certainly shouldn’t be over reliant on it. And of course if you try threatening and it doesn’t work i.e. the system proves to have no teeth, then you’re in big trouble.

I think maybe the other conditions that I had noted would be alignment of policy and clarity of goals. Now these are much bigger questions, but I do worry about the confusion of goals right up to the Ministry level. Not the goals they are individually setting but how they all pull together into some kind of focus that we can really get on with. It’s like the whole merger story, you know, is it not just distracting us from key goals for the system, it’s about the output of the system, that’s what counts. That’s all that counts in the end and the rest is the means to that end. And if we don’t separate means and ends carefully. If you see how many goals there are in the NPHE, you just simply can’t do all that. So we need to get round to focusing on a few priorities. But I think that’s going to be something that we’re going to be pushing all along.

What is your opinion on the value of the IT&L Resources?

I think we’ve gone through many interactions but and you will know better than anybody else, how difficult it was to put that together. You did a stunning job yourself …you really saved it, I think. I have the sense that they’re being extremely useful. Yes I’ve been going through them and it’s again how they will be used. There has been a tendency just to treat
them as checklists, however hard we, in particular-you’ve tried to avoid that. But even so you
know there are some good things to check there if you can get people thinking about those
things. I actually used them and I found them extremely useful in my particular session at the
auditor training workshops because they brought things to life. We doctored them a little bit
for the workshop and I found that people related to them well. I mean the danger of course is
going to be that they are overwhelmed by this stuff. We shouldn’t just dump them on an
innocent public and expect them to be used properly. The role of the internal development
people is to use them judiciously. And with the right groupings including HOD's programme
conveners and other middle management people one could build up knowledge and expertise
where it is most needed.
The macro-question is: To what extent you believe the HEQC’s policy instruments (the two Framework Documents, the Proposed Criteria for Audit and Accreditation, the proposals for self-accreditation, the MBA Review, supported by the Improving Teaching & Learning Resources) are valid, acceptable, feasible and potentially effective?

Do you think that the policy instruments that the HEQC has produced so far are based on adequate expertise?

Well at the A we have been working with the HEQC on some of these instruments, especially for audit. Most of what we recommended was taken note of, so research input has not been ignored in the HEQC’s policy development. I think the HEQC has succeeded in keeping a finger on the pulse of the HE sector, certainly more than the FETC, SAQA and the DoE, these have shown less recognition of what he sector wants. Whereas the HEQC has used international and national expertise and has asked for feedback from the sector.

To what extent are the the HEQC’s policy instruments implementable in your context/institution?

We didn’t think that the programme accreditation criteria were implementable. They didn’t reflect our programme self-evaluation framework. We shared this with the HEQC and they did take note of it, so we expect some improvements in the final version.

With respect to the audit criteria, we were less happy and it’s still difficult to interpret what they will mean in practice.

We like the IT&L Resources, we have already started using them in our staff training programme where they are finding them very useful.

What are the resource implications of implementation?

The resource implications are huge, we need a phased in approach. I will have to make some critical decisions in terms of priorities. I am going to propose that we implement self-evaluation for all programmes next year in a staggered manner, so that by the end of 2004 all 80 – 100 programmes have been done. Then we will focus on improvement.

As for audit, we will expect Deans to have something in place by the end of 2004, a mix of things at different levels, such as the quality management of partner programmes, for AD and support services. Here I find the HEQC’s criteria confusing, they are at different levels and have different implications, some are institutional level things and others are not. So we will have to try, I also accept that the accreditation criteria are more final and definite than the audit ones, so I am waiting to see.

What are the constraints to successful implementation in your own institution? And to what extent can you overcome these?

We are still understanding the implications of the HEQC’s requirements. The Faculties feel that resources, human resources and capacity are all limitations. We have big human resource constraints at the centre – we don’t have enough support for people at faculty and department levels. The other policy imperatives are putting huge pressure on the system, for example we are now a parallel medium institution, we have to increase our research output, we have a great diversity of students now and we have doubled student numbers in 3 years! So how will
we overcome all this? I’m trying to make the things already in place useful and I’m also having to prioritise what we can do.

**How do you intend to mediate the HEQC’s demands in the internal quality management system you are setting up for your institution?**

Well we have to balance the HEQC’s policy requirements with what we actually want to do in terms of quality improvement. We have to simultaneously meet the HEQC’s requirements without letting our staff fall into compliance mode. So we’ll introduce things cautiously, apart from the committee context, the Quality and Programme Planning Committee, we won’t disseminate broadly the HEQC documents. Normal academics need to be shielded from these. In any case we will wait until the HEQC’s documents are final before we circulate these to selected people. When we do launch them we’ll just give them an overview and link the requirements to institutional priorities and phase them in gradually. We feel strongly that the HEQC policy direction should be only guidance and support for us, not the essence of what we must do, we have our own thinking on what is good practice for us. This does correspond well with the HEQC documents. But I believe it’s important to establish a quality culture of continuous quality improvement, and so we don’t want to just comply. But it will be difficult to keep the balance, we will only be partially successful. Our Deans have already said: ‘tell us what the HEQC want and we’ll do it!’ So it’s a difficult tight-rope we want to walk. I’m afraid that once you establish a compliance culture, it’s difficult to break it, so I would rather run the risk of not doing enough, not going for coverage and maybe getting into trouble for this. I was on the QPU-SERTEC review team and we saw how compliance was established in the Technikon sector, we don’t want this, but I’m an idealist, I won’t get it all.

The carrot that I use is that we are trying to establish or protect a reflective practitioner approach. For me QA must really involve a deeply reflective approach on ‘what, why and how I am doing and how should I improve?’ Not a set of forms to complete. I would rather therefore do less, but do it properly. On the other side, we are already using the HEQC as a kind of stick. We can now say to tardy departments and HoDs, ‘you have to do this’, for example assessor training is our staff development priority. We can now say to Deans ‘we are offering this and if there is not a good response it will become compulsory because the HEQC requires it’.

**How do you think academics are going to respond to the implications for them of the HEQC’s requirements?**

Academics will respond by doing what we ask and what we say the HEQC requires. They see the HEQC as a stick. But this is not what we want. The QA regime is not properly understood by academics, for example the MBA Re-accreditation. There they said, we’re comfortable with our quality, we’re happy with our School of Management, we’ve done all the right things. Then they were taken up for not indicating separately the on-line MBA from the contact one. This brought home the importance of taking note what the policy requirements are. So this message is getting through, people will take the HEQC seriously, but I hope that we can retain a balance by using what the HEQC requires to improve in ways that we believe in.

With respect to the MBA Re-accreditation, people felt that the HEQC submission required too much documentation. But people are now realizing, ‘OK we need to this stuff in place in any case’. In older universities many things that are done are not documented or structured, there are a lot of loose things that are not tied up neatly in policy documents. This dawned on us in the MBA process, we realized that procedures are followed, but not written down, processes are tacit, but not on paper. We felt relatively happy with the HEQC team, with their attitude and approach. The only hiccup was with our private partner, E-Degree who offer an on-line MBA. But we have been struggling with this partnership for some time, it is a difficult one to manage.
What (if any) underlying paradigm/value/worldview clashes exist between the HEQC’s conceptualization and operationalisation of quality in HE and your own/and those of the academics in your institution?

I think we still have a problem with the HEQC passion for trying to cover everything. In terms of their definitions or quality, I think we will see more of a ‘fitness of purpose’ approach rather than a ‘fitness for purpose’ one. But I don’t see this as necessarily meaning that we clash with the HEQC’s view. We see ourselves as a university in South Africa, having to fulfill functions that are not traditional university functions, in other words we are a university, but in a certain context which means that we have to do extra things that universities don’t usually have to do, for example we have to provide space and time for disadvantaged students to grow. I see QA as involving the monitoring of both planning and implementation. So we are really fulfilling both the ‘fitness for’ and ‘fitness of’ approaches to quality. As for transformation, this is not strongly fore-grounded in our institution, but part of our mission is to serve a diverse body of students leading to the transformation of the students. We feel that all our students are unique in terms of their background, language etc. and that we should find a way to create a space for every student to realize their potential – both individual and social, within the parameters of what is possible. So this is our broad mission and vision, we want to be a university that plays its role in building a new society in South Africa, but we can do this only by being a good university, not by being an NGO or something else. So we need to offer good relevant programmes, and research and be a socially responsible, engaged university, also doing things like service learning and research into service learning.

To what extent do you think the HEQC’s policy instruments will fulfill their purpose – namely to ensure accountability and improve the quality of HE provision? In your own institution? Country-wide?

I think the HEQC will fulfill its purpose and that HEIs ignore it at their own peril. Here in the A there were headlines about the private provider that did not get accreditation and there was a public reaction. So I think that the HEQC signals will make HEIs realize the importance of quality. Here in the UFS there has been a mixed reaction. Some feel that we have always had good quality, others see it as a challenge. It will be difficult to get a good alignment with what the HEQC wants and to get a critical mass of academics to support it. Some of our Programme Directors are innovative and our Programme Planning Committee are well-informed about the HEQC requirements. But I fear that accountability will override the HEQC’s achievements and improvement will remain in the background until the restructuring of the system has been implemented, for we don’t have the capacity to do all these things properly at once. So people will go the accountability route first for self-preservation. We are incorporating 2 other campuses, and the implementation is very taxing. So I don’t see system-related improvement for at least 5 years from now. We are trying to focus on quality and especially on improvement via staff development in the incorporations of QwaQwa and Vista. So we did what the DoE wanted, and we saw this as an opportunity to improve quality and equity. But the focus on equity alone is restrictive, we had to add staff development as a main focus of the incorporations. My own thinking is that quality and equity are not necessarily in conflict, but they may be in tension. Diversity can contribute to quality, the more diverse we are the better the institution.

Any other comments related to the national QA project and your management of quality at your institution?

Well, as I’ve said, it’s going to be a balancing act. The HEQC have provided us with a good framework and guidelines and they provide a stick. But we would like more time and resources to make it work in our own way, for improvement. Time will tell.
The macro-question is: To what extent you believe the HEQC’s policy instruments (the two Framework Documents, the Proposed Criteria for Audit and Accreditation, the proposals for self-accreditation, the MBA Review, supported by the Improving Teaching & Learning Resources) are valid, acceptable, feasible and potentially effective?

Do you think that the policy instruments that the HEQC has produced so far are based on adequate expertise?

The HEQC has drawn widely on international expertise and consultants. They have accessed the best local knowledge and consulted widely with HEIs and QA Managers. But my worry is that they have not always taken the good advice that they have been given. Sometimes, in my experience, they have been given good advice, but haven’t taken it.

To what extent are the the HEQC’s policy instruments implementable in your context/ institution?

Implementability varies considerably across the range of HEIs because institutional capacity varies greatly. Some of the HEIs are served by capable people who have been in the game for a long time, whereas other HEIs have only in the last 6 months appointed their first QA Manager. Some have appointed people at professorial level to represent QA whilst others have appointed junior people who haven’t a clue what to do. So the bottom line is that there is a huge human capacity and expertise problem. There are other specific problems, for example as was raised at our recent workshop – ‘what is a programme?’ For two and a half years government has given no clear definition of a programme and the sector has had no clear answer to this question. The HEQC doesn’t seem to understand what we are saying on this. This points to a systemic problem across the country related to a lack of clear policy direction at the level of detail. This will of course affect programme accreditation. We’ve raised the problem with the HEQC, but I’m willing to bet that they won’t respond to this simple piece of advice from the sector. So I’m constantly reminded of the diversity of capacity in our system, even at the top management level. We also have some huge HEIs and some medium to small ones and this will impact on the nature and form of internal QA systems.

What are the resource implications of implementation?

These are severe, especially with respect to Programme Accreditation as currently proposed. But the HEQC may respond to our comments and change this – as I am hoping and have good reason to believe that they will. Most HEIs only have 1 or 2 QA staff, which is not enough to run an internal system that will meet HEQC requirements. If you ask most VCs, ‘do you support QA?’, they will agree, but they don’t understand QA as a management tool, they don’t go around banging the QA drum. They just appoint a QA Manager with 1 or 2 support staff and then leave them to it. I have many QA Managers confiding in me that they don’t have sufficient support from the top to do a decent job – they are left marooned, just one man and a dog. When I was at Rhodes I took QA very seriously as part of my own management process and gave it a good name and lots of back-up and resources, but this is exceptional. At Rhodes the QA Manager has had a head start, but even now she needs more support. The other problem is that the re-structuring and the politics that this throws up, will supercede any QA concerns, so for some time to come QA will be on the back burner.

If you look at resourcing seriously –take the University of Pretoria, they have over 2 000 programmes, what are the resource implications of this? A place like Rhodes has only 500 programmes and we reckon that it will take 2 full-time weeks per programme to prepare to go
through the currently proposed accreditation hoops. If you have 5 full-time people in a QA unit, it would take them 5 years to get through all the programmes at Rhodes—assuming that they have nothing else to do! We also haven’t costed the external reviews that are required. No single VC has a realistic estimate of what the costs of this QA system are likely to be. How many VCs have even read the documents? What usually happens is that critiquing and responding to the HEQC documents is left to the QA Managers who are asked to give the Executive a 3 minute summary. I have noted that many HEIs have not put in institutional responses to the audit and accreditation proposals, they are happy just to go along with the SAUVCA response, so we do all the work for them and I suspect that in many cases they don’t even have the capacity, let alone the time, to respond on their own. So this indicates the nature of the problem. I don’t think officialdom have begun to understand the problem of policy overload that exists in the system.

**What are the constraints to successful implementation in the system? And to what extent can these be overcome?**

We need more staff, more money and more training of staff, managers, QA staff and academics. But the most critical thing at the end of the day is that most academics are not on board. In their hearts, all QA Managers know that it’s not just a matter of taking the horses to the water. They don’t know how to make them drink. In terms of the HEQC’s policies, if the audit is designed to dependent largely on QA Managers, which it seems to be, then I’m reasonably happy with it. However, programme accreditation is dependent on academics, they have to do the job. If programme accreditation is going to work, then academics will have to buy-in to it. If I ask myself what is the level of academic buy-in, I would say it’s very low – most academics would reject the current accreditation proposals. From those I’ve spoken to I would say that if they water the proposals down to about 25% of the current volume, then about 20% of academics might support them. So it’s going to have to become a compliance process which is what we had all hoped to avoid.

**How are people intending to mediate the HEQC’s demands in the internal quality management systems they are setting up for your institution?**

This is being done with difficulty. One of the tasks of all QA Managers is to try to prepare their HEIs. They are taking the HEQC documents and boiling them down so that academics can grasp and accept them. But the documents are becoming so complex in principle and detail that academics will reject them. There is too little left for their discretion and interpretation. As one colleague said, it is increasingly becoming difficult to defend the HEQC, their actions and documents in our HEIs. The HEQC does not yet seem to understand that their best ambassadors are the QA Managers – they are the ones carrying and selling the QA message. But the HEQC treats them with disdain, it doesn’t treat them well. They can legislate like crazy, but what are they going to do if the academics say ‘up yours!’? Unless they radically reduce their demands, I wouldn’t be surprised if there won’t be a complete revolt by academics who simply say ‘to hell with this’. What could the HEQC do then? If 20 QA Managers arrived at a workshop and said that academics had decided not to go with this, it would all be discredited. The HEQC is totally dependent on the good will of the academics, many of whom are up to their ears in hard work. Now our academics will have to live with the full fall-out of bad policies.

**How do you think academics are going to respond to the implications for them of the HEQC’s requirements?**

You know, good managers understand something – in a good university – they know that they have to work through their Senates. They have to inform their Senates and get them on board. So if you want to get any institution-wide policy or system going you have to work through the Senate. So for a policy on programme accreditation for example, you would have to work
through your Senate to get it off the ground. You would have to work through the academics, it’s in their hands at the end of the day. Senior managers and QA Managers have to work together and do what’s doable. This includes getting your senior academic managers, Heads of Departments, etc. on board at Senate. Then there should be incentives and rewards to help them to sell it in their Departments.

What (if any) underlying paradigm/value/worldview clashes exist between the HEQC’s conceptualization and operationalisation of quality in HE and your own / and those of the academics in your institution?

There is a widespread desire to achieve quality in HE. There is also widespread acceptance of the need to demonstrate that quality exists, that is, to assure quality, the need for formal monitoring is recognized. But the universities and the HEQC differ about the best approach to achieve this. So our goals are similar, but the means of getting there are different. If I had my own way, I would want the HEQC, after consultation, to say to HEIs, ‘we think this is best practice – now it is up to you to persuade us that some of this is going on in your institution. You demonstrate to us that students at your HEI are getting a good deal. How you do so is up to you.’ On the basis of sampling key areas in a particular HEI, the HEQC could then approve the whole quality management system. Most HEIs would respond to this approach which would avoid prescription and compliance and cater for our range of diversity. It is based on a philosophy of self-evaluation, it’s a holistic approach and asks people to evaluate themselves. Instead the HEQC is going for a heavily over-prescriptive approach which removes opportunities for innovation and feeding self-involvement. Instead of saying ‘hmm, this is an interesting challenge’, academics will be saying ‘what can I do to get this off my back’. We need to present QA to academics as an interesting intellectual challenge. They need to understand evaluation as a form of research. I once ran an Honours programme and I asked the students to come up with the criteria on which we should evaluate the programme. I asked the staff on the programme to do the same. We then compared the two lists of criteria and negotiated a compromise. We got buy-in and engagement from all parties and we wouldn’t have had a problem convincing an external evaluator of the effectiveness of our self-evaluation. Obviously there are numerous ways of doing this. The point is that academics need the space to research and own their evaluations. If you don’t do this you will get either revolt or compliance. As you know, at our last SNQAF workshop, the University of Pretoria rep asked ‘who wants self-accreditation anyway?’ This could sow a seed and before long the whole pack of cards could come tumbling down.

With regard to the HEQC’s emphasis on transformation. I don’t mind this being built into the definition of quality, I can see the need for it, for equity and redress issues etc. I myself don’t always think in transformation mode, but I’m well aware of the problems. I’ve been conscious of it all my life, but I’ve always addressed it at classroom level. I think that the HEQC have taken this too far and then it becomes silly. For example their insistence that there is equity of inputs as well as outputs. It’s plain stupid to try to force representivity of outputs in our context, it only disadvantages black students more if you treat them as disabled and so lower the bar for them. This doesn’t help anyone. And no one is telling the all-black universities to take in others. So I’m not against highlighting transformation issues, but to me this is, this has to be, a micro-teaching issue, you can’t enforce it at a macro-systems level without running into social engineering problems.

To what extent do you think the HEQC’s policy instruments will fulfill their purpose – namely to ensure accountability and improve the quality of HE provision? Country-wide?

The HEQC will succeed only if they put more emphasis on development and give HEIs the chance to interpret policy slowly in their own ways. They will fail if they apply it in a rigid manner. They would achieve more if they put more emphasis on the goals and objectives of QA and sold this to the academics, rather than telling us exactly how to do it. Look there has
been a great deal of good work done by the HEQC, SNQAF and the QA Managers, we all have the same aims. But we are now at a critical stage. The policy documents are more or less complete, they are conceptually quite good, but the HEQC could mess up on implementation – by over-prescribing. This will lead to resistance. Also, some HEIs just don’t have a hope, they don’t know where to begin, so the HEQC should not try to do so much at once.

Any other comments related to the national QA project and your management of quality at your institution?

If I was running the HEQC I would use good classroom sense and pick on the biggest bully in the class – this sends a message to everyone else and means that you can do a few reviews well. For example, it was clever to pick on the MBAs for re-accreditation. This was a high profile exercise and by all accounts they did it very thoroughly. I just hope they will be tough and stick to their guns on the outcomes, even if threatened with legal action. If the HEQC goes to prestigious University X and says ‘your MBA stinks’, this will work and get people scurrying across the system, the impact will be huge. I think that if the HEQC focused on subject reviews and each year picked one programme and ran good peer evaluations, for example I hear that next year they are planning to do teacher education – there’s a lot of rubbish in there- this will do more for quality in the country than messing around and insisting on trying to re-accredit every single programme in the country. They should take a strategic approach, be selective and use the peer review principle - and then the resource requirements will be manageable. They should pick one area per annum and be tough and just. The peer review principle will get people moving. The results should be published and accountability to taxpayers should be demonstrated in this way, transparently. If they did this for even 2-3 years, it would give us all a wake-up call and be good for the country.

I know of an example at the University of Pretoria – they have a good system there set up in van Zyl’s day. When a Prof retires they have an internal review of the Department. They then set up a review panel with at least 2 externals on it. When we came to write the report there was a difference of opinion between the internals and the externals. The VC said we should table separate reports. We had to say that the graduates from the University of Pretoria were not up to national standards, this was a tough statement. But this shows how the peer review principle can work, if it remains only internal it is unlikely to bite, but external peer review is informed and credible and can also be critical. So if I were the HEQC, I would base my system on this principle and pick one and only one significant area per annum for external peer review.

Conceptually we need to keep quality and quality assurance separate, achieving quality should not be confused with having a QA system. QA and accountability is necessary, but is not directly an improvement device. Setting up a good QMS will not necessarily lead to a good quality education system. This is where the HEQC is making a wrong assumption. QA is a management tool, let managers manage and use QA to manage well. But quality is what the academics should be concerned about, let them demonstrate this to each other, no one else can judge quality.
The macro-question is: To what extent you believe the HEQC’s policy instruments (the two Framework Documents, the Proposed Criteria for Audit and Accreditation, the proposals for self-accreditation, the MBA Review, supported by the Improving Teaching & Learning Resources) are valid, acceptable, feasible and potentially effective?

We at A are familiar and I am familiar with those documents because we’ve been asked to provide comment on them. And so I think that we’ve been involved with both the criteria for audit and accreditation, the MBA review and the Improving Teaching and Learning Resources. And I think we can generally say that we welcome that there is a push in this direction. But I think one of the difficulties that we’re finding as an institution is that so many of these things have come flying out at us sometimes with very little warning or if we have some warning of a date, frequently that date doesn’t get adhered to, and throws us out completely. For example one was expecting a lot of the documentation coming through in March of this year and they’re about to hit us only now. And I think that causes a lot of problems for us. And personally it causes a lot of problems for me and my role because one works to such a tight schedule that you know I firmly believe that with QA and the teaching and learning in my portfolio that I should be seen to be driving these sorts of things and should be involved with quite a number of the big issues. And I think sometimes it’s a little unfair to sort of leave it to people who report to me and that as often as possible I should be able to get to these meetings. And sometimes you know it’s impossible when they’re sprung on one. For example, these ones that are happening that [HEQC official] is calling for and wanting a response by a certain day and we’ve said look you know we have mechanisms within the institution where we like to involve our people. So if we have to respond to a document we like to put together a Working Group. And a Working Group of people who one, are interested in the particular subject and who, have got some expertise and who serve on our Teaching and Learning Committee and who are also involved in QA. And it’s very difficult to suddenly call those people together at short notice and A has always sort of felt if we’re asked for comment, then we must sit down and do some homework, give some comment and not just a case of ‘yes we think it’s fine, go ahead we’ll support it’ kind of thing. And that actually you know the latest one with [HEQC official] has caused some concern and also this workshop. This workshop has caused considerable frustration for us because right from the beginning we said ‘yes this is a good idea but please not now, early next year will be fine’. And the HEQC was not comfortable with that and then John phoned me and said ‘please can’t I do something’ etcetera and we said ‘quite honestly we are right now just so slumped with stuff we won’t be able to do it justice’. Anyway P and I sat down and we said ‘well okay let’s see what we can do’. We were also a little concerned and I don’t know how it’s worked out today with the workshop is how they paired institutions. There must’ve been a reason for them pairing the B with us. We sort of wondered, we thought that maybe it might’ve been more appropriate to have C or D and us, but anyway. Yes and maybe there was a reason, which we just don’t know about. So on the policy instruments I think they are valid and I think they are acceptable, feasible and potentially effective. But for them to really meet all those things you need to really give the institutions time to do things. The University has got its own agenda that it’s got to get things done and it doesn’t just revolve around HEQC, although it’s a very important component. One of the things that we’re very aware of at A is that we’ve got a lot of good policies but we are actually rather bad at implementing and communicating those policies to Faculties and Schools. And I think it comes from the point of view that we know that these policies are available - they’re on the intranet for anyone to read, but when you’ve got new Deans coming in nobody ever tells them about it. New Deans have got new Heads of Schools coming in and somehow one takes this for granted that they’re aware of them. It’s become patently clear to me when I go and speak to deans and to schools that they haven’t a clue that these sorts of things exist. And some of
them are doing things that are totally wrong. I mean I’ve just had a case with Commerce Law and Management, where, with respect to a student, the supervision of a Masters degree, and they’ve gone their own sweet way of doing things and the way they appoint supervisors and the way they appoint examiners is really scary. And so and I’m very conscious of it right now because we’re just revising the standing orders on higher degrees. So in some ways, perhaps it’s good that it’s come up now that one can get it right at the beginning. If Senate accepts the new policy, to say ‘okay now something needs to be done’ and to communicate this back down to everyone. But it’s been to all the Faculties, it’s had wide consultation and now Senate has got to grapple with some of the big issues because we felt as a Working Group we’d done as much as we could and now the big academic debates have got to come in. So when ones going through all those things and suddenly you get thrown something else from the HEQC it throws one out.

**Do you think that the policy instruments that the HEQC has produced so far are based on adequate expertise?**

In general I would say ‘yes they are’. There will always be times when one gets some of these documents that you say ‘what on earth are they doing this for?’ or ‘why are they doing that?’ so one will query something which might be interpreted that you query whether, in fact, they do have adequate expertise. But I think what we at A have really appreciated is that there has been consultation. And I think that’s very important because I think, you know, the whole quality assurance thing that we’re trying hard at A to do, it mustn’t just be a compliance exercise. And maybe some of the difficulties that we’ve experienced have also been that sometimes the goal posts have been shifted slightly. And that is a little bit difficult because one sort of gets used to one thing. I think the classic one was the ‘fitness for purpose’ and the shift to ‘fitness of purpose’. There seems to have been a change round. Also as we said at one of the SAUVCA workshops the developmental process is something that we all thought was a very good thing but somehow the developmental process seems to have not taken on an as important a or as a high a profile as we thought it would.

**Who do you think should have been involved in the HEQC’s policy development process?**

Yes I think they are. I think they’re realistic, we can implement them. What we at A grappling with is, as I said, before we’ve got some good policies but we don’t have an overarching Quality Assurance policy. And that’s something that we still have to develop. And when the HEQC site-visit happened in September of last year we’d put together some very substantial documentation, I was a bit anxious that it might’ve been considered overkill, where we indicated all the different things that we had in place you know everything that we think is a quality thing, even our HR policy-what are the criteria for promotion, what are the criteria for appointments at all the different levels. And those were the overall generic, you know the University’s policies. And then we’ve asked Faculties to look at Faculty specific requirements so that for example the Faculty of Science has a policy that they won’t appoint anyone at the lectureship level unless they have a PHD or unless they are virtually at the stage of handing in. They would rather appoint them at a lower level that doesn’t require the research side. And then they can always prepare say no they’re thinking more at a tutor level or associate level for a but for a lectureship, you have to have a PHD. Whereas other Faculties are saying ‘we can’t do that’. So there are Faculty specific requirements that we’ve asked for, as well as the University overall requirements. There are all the things about assessment, for teaching and learning, the policy for student assessment that we’ve spoken about at the workshop. The higher degrees things there are many, many policies that are in place and it’s quite strange in a way that we don’t have an overarching QA policy. And the HEQC when they came here we had set the ball rolling at each of the Faculties. We had what we called Faculty road shows where we wanted to get across to the Faculties that quality assurance is crucial. Now quality assurance in many instances was there with the professional faculties with their accreditation
by professional bodies. But for some of them, many of the other Faculties, this whole business of quality assurance was viewed with a certain amount of suspicion and trepidation. We didn’t want it as I mentioned before, just to become a compliance exercise, so we tried to organise these road shows with each of the Faculties, where all the staff were invited and Faculties had been asked to put in place a quality assurance person that looks after quality assurance in the Faculties. Someone who’s already on the staff. And we asked those people to start driving the process of what are the requirements specific for their Faculty that we need to be aware of. So those people put together some documentation for each of their Faculties. When the HEQC people came, we thought we should at least tell them that this process has started so the documents that the individual Faculties had drawn up were put in our submission, at the back. And the comment was ‘we know you’ve got a devolved structure but aren’t you scared that the Faculties are doing their own things?’ So we said ‘no this is the beginning of the process get them on board’ to say ‘these are good things you’ve got in process they match well with the Universities policies etcetera, but here are some others that need to be addressed’. And although we tried to stress it when the HEQC site-visit came, in their report, once again, they said ‘you know it’s nice to see what’s happening, but we’re worried about the fact that Faculties might be coming up with all the bits and pieces’. So we are very conscious that we don’t have an overall HEQC policy in the institution. And that’s top of our priority at the moment to develop. One of our difficulties was this particular office that I have, the DVC Academic Internal has very little in the way of manpower resources and it’s only since 2003 that we’ve been able to get the Academic Planning Office approved. It was approved at the end of last year and we advertised for the directorship and appointed P from the first of January. So we didn’t have the manpower to do this. Then we advertised for the other positions and we took a strategic decision that we didn’t want it to be called academic planning and quality assurance office but we call it the Academic Planning Office and linked to that is quality assurance. And we didn’t want to say half of the six people in the office, three are going to be QA, three are going to be planning. We actually as a team wanted all of them to have the expertise. So although Q is down as the QA person it’s historical because when I first moved up here in an acting capacity, we needed some kind of QA link and so Q was appointed under R, in the Centre for Teaching and Learning, and Development as the QA person. And when the APO came into being it was logical that she came across to APO and so she still has the legacy title of the QA person although she’s also being brought into the frame. There are other sorts of little difficulties that we’re still handling because when she was in R’s office she was on the academic conditions. So everyone else in APO is on support service conditions so there still needs to be discussion as to what’s going to happen. We also went into difficulty at A, where the budget had started to run away with the University. And all of a sudden we were told that posts all had to be frozen and special permission had to be given before they could be unfrozen. Now we’d already advertised we’d already short listed but we couldn’t go any further with our interviews. So I made a representation to the Vice-Chancellor saying ‘I cannot do my job unless you let those posts to be filled’. And so they allowed us to proceed and we appointed the new folk and they had all taken up their positions by the 1st of August. So some of them were internal so they you know still had to work in their own positions so to speak. We have a policy that if there’s an internal promotion or internal move there’s a negotiation that takes place between the outgoing and the incoming group. Just so that people don’t get left in the lurch. So we’ve only been at full strength at APO since August. And P has been running it and doing a fantastic job and she’s got some really enthusiastic people around her. And we’re delighted about how things are going. So we’ve got you know a whole lot of course reviews on the go because they have been allowed to slip and they now are in place. It’s called ‘reviews of academic entity’ so it’s quite broad. So it would all be new Schools and I’m also looking at it from the point of view that Faculties are going to be reviewed. The Faculties are doing it. And so we’ve started that again and there have been two Schools from each Faculty that will advance through the process this year. And so we’ve got a programme set out right up until 2006. And it’s a huge amount of work. What happened with departmental reviews before is that you would have a group of people put in place, which would be chaired by someone who wasn’t the Dean,
someone who wasn’t the Head of a School, and there would be a representation on that committee of people from within the Faculty and across Faculties. There would be external people that would be brought in. The schools have to put together fairly substantial documentation where they address certain issues and then that group, that committee, gets those reports. They meet, they discuss, they interview the Head of the School, they visit the School, they meet people within the School and they eventually come up with a major report. Where the deficiencies are, where there are problems that they feel that they’re making effective use of the policies at our institution and so on. And what used to happen is that those reports the departmental reviews used to go to what was the Academic Board or Executive Academic Board. Then part of our whole Academic Planning Office development was we put forward a motivation to Senate to disband those two committees and have a new one in its place called the Academic Planning and Development Committee. And the reason for that was to try and provide a forum where some of the bigger issues were discussed, bigger academic issues. When Schools wanted to put forward new academic developments. And if they wanted to have some radical changes that we wanted debates to happen at a higher level than just a rubber stamp. If you ask me whether it’s been successful we’ve only just begun, just under a year, and I think it has been reasonably successful. I think we still have to be careful that Deans don’t say ‘well you know that’s not a very important meeting because my Faculty, our developments are not being looked at’. We were hoping that they would come to all of these things and have a big discussion. So P and I have got a little bit of a concern there that what we’ve put in place which goes to Senate next week is some of the big issues about academic development, the minor, the major and how it relates to the document that was put forward that resulted in our PQM. Because so many things have changed and a lot of people have forgotten what they put in and how does it relate to this. So and we felt that because we don’t yet have an overarching University quality assurance process we have a really good academic review process where a lot of these things are addressed until we get the quality assurance policy in place that’s going to be our saving grace.

And then about the link between academic planning and quality assurance, we have been plugging away within the institution that we cannot do academic planning and then separately do quality assurance, but when we academically plan, we’ve got to insure that we’ve got something in place with quality assurance. And so we’re very comfortable with having these two linked closely together.

And so when, for example, people apply to have a new programme approved part of that would be how are you going to assure it.

Absolutely! And P and her team have put together two very nice documents. What people need to do when they come up with academic plans for new developments. We’ve also got a mechanism in place, you know one of the big things the University is concerned with, when I say the University, the Schools. When we completely restructured and we amalgamated departments into Schools reduced the Faculty numbers etcetera. They were all looking forward to the fact that there was going to be less bureaucracy coming down from the top. And the VC and I have embarked on a programme where we go round to visit Schools and one of the things that’s coming through loud and clear that people are saying is ‘the bureaucracy seems to be running riot’. And I think one of the difficulties is that so many of them have they say you know we often have to respond to the outside profession and we have to respond to outside developments and when it takes 18 - 24 months to get a programme approved by Department of Education, we are losing out. For example people in the computer science or IT say it takes too long to get these things, we’ve missed the boat if we have to wait that long. You’ve got to have a mechanism where you can respond quickly. So mining engineering people will say the same thing. So what we try to do is, we’ve tried to come up with what our obviously the major academic developments and what are minor. And the minor academic developments will have to go through the whole APO office to make sure that we are comfortable that they are minor. Because sometimes in some of the discussions some of the Schools are saying they’re minor but in actual fact we say they’re major. But if
they are minor then they can be approved at Faculty level to try and stream-line that process. And therefore it was important that we have something in place that is some kind of a gauge and say if this happens and that happens then this is a minor. And another thing that was a problem is that Schools have been functioning for some time and every year they change their course outlines a little bit more and if you go back two years you’ll see that fifty percent or seventy percent of the course has changed. And they’re still saying this is a minor change. So I think what we’ve tried to say to Schools is you know ‘when it takes so long for something to be approved, it’s not of our making it’s unfortunately something that we have to comply with’. And some of them are still finding it frustrating and having recently moved up from down there I have a great deal of sympathy for them because you come up with good ideas and you think it’s not a major thing and can we get it through. And then the other thing that P and her office have been trying very hard to do is just to make sure that there’s a very distinct kind of time-table sequence so that if they want something to get through for implementation the following year you need to meet these time deadlines, for APDC for Senate etcetera. And that hasn’t happened before. And I think there might be times where they look at all this bureaucracy but in actual fact when P speaks to them then they are very appreciative of the fact that at least they now know what time lines they’ve got to work towards. And so the APO is also working on this basis: they’re trying to get away from the ‘them and us’ situation which is quite strong at this university, or what people often call the centre. And so P, and it’s because of her personality as well, she actually goes and visits the Faculty Offices and visits the academics and you’d be surprised the number of times people have said ‘wow this is unusual, we normally get summoned’. And so what we’ve tried to do is to say to Schools if you are thinking of maybe wanting a new academic development and you’re not quite sure of the process to follow whether it’s major whether it’s minor give the APO office a ring and they will come and discuss it with you. And that’s working very well. And P has designated some of her people: this particular one perhaps at the moment is working with Humanities, this particular one is working with Health Sciences, this one is working with this faculty. That’s working quite well. And then the other big thing is to bring the Faculty of Registrars on board you know because they’ve got to realise that they have responsibilities as well. And unfortunately I think historically Faculty Registrars have often tried to play the game in terms of knowing that things are running a bit late so therefore don’t submit anything because they know we might give an extension. We’ve actually started to get quite tough on them. Just by saying you know we have a contract with the students that the rule book has to be out, that all the information has to be out and you cannot leave these things until November because the rule books have got to go out get printed etcetera. And we have an example with Humanities who wanted to do something and they hadn’t yet okayed it at their Faculty level and they wanted to bulldoze it through and we said ‘no we’re very sorry, if you people really want to get it through then your Faculty calls a special Executive Faculty meeting and a special Faculty Board and we want the comments from that and if you can’t do that then it can’t be that important’.
To what extent are the HEQC’s policy instruments implementable in your context/institution? What are the constraints to successful implementation?

What are the constraints to successful implementation in your own institution? And to what extent can you overcome these?

What (if any) underlying paradigm/value/worldview clashes exist between the HEQC’s conceptualisation and operationalisation of quality in HE and your own/and those of the academics you work with?

You know the way I look at resources is that there’s the resources that require money and the resources that require the time of individuals. What we’ve tried to do is to get Faculties to actually develop or to have an Assistant Dean who looks after Student Affairs that’s the teaching and learning component, an Assistant Dean who looks after the QA and an Assistant Dean who looks after the postgrads. And all Faculties other than Commerce Law and Management have done this very successfully. Commerce, Law and Management have a history where those three groups were once very strong faculties and they’ve all been lumped into one, and they’re still finding their feet. But the others, they have got people but they don’t like to call them Assistant Deans. So that’s one Faculty that hasn’t bought into the Assistant Dean component. But all the others have got Teaching and Learning Committees and QA groups. And so any academic development innovations go through their Teaching and Learning Committee, who looks at some of these things. And that’s putting more and more work on peoples’ plates and we’re not reliving them of anything. This is the real problem that we’ve got to deal with because I think you know the University A has really often come up with some really good ideas, for the whole time that I’ve been employed here, and even when I was down at Natal, but they unfortunately fall down in providing the capacity. I don’t think A is probably the only institution that does that. But it creates huge amounts of frustration. So you know with all our restructuring I think to put it bluntly people are tired. Now I keep on saying ‘if I think of what Deans have got to do now compared to what the Deans used to do it’s a frightful job’ and so is a Head of School as opposed to a Head of Department. And we’ve got to be realistic at the institution saying we can’t continue asking these people for more and more and more. We’ve got to realise that and I don’t think that we’ve come up with a solution to that. So it’s resources in terms of how we use peoples’ time because normally the people that come into these positions are good people in their teaching and learning and research and then these things then have to take a bit of a dip and that creates a lot of frustration.

How do you intend to mediate the HEQC’s demands in the internal quality management system you are setting up for your institution?

Well it’s a difficult one to answer. We’ve tried by doing these road shows and trying to explain to academics why we need to be going along this route and we’re trying do this to get them to buy in rather than to sit and simply say, this is another I mean the radical one’s would say ‘who are the HEQC to tell us what we should do’, ‘this is an infringement of our academic freedom’ and all the rest of it. But I think that’s a minority view so that’s encouraging. And so we’re trying hard to get them to buy in and realise that it’s a good thing that we’re doing and it’s not just a case of ticking off the check-list that we’ve got X in place. So we’re trying hard to get away from compliance. Although we realise obviously compliance is there. I mean the five year reviews are not something new. But they let them slip during the whole period of the restructuring because so much was on the go. But I think one of the big things which I’ve always been critical about the five year review is the one of the things that was in our document, if something is identified it has to be rectified. Then there needs to be some mechanism in place to see what has been done. So instead of waiting until the next five year review there needs to be a progress report, which goes to Senate and says ‘this needs to be done and this needs to be done’ and therefore Senate needs to know what is actually
happening. But in all the years I’ve been at A I’ve never seen anything come to Senate saying
this is happening. So that’s what I mean about not being good in following up on things. So
we’re also trying to put in a mechanism now to do this. And so this new document which P
and I are taking to Senate will hopefully help that. But I think if you look at it, it’s a big thing
for each School to go through. It’s time and effort so that’s why we’ve got a programme in
place so that people know who’s going to be going through that process in 2004, in the hope
that they are starting to get all the documentation together. And the one thing that I’ve got to
wrap one Faculty over the knuckles because one Faculty, although everything was meant to
have been done by the end of October, they have not actually started theirs. I’m sorry but this
is not good enough so we’re thinking of linking this to our whole performance appraisal
system. And for example the ones that have been through it this year have all said wow even
though it was a huge amount of work to do, but it’s very good for documenting for their own
purpose what has happened. Where difficulties arise they’ve greatly valued meeting with the
committee and the external people and engaging with them. And it’s very open process
because what’s meant to happen is the committee will meet together with the external person
or persons that have been appointed and they would’ve had an opportunity to read through all
the documentation that the Schools have put together. They then meet formally with the Head
of the School, have a meeting and they will also visit and have a look at facilities the
Department or whatever the case might be and they will interrogate some of the things that
have been raised in the report from the Head of School. And we’re hoping that Heads of
Schools are also going to start being critical and saying ‘this is an area that needs to be
addressed’ and the committee will pick this up and say ‘well tell us a little bit more about
that’. Then that report gets put together, and it normally would take several meetings, and that
report, when it has been approved by the members of that committee, will then go back to the
School and it will make very firm recommendations and the School then has the opportunity
to look at that report and say ‘we think this is a lot of... how dare they say this about us!’ And
will be able to say ‘I’m sorry I don’t agree with that because of X Y or Z’. Then that
committee has got to engage with them. And then when that whole thing has happened then
the Faculty Executive meets to consider these reports and at those meetings, a Deputy Vice-
Chancellor has to be present and it’s the recommendations that come out of that Faculty
Executive that will now come together with the report to the Academic Planning and
Development Committee. And then we would pick out for example let me just think of
something that is perhaps off the top, we’ve just had a review of Geography, Archaeology and
Environmental Sciences Studies and Geo-sciences (which is geology) and when the whole
restructuring process took place in ‘99 into 2000 apparently there were comments made-is
Archaeology more appropriate to the Humanities Faculty or to the Science Faculty. I wasn’t
involved with this debate but it was a huge debate. Eventually it was decided Archaeology as
it’s done here at A, is more appropriate as a Science. Another thing when Professor Bundy
was here, and they were amalgamating, they said surely Geography and Environmental
Studies and Geology why don’t they become the School of Earth Sciences. And that was a
huge big debate and it was a very fiery debate and eventually it was put down. So now it’s
something like three years down the line and we’ve now got the quinquennial reviews some
people are still aware that that question was once asked. So they will suddenly say ‘are we
happy with Archaeology as a Humanity?’ and this causes huge problems because there hasn’t
been any reason to change that but just the fact that the people at the School will see it in print
that this question was asked. Simply saying ‘come on guys we gave you all the information
and it was accepted, things have not changed, so why is that revisited?’ But many times
people such as myself who’s chairing that committee wasn’t aware that that had been raised.
So it raises temperatures when things get raised again and then the Vice-Chancellor is under
pressure because of simply saying ‘well you know we need to think about what is the best
academic thing and maybe we need to revisit that again’. So contextual the context will
always come in, and QA raises big issues, really big issues sometimes. And so it’s not just a
‘well done folks you’re doing a good job’. And then the APDC will grapple with the reports
of those things and then pick up the big issues, which would probably have to be discussed at
a more senior level. Say with the Senior Executive team would include all the DVC’s the VC
the Executive Director Finance, which is at the same level of DVC the registrar and all five Deans. The philosophy behind that is A used to have a system where there was a VCO office which all the DVC’s and the registrar were involved in and then there were the Deans and the VCO would meet and when it was a Faculty matter they’d bring in the Deans. So the Deans were sitting out there, VCO was sitting here and often these cliques developed so when Professor Bundy was going through the major restructuring it was decided that one needs to get the Deans on board right from the beginning and that’s how Senior Executive Committees came into being. But what happens when difficulties are identified is what is the intervention to rectify that and has that intervention been successful. That’s where we haven’t been good. And that’s what we’re putting in place now. So that there will be a reporting mechanism and I mean at one stage in our documentation where we revised the Quinquinial Review Standing Orders was that we needed a progress report every year. And we still feel that it’s a good idea but if it’s been a clear cut one that everything’s favourable and there are only minor things then we don’t believe that you know a full detailed report. So the next step really is to track the progress after the review. And I think you know like these ones where we’ve just started again if they can see that it’s handled openly and frankly and transparently that hopefully will filter through to those Schools who are still going to go through the process. But all of them, I mean this is the first time that new Schools are going through a report and you see that that’s also a difficulty because if that’s what we’ve tried to do we tried to do quinquinial reviews of those schools that didn’t necessarily have major amalgamations for example in Humanities the School of Social Sciences was a fusion of six academic departments. And they’ve got to be allowed to go through the five years before they get reviewed whereas departments like Physics and Chemistry and Mathematics those weren’t fused with any other and so those are the ones that are now doing the quinquinial review. And then another big thing in Health Sciences which is a Faculty that I look after as well Anatomical Sciences and Physiology were the two that were identified for this year to go through quinquinial review so they weren’t amalgamated but there was discussion during the restructuring phase why don’t these two come together. So the Dean asked permission for the quinquinial review to proceed but that one of the questions that will be asked because it was said that within so many years it would revisit whether Anatomy and Physiology should be combined. And what has come through very loud and clear from both the external people and the internal people is that these Departments is that these Schools are so big it wouldn’t be a good idea to bring them together but there are links between them and they work together across certain areas.

I think you’ve really illustrated how planning and QA are integrated quite well.

I think so. So that would be six would it? Academics are going to respond. I think with a little bit of suspicion to begin with but we’re hoping to minimise that.

What is your opinion on the value of the IT&L Resources?

Yes Kathy I think our world views are congruent but perhaps I should qualify that. When we went through those audit criteria and we had that one workshop we were very concerned that they had changed and that now it was going to become a compliance approach. The way they wanted to go there was a good chance that institutions would see it as compliance rather than a developmental process. We did have discussions with Prem about that and we said we were worried about that but I see it’s still there in the document. Because certainly in that one SAUVCA workshop people felt most strongly about it. But you see that’s also good and it will engender more confidence from the institutions and the academics if they can see they’ve put some effort into this saying ‘they we’re worried about X Y and Z’ for a particular reason, and it can be seen that the HEQC has looked at all those things and said ‘okay maybe we need to have a rethink’. And that in itself, if it’s handled the right way at the institutional level we can say ‘look you see they are taking cognisance of certain views and they have modified’. I think that would that would in my mind also engender more confidence in the system from institutions and academics who are in the institutions.
To what extent do you think the HEQC’s policy instruments will fulfil their purpose – namely to ensure accountability and improve the quality of HE provision? In your own institution? Country-wide?

I think the accountability has to have some spin off for the country in improving quality. I think that just the fact that institutions are going to be held accountable for what they do right now and how they do it and that they actually have a mechanism in place for wide consultation is a good thing and I think one of the things that the process that we’ve embarked on. I think Schools and Faculties actually appreciated the fact that it’s not just something they perceive as ‘do this do that’ but that one has actually tried to inform them and say ‘you know this isn’t, actually something new at A’. A have always have always had good policies in place for quality assurance and sometimes we don’t use them appropriately sometimes we don’t publicise them and so what we’ve just got to do is to make sure that a lot of these things are well co-ordinated. I mean Francois Strydom organised a Quality Assurance workshop for his School and the interesting thing he asked if I would give an overview you know some overview about QA etcetera and I decided that I would broach it from the point of view of trying to tell the people what we have in place. And to my amazement you know people were really quite surprised and once again it shows our lack of communication to people. We said ‘they’re there’, ‘what you’ve got to try and do now is adapt them to your own School and to see how you’re going to do things’. We gave the HEQC site-visit people this strategic document for the shape in the future all the way down to their recruitment procedures these are all documents that we’ve got: assessment, the standing orders for the higher degrees guidelines for periodic reviews, format for major academic format for minor counselling and careers development unit centre for teaching and learning and development, and then staff training recruitment selection procedures for most of your academic staff and then some information for statistical cause they wanted those. So there’s a lot of that and that’s all in place. But the strange thing is that people don’t have an overarching institutional policy. And what the ideal thing that we’d like to try and do is to have a policy document that’s short and to the point. But referring to a lot of these things. And I mean some of them you know are very substantial documents it’s not just a one pager or something. And then in this one this particular section this was the one to show what the different Faculties were doing with respect to quality assurance…all five of them. And so you know how some Faculties were tackling the teaching and learning excellence. So there are a lot of good things there but it’s we just need to manage them better I think. And so adapting that approach when you visit Schools and say you know the things that are here are good things. But and we update these, I mean since I’ve been in this office we’ve updated the Senate Standing Orders that are going through to Senate now. The student assessment was updated 2002 and we’ve got to update them again in 2004. So these things are reviewed on a regular basis. And all these documents are on the A intranet so that people can call them up and review.

Any other comments related to the national QA project and your management of quality at your institution?

You know I guess everyone’s sort of wondering in fear and trepidation when the audit will come and because we’re not a merging institution we’re going to be somewhere between 2004 and 2006 and we’re simply saying ‘they did say they’d give us a years notice so if they haven’t told us yet, the soonest it can be is the end of 2004, otherwise we’re likely to be 2005’. We have put a process in place because you see one of the things with the development of a new office like Academic Planning with Quality is, we’ve had to do some workshops to decide what are our priorities, what are our deadlines, when are we going to come up with a policy because the other thing that I’ve not mentioned but it’s a huge thing for me and it gives me nightmares, my job is also to come up with an academic plan for the institution so the Academic Planning Office plays a role in that, so it’s coming up with an academic plan linked closely to the QA side.
We’ve had one workshop with the Senior Executive team and it’s been pretty basic in some ways. For example we decided that there should be certain questions that everyone should try and answer before they came, some homework to do. And sort of along the lines of ‘why would anyone want to come to A? What has a A degree got to offer? Is there something particular about a A degree? Should there be something different about a A degree?’ I think the Vice-Chancellor was a little bit apprehensive, ‘what’s going on? These are strange questions’ Anyway we got it in mind that we would do this and the interesting this was that it actually generated discussion. And some of the Deans said we should’ve been talking about this a long time ago. And one of the jobs that I’ve got to do this week is actually pull that thing together. Because P was there as Head of the APO office and we’ve got to make sure that we move on this. It’s already four weeks since that workshop but there’s just been so much happening at the moment that we’ve we haven’t had a chance to put that final report together. So we need to come up with an academic plan for the institution. And I mean if you ask people what an academic plan for an institution should entail the divergence of opinion, you know it goes from ‘well you need to say this is what A will be offering’, in other words the PQM and these are the things and maybe we want to move into that area at such and such a time. And it’s bringing in aspects of the three year rolling plans. As well you know student numbers I mean we went through that bad phase 1998 1999 our student numbers dropped and so there was this whole restructuring was to grow the student numbers. Now we can’t grow anymore, the infrastructure can’t cope. So I’m trying to get the basic teaching and learning infrastructure in place. Phase one has cost three and a half million rand. We also have had a good course and lecturer evaluation system in place, but it was compulsory and students get tired of doing it. They stopped taking it seriously because there was never any feedback to them. Now we have an electronic evaluation for students, which is voluntary and anonymous. The staff development unit processes these and if there is something serious it could lead to disciplinary action. The Vice-Chancellor has motivated the SRC to take this system seriously and to get them out of the ‘I’m disadvantaged’ syndrome. We also try to get students to respond to HEQC documents in our Working Groups. So QA might have some spin-off in empowering the student body.
The macro-question is: To what extent you believe the HEQC’s policy instruments (the two Framework Documents, the Proposed Criteria for Audit and Accreditation, the proposals for self-accreditation, the MBA Review, supported by the Improving Teaching & Learning Resources) are valid, acceptable, feasible and potentially effective?

Do you think that the policy instruments that the HEQC has produced so far are based on adequate expertise?

Well I think that a lot of the policies that the HEQC have put out are useful. I think they certainly are useful. I, as an individual, would probably not have been able to interpret entirely what they mean all the time in these policy documents. They tend to be cumbersome in reading them. I don’t know if it’s because I’m a scientist and I like to have, you know, summarised things and methodology, you know, step one, step two, step three, sort of thing, if possible but if I didn’t have the assistance of our unit for Quality Promotion to interpret those at an operational level I might have had some difficulty. You know I found them to be a little user unfriendly… I think that explains what I’m trying to say. The audit criteria I think are cumbersome…I think that is not acceptable. I cannot even give a recommendation as to what would be acceptable to be perfectly honest, but I do know is that this is not the right way, I don’t think that’s the right way to approach it at all.

Who do you think should have been involved in the HEQC’s policy development process?

Yes they are implementable, because of the way we have approached it, I believe in the correct way. From the beginning we used the HEQC instruments as a base line for our own self-evaluation criteria. Our QPU had an idea of what was coming from the HEQC so they formulated the self-assessment criteria for us based on what the HEQC would’ve liked. And in fact when the policy document did come out it was very similar. So I think we had the right guidance from that group which is fantastic because we could’ve gone completely another route and we would’ve sat with something that was not usable. I mean we would’ve had to redo everything.

To what extent are the HEQC’s policy instruments implementable in your context/institution? What are the constraints to successful implementation?

Resource implications to come to that. I’m just wondering if our library our media resources would not be affected. I think it would be to a certain extent because the access of students to our computers and internet would certainly be affected. And our space on our campus in particular, which is the Arcadia campus, the Faculty of Natural Sciences sits out there we have our own library but there’s just no space. We cannot expand! So if we needed to expand for more computer access to students and things like that we wouldn’t be able to do that. So I think in that respect, resources would have some kind of implication.

What are the constraints to successful implementation in your own institution? And to what extent can you overcome these?

I think generally speaking I don’t see many constraints. I think there are certain areas in the audit criteria, which could affect us on an institutional level. Our financial management systems are flawed and have been for many years. So we sit with that kind of problem and we have had to devise our own internal way of keeping checks and balances. The unfortunate
thing is it’s left to the Academic Departments to always prove that they are not X Rand in the
red as implied by the monthly statements we get…it’s an ongoing battle. So our paperwork,
as you can imagine, is unbelievable. At the institutional level, I see the support systems are
not necessarily there from an administrative point of view because we might want to move to
outcomes-based education or modularisation but the exam division will not be able to
accommodate it, for example. It will take them time to catch up. Then you’re left with the
situation where you have to do your own thing and when assessment comes then they’ll say
‘well what security do you have?’ I’ll say ‘well I don’t have a strong room to keep all things
like that’. So I can see those kinds of things happening. So the constraints are really old
structures and people who are anti-change and cannot think differently. Very often I think it’s
a people problem you know. And other things I think of would also depend on the course or
your programme. For certain programmes I think you will be able to attract Masters and
Doctoral students a lot easier than for others. And I have exactly the opposite in my
Biototechnology programme. I can attract a helluva lot but the biotechnology industry is so
small in this country that people will return for higher qualifications. Food technology you
can forget about it. My students get jobs, they get promotion, they go to production manager
level, technical manager level, they’ve got cars, they’ve got packages, they’ve got all these
things with a basic B-Tech, so why would they want a Masters degree? Well what’s it going
to bring them? The industry doesn’t recognise it anyway. They’re not interested. So if it’s on
a B-Tech level it’s fine and what you often find is that they go out and do courses in
personnel management or something like that you know. But on a food technology technical
level very, very little interest. I’ve tried everything to attract those students but they’re not
interested…So I think in that respect, you know, if I’m required to attract so many M students
or try and get my post graduate programme and research outputs going then it will probably
be mostly at the biotechnology level, very little in the food science area.

What (if any) underlying paradigm/ value / worldview clashes exist between the
HEQC’s conceptualisation and operationalisation of quality in HE and your own / and
those of the academics you work with?

I think the surprise that came in doing our self-assessment. The questions that we were asked
and the way we applied the questions actually reflected that we are doing is what we need to
do. Yes of course I need improvements in certain areas, but there was nothing major that
came out. So programme review, and programme revision on an annual basis we do that. We
have academic morning sessions every second week, something we just do, and there we
discuss curriculum and teaching problems and we feel too we need to revise this or that. The
B-Tech level we just recently revised it and took some things out and added other things and
it goes through the Advisory Committee, which is an industry-based committee before, it’s
allowed to go back to the students. So you know everything that is required we found to our
surprise, we were actually doing it. Very, very surprised like ‘wow!’ you know.
I have no doubt that SERTEC was a great help because already then we were schooled in
documenting to a certain extent what we do and assessing whether we’re doing it well or not.
And of course we had to have the documented evidence to show why we thought we were so
great or we’re not so great or we plan to do this to fix it.

How would you compare the Proposed HEQC QA system with the old SERTEC one?

It’s a difficult question because at first I kicked against the HEQC system because I was used
to SERTEC. But having gone through this process now recently with the HEQC in mind, I
think I prefer it almost because it’s not so prescriptive and it gives you a lot more chance for
self-reflection. That’s how I see it. I think that, certain people, from what I’ve seen, because
of the fact that it’s not so prescriptive, are going to have difficulties. They’re not going to
understand necessarily to what depth they want you to be reflective. And I saw that in a
department that I assessed yesterday, also in our Faculty. It was a completely different
approach to the one I took. So I think that’s the danger. Just the fact that you omit certain
information could make people suspicious and say ‘ahha you’re trying to hide something, let’s scratch’. You know and I think that the message that needs to go out is to be as open as possible, and not be afraid of self-criticism. By all means criticise, but say what are you going to do to fix it. Or at least what have I tried to do to fix it. Don’t sit there and gripe that the budget is not enough. You know those kinds of things don’t tell anybody anything. This is exactly what we saw yesterday during a Departmental self-assessment. You know ‘we don’t have air cons’, ‘we don’t have this’, ‘we don’t have that’, ‘we don’t have time to do short courses’. But then when you look, there is time to do short courses, you know. So it’s not good enough. And you’re going to get trapped in your own document, you are going to get trapped because people are not stupid and they’re going to try and form that cycle for you and then suddenly you realise ‘oh, but you know what, they’re right!’ ‘Better you do it yourself first.’ And I think my approach is to involve the entire Faculty. I don’t do anything like this on my own because it’s very much our document; it’s not my document. And I think most people bought into it. The resistance came from the question of time. You know internally we were told that we should do this for October. And I think between A (the QPU) and our Dean who’s so busy with this merger - he sits on I don’t know how many of these committees; he’s never available. So I think it created a lot of bad communication for a period of time. We got very little support from him. And it’s not a criticism of him, he’s actually very supportive, but because of this period, it just worked out that way. So we felt a little bit on our own. And we thought we needed more guidance but A said ‘No, do what you think is right, I want to see what you’re going to do.’ I think she wanted to see how we interpreted the document at Faculty and Department level. I don’t think she wanted to give too much assistance in that respect. But I understand why. I didn’t like it, but now that I’ve done it I understand why she took that route.

How do you intend to mediate the HEQC’s demands in the internal quality management system you are setting up for your institution?

Okay well the implications for staff of the actual self-evaluation. Because we do everything in a team we had a typical situation of: we get together, we look at what’s required, we divided it up amongst each other and we went and sat and wrote what we thought needed to be written. With certain guidelines understanding that document, how we say ‘we do this well’ ‘we don’t do that well’ and why. ‘How did we get to this point where we’re saying we do it well?’ ‘because we have revised it every year’ or ‘we’ve devised a new form to try and tighten up the situation for supervision of marking students’. For example we have a new internal form, which we’ve devised and we’ve said ‘right at every meeting we fill in this form’. It’s very basic - who attended, student name, what degree title of the theses or the project, date of the meeting, and right we discuss these issues. This is what still needs to be done so task responsible person plus date and comments. That’s all documented and we type it up and send it out to everybody who was at the meeting. So we know, it’s documented. Then we sit again and we go through this and say ‘was this done?’ and you know ‘you must submit this in two weeks time’ or ‘do your stats’ or whatever. And I have developed an internal web-site just for the Departments, where we’ve loaded all our documentation that we devise in our own Faculty for whatever we need. So you know B-Tech projects – ‘this is the assessment form for how we do it’. Experiential learning – ‘these are the guidelines, that’s how we do it’. And by the end of this year we will have all our study guides electronically available for each subject on that internal web-site. And I know that we’re the only Faculty in the entire Technikon that has that. So it’s really a lot of work, and this is what I’ve said in my document. The next step for us to do is to now start with the proper documentation numbering and revision so that we have a system where we can say this is document number two …this is the third time we’ve revised it. We haven’t got that yet but we’ll get there. This is the kind of thing we understand in the Department, we know that’s why we must do the self-reflection. So I don’t think staff resistance is really a terrific problem in my situation. Every time I would collate the documents and then go back and say ‘don’t you think we should do more on this and more on that?’ ‘Yes I agree.’ ‘Please run with it and give it back to me in a week.’ And so
I really got the draft from everybody that could make a contribution. And then I collated the document.

So the question is ‘is it actually improving quality?’ Is it adding value?

You know Kathy it’s a tough question because I do believe it is, but the question is for whom are we doing this? Yes we’re doing it for the HEQC and that’s important, but ultimately we also need to do it for ourselves because we’re really benchmarking ourselves and we’re not benchmarking ourselves against other Departments in the Technikon, because, and I don’t want to sound arrogant, but I know we are doing better than most in this respect. So I don’t know whom I’m benchmarking myself against. I don’t have a comparable situation. It would be nice to know that we are carrying out a ‘good practice’, but I would also like to see others that have a similar situation and be able to learn from those people. I would actually like to be on an HEQC panel because I do auditing for quality systems in the food industry, but that’s a food safety issue, a food microbiology management tool that is implemented in the food industry. So I do audits, I have the knowledge of how to audit and what to do I mean all audits are the same, the procedures the same. It’s the documenting thing and then it’s the on-site visit to say ‘right now prove to me that what you said in there is actually happening’. So all in all it takes a lot of time, I must say it takes a lot of time. But I think that’s once it’s going, once the system is set up, its going to be a lot easier.

What is your opinion on the value of the IT&L Resources?

The HEQC’s definitions of quality make sense to me, they really do and they’re right, I like them. But what worries me is the how it’s going to be operationalised and what emphasis is going to be placed on what aspects. I would hate to see, for example, staff equity becoming a big issue. Whilst everything else can be proved that there is good quality here and I have 95% of students in my courses are black, so if I am still doing a good job and educating a student and putting out a good student in the workforce that is ultimately I think what we’re supposed to be doing from a national goals point of view. Now the fact that I have a white skin should not count against me. And that is what worries a lot of my staff because we are committed to transformation, but if we cannot get black people (South Africans) who are adequately qualified in these fields, which is difficult in our field, then there’s really nothing I can do about it. You know I cannot be held responsible for that. So I can be seen to be doing a good job with the students. But one of the examples the HEQC official gave us was some silly example that he would make a joke that only a white person for example would understand…we know that! How do we deal with it? Well in food microbiology where you do fermentation of food products you talk about olives and pickles. Black students don’t know what you’re talking about, it’s not in their framework, they don’t eat that stuff. So what do we do? We have a platter of food at the beginning of that lecture, we go out we buy salami, we buy olives, we buy pickles, you know, we buy cured cheeses and all sorts of things and we make them taste. ‘Did you taste the acidity?’ You know what happened here lactate acid, bacteria did this, did that. So we try you know. I just would like to be seen to be rewarded for the attempt and not knocked with ‘oh but you don’t have ten staff members that are black’. This is the worry I have in terms of the HEQC and how they’re going to approach QA.

To what extent do you think the HEQC’s policy instruments will fulfil their purpose – namely to ensure accountability and improve the quality of HE provision? In your own institution? Country-wide?

I think again if it’s done correctly and the same standards are applied to all institutions then I’m sure accountability and improving the quality of our higher education provision will be achieved. I could see the usefulness in that. The worry is we’re going to start differentiating again amongst Universities, Universities of Technology, private higher education institutions etc. You know I would hate to see that happening because then we’ll still sit again with
differentiation and it’s been artificial, because in many respects Technikons can differ like chalk and cheese, but to say that all Technikons are at a low level, lower than university level, is not acceptable. And we’ve seen that now with the mergers for example. And if QA can be standardised from the HEQC point of view I would believe they’re on a winning streak. If they start differentiating then there’s a danger of having tears once again. And the snobbish attitude from some institutions to say that the others are not good enough; and I’m very pleased that universities are being assessed as well because I think it’s very important. You know there are some universities and even within universities you have some great divisions and some, which are just not up to scratch. Okay at our institution I think there is a management of quality but I don’t think that everybody’s bought into it on a management level, and senior management level, in particular. I think a lot of it is still lip-service. And it’s easy because from a DVC or a Dean’s point of view, they think it’s easy and they just delegate.
The macro-question is: To what extent you believe the HEQC’s policy instruments (the two Framework Documents, the Proposed Criteria for Audit and Accreditation, the proposals for self-accreditation, the MBA Review, supported by the Improving Teaching & Learning Resources) are valid, acceptable, feasible and potentially effective?

Do you think that the policy instruments that the HEQC has produced so far are based on adequate expertise?

I will first tell you about the pilot audits, we have just been through one and I was also trained by the HEQC as an auditor. Well, the advantage of the private sector is that pre-dating the pilot audits we already had accreditation site-visits, 2 institutional accreditation site-visits and for programme accreditation site-visits and also the HEQC one-day visit. So without realizing it we were well-prepared for the audit. The 3 institutions involved in the HEQC pilot audits worked together. We were by far the best prepared, it took two of our people from the A campus about 2 weeks to prepare for the audit – all the paperwork was already done, we just had to re-arrange it, we already had the evidence in place. We already had our new QA systems in place and we found that in the audit it all came together. We would have found the IT&L Resources very helpful to have had prior to the audit, they would have helped us prepare. In fact most of the accreditation criteria did help, but these haven’t stayed stable, the HEQC is still refining them. Most privates now have QA systems in place. And we were glad that the audit and accreditation criteria are linked, this makes sense to us, to us who are in the know. But we did find that our staff didn’t understand the difference between audit and accreditation, so they got confused, they understood audit as for accountability, so the developmental potential of the audit was definitely compromised. But we have now sorted this out and cleared the post-audit confusion. It is now 3-4 weeks after the audit that its huge developmental effects are apparent, all our academic staff are now talking about the audit. At the time they perceived that panel to be very severe and serious, some felt that they were being interrogated. In fact both parties were nervous, our staff and the HEQC panelists. Personally, I’m happy with the HEQC documents and process, but many others find it very imposing, full of jargon and dense and repetitive. I think that the HEQC should improve the Audit Criteria, they should make it much more user-friendly.

But now, after the audit, we have had positive feedback and people are saying it was a positive experience. Although the feedback was only a 5 minutes statement by the Chair of the panel. We’ll get full feedback form the HEQC at the end of November. How the feedback is handled will depend on the management and how they deal with it. We have a big divide between management and academic staff, management issues are usually secretive and academics have no power at all. But the audit process has to some extent broken this. Management has been obliged to set up Academic Boards to deal with academic and quality assurance matters.

To what extent are the HEQC’s policy instruments implementable in your context/institution?

Well for private institutions, we have to implement the HEQC requirements, it’s a matter of ‘do or die’, so I have no problems with the HEQC and its instruments. Our problem is that the DoE don’t understand the HEQC and there is a lack of policy alignment and communication between them. Only the DoE is actually empowered to close us down, but we get two letters, one from the DoE accrediting us and another from the HEQC de-accrediting us. So the issues aren’t thought through, we now have to take it on appeal with the DoE, a legal process. This kind of inconsistency is losing the HEQC credibility.
What are the resource implications of implementation?

For us the resource implications are great, huge. Remember that the model for private education is to work with part-time staff. Our academics are paid by the hour, so many hours per week, but they teach for 45 minutes. So in that 15 extra minutes they must do their course preparation, marking, QA etc and that’s it, they’ve got to fit it in! And our academics don’t complain, they don’t have rights, they have to do what management tells them. We do have some full-time people, like myself, we are managers and administrators. Some of us have been released to take on the extra QA duties for a Faculty.

Then remember that we have to pay the HEQC for our accreditation of programmes. For our 500-600 programmes it will cost R7.3 million, Damelin alone has sent 1,700 files to the HEQC for accreditation. We have 48 sites for them to visit. So I think that the HEQC’s model of accreditation is a noble idea but it’s not physically and humanly possible. Take auditing, it takes 3 weeks work per audit and in the first cycle of audits they will have to cover 21 publics and about 120 privates. They should appoint 3 or 4 audit teams full-time, they need statisticians and HR specialists on those panels too.

What are the constraints to successful implementation in your own institution? And to what extent can you overcome these?

How do you intend to mediate the HEQC’s demands in the internal quality management system you are setting up for your institution?

How do you think academics are going to respond to the implications for them of the HEQC’s requirements?

These have been dealt with above.

What (if any) underlying paradigm/value/worldview clashes exist between the HEQC’s conceptualization and operationalisation of quality in HE and your own/and those of the academics in your institution?

There’s no clash between us and the HEQC, there’s no problem.

To what extent do you think the HEQC’s policy instruments will fulfill their purpose – namely to ensure accountability and improve the quality of HE provision? In your own institution? Country-wide?

Yes I think so. I think there’s a barrier that they’ve got to break through and I think that the barrier is the academic staff attitude barrier. You must remember until now in public institutions academic staff were not accountable at all for anything. It was the most wonderful job in the world. And all of a sudden there’s an element of accountability there’s an, I don’t want to call it, an inspectorate, but there is an element of accountability it’s accountable to quality, to the HEQC and it’s a new phenomenon. The HEQC’s got to break through that, it’s going to take some time, it’s got to be worked through. And in our case it is accepted they’re not seen as villains or anything it’s accepted that in order to operate you’ve got to meet the new requirements and that’s it. It’s a business like approach. You see for us, like I said in the beginning, it’s do or die.

Well in terms of improvement, what we experienced at our institutions it’s an unbelievable improvement in quality. It’s a mega … it’s almost a quantum leap in quality improvement. Whether it’s going to be the same for the publics it’s difficult to say, for the public institutions. I believe that the assumption that was made until now that public institutions have good quality assurance processes embedded in their system is a lot of balderdash. I’ve been to too many Senate meetings at different institutions to tell me it’s not about quality –
no, it’s about egos. I see it. So I think the assumption until now that the individual Acts of the universities have imbedded in them a quality assurance guarantee was a false assumption. I know, I mean I’ve been in the position where people submit, you know you’ve got to appoint examiners for your PhD it’s not a good PhD. So what do you do? You select the externals carefully. ‘They won’t fail my student, my mate won’t’, so you call and say ‘I’ve got a lekker student’… And I know they had the names of all the examiners that will never fail the students loping around the department. So you know which one to choose. And you only bring in the difficult ones if you’ve got a good student, you bring him in. But we’ve got a very good moderating system. Why? Because we have to or else we don’t get accreditation. Our students get moderated from year one. Even their assignments are externally moderated - the curriculum, the assignments, the tests, the semester exams, final exams from year one right through to year three when they get the degree. It is it is time-consuming expensive, but it works. There’s an internal set of marking and external moderation. It doesn’t exist in the publics.

Peer review needs to be managed very carefully for the HEQC not to be perceived as a sort of, you know, ‘who do they think they are?’ that I’ve heard so often. Even in our environment initially in the beginning that was the attitude… ‘Who do these people think they are they? Let’s take them to court’. But now that they have actually been invited to participate in the consultations, in the training, they are coming around to it.

What we really need in the system is a bunch of professional educators. I began that system at B when I was Head of the Bureau of Learning there. It took me eight years to convince the system that you need a bunch of professionals and course designers to curriculum development that will assist and support you. So advocacy can make it work but it’s going to take some time. But you see you can’t do with the privates, they will never pay for that sort of thing. With them you just dam will do it or you’re dead.
1. To what extent do you think that the HEQC’s Improving Teaching and Learning Resources will be useful and have impact on Teaching and Learning at your institution?

I must emphasise that I think the document contains a wealth of very useful information. The first comment is about the form of the document. It may sound trivial but I do think that the form is important. As it stands it is a very forbidding-looking document. Although there are separate sections I think the document would ‘look’ more inviting if presented differently. On a less decorative note, I think an attempt must be made to somehow minimize the new-speak bureaucratic jargon. Here’s an example of an offending sentence: ‘As the ETQA for the HET band, SAQA has assigned special functions to the HEQC with respect to the quality assurance of assessment.’

I wonder if it isn’t possible to set out all the bureaucratic stuff – the relationships between the various bodies etc. – in a separate section that could be used for reference but could also be avoided by those who find this stuff intimidating (in the sense that they don’t want to read it). The other comment is about substance. I think there is a missing section and that it leaves the document incomplete not only the document but also the conceptual framework. I was left with the impression that quality in teaching and learning is almost exclusively the responsibility of the institution, the curriculum and the teachers. There is hardly a word about the learners and what their contribution needs to be. This is something that has been on my mind for sometime. We now have a situation for example in which non-attendance at lectures is almost becoming and accepted norm. (I’m not suggesting that mass lectures are the best teaching tool but the reason for the non-attendance is certainly not because of the poor quality of the lectures. The same is true for small groups of tutorials where these are not compulsory with registers etc.). The assumption that our students arrive at university burning with a desire to learn is simply naïve. Although our modules are designed and based on the idea of notional study hours, hardly any students devote the time to study that we assign them. The idea of reading a book, or visiting a library to find one, is becoming increasingly foreign at least to Humanities students who only want to know which precise pages they must learn for a test. My view is that we cannot simply ignore the kind of learning ethos that prevails at most universities today. We may not be able to do much about this but we need to recognize it, especially in dealing with QA. What I’m suggesting then is that there needs to be a section dealing with expectations of students – what they are required to invest in the learning situation – perhaps the old idea of a ‘learning contract’.
APPENDIX 9.9

Interviews with Quality Assurance Managers
The Macro-question is to what extent you believe the HEQC’s policy instruments (the Proposed Criteria for Audit and Accreditation, the MBA Review, and the Draft Guides to Good Practice) are valid, acceptable, feasible and potentially effective.

I’ll focus on the Criteria for the Re-Accreditation of MBAs as that is what I’m most familiar with. The document is badly put together, it’s uneven and drawn from different sources with different levels of complexity. It is reminiscent of SERTEC, i.e. specifying each of the criteria which causes one to lose the picture of the whole. I prefer Woodhouse’s approach, it is more integrated and analytical and based on the expertise and professional judgment of the panels to find out where the problem is. The HEQC’s document is too prescriptive, you end up supplying information, finding the right documents and giving descriptions rather than processing it. It precludes an open and honest assessment of where you are really are. We want to be transparent but the style doesn’t encourage this. The volume is just ridiculous. We supplied them with all the appendices they wanted – two volumes plus the report of 80 – 90 pages. For example each of our MBAs required 3 volumes of data and the HEQC requires 5 copies of each, we had to courier off about 20 volumes of stuff! I hope they will realize that they can’t process all of this stuff and will try to hone it down to actually get what they want.

The MBA Re-accreditation manual is 58 pages with 13 different areas to supply information for and a SWOT analysis for each. It becomes repetitive with overlaps between areas, it doesn’t hang together well as a narrative in the end. It could have been done much more simply with more readable products. In terms of time, in A, P was very thorough. It took 3 people working for 4 weeks to put it all together. One good thing is we will know where to find the documents in the future. We are going the same way as the UK, base-rooms full of colour-coded documents, two copies of all sets of minutes, it’s a complete nightmare, it’s accountability gone mad!

Validity:
In terms of validity, the theoretical underpinning is very mixed, it is outwardly developmental, but in practice, the opposite, I think it has got confused. The areas are valid, but the audit criteria are odd, for example service learning is elevated, this is obviously some one’s personal view.

Acceptable:
Only just

Feasible:
Not really – perhaps if we had all the time in the world and only one programme – but not really in the context of a large, busy, merging institution.

Effective:
I don’t believe these criteria will change what happens in the classroom. They might make us get the paper work together, write up some policies for practices that have always existed (but practice is a living dynamic thing, which is what we want), but they want to see one self-standing document that everyone adheres to, e.g. a QA policy document, all codified and documented. This will lead to a bunch of managers putting stuff together in a hurry, trying to codify existing practice. There is not enough time, the process is not conducive to working it with practitioners. It is too bureaucratic. Everyone else just carries on, uninvolved, so it is not effective for improving quality.

Do you think that the policy instruments that the HEQC has produced so far are based on adequate expertise?
I doubt this very much, it seems to be so derivative of other countries’ bad examples, the HEQC documents are far from the realities of institutional life. Therefore I would question their expertise. They did consult and they have gone through formal processes so I can’t fault them on that, but they didn’t listen to us. For example I was on the audit team, we were a team from 10 universities, technikons and privates and we were all of a mind about how audit
should be done but it came out completely different, as an accountability framework which is not what we wanted. It got edited badly and now has got so mixed up with the Accreditation Group that we wouldn’t put our names to it, it just wasn’t recognizable. We didn’t want criteria at all. So one must ask to what extent have we actually been listened to?

**Who do you think should have been involved in the HEQC’s policy development process?**

The right people were consulted but it wasn’t paired with sufficient expertise in the office. This is frustrating because they have heard the critiques from others (the gurus in the field) but haven’t been able to distinguish between say accreditation in India and audit in New Zealand – probably as a result of insufficient expertise themselves. In the recent workshop for QA Managers they kept on insisting on a single system for private and public HE, but even within a single system one could tailor the instruments for different contexts. We do this in our own institution for example where we have the same criteria for promotion but apply them differently in different Faculties. So I think the HEQC is blind to context and are using the political imperative of having to have a single system as an excuse. We could have had the same principles and approach but with different applications. We don’t have to have uniformity throughout. For example their handling of research is very ham-handed.

**To what extent are these instruments implementable in your context/ institution?**

**To what extent do you think they will fulfill their purpose – namely to improve the quality of HE? In our institution/ country-wide?**

**How do you think academics are going to respond to the HEQC’s demands on them?**

I’ll take 4, 5 & 6 together, based on the MBA experience. It’s taken us (3 people and myself) 4 weeks almost full-time to gather the data and Q in B is still battling. The HEQC requirements will definitely take time away from real activities such as research and teaching. If the process had been different, as we’ve tried to do with our internal process, we could have sat down for a morning and talked about some real issues based on much limited data such as students marks, students evaluations and programme templates (instead of spending hours re-formatting all the staff’s CVs into the HEQC format!). If we had been able to spend just a day talking honestly about this data, talking about the main issues, assessing where the problems are and producing a 2 page report, it would have been really useful and I imagine that academics would be in favour of this.

Here’s another example: when I saw the HEQC audit criteria document I was horrified. I sent it out to all Deans and members of the UTLC, to the unions and students, for comment. I didn’t get one comment back, except from one who said “If I get another government document like this I will resign” and another who said “This is a crock of shit”. They won’t even read a 58 page document on audit criteria. They just didn’t care. I then sent to them my own response and some thanked me for my response on behalf of the UN. There are too many government documents especially with the merger, and this is just one of them. When they see the 58 page criteria document they will just throw up their hands in horror and decide not to even look at it. I know how they are going to respond. Then when the audit happens they will all have to rush around to meet the minimum requirements, moaning all the way and no one will learn anything.

**What (if any) underlying paradigm/ value / worldview clashes exist between the HEQC’s conceptualization and operationalisation of quality in HE and your own / and those of academics?**

Academics think of quality as setting high academic standards, e.g. excellence in research. They have their traditional indicators for this and see quality residing in how you teach and research, not in good documentation and procedures. In the traditional way the indicators are all anecdotal and peer review is the main mechanism. The majority don’t see quality as residing in having good paperwork and processes. Quality is also collective, e.g. a good
department will encourage and build up good teaching and good research practices. The clash for me is I think that the HEQC has latched on to a managerial understanding of quality, e.g. providing specifications beforehand, you either meet minimum standards or you don’t. These standards and criteria are not about how much your students are learning or about the quality of journal articles you are producing. Rather they want a policy on X, its all paper work and this is unlikely to capture the substance of what we do. For example, we have just submitted reports to the HEQC on our two MBA programmes. One had all its paperwork in order and the other didn’t, but if I was a student I would much prefer to study the latter programme. However, at this stage we don’t know how the paperwork will be used and we still have the evaluation visits and interrogations to go through, so I will reserve judgment to some extent.

What we wanted from the external QAA was predicated on a stable HE system. Now QA is being used as an instrument to restructure the HE system. This will be fatal for our approach to QA – I don’t know how much to tell the ordinary academics – e.g. those on the MBA programmes. They don’t realize that the HEQC could close them down. It is an abuse of power, no one outside of the institution should tell you to close down a programme or what you may or may not teach. It is compromising academic freedom. The HEQC’s lack of expertise and their distance from what goes on in HEIs has allowed them to get caught up in fulfilling a state agenda. The quality agenda has been hi-jacked.

**How do you (the QPU) intend to mediate the HEQC’s demands in the QA system you are setting up for our institution?**

We are going to set up an internal system that we think will work based on an understanding of quality that we believe in and hope that at some point these will meet the HEQC’s demands. Their ad hoc demands result in minimum compliance. We won’t use their policy documents as points of departure, we want to develop our own systems, but make sure that they are not entirely different, obviously we don’t want to make academics do double work. Our thrust will be internal, much more developmental and friendly (what we originally wanted and hoped the HEQC would be). You know, we wanted them to be a national body that had expertise and could help develop our systems, finding holes in our internal systems and sending consultants to help us. We wanted them to add value and to give us guidelines. This is the same role we see the QPU having in the institution – i.e. a resource rather than a policing body. The HEQC is forcing us into a policing mode. We would rather be a resource within the institution, let academics find out what the quality problems are and then refer to us to help and support, it is their investigation of issues that contributes to improving overall quality. No paperwork will fix a bad teacher. It is the teacher-student relationship which is the key to quality, if you can’t fix this at the coal-face then you can’t fix quality. We will try to get communities of people talking to each other, we will encourage self-reflection, identifying quality gaps and finding solutions together. At both group and individual level we want open and honest discussion. At this institution our assumption is that everything works (more-or-less) – although the merger might change that. Our programmes and modules exist and we will not use quality as a feasibility exercise or to restructure or close down programmes, we are working rather to get the academics to improve them themselves.

I do have some sympathy for the HEQC in the sense that they are trying to use quality as a lever to force change, to maybe close some privates down. So their point of departure is quite different. So I do have to say that the kinds of things we would have wanted as an institution to see from a national system are predicated on a stable kind of higher system and not on a minister who’s wanting to close down some MBA programmes or to reconfigure the system. And I think that’s what’s happened, actually, is that they’re using quality as the instrument to do that. And that’s fatal for their trust with the institutions and for development. The question is how much do we tell them…Because they could close us down. And I don’t think anyone should have the power to close one down. They might not fund you, they might not accredit you, I
guess, but they can’t say you’ve got to close down. That really steps on academics’
toes. We are working rather to get the academics to improve them themselves. So, I
think that the HEQC falls down both because of a lack of expertise and also because
they have allowed themselves to get caught up fulfilling the state agenda.
The macro-question is: To what extent you believe the HEQC’s policy instruments (the two Framework Documents, the Proposed Criteria for Audit and Accreditation, the proposals for self-accreditation, the MBA Review, supported by the Improving Teaching & Learning Resources) are valid, acceptable, feasible and potentially effective?

Do you think that the policy instruments that the HEQC has produced so far are based on adequate expertise?

In a sense yes because I think the HEQC has consulted widely in terms of other QA systems, for example for audit we looked at the UK, Australian and New Zealand systems, plus others. So for both audit and accreditation the HEQC has looked carefully at lessons learnt from elsewhere, so I think the documents are based on adequate expertise.

But I’m not sure that the HEQC has given enough thought to the problem of contextualisation and how to adapt international frameworks to South African conditions, to our specific circumstances and context. I think that the HEQC may be taking established good practice from elsewhere and being too ambitious in thinking that our HE sector is sufficiently sophisticated and has sufficient expertise to handle this at this stage of its development.

My second concern is that there are very few in South Africa who have adequate expertise in how to design and implement a national QA system. In a sense this is inevitable, so we have to accept that we are all on a steep learning curve. And we have already learnt a lot in the last 2 years, this is evident in the rather messy way the documents have been developed.

I think that the revised versions of the policy documents – I’m referring particularly to the Audit Framework which I’ve been involved with – will be an improvement. It’s now clearer how much detail is required and this should help improve institutional audit manuals. (I’m not up to speed on the Accreditation documents, I think that the Draft Accreditation Framework document was good and doesn’t need much improvement.)

Who do you think should have been involved in the HEQC’s policy development process?

I’m pretty satisfied with the policy development process, I have been privy to internal HEQC discussions, but this is my personal perspective. The HEQC has been pretty good about consultations with QA Managers, there have been feedback sessions and discussions three times a year at the QA Managers Forums. These have been very useful and QA Managers have been kept in the loop. Some may feel that they should have been consulted more on policy development and choices, but to really make a substantial contribution one needs to be in a regular consultative process, or to work as a consultant! To me there seems to be bursts of activity in which we are invited to participate (as consultants) and then it does quite for a while and we are no longer in the loop. But overall I’m happy with the HEQC’s attempts at consultation.

The real question is has the HEQC heard our comments and feedback? I think we are heard from a defensive position. The HEQC has already made certain ideological commitments, (for example a ‘fitness of purpose’ position), which is non-negotiable. They will receive a range of comments, but they aren’t going to budge from this position anyway. So I’m not sure that our comments are really heard – some are but others are ignored. For example concerns re the
merger process, perhaps the HEQC is under pressure from the DoE on this and so can’t change their position. So what I’m saying is that the HEQC does call for comments but in many cases they are unable or unwilling to change, not everything is up for grabs, in the end they feel that their position is defensible and they have to take a certain line. In some cases they have taken a heavy-handed approach, for example on accreditation and this is a given.

**How do you think academics are going to respond to the HEQC’s demands on them?**

When the HEQC sends documents for comments their deadlines are too tight. Academics see these as something threatening from Pretoria, very few have the expertise to respond, they are too busy to get a handle on the documents and just throw up their hands in despair.

But when the HEQC came to UPE for one day to get comment on the draft Audit Criteria document they asked for academics to be present. These selected academics did read through the document and my general impression was that they were mostly OK with it. They accepted the HEQC and that they have a role to play in implementing an audit system. There were concerns about the volume of criteria and that they are so wide-ranging. But I don’t think the academics questioned the legitimacy of the criteria. They basically accepted the principle of audit. They were concerned with how it would impact on their own work as academics. They wanted it to be phased in because of the huge impact of the mergers. Generally it was a positive, constructive meeting without a sense of animosity, the academics didn’t launch an attack on the HEQC, they were more concerned to think constructively about implementation, they weren’t antagonistic. The consensus at the meeting by senior academic managers was that the HEQC must take a phased in approach, we need time to develop all the processes required to address all the criteria and to get up to speed. People felt that the number of proposed criteria is unrealistic, there is only so much you can do in a 3-4 day audit visit.

Our one-day visit from the HEQC in May this year was also positive. About 50 academics attended a two-hour session. Generally fears were expressed and allayed by the HEQC. The HEQC showed that it was concerned about financial constraints and also demands on staff time. They asked legitimate questions, for example our curriculum planning procedures and how we are addressing the needs of the region and our context in our curriculum design. People commented that the HEQC is much better than SAQA!!

**But Note – I can’t claim that all academics share these sentiments, we tend only to invite academics who will be constructive to these meetings. Others just stay away, I’m sure there are many who would say that QA and the HEQC are a waste of time.**

**To what extent do you think the HEQC’s policy instruments will fulfill their purpose – namely to ensure accountability and improve the quality of HE? In our institution/country-wide?**

The balancing of accountability and improvement is always a problem in QA systems. There has been a shift towards accountability by the HEQC since the Founding Document of 2001. I thin they are hammering accountability more than 2 years ago. I thin they will achieve their purpose with respect to accountability. But the question is what kind of accountability? They may achieve a superficial compliance kind of accountability, but not an authentic accountability that is owned by academics and departments. Academics don’t generally yet embrace the idea that they should be accountable as a legitimate requirement, they see it as an external imposition. On the one hand I can understand why the HEQC went the way that it did, e.g. the production of criteria and taking the initiative away from HEIs. But the imposition of criteria by a national QA body will inevitably result in a compliance culture. We had hoped for a more developmental path where academics could be asked to determine internally what criteria are applicable to them.
On the other hand one could ask what’s wrong with compliance? At our stage of national development we do need certain minimum thresholds, and there should be no uncertainty about what should be in place to ensure acceptable standards in certain institutions. I do understand the argument that we need clarity and consistency. But the danger is in the way the criteria are communicated and implemented in practice. Will HEIs be encouraged to make the criteria their own and adapt them to their contexts or will they be rigidly imposed from without? I took this approach when working on our internal audit manual, I tried to adopt a flexible approach and avoid a check-list mentality. Mark Hay (HEQC official) seemed to find my approach acceptable. (Talking of which, I heard that one institution in the pilot audits expressed its achievement on each criteria as a percentage mark!!)

People are less positive about programme accreditation, they are already moaning that it have become a complex bureaucratic paper exercise that's not integrated into institutional culture.

I think the HEQC would be more effective if it proposed fewer, meaningful criteria and took a less ambitious approach, seeing it from the institutions’ viewpoint rather than from their own sometimes politically-driven one. So the big question for the way the national QA system develops will be whether HEIs develop a sense of ownership or not. The ultimate worth of any national QA system has to be the way it gets quality to be embedded in the academic activities of institutions and taken seriously by academics. In other words, are we making a difference in the classroom and are we developing learners who can meet the demands of society. I fear that the HEQC, whilst it shares these concerns, may get bogged down in its policy formulation and lose sight of the ultimate goal which is good teaching and research. I you compare our system to Australia you will see that their system is less prescriptive than ours and gives more responsibility to HEIs. But some will say that for our context the HEQC’s approach is right. The question is: is it possible to go down a strict accountability road than then shift gear later – and shift the locus of control from the HEQC to the institution at a later date – as the HEQC want to do with their re-accreditation proposal.

My other fear is that the HEQC system presupposes a fair level of sophistication inside HEIs – for example that QA managers are competent, work hard and have good management information systems. The demands of developing a quality management system are very complex and comprehensive … But I know that some of our QA managers haven’t go a clue and so we will be perpetuating the divide between the more and less advantaged institutions. So unless the HEQC is going to take capacity development very seriously, the historically advantaged HEIs will get self-accreditation and the others will get left behind which will create a difficult political situation for the HEQC.

To what extent are the HEQC’s instruments implementable in your context/ institution?

They are largely implementable and contain what needs to be in place eventually. But the HEQC must understand that this is a process and it will take time to get these things in place. Setting up a QMS is a long-term project, every year we put a new aspect in place – for example we now have a postgraduate policy and an electronic student feedback system – but these take time, hard work and money. The trick is how you sell implementation in your institution – I don’t use the big HEQC stick approach but rather ask how can we be an internationally respectable institution that can fulfill its legitimate place? So in the medium term we need all the things the HEQC is asking about if we want international students, partnerships with business etc. and if we want to be taken seriously. So overall I’m quite positive about the process but we need a few more years to get there.

What are the necessary conditions to meet the HEQC’s requirements?

Right at the top, the VC and DVC (A) must be behind the QA process and buy into it. They need to walk the talk and support you. Secondly, I’m convinced that you can’t be a QA
The manager is you yourself haven’t been an academic and had substantial experience in academia in both research and teaching. We have some QA Managers who have hardly been academics and how have no experience at academic decision-making. This is important for the legitimacy of the person and for understanding what additional external demands mean. I would not feel comfortable as a QA manager if I hadn’t been an academic myself. Thirdly, the QA manager must have sufficient authority and clout to stand up to senior academics, he/she should be at a Professorial level and have power and credibility.

What (if any) underlying paradigm/value/worldview clashes exist between the HEQC’s conceptualization and operationalisation of quality in HE and your own/and those of academics?

These worldview conflicts play themselves out within the institution. For example the senior managers may want an approach to quality that emphasizes value for money and the good use of resources. Academics prefer a ‘fitness for purpose’ approach and feel threatened by the other approaches. They fear a loss of autonomy and academic freedom. This is understandable but they need to realize that they are accountable to the taxpayer and to students, they can’t just be left to do as they please. They need to demonstrate the investment that society is making in their HEI. Academics have to realize that it is not wrong that they are being called to account for how they do their core business, But we should not impose a given understanding of quality on them, let them define it for themselves in a way that is meaningful for them. We can’t go and ask them why they aren’t complying with national policy imperatives, this will just put their backs up. My preferred position is to affirm what they are already doing as important and legitimate and let them tell us how they think their work contributes to society and its transformation.

The HEQC’s ‘fitness of purpose’ approach is going to be problematic. The HEQC is pushing a ‘fitness of purpose’ approach while the HEIs want a ‘fitness for purpose’ approach, we want to define for ourselves what our purposes are. This is going to cause a paradigm clash. HEIs are going to debate with the HEQC about how one defines ‘fitness for purpose’ and about who has the right to translate the DoE’s transformation agenda into our own context. ‘Fitness of purpose’ is OK if the HEQC let’s us define for ourselves what we regard as our purpose. I think that there is a danger that the HEQC wants to vigorously embrace a ‘fitness of purpose’ approach in which it defines our mission and transformation for us, thus doing the DoE’s job for it. Yet the DoE already checks these things through our 3-year rolling plans, enrolment and equity stats etc. The HEQC appears to want to be closely aligned to the DoE and to be pushing on HEIs the government’s requirements in a confusing way. The HEQC needs to ask itself these questions. Could it not be more like the national research bodies which are more buffer organization that mediate independently between the state and the HEIs? The HEQC could position itself more in the middle, and mediate between the state and the institutions.

I think that the transformation agenda is potentially the most valuable definition of quality for our context and here the HEQC and HEIs could find common ground. I liked the emphasis in the Founding Document on ‘social and personal development’, i.e. the development of learners, this is sound and the heart of the quality issues. We should aim to produce critical graduates, following Ron Barnett. This could be a fruitful locus for finding common ground.

The HEQC is of course accountable to a range of stakeholders and so perhaps the clash is inevitable. In Australia and New Zealand this is managed by delegating responsibility for QA to the institutions, this softens the managerial thrust. HEIs are asked to develop QMSs that will serve their purposes and to demonstrate their effectiveness. This is really a ‘fitness for purpose’ model that is based on trust between the QAA and the HEIs. It’s tricky to get it right, perhaps tensions are inevitable because quality will be defined differently by different role players.
How do you intend to mediate the HEQC’s demands in the internal quality management system that you are setting up for your own institution?

As we are developing our own QMS I have tried to take cognizance of what the HEQC wants and to build it in, in a sensible way. I’m trying to keep our and their systems aligned and to interpret state requirements for UPE. I am also realistic about what the institution can and cannot carry. I don’t want to set up a huge system that overwhelms and paralyses people, so we will go slowly and build on small successes.

Any other comments related to the national QA project and your institutional QA work?

I’m concerned about the HEQC’s capacity to pull it off. I won’t be surprised if some of the wheels fall off when the audit system starts. The HEQC has very few officials who can really do the job, they will find it difficult to implement their own system, and will probably have to use consultants. The lack of expertise and capacity in the HEQC may lead to a credibility crisis in the development of a national QA system.
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The macro question is: To what extent you believe the HEQC’s policy instruments (the two Framework Documents, the Proposed Criteria for Audit and Accreditation, the proposals for self-accreditation, the MBA Review, supported by the Improving Teaching & Learning Resources) are valid, acceptable, feasible and potentially effective?

Although I was involved with the whole process putting the Resources together and saw a lot of the earlier first drafts, it was really only when I saw the finished product assembled together in a booklet with an introduction and a consistent pattern going all the way through and with consistent quality going all the way through, that I actually began to sense what a valuable Resource we’ve actually got here. And it’s a systematic coverage of a whole range of absolutely critical academic practices associated with teaching and learning. And for each one of those areas there’s a nuanced discussion up front which immediately introduces one to the complexity of achieving institutional change and the difficulty of trying to engineer this.

So I thought that was hugely helpful and the Evaluative Questions I thought set up a very, very valuable framework for understanding the management of teaching and learning. I think it’s all about the management of T&L. I thought that that comment at yesterday’s Western Cape workshop was a very interesting one where the A guy got up and said this Resource is a Resource about a particular way of understanding academic practices from within a particular paradigm… And although I think that he was wanting to suggest in a very diplomatic way that there was a kind of a technisist slant to it, in a way I understood what he meant, it’s because of the emphasis in the Resources on management. It’s the managers gaze. It’s the attempt by us educational developers and institutional managers at various different levels to try and bring complex social practice under control.

I suppose that’s reflecting the modernist part of our souls. We’re wanting to bring things under control and we assume that management is possible and that through management we can improve things. That’s the dream that we’re enacting and that we have codified it in this whole set of Resources. It’s the ‘gospel of educational developers’ being laid out in a systematic way. I think that some amongst us were probably irritated by the complexifying discussions that happened in your Discussion Sections at the beginning of each chapter, others would’ve wanted a much stronger foot-stomping set of requirements, e.g. “you will do this, and it will be done in this particular way.”

How do you think academics are going to respond to the implications for them of the HEQC’s requirements?

What (if any) underlying paradigm/ value / worldview clashes exist between the HEQC’s conceptualisation and operationalisation of quality in HE and your own / and those of the academics you work with?

How do you intend to mediate the HEQC’s demands in the internal quality management system you are setting up for your institution?

In attempting to answer these questions, I have to say that what’s happened to me has been my own trajectory of learning that has happened over the last few years when my ‘educational developer soul’ with all of its assumptions has come under a certain amount of stress and modification, largely as a consequence of my own research. My research has involved
interviewing a large number of academics. I actually conducted ninety interviews across two institutions in the Science Faculty, Humanity Faculty in each case; and in the process, of coming to understand the world-view of academics on the ground and also coming to terms with some sociological theories around education. This has served to modify some of my assumptions about these things. It’s difficult to wrap this all up in a neat way but I suppose if there’s a single sentence that sums it up it’s something like: “academics do what they do because of who they are.” And I think that I, certainly in my earlier years as an educational developer, I think I underestimated and misunderstood a lot about who academics are and what motivates them. What structures their way of thinking. Part of what I did for my research was to try and understand what was motivating academics who were disposed towards change. So in my ninety interviews I was trying to understand where resistance to curriculum policy was and where the people who were inclined towards adaptation or inclined to respond to the policy were. And so I then selected groupings of people who seemed to be inclined to respond to the policy and I went and interviewed them much more closely. My goal was to try and understand firstly what was motivating them and secondly what was their experience of actually trying to bring about the modifications that they wanted to put in place.

Originally I asked them to reflect only on the experience of a couple of years. You know the actual programme planning process and the initial implementation of it. So I was interviewing people generally in the first and second year of implementation, but they had gone through the whole negotiating process beforehand and that was a fundamental process where academics negotiated with each other around constructing new curricula across disciplinary boundaries. And I found several things. I came to understand that academics were not responding to the policy itself. They were trying to get fulfilment to pre-existing dispositions. The policy simply opened up the space for these dispositions to be exercised. And they were by in large trying to give fulfilment to much deeper motivations which were conditioned over long periods of time. I found four broad motivations driving people:

a] Quite a large grouping which I called traditionalists and they operated in two ways. Some were trying to resist changing at all and were trying to hold onto some existing order. Others were trying to adapt curriculum back to what they saw as being a desirable order. Very often trying to move back towards verticality and disciplinary depth. So for example they saw the whole process of as undermining traditional disciplinary depth. And so they were moving to try and restore that.  
b] Then there were three groupings each of whom had adapted orientations and were trying to shift things in different ways. There was a second group who were motivated by what I called pedagogic impulses. They were people who were trying to bring about educational reform. And it was normally geared towards a learner-centeredness or outcomes-based approaches to education. These are the kind of people who are the natural allies of educational developers. The people that we typically work with in departments. These are people who are often driven by fundamental social justice concerns. They have a very strong impulse for equity but it’s not drawn from policy documents it’s drawn from much deeper, longer-term sets of values, a deep sense of commitment to a particular vision of a social order, of how the world should be. And people feel very deeply passionate about this. And what I’ve found is that these people have had a terrible time, they often emerged at the end of the whole process bruised, bleeding, battered and disillusioned. The more they’d invested, the greater the risks they took, the more damage they tended to incur. And this really was a consequence I concluded of a deep lack of exposure by their colleagues to the educational discourses that these people had absorbed; a lack of exposure to the intellectual foundations that inform educational reform. The intellectual foundations that you and I have soaked up over years and years of the educational developers. Those discourses are just absent and instead what’s in their place is a very kind of bipolar two dimensional set of polar opposites. So, for example, the ‘sink or swim’ ethic would be valorised against the ‘hand holding’ ethic which was pathologised. So it was two simple dichotomous camps, the one is good the other is bad. And there’s very little systematic intellectual grounding informing either
of those positions. But there’s a deep sympathy for the ‘sink or swim’ ethic because that is how academics have got to be where they are. They have a natural capacity to have exercised and to have risen to where they are. So there’s a tacit, unstated, unspoken or unarticulated commitment to that ethic and there’s a deep antagonism to ‘hand holding’ and there’s no understanding of the whole range of different methodologies that educational reform supports nor the intellectual arguments and research, that underpins it. So it’s not okay for us to categorise people as dinosaurs … they simply don’t know. So that’s number one and number two. A lot of No. 1 colleagues could use this huge welter of policy reform that had been coming at them (and most obscure and threatening was the stuff coming from SAQA) - this welter of acronyms etc, which tended to pathologise educational reform. So I came to understand that division in a way that I hadn’t properly appreciated for because I had been looking at the academic world from the educator developer side of things. And what I did through all of this was to actually climb to the frames of reference that academics on the ground work with. And what I came to understand is that there’s an immense lack of appreciation of what the policies are actually trying to do and what educational reform was trying to do.

c] The third category were academics who were inclined toward reform because they believed that responding to the market is a really worthwhile thing. And I use the term “market” here in its broadest sense. So there’s a variety of people clustered under that. And fundamentally it’s people who are working in disciplinary areas where there are applied possibilities. So they could even be in the English department surprisingly enough. For example you might find someone who has been doing a whole lot of work in media who suddenly realises that there are fantastic opportunities for training students for careers in the media and for putting out critical media workers, people who actually go into media industry with a really good intellectual academic training. Who say, yes, it’s appropriate to face the outside world. And they allow the outside world to shape the curriculum. So the other end are those who are facing the industrial market. You find them in Science and Engineering very obviously. And you also find them in the Humanities Faculty. You know people in politics and sociology who are concerned with development. And they want to push development studies. They want to collaborate with certain sectors of government, civil society, and relevant programmes. The great problem with people who are focused outwards is they disagree on which segment of the outside constituency to focus on. So that was that’s one of the great difficulties. But fundamentally it’s based on the implied possibilities of knowledge rather than monetary gain I think. It’s the intellectual possibilities of applied knowledge that excite them. So that’s why I clustered them together in the category that I call market-orientated.

d] And then the final category is a category I call cognitive which is people who are responding adaptively because of changes in their intellectual field. Quite often those changes would be where their discipline was converging with another discipline and so they were very excited by the possibility of interdisciplinary knowledge. But there it was the pure intellectual excitement of a disciplinary cutting edge. And those were the people who were driving these things. They were often people on the borders of their disciplines, (you know how tricky it is to try and decide where the boundary of one discipline is) where the new knowledge is coming out. They were often people working in departments where these new hybrids are not easily accommodated and so the policy opened up the opportunity for these people to state their particular interest and to try and firm up that interest and put it in place in terms of the new curriculum. Okay, the reason why I’ve talked about all of this and why I’ve spoken about these four different categories is to point out these categories grew out of deep commitments generated over a long period of time and associated with deep intellectual or moral frames of reference. It’s their sense of identity. They are responding the way they do because of who they are and who they understand themselves to be. I never came across anyone who said ‘the government is asking us to do this’ or ‘institutional management is asking us to do this, hell, I’ve got to drop everything and do it.’ Surprisingly not a single academic told me that. So I think all of this has implications
for understanding how these Resources might get used. They will be re-interpreted contextually by whatever frames of reference people already have in place. And so if we’re wanting a nuanced thoughtful interpretation of these policies, we have to work to put in place the frames of reference that will help people to understand where these things are coming from.

I suppose the quality of implementation depends on the quality of the discourses that are circulating in those different contexts. And I think it’s a huge job to actually insert a more complex and more nuanced discourse about education into department level consciousness. One needs to have recurrent conversations happening as the norm inside departments about the kinds of issues we want to address through the Resource pack. Now that’s an immense undertaking! And it’s a long term project and it crucially depends on middle management on that kind of distributed leadership that is exercised by mid-career to senior academics in their own departments, people at senior lecturer and associate professor level, people who become Heads of Department positions or Programme Convenors. Also people who are playing both a management role and an intellectual leadership role, the people who shape the corridor discourses of departments. And so the task here is to promote a nuanced understanding of our policy environment by such people.

I think that a policy environment happens at multiple levels: it’s understanding what’s happening globally in higher education and that the things happening in South Africa are not some ghastly aberration, we are part of a larger set of shifts for good or bad that are happening internationally. Understanding what’s happening nationally - the various imperatives that there are in terms of equity, social development and economic development the priorities in particular institutions for competitive advantage, etc. But crucially I think that departmental middle management needs also to be thinking about where the discipline is going. What areas should their department be prioritising? How can they take their department in a particular direction? So those are the various different levels of the policy environment that I think we need to be thinking about. So the direction they prioritise for their own department’s discipline is part of policy implementation. It’s fundamentally what shapes academics’ worldview. So that’s the one dimension.

The other dimension is understanding what underlies the pressure for educational reform what underlies notions of quality learning and teaching, and beginning to give people some exposure to the literature. And I’m speaking here from my own experience on the Higher Education Studies programme …from my own experience of what happens to the career academics when you expose them to that literature and they begin to get a sense of the intellectual foundations that inform these ways of seeing. When you give them the intellectual equipment a transformation and a light comes into their eyes, a kind of radiance that they glow with and they can set the institution alight with missionary fervour. And part of our responsibility I think is to realise that missionary’s make the best hamburgers. The kind of project I’m trying to develop is an understanding of policy priorities and the debates around them. I’m not in any way advocating that we induct colleagues into becoming the hand-maidens of policy. I’m thinking of equipping them with a critical language to understand what informs policy and how to interpret policy. How to interpret it for their own particular contexts. Where if necessary to resist and protect core academic values and practices. The other project is one of trying to develop educational discourses. But this is a long-term project and it’s an expensive project. It’s expensive in terms of time, time and commitment at every level of the institution from top executive leadership right the way down to academics on the ground. And we’re at the situation at the moment where the time is not available. There’s so many competing priorities. And an institution like UCT, research is always going to be first priority for academics on the ground. And I’ve yet to hear anything other than lip service to prioritising teaching and learning. So I think we’ve got a very, very serious issue of credibility. Credibility in terms of value systems, credibility in terms of understanding where this Resource pack is coming from.
To what extent do you think the HEQC’s policy instruments will fulfil their purpose – namely to ensure accountability and improve the quality of HE provision? In your own institution? Country-wide?

I think that institutional management and the HEQC will need to be highly selective on what they prioritise. And I go with Ian when he says it’s absolutely critical for us to pinpoint one or two key issues and work on them and then let the consequences of those issues accumulate and let institutions adapt and begin to deploy resources to addressing those issues properly. And then to assist institutions to understand in the longer-term what it takes to actually try and address those things. First instincts will be for people to make short-term pragmatic adjustments and to do things in ways that could be detrimental to quality. The HEQC are only going to have limited credibility at the most senior levels of the institutions. I think the rest of the institution barely knows who they are and is either disinterested or hostile. I don’t think there are going to be any academics on the ground who will be seeing the HEQC as a necessary instrument, certainly not in an institution like this one. A kind of institution that is reasonably well managed. What academics want is to be left alone to carry on doing their work. But I do think at the most senior levels at our institution the HEQC is increasingly being taken seriously. And I think strategies like bringing in key institutional figures to be part of the auditor training helps enormously in helping to build that credibility and helping people understand that the HEQC is serious about what they are about what they’re doing. It’s absolutely crucial that what the HEQC does and how it actually does it wins credibility. For example, if the audit exercises are screwed up and if the HEQC comes in with unwarranted attacks on reasonably high status institutions they will undermine their credibility. At the same time they do need to be calling institutions to account in measured, very directed ways. If they were to come in and focus on some key issues and raise alarm bells about some key programs, e.g. business studies for with respect to equity, then they will be more effective than if they use a shotgun approach that tries to have a go at institutions across a board front.
The macro-question is: To what extent you believe the HEQC’s policy instruments (the two Framework Documents, the Proposed Criteria for Audit and Accreditation, the proposals for self-accreditation, the MBA Review, supported by the Improving Teaching & Learning Resources) are valid, acceptable, feasible and potentially effective?

Without answering the question directly let me say first that I think part of what hampers the HEQC’s policy work is that their policy instruments are actually not finalised. And it’s a typical trend not just with the HEQC but also the DoE. For example, you get the Draft Framework document, in the case of the HEQC, you comment and then there’s this kind of pause and nothing ever gets finalised. Then you get the draft criteria and you say hang on a sec we haven’t had the finalised framework. And then they say something slightly off the cuff like, oh well you must just take the draft framework as the current one until we finalise the policy. So you’re working off a shaky and unstable policy environment that makes the next level rather shaky. So that bedevils everything that they do. But let me not just blame them for it because they are working within the shaky context of no finalised new academic policy etcetera. It’s a system-wide problem. With respect to valid, acceptable, feasible and potentially effective I think what the HEQC is doing is ambitious. That doesn’t mean that I don’t think it’s good to aim high but it’s one thing to aim high and another thing to be realistic. And I’m also seeing this year that they are defending their position in terms of aiming high by saying they’re being very thorough but yet they seem to be going beyond their stated principles that the system must be driven by self-evaluation, self-improvement, self-responsibility and institutions should take prime responsibility for quality. And especially this year we’ve seen less of these principles with the accreditation with the audit criteria I suppose also with the MBA re-accreditation criteria. And it’s what Peter Owen was talking about yesterday - that the leadership of national organisations, be it the Health Professions Council or the HEQC, they may have a certain view that is acceptable, but somewhere in the middle something changes and the people who are actually doing the operational work are bureaucratic, don’t see the big picture they simply don’t have the capacity at operational level. We see this all the time at the programme accreditation level, we correspond a lot with the HEQC on this.

The MBA review was a difficult process because our Graduate School of Business Administration is in a difficult period. They’re trying to cede from the Faculty of Commerce …. So P and I were involved trying to assist them with the process but there is distrust of the Centre in this part of the university... They just regarded the MBA re-accreditation as a pure irritating compliance thing rather than taking the opportunity of a self-evaluation. The HEQC did consult in order to establish the MBA criteria and the Business School seemed happy with these and with the composition of the panel, particularly as two of the more senior staff developed the criteria with the HEQC. But they weren’t particularly impressed by the arrangements the HEQC put in place prior to the review. When I say the arrangements I mean communication and stuff like that. A lot of that we had to buffer to protect the HEQC. So if we hadn’t heard from the HEQC we would follow up, we would sort out the garbled messages so that they didn’t see all of that. So the bad process was part of what bedevilled the value of the review. But also internally there wasn’t a quality cycle in place and so we didn’t get the value that we could’ve got out of it in terms of self-evaluation. Also to be fair to them there was very little direction from the centre, from the APO about what QA systems they should have, I mean they simply didn’t understand plan, implement, monitor and review. They didn’t see that running through the thread of things. So ja it was a missed opportunity.
Do you think that the HEQC policy instruments are based on adequate expertise?
As a quality manager I should be able to comment, based on other systems. But I can’t because I don’t have that knowledge myself. What I do like is that they seem to consult people who do have a fair amount of knowledge, so they ask people like you, they ask people like Q, they do seem to use people in the system, sometimes to an unfair degree. But probably it is adequate, yes. Okay that’s the first one.

Who do you think should have been involved in the HEQC’s policy development process?
Well definitely the institutions. I don’t know to what extent they have used international expertise, whether African or other internationals. I’ve heard Gibbs’ statements about modelling on Australia’s system of self-evaluation but I don’t know if that’s been done extensively. But I don’t think the consultative process is adequate. They do contact experts and that is good because then you’re not floundering around reinventing the wheel and someone puts something good on the table. Then there’s some form of consultation with institutions, but you never see the results. Now why is that? There is no transparent feedback. So now we have the framework documents hanging in the air and never finalised. Ja we are told that the criteria that are sub judice so what’s going on? So I think there’s this lip service to consultation. But let me give praise where it’s due, they’re much more consultative than anyone else. I mean SAQA’s much worse. DoE never consults at all. DoE is like black hole….

To what extent are the HEQC’s policy instruments implementable in your institution?
What are the constraints to successful implementation?
Well obviously there are two sides to it. I think that their criteria and timelines are ambitious. It is arrogant in the extreme for them to keep missing deadlines and expect us to meet their foreshortened deadlines because they missed their deadlines. It does nothing for institutional buy-in when I do something like I put a time table in place and I say to my institution we’re going to expect these criteria for comment in this month they never arrive they might arrive three months later with a two week deadline. And then we have to bow and scrape and grovel for a two week extension. When we gave them a well-reasoned proposal why we need a months’ extension saying we need to take it through this committee that committee we want to give schools time to go developmentally through the program accreditation criteria - because we think it’s quite a key instrument if we’re changing the whole system to the student-centred programme-based system which the HEQC has done already - and Wits hasn’t really grappled with this. Okay so I think the constraints are that it’s ambitious, the timelines are unrealistic. I agree with R’s point yesterday - if we can do things developmentally and choose and justify our strategy in such a way that we’re being honest and open – and we’ll get to the other stuff later - why shouldn’t we be trusted to do that.? So many things in our education system Kathy I think come down to the lack of trust. This may be understandable given our history but what comes of it is the invasive NSB SGB system. The system doesn’t trust us! The creep we saw in the audit criteria is because there’s a lack of trust. It is two-faced to say quality is your responsibility and yet we don’t trust you to do it so here are the criteria. Ja it’s one thing to write the Guides to Good Practice and say we are now trusting you to take this on, but another thing to then stick them into the audit and accreditation criteria. It’s all a matter of trust!… And the DoE, HEQC, SAQA the whole lot of them don’t trust the institutions. But trust is a two way thing. Yes we mustn’t be too whingeing which we are. We whinge a lot but our criticism should be constructive. But on the other hand we want to be treated professionally. If we offer a hand as we did at the workshop yesterday we want the latitude to give an intelligent reason why we need to take this slowly and developmentally we don’t just want to be told this is how it must be done and the auditors are coming to check up on this and this.
How do you think academics are going to respond to the implications for them of the HEQC’s requirements?

I think that a lot of what was raised in the workshop today and yesterday is important because it depends what the implications are of the HEQC requirements and these aren’t yet finalised. If this year we’re seeing them swing towards more checklist approach to accountability, a deeper level scrutiny than ordinary accreditation then the response required from academics is not going to be sustainable and will not lead to improving teaching and learning or better quality. We need fewer sticks and more carrots, although whatever proportion of carrot versus stick is implemented people will complain. …I would like to think this is a strategy from the HEQC where they come on tough and then backtrack and then institutions can say ‘gee that’s nice and now they understand our position better and trust us more’ ….. It would be nice if we saw that move back to being more supportive and developmental. So depending on what the HEQC puts in place finally, that’s going to determine how academics respond.

What (if any) underlying paradigm/ value/ worldview clashes exist between the HEQC conceptualisation and operationalisation quality in HE and your own/ and those of the academics you work with?

Well is trust a value? It goes back to that question that if one of the values you want to engender is trust then I think there is that clash. And I think that is a real clash and I think it’s actually got to be brought into the open and spoken about because it isn’t being spoken about and there are so many emotions that run around this issue. The lack of trust is construed as being political, e.g. historically black versus historically white and then there’s a conflation of criticism with being anti-transformation. It’s not easy to be critical then, if you are already put in the ‘historically white box’, you feel that you aren’t being heard and are being misinterpreted all the time. So we need to acknowledge that we have to work through these issues of trust.

Other values I know that our academics would go on quite a lot about academic freedom, and institutional autonomy shifts.

Then another value is the principle of running everything from the principle of what is educationally and academically sound. And obviously academic freedom is tied up with that. And if we can kind of justify everything on the basis of what is educationally sound, not what is compliance or what is necessarily strategic - if that’s always the fallback position or bottom-line, then once you determine what is academically sound, then you’ve got to negotiate within those boundaries. And so then the question about the HEQC’s operationalisation is ‘are they setting boundaries for us to work within or are they actually defining those boundaries so that there’s no scope?’ Again, I think there’s no latitude. Again back to R’s point about academic discretion and professionalism - ja these things are all just bound up together.

How do you intend to mediate the HEQC’s demands in the internal quality management system you are setting up for your institution?

Yes well that’s really squarely in this job and we see our job as translating and interpreting for the institution, we see ourselves as a buffer between the state and the academics. So let’s sift out of what we get from outside that is of value and prioritize that and suggest that and let’s minimise what we have to do which is just compliance. And our in terms of operational stuff, how Wits has gone about it is by having this office. As you know the HEQC’s primary vehicle for control is programme accreditation. The APO aims to take on the worst of this out of academics’ lives. We design the templates, look at every course and we make sure it’s part of the PQM for the DoE and go through the requirements for the HEQC and SAQA …trying to take all that waste of time out of academics lives and do it for them - either by giving them a suggestion list of what they should fill in whilst not doing the work for them. We try to enhance what is actually of value from what
the HEQC is saying. So if we believe that learning outcomes are of value, so we make academics do then by filling in the form …

To what extent do you think the HEQC’s policy instruments will fulfil their purpose - namely to ensure accountability and improve the quality of higher education provision - in your own institution? Countrywide.?
Again it pivots on what the HEQC eventually ends up with in this unfinalised system with unfinalised policy and unfinalised criteria. I think they will ensure accountability. But if accountability is the primary responsibility of institutions then they have to tread very carefully because they could very easily flip the whole system into a jaded compliance mode instead of a developmental attitude change. Some one said to me a while ago that the key questions is how to change ‘institutions of learning’ to ‘learning institutions’ which is related to this issue. How do you change people from complying with QA to actually owning quality. The HEQC is walking a tightrope – and this year they’ve shifted onto one side, the side where we don’t want to go. It’s the side that they promised us they’re not going to flip towards and yet it seems that they have. They could now easily flip the system into a jaded compliance accountability system and with no real improvement in quality. But if it flips more to the developmental side then ja we could live with that.

Any other comments relating to the national QA project and your institutional QA work?
I think that my main comment is on pace, the speed with which they’re trying to implement their ambitious goals is quite unrealistic. The problem of not having policies finalised also bedevils things. Saleem Badat (CEO of the CHE) himself has spoken about institutional overload and people being policied out. And then this bizarre thing that we’ve seen in the last few years the kind of hierarchical jockeying between the DoE, CHE, HEQC and SAQA and the DoL. You don’t know who’s running the show and we get mixed messages, and don’t know who calls the shots. So there is this desperate requirement to go back and to align ourselves with our key principles and purposes. Instead this attempt to improve quality via accountability will make institutions set up a superficial compliance unit within the institution and we’ll protect the rest of the institution and we will decide what is important for our institution and just go with that. This is soul destroying kind of work and not what we want. This work will land in my unit (the APO). And it won’t be exciting work. There are also resource implications. Well for a year WITS paid my salary just to do interim registration for SAQA. …
The macro-question is: To what extent you believe the HEQC’s policy instruments (the two Framework Documents, the Proposed Criteria for Audit and Accreditation, the proposals for self-accreditation, the MBA Review, supported by the Improving Teaching & Learning Resources) are valid, acceptable, feasible and potentially effective?

Okay I would differentiate between some of them in terms of their validity. I think the Founding Document was indeed valid and acceptable but I’m not sure that it’s all that feasible. It might be because well in the nature of the Founding Document it was vague on certain issues, the big picture was without detail. This was not necessarily a problem with the documents at that stage, if you sign a contract without knowing the detail you must be very careful and say this is a good Founding Document, we should just add a footnote there that the feasibility of it wasn’t clear at that stage because we didn’t know what the policy frameworks and the criteria etc. would be. I think it was indeed effective in the sense of setting the scene and I think it was wisely done, the Founding Document. The two framework documents in terms of validity, yes I do think so, although I think the validity of the audit one was more questionable than the other one because there was a major shift towards ‘fitness of purpose’. And there was a bit of an outcry, you know that story. So the validity was more ambiguous there. It wasn’t as acceptable. In terms of feasibility I think both the two framework documents are too ambitious and I think both of them will be toned down significantly. In fact the final documents are much toned down. And again I don’t think it’s necessarily a problem. Since I’ve been involved we talked about these things at the HEQC many times and the issue is how do you make your opening moves. Do you begin by putting a very small proposal on the table or do you try to do as good and comprehensive job as possible. Put a comprehensive, solid document on the table and then tone it down later. And I have argued forcefully a number of times for this approach. Although that is indeed a problem now that the HEQC is being accused of being unrealistic because the opening moves were too comprehensive. As you know with the Resources and all these things. I mean in the Accreditation Framework, which I was very involved in as well as the Accreditation Criteria, I made a purposeful decision to do as comprehensive a job as possible, knowing quite well that not all of it is feasible. But rather put a good thing on the table for discussion and then tone it down. The effect of that might be ambiguous. I think you could go the other way around and begin with a very thin thing and then realize no, no you have to prop it up or ratchet it up and then you would have another reaction. What we can do now with the accreditation, we started with about 60 criteria on the first document and by the time it was circulated for comment it was down to 30. And when we’re done, I would be surprised if there were more than 20 left. And the same will happen with the Audit Criteria. I talked to one of the auditors at the Pretoria pilot, at the moment I think there are thirty six or so audit criteria and I think at the next shot we will end up with 14 if the HEQC accept members’ suggestions as final. So I think doing it like that you begin comprehensive, you test it, you pilot, you talk and when people give feedback that is too demanding you reduce the number of criteria. This can help with the buy-in. So I think in terms of strategy this is what the HEQC are planning. I know the Dean of Engineering said the other day that these HEQC people hire some Professor of Education to write all these grand documents, they pay people to write these grand documents and they are totally out of touch with reality, because you can’t do all those things.
I have to complete re-writing the Accreditation Criteria by the end of next week. And I think that I will get them down to thirteen, perhaps twenty. The engineers say that they want eight. Anyway the number will come down and I think some of them we can combine.
Ja. The other thing is the Audit Criteria, the three levels will go. They don’t make sense. And the crucial challenge there will be to link the new format of the Accreditation Criteria with the new toned down Audit Criteria. So I’m going to suggest that we do the final revision of the Audit Criteria first, I need to see that before I can finalize the Accreditation Criteria. So at this stage I’m simply going to analyse the responses and then suggest that I can’t write the final version until the Audit Criteria are done.

The proposals for self-accreditation are very vague but I think it’s a valid and a good idea. I think it’s acceptable it’s welcomed by everyone. I think it’s feasible in the good institutions but a problem for the chaotic institutions. And I think it will be effective because it can be revoked at any stage. So the idea of self-accreditation is very good until you need to do it. And you realize in order to do all of this and meet all the conditions for self-accreditation it’s a helluva lot of work. People may end up saying ‘well is there really anything in this self-accreditation thing, shouldn’t we rather let them do it?’’. It depends if you project self-accreditation as this hard thing and with external monitoring and all of that and if it boils down to the same thing in the end, why would you do it? So there must be something else that’s attractive in self-accreditation. And I do think from an institutional perspective, the idea of autonomy is very attractive. If we can be left alone to do our own thing, although within the framework of the broad policy but we don’t have to comply and go through the motions with an external body looking into every little bit of the institution. So I like the idea of self-accreditation.

As for the MBA review, I thought the criteria were very good, although they were mainly just the same that’s been used by international accreditation MBA accreditation bodies. The Director of the Business School told me yesterday that there seems to be some problem now, and they don’t actually want to accredit any MBA. Ja. They met on Monday and Tuesday and then yesterday there was a rumour that they’re not going to accredit any of them. I was taken aback and surprised with all of this. But I think the process was good. I think it was valid was acceptable, it made an impact it was taken seriously. It was definitely taken seriously. In our case the Director of the Business School, Eon Schmidt, he’s a very high-level guy, he sat down personally with that stuff. He said that’s not something to delegate, you sit down and you apply your mind and you work on it yourself. He had people who helped him but he was personally very involved and happy enough with the site visit process.

How did the IT&L Workshop that you facilitated go?
- what did it achieve?
- where did it fail?

In fact I might as well say it on the record I think that the credibility of the HEQC fell through at the Stellenbosch workshop. We had an A-rated researcher sitting there for two days, Doug Rowling. It was very frustrating. So I think with the workshops the target audience and the purpose of all that wasn’t thought through thoroughly enough. I did like the enthusiasm with which the HEQC drove it and [HEQC official] specifically, he was very enthusiastic and he was busy with it all the time and he changed the programme all the time. But just in terms of our institution, the credibility of those working in Quality Assurance and Staff Development at our institution was compromised by these workshops. And they differed, I mean, the initial workshops differed altogether with the final one. By the time I was involved in the final one at PENTECH they had changed the programme significantly and I thought it went fine. It was much better than the earlier ones. But the idea of workshoping the Resources, I don’t think that worked that well. And I think it’s primarily because the wrong people were targeted. I think what they should’ve done was workshop it through the QA people who’re actually doing the job and perhaps a few Registrars or so and then leave it to the institutional units to disseminate it and workshop it through the institutions. Instead of the HEQC trying to come in from the outside and
do the work for the institutions. Capacity building doesn’t work like that. You have to work with the people in the institution who know the situation. Okay I facilitated the one on Pentech and Capetec and I’ll talk only about that one, not the Stellenbosch one because the Stellenbosch one was not good. The Pentech one, as I said, I thought it achieved by exposing a number of people to the Resources, there were forty-two enrolments. During the two days there were never fewer than twenty-five people. There was excellent participation from a number of private institutions and they did quite well. From the two technikons who are going to merge I thought there was a good spectrum of academic and non-academic people. And some of it was very new to the academics. So I think it was okay.

Where did it fail? I think the program was thin. Instead of two days I think we could’ve done that in one morning or in two hours. Where did it fail, I think the mixed audience was in some sense good and in some sense not good but I think the biggest failure was in the way it was conceptualized and I wrote that in my report also and I sent you a copy of that. I said if you decide the purpose of this workshop is to introduce people to a new document then you invite a wide audience and you need an hour and you’ve a nice power point presentation and a good speaker and that’s it. If you want people to design a Teaching and Learning Strategy for an institution the HEQC can’t do that. That’s up to the institution to do it and then the people who are actually mandated to do that must do that. But what happened here is that the HEQC dictated who should be invited and those people didn’t have an institutional mandate to develop a strategy. So it was a simulation game for a number of people to sit there and sort of design some kind of thing and hopefully some of the people there were in fact on the institutional structures and have the mandate to do that kind of thing. I think the assumption was that it would be the first time that institutions design such a thing and I think that was wrong. That’s absolutely wrong! I think the HEQC didn’t meet people where they are, they had their idea and they thought these Teaching and Learning Resources are new and now for the very first time people will start to think about these things and design strategies. So the point is, and you should put this in very strongly, the HEQC shouldn’t try to do the whole job for us. They can set the whole policy framework and they can have the criteria and they can put up the systems and all of that, but capacity development no. They can’t overrun the institutional structures and come and do our capacity development for us. And not only capacity development even institutional policy development especially also with policy development, they can’t come here and say okay now the HEQC is going to sit down with a number of people from A and develop the policy for RPL. It’s not their business. We’ll do that. So I think that was a major failure. I really think that the HEQC need to give hard thought on how they’re going to do their capacity development. The target audiences, the purposes, and all of that. It must be in a strong partnership and it must be conceptualized in a way that you absolutely honour the institutional structures and don’t bypass them or worse undermine them, because that’s what happened here. I think the credibility of institutional structures that have been built up with difficulty over a long time was undermined. You work six years to build something with credibility and then you invite top academics and you waste their time for two days they will never do it again.

Please comment on the IT&L Resources
– their quality
– the extent of their usefulness
– and how they were used in the development of the criteria and minimum standards for Programme Accreditation.

Okay that’s the workshops. Let me talk about the Resources. I had an interview yesterday with a candidate who applied for a job and he referred to these Resources and the original author by name and at least three or four times citing that as a prime example of good work and he
expressed his immense respect for the original author, a certain Mrs. Luckett, and he said, as a QA practitioner, that it helped him to get the big picture. But interestingly enough he said he’s not in a position to critique it but when he reads it he says okay this is how it works. So I think it will prove to be, in the end, perhaps one of the most valuable documents from the HEQC. The idea of calling them Resources is mixed because it doesn’t cover everything, there are a few gaps in them like distance education. So in that sense it’s not Resources, it’s actually more like ideas for Good Practice rather than Resources. So I’ve commented on its potential effectiveness and feasibility and acceptability and its validity.

How were the IT&L Resources used in the development of criteria for Programme Accreditation?

It’s interesting, initially the first discussion that was right at the beginning, the feeling of the HEQC circles was that that’s another Directorate, that’s the Capacity Development Directorate, so let them do their thing. We in the Accreditation Directorate, we’re going to do the actual thing with the criteria and we’ll do it on our own. That was how I came into it at that stage. But then when we actually began working on it, it was obvious that we had it right there so why should we go and re invent the wheel? So both and I and [HEQC Official] talked about it and we decided to use the Resources. In the section that I did, which was about 70%-80% of the criteria (the broader document Herman wrote). In terms of the criteria itself, it was a bit of a rearrangement. I didn’t use the exact categories of the Resources but I would say it actually was the basis for the criteria. It was used as the basis for the criteria. It was reinterpreted and it was toned down and it needs much, much more toning down. There was still too much of the good practice level that ended up in criteria, but that was a purposeful decision. So let me put that on record, that was a purposeful decision. We didn’t want to go in and make the first move on too low a minimum. And I think that’s where justifiably the critique of SAUVCA that the criteria are too ambitious and not feasible. But now they’ve they had the opportunity to comment. And so as you see, the ideas were taken over but reformulated and reorganized and some of them were indeed rewritten in another form. So there was a strong direct link between the Resources and the development of the program accreditation criteria. Although we also used other sources, there was a whole stack of literature from different places and different institutions which we also referred to, the same with the MBA criteria. So we purposely looked at good practice elsewhere and systems elsewhere. I looked at the Dutch and the Flemish. So there was a very explicit effort to refer to international examples and international good practice as well.

How do you feel about the future of the HEQC’s IT&L Project and the HEQC’s role in quality promotion and development.

Okay I’ve spoken about that already... The future, I think let the HEQC get the funding from the Fins, that’s excellent they can do that on a national level. Then they put out a call for proposals and set a framework for the proposals. That’s typically what you do at a national agency level. But don’t nurture an ambition that the HEQC themselves will come into the institutions and do it for the institutions. And I hope that they’ve learnt that from these workshops. So the idea of partnerships with funding within a framework that’s excellent, where the institution actually does the job and not the HEQC. So the HEQC is facilitating the development, it’s not doing capacity development. And I’m not sure they understand this. And particularly the current Director of Capacity Development doesn’t understand the difference between these two things. What he needs to do is to set a national policy national framework, set up a national support system, get the funding, organize the system but then once you’ve given them the money, then it’s up to the institutions to do it, then the HEQC can monitor again and all of that, that’s fine. I think in the
HEQC’s role in quality promotion we need to involve more academics and not broad academics but people specializing in this field of study. At the moment you have people who are QA managers, but quite a number of them are administrative people without insight, without a theoretical take on things and quite a number of them are useless old theologians who no longer have a job… Ja about half of them are ex-theologians or Classics people. I mean we don’t have the theoretical foundations for this work. So I’m thinking of people like Paula Ensor. Educationalists but not all educationalists because then you have another problem, but good academics with solid academic insight and specialization who know the literature and who know the theoretical issues, we need more of that.

The SAUVCA Response to the Proposed Criteria for Programme Accreditation suggests that the minimum standards are set too high and are too close to the IT&L Resources. Also that the Criteria are generally too comprehensive and too demanding. What is your opinion on this?

Okay I’ve talked about it, I gave you the reasons. So the answer is yes, the criteria are set too high and they are too close to the Resources. That was a purposeful decision to set them high and then to tone them down. Rather than making the opening move too superficial, because nobody’s going to take you seriously. The risk is that if you come in too high people will also say ‘well you can’t be serious about this’. But at least we now can say ‘we can’t manage all of this’ and the HEQC can tone it down. I don’t think it was a problem that it was too close to the Resources. I think it was indeed close to the Resources, but that was fine, the Resources were good. And it was South African it was a product of South Africa, why couldn’t it be close to that it’s a whole team of South African people who have worked on that? I couldn’t care less about the in-fighting between the two Directorates in the HEQC, to my mind it was South African people, it was a team of good people who understood the South African context, and to use that as a basis to develop the criteria made perfect sense to me. The initial criteria are perhaps too comprehensive and too demanding but we can tone it down. And I’m unfortunate to have the job of toning it down and I’m going to do it. So my problem is not whether it’s Good Practice or minimum standards, that’s not the issue. For me the issue is whether they are too high and too comprehensive or not. So it is not inherently that the one thing is Good Practice and the other is a minimum standard, inherently it’s the same thing. The issue is whether it’s feasible or too demanding, whether the minimum is too high or not. But they shouldn’t take the same approach with the auditing. In the auditing you need another approach. You need sort of a comradely support and development enthusiasm. I once listened to [HEQC Official] talking to private providers and he said ‘listen guys you’re in the business of education, you’re not in business and you’d better get that straight. You’re not in money-making you’re in education.’ So that sort of hard-line, that’s good if you’re talking about programme accreditation. You need to protect the students and all of that. But institutional audits, perhaps you need another way of doing that.

Just to follow on that, do you think that the integrity of audit will be sustained in the HEQC’s self-accreditation model?

I think it will work. I really think it will work. There’s a strong compliance dimension though, if your audit report is not okay, you’re not going to get the self-accreditation. So there’s a strong incentive to go all out for it. I think the self-accreditation thing is for a period of 6 years and then needs to be reviewed. And international experience is that the second round is usually less intensive. So we need the strong first round and the second round perhaps less intensive. But I
really think that it can work. And I like the idea of the intergratedness. What I’m not at all sure about is the practice of all of this. We still need to give a helluva lot of thought on how we’re actually going to do that at the level of the nitty gritty. And to cut out overlaps as much as possible. And it’s interesting, we tried to do that in the design of submissions for new programs and you might find this very interesting: what we ended up with was a whole lot of these things in the criteria that are covered in institutional policy documents, which actually forms part of the institutional audit. So in your programme submission all these things are simply a check list, e.g. I have an RPL policy, I have an admissions policy, etc. And these policies meet these requirements. But you can do that in the context of audit as institutional stuff. The programme specific stuff you need to separate from and then it’s much easier, it’s quite toned down. You don’t have to repeat all this policy stuff every time you make a new program submission. So once you do that, and you take the policy framework and the existence of policy closer to the audit, and then the programme stuff, especially the accreditation of new programs is much toned down to the stuff that you actually need to get a new program going, and if you do the programme accreditation a second time the same kind of thing. We say ‘what are the things that you’re going to look at thoroughly when you do the institutional audit. And what are the actual things that you need to do when you run this programme?’

How have academic managers responded to the Proposed Criteria for Programme Accreditation in your HEI?

How have academics responded to them in your HEI?

I had a small group working with me and I can really say that I think they learnt a lot that they came around, but they worked very closely with me. Beyond that people know ‘oh Q is working on that, don’t worry about it.’ But because I keep saying these things they don’t hear me! They don’t hear me at all! And then S came around the Research Director and the retired Dean, they were on the panel in Pretoria, and they came back and suddenly now they themselves for the first time heard and experienced what is going on there. Now there’s nobody like the newly converted. They’re up and running with this thing and they talked to the VC every time they see him ‘you need to do this’, ‘we need support here’, etc. So I have wonderful allies there. But on my own I couldn’t convince them. Until they themselves were externally involved. And that’s on the level of institutional audits. For Programme Accreditation, academic managers we had a very good discussion with the Programme Evaluation Committee as well as the Faculty Program Managers, who are all senior academics. And the A response to the Programme Accreditation Criteria was fairly mild. They asked to reduce the volume. They said internal monitoring of existing programmes thing is not feasible. With the existing system. It’s simply impossible to do all those things that are required there. There’s a bit of a grumble about introduction of external examinations because we don’t have that except in the professional programmes. Did you know that? Personally I think that external examinations is a waste. It’s a legacy of colonialism. British. It’s like rugby and cricket. We got it from the Brits, we would’ve been much better off without it. But now the interesting thing is that some of the professional bodies feel they need to be even stronger on external examinations. They now require our engineers to go through the whole tootie, in fact somebody told me that you need twenty seven signatures now, from the time you draw up an exam paper until you have the final mark done. That’s what the ECSA require. So I think they’re going over the top with this external thing. Whereas we argued that in micro-biology and in history and those disciplines, we do thorough departmental reviews once in five years and that’s it. And there we have external people checking the system. But we don’t have external people checking every exam paper. And we don’t have internal moderation in most cases.
There are checks and balances in the system but we don’t have a formal sign off internal moderation thing so in all departments. And I think we need to improve on that. Academics were overwhelmed by the criteria. It’s not a good time of the year, it’s never a good time, but they realised that they will have to do this. They don’t like it, but they realise that they will have to do this and they will take it seriously.

**What (if any) underlying paradigm/ value / worldview clashes exist between the HEQC’s conceptualization and operationalisation of quality in HE and your own / and those of the academics you work with?**

I’m not sure that we’re at a point of explicit clashes due to the fact that we’re at the beginning of the stage and many academics are only now beginning to think about it and confronted with it. So the views that they have on much of this stuff is still unreflective and ignorant. Ja. It’s ignorance and they haven’t thought about it. They like the old traditions and the old ways of doing things and ask ‘what is this new thing?’ The idea of the HEQC that institutions and academics themselves should take the primary responsibility for this is good. The idea that there should be system of checking, checking, checking that’s a bit foreign in some disciplines but again there they differ. The medics, the professionals, the engineers they’re used to that. The formative fields hate it and they’ve never been involved in that. This is where there will be a culture clash. I think deeper down academics, in general, are not necessarily convinced of the critique of higher education being too ivory tower and not producing the human resources that we need… If you talk to academics they think we’re OK, we produce the stuff. And there is a gap. If you talk to employers, you hear a different voice, many employers say ‘No, there must be a closer link to what we need.’ Again it differs from discipline to discipline. There are those who are well-informed but not all of them. What academics, like most professional people, want is to be left alone as far as possible. So the idea of somebody checking under your fingernails everyday, everyone hates it. I think the best way to summarise it is what I heard from a colleague recently, he said ‘I know we have to do this, I know it’s extremely important, we will indeed do it, but let me tell you up front that I’m not looking forward to it.’ In fact when I think about it it’s like a farmer on a farm staring out over the drought, the dry fields saying ‘How will I ever get through this drought,’ but he knows he must.

**How do you intend to mediate the HEQC’s demands in the internal quality management system you are setting up for your institution?**

Yes there is strong alignment between our internal system and the HEQC’s. But what I did is I used exactly the same approach. We had a departmental system for a long time that was very low-key and almost superficial. And then the HEQC’s stuff came and with this small task team we developed a new thing for departmental reviews that’s over the top. And we’ve given it to people to comment on and now we’re toning it down. So that was a purposeful strategy on my side.

**Did it include program review?**

Yes. The link between the two is we say that in the context of departmental reviews we will do post-graduate programmes and we will do undergraduate modules. Then in addition to the departmental review we will do undergraduate programme accreditation and reviews as a separate thing. But the departmental review remains the heart of the issue. So there you do your post-graduate programmes in terms of the full HEQC criteria. So, in fact, we have identified forty seven items which have to be covered in the departmental review. But the thing that I’m very excited about, but I’m not sure it’s going to fly is we’ve listed forty-seven items, but we didn’t
give them the criteria. We expect the departments to develop their own criteria. And the reason for it is because I tried to link quality assurance to normal academic practice, something that’s intellectually challenging. So you have to think about the foundations of what you’re doing, and you have to define quality for micro-biology, ‘what is a good quality micro-biology department?’ ‘what are the criteria in terms of how I think micro-biology should be taught?’ And we define the criteria ourselves and then the external people do two things: they have to validate the criteria and they have to validate the self-assessment against the criteria. So the department has to sit down and design the criteria and then score themselves or assess themselves against those criteria and then the external people validate it. We’ve designed the template in two forms. So they first say ‘forget about micro-biology at A’, ‘let’s just talk about a good micro biology department in South Africa. And then secondly, these guys here at A have to score themselves. You know the response is positive, especially the Humanities people who absolutely like it, they’re used to doing these things. The commerce and business people said ‘no, please sit down and give us a set of criteria and we’ll just tick yes or no.’ So that’s about the two extremes that you find. So I think I’ll go for a compromise in writing a set of criteria and then make it optional to use that. So you’re welcome to use it, but you don’t have to. We still prefer you to design your own criteria. Obviously criteria within the broader framework of the University and of the HEQC and all of that. And that’s the challenging thing that I’m looking forward to do. In the first departmental reviews I will be very personally involved and sit down with these people and say ‘okay let’s talk about micro-biology, what do you think is a good department?. What do you think are criteria in terms of which a department should be assessed? And let’s design a good department and then assess yourselves against that.’ And then we’ll get the externals in. [HEQC Official] said forget about it. He said ‘no you’re crazy forget about it’ he said ‘don’t go this way of own criteria we in the HEQC have the criteria and you stick to that.’

So in some ways it’s a bit of a statement of autonomy but not irresponsible. So we will definitely look at the HEQC’s criteria but we’re not simply going to use them as is. In some cases we will surpass them and there might be cases where we will not meet them and that’s a tricky one if there’s a risk of losing your programme accreditation then obviously you have to be very careful.

**The key issue is who sets the criteria. That is the key issue.**

Yes, that’s my fundamental take on this whole thing is to make it an academic intellectual exercise and that’s the way I sell it; try to sell it.

**To what extent do you think the HEQC’s policy instruments will fulfil their purpose – namely to ensure accountability and improve the quality of HE provision? In your own institution? Country-wide?**

You know the old story of the English-speaking Universities in the old system they didn’t listen to the government and they still don’t. And in the old system the Afrikaans people listened very carefully to the Apartheid government and did everything expected from them and they still do so in the new system. So there is a cultural expectation that we will do these things at this University. We have interesting example of how we differ from B in very specific senses, they just do whatever they want. So I think it’s part of this kind of institutional culture that we will do it, we’re going to hate it, but we’ll do it. So in our institution I don’t see a problem with doing this. I think this institution is a bit self assured, they think they’re okay. And I think they’re in for a hang of a surprise. What we’re going to do is with a team of three people we’re going to do a block self assessment of the institution in February. And that will be our missionary document for the next year. So we will do a mock self-evaluation as if we are audited now, this is where we have problems. And then take it for a round of discussions and then on the basis of that design a
plan. Building up to the expected audit in 2005. We know we’re not on in 2004. So I think the accountability part, we’ll do. The improvements we will continue to exercise as that is the major reason why we do all of this. Although it’s a bit problematic in arrogant institutions, because they think that there’s not much improvement needed. So that’s where we will need a bit of a shock therapy. Countrywide is interesting. I think UCT, Natal, Rhodes and to a lesser extent Wits will not worry too much about this. I think it’s again part of their tradition. There would be a more independent kind of UDI kind of attitude there. I wouldn’t be surprised if the newly merged institutions say ‘please forget about this, we are struggling to merge and we’re still in the merging process, even though it was three or four years ago, we can’t really do this.’ If you’re going to merge an institution and in the next year you’re going for quality …are you crazy. So countrywide I think in the merged institutions I’m not sure that even in three or four years time it would be that effective, but I think they’ll do it. For the system as a whole I think it will work. There will be hitches there will be many things to be sorted out as we go along. And I think, if we’re ten years from now, when we look back we will say that this whole exercise has added immense value. Similarly to what people say now about those processes that already have been completed. They say we’ve learnt a lot it’s helped us a lot we’re glad we did it.

Any other comments related to the national QA project and your institutional QA work?

Okay I said I think the national QA project a new thing, it’s going to be challenging. I think if it’s wisely done, in ten years time, it will definitely make a difference and we will look back and say ‘wow we’ve made significant progress.’ I think all along we will have tensions as we go through, we will run into problems. The most serious problems will experience will be people complaining about the bureaucratic nature of it: more work, more work, more work. The challenge will be, or let me put it this way, the best system would be the one in which you get optimal results for the minimum of time. So the less time you spend on this thing, the better the system is, while getting more results. I think those two things are directly related and that can be an interesting sort of quality test. The quality test of the system would be less and less time. The shorter the time span the higher the quality.
The macro-question is: To what extent you believe the HEQC’s policy instruments (the two Framework Documents, the Proposed Criteria for Audit and Accreditation, the proposals for self-accreditation, the MBA Review, supported by the Improving Teaching & Learning Resources) are valid, acceptable, feasible and potentially effective?

1. How satisfied are you with the latest version of IT&L Resources?

Well I suppose having been privy to two IT&L workshops, the one I went to at B and the one I facilitated at A, and, in spite of the fact that at the B one, [HEQC official] began by apologizing in great detail for the Resources, I think they got a good press from academics. People described them as incredibly useful and well written. So when [HEQC official] started off apologizing for them at that B workshop I thought ‘oh my goodness now my colleagues are going to jump in and stomp all over them with two feet’ but they didn’t. So I feel very pleased about that. I think comments were made at the workshops that can probably help them to go into one final draft. Whether or not the HEQC will get them there is another thing. Some of the comments that I picked up for example were: ‘could they not go onto a CD ROM?’ and ‘could they not have a glossary of terms?’, because people were complaining about the language, ‘could there not be a sort of hypertext gloss in some way on a website?’… Computer people could do something that would be very easy and accessible. Another thing that came up at the B workshop was couldn’t there be a commentary which said if you are a head of department you might be particularly interested in these issues. If you are a program director you might be interested in these. If you are a lecturer you might be interested in this sort of thing.

I think that given the process we went through to get them developed, as you well know, it was long, contested, difficult, fraught with uneven capacity and was a political project, I think it’s a miracle that we got them to where they are.

How did the IT&L Workshop that you facilitated go? What did it achieve? Where did it fail?

The one I facilitated, I looked at the evaluations, and they were very positive. What did it achieve? There were good practices shared via the case studies. One wasn’t convinced that all the case studies were in fact good practice. There were a lot of questions that I could have asked about them but those questions largely went unanswered in the room. I think it did help people to engage with the Resources. I was quite directive in the workshop I facilitated and I think that was partly out of my frustration at the B one that I’d been to, where the Facilitators were unclear about the tasks and were also hesitant about the structure of the Resources. I directed people to the Resources and said ‘this is how they’re structured’. And then we used the Resources having had that sort of mapping into them. Ja, so I think it helped them to see how the Resources could be used.

Did you manage to get participants to think about the management of teaching and learning?

I’m not sure because of the mix of people there. I’m not sure if they understood the different levels at which one would manage quality. Often there was a tendency to bring it down to the local level. A teaching and learning innovation, if you’ve got an idea for an improvement, what do you do with that idea? My understanding of the ways universities work is that you put a concrete proposal into a committee structure. Then those in power say yes or no. There was a lack...
of understanding of this process and the need for teaching and learning action plans. But there was a mix of people there from quite high-powered people who had been working in quality promotion and quality assuring to people who knew very little about it. In the workshop I facilitated some didn’t know what was going on. They didn’t challenge me, I don’t know, I got the impression that one had to tread softly on behalf of the HEQC, saying ‘yes that’s good’, being affirming; whereas I think there could’ve been a lot more challenge in terms of the plans and the things that were put forward. The other thing that I thought came out very clearly in that RAU workshop was they identified gaps in the Resources and I didn’t think those gaps were appropriate. So for example, one of the gaps they identified was experiential learning. They said, and this was from the private providers, that there isn’t a Guide on experiential learning. I said ‘well that would come into programme planning and it could come into course development because I understand experiential learning (in terms of curriculum alignment you know between the outcomes the methods and the assessment) that you could use experiential learning, you would be bringing it as part of your learning facilitation so that students could experience aspects of the competence they were expected to perform. And so there was a misunderstanding of how to make use of that alignment process we put into the guides, and people didn’t understand that sort of macro-framing so the gaps that came up, I think, weren’t always appropriate. Similarly, the University of Pretoria’s Department of Telematics wanted a Guide on ICT, you know computer-based instruction or whatever they were calling it. Again for me this is about that alignment principle, the purpose of your programme, who’s your audience and that sort of thing.

A related question was asked in the B workshop that I attended, it was a philosopher, a B philosopher and he’d obviously read the Guides (I keep calling them guides), he said they have a particular principle here and he could identify some of the elements of that principle. Instead of explaining the principle, [HEQC official] backed off and said ‘oh these were written by a group of AD types and they have a particular view of curriculum’, and he went on to say the HEQC doesn’t push any particular view of curriculum and it was these people who picked up that view of curriculum, and that’s why the guides are in this form. I challenged [HEQC official] and I said ‘but that’s not true, that that view of curriculum and programme planning comes out of bodies like SAQA and the NQF, it comes from the wider policy environment and the HEQC is an ETQA of SAQA and uses this principle in their program accreditation… so he backed down on that one.

What impact do you think the IT&L Resources will have in HEIs?

I think the impact of the Resources depends on how widely they can get read. I know my colleagues, and this is speaking as a participant, at the B workshop had read them. But then that would be something that they would just do, I just know B colleagues would do that. But I was also asked by QA Managers at B to invite the sceptics, the difficult ones… and they had also read the Resources. They pointed out things that they said could be jolly useful. So for me the impact would be (and the workshops affirmed this) that those Resources have value. But it’s just getting them into the institutions and getting them read, it’s a dissemination issue.

How do you feel about the future of the HEQC’s IT&L Project and the HEQC’s role in quality promotion and development generally?

Ja, the whole project has been fraught with politics. Remember when whichever hotel we were in, when they launched the project at 9 o’clock one morning and canned it the next morning. It was just so fraught with politics. And isn’t that the issue, you know, what future does quality have when it’s so fraught with HEQC politics. You know I don’t think that you can put together the quality promotion and the quality policing roles. I’m very happy with the B structure where there’s a director of quality assurance who does the policing and then the ADC is located separately where we provide the support to staff who
need to meet the requirements of quality. Ja and Stellenbosch have just done that too. A are also trying to get there. A have been to B to ask us how it was done. So they realise that that putting the promotion and the policing together don’t go. I mean I can give you all sorts of examples of where… we often protect poor practice in order to give the lecturers (the person who’s implicated in poor practice) the space to develop. And I think you have to do that. And some of the hardest things in the five years that I’ve been at B has been ethical issues about protecting academics - about who sees what is protected and stuff like that. I mean making a distinction between data (whether it’s student perception surveys, qualitative surveys or big questionnaire type surveys or whether it’s peer observation) who gets to see that in it’s raw untriangulated form and who only sees the processed versions. We’ve made a distinction between the data and the written-up evaluation in a course review or in a portfolio and I think that’s been incredibly important. So I don’t think those two concepts - quality promotion and quality assurance sit happily together. I think there needs to be another separate agency for quality promotion and maybe that’s the role for AD.

That’s the other thing that I wonder about because I think the expertise to pick up the development work is in the academic development movement. I suspect and sadly I think it’s also in the historically white institutions, there probably aren’t many institutions that can pick up that quality promotion work. If the HEQC’s got funding or got the capacity to advise on who to give that work to, it’s not likely to come to the people who could actually do it because of political considerations. It might well go to private providers or to consultants. So I think it’s bound to be politically fraught.

Can you comment on the acceptability of the suite of policy instruments that the HEQC has produced so far (the Proposed Criteria for Audit & Accreditation in particular)? To what extent do you think they have appropriately understood and used the IT&L Resources?

I think it was a big ‘shlenter’… I think it was about trying to get credibility for the audit criteria and the programme criteria. I mean we wrote those best practice and threshold criteria and then you know they basically just vomited them out as the audit and accreditation criteria. I think we were conned.

They had to keep us in the background because they had the wrong group, I mean they had a largely white-led group and then they brought in a few token people but those people didn’t really have the capacity to do the work and it was very difficult… Thami was the only one with capacity. You know what I mean then other whites like the A people are spitting that they weren’t involved. That came out at my workshop… That was the first question they asked when they looked at the names, they asked why the expertise doesn’t go across the board and they were clearly talking about Hester…

How do you think academics are going to respond to the implications for them of the HEQC’s requirements?

I think there is an enormous potential for the HEQC just to become bureaucratic nuisances. And when I look at how other people understand, for example setting up evaluation, and gathering student perceptions and stuff like that and how unhithoughtfully it’s been done. You know it should be a form of research, it’s evaluation of action research, what we should get involved in, and one has to be very thoughtful and set it up as you would a piece of research. But because we’re having to institutionalise it and because people are looking for generalised instruments I think there’s a danger that it’s just going to become bureaucratic and it’s not going to be useful. And you know I think the hardest part of the job I’ve had at B is trying to make evaluation thoughtful. Trying to grow that culture of thoughtfulness. I think another problem is the way the policy says that quality is invested in the institution. It’s invested in the individual, this is B’ emphasis, so
nobody’s going to evaluate you, you have to evaluate your own work. You are responsible for quality. The Directorate of Quality Assurance is not responsible. So our work has been in supporting and assisting individuals to evaluate their courses and their teaching and also taking some of the donkey work off them, doing the analysis, the processing, so it’s been very easy to start and close the quality loop because we’re saying ‘okay, what do you want to know about your course, what do you do in your course, why do you do that? Let’s test the assumptions about why you’re doing that, as well as asking the students about how they experience what you do.’ And that for me has been very important. We try to grow that thoughtfulness about evaluation but I think it helps that we’re a small institution. I think in a lot of places it can just be a bureaucratic nuisance.

What (if any) underlying paradigm/ value / worldview clashes exist between the HEQC’s conceptualization and operationalisation of quality in HE and your own? Between those of the HEQC and the academics in your institution?

I think you know one of the things that struck me about B when I went there, and I’d been at C for five years, was that people were serious about their work, people cared about things, people cared about the institution. You go to campus on a Saturday morning and there’s a substantial number of cars in the car park. And so it’s that institutional pride which does and it need to be challenged sometimes, but people on the whole are caring about the students. And so for me, one clash at B, was that staff were a bit insulted that we were doubting them like this. That’s what I had to do at B, I had to affirm that people did care and that people were good. You know it’s not that simple, teaching learning, designing a curriculum, assessing students’ work - it’s not formulaic it’s problematic – and this does come through in the Teaching and Learning Resources. It’s not that easy, it’s problematic. At B the academics were saying ‘don’t knock us because we do care, we do have pride in our work.’ And then we had to affirm them saying over and over again ‘there are areas of excellent practice but there are also gaps.’ So the clash was about distrust.

We’re being audited in 2004. We’ve had a long history of self-audit, it’s called academic review. And so we’re doing our own academic review in the beginning of 2004 and then the HEQC is coming in the second half of the year. But already we’ve had to become a lot more bureaucratic in terms of our preparation for the audit. And then one of the things that gets produced is a template which is intended to help course facilitators get that alignment in place and then to start gathering the evidence. So we’ve got that, it’s on the B website which says ‘you may find this useful in helping to prepare.’ I know that a major task for the ADC next year at B is to get people to engage with that thoughtfully. And I think a lot of our work will be about affirming academics. There’s been a growth and a tradition of evaluative work at B you know… and I’m one of the people doing the peer analysis of the Senate document that now is being overlaid by bureaucratic requirements to conform to the HEQC requirements.

To what extent do you think the HEQC’s policy instruments will fulfill their purpose – namely to ensure accountability and improve the quality of HE provision? In your own institution? Country-wide?

Countrywide it may be different, I mean if I think back to C, they didn’t need a stick they needed a bomb! You get some institutions where people are selling mark changes on the computer system and issuing fake degrees. If you’ve got that level of academic corruption and if you’ve got people who don’t bother to go to their lectures, if you’ve got people like I witnessed who pick up a script from an enormous pile and says this sounds like a 67 to me and puts 67 on the paper without opening the script. There were practices
that I witnessed that need a tough regime to go in and say ‘this cannot continue.’ But the trouble is then you’ve got other more thoughtful places which aren’t all good but still have an integrity about them and you’ve got to be careful that you don’t destroy that integrity and that thoughtfulness. I’m thinking of the two people who won the distinguished teaching awards at B this year. They were entirely different! Excellent in very different ways so implementing a rational QA system is an impossible task because of the disparity and diversity in the system. But then politically can you have anything other than a one size fits all approach?
The macro-question is: To what extent you believe the HEQC’s policy instruments (the two Framework Documents, the Proposed Criteria for Audit and Accreditation, the proposals for self-accreditation, the MBA Review, supported by the Improving Teaching & Learning Resources) are valid, acceptable, feasible and potentially effective?

Do you think that the policy instruments that the HEQC has produced so far are based on adequate expertise?

I think it’s difficult to say who participated although in some cases the names of participants are made public ... So one doesn’t know whether these people are actually experts in the field or not. Whether they may be experts in another field but have just been used as policy writers or whatever. So it’s very difficult to know, it’s how one critiques it...

Who do you think should have been involved in the HEQC’s policy development process?

To what extent are the HEQC’s policy instruments implementable in your context/ institution? What are the constraints to successful implementation?

The policy instruments are implementable, i.e. they are sufficiently developed to allow for implementation. But therein lies for me the problem and perhaps I might comment on it. I think because the policy instruments are so detailed they will tend to become templates. And because they’re templates I think people will respond to them as templates. So they will try and address the template rather than reflect on practice. In that sense I don’t think the implementation will be successful. I think again, at least in technikons, it goes straight down the old compliance way that we already are familiar with. And already you can see people reading the criteria like a check-list and then saying ‘okay let me quickly put this in place, let me get a little policy in place’. So immediately people are saying ‘ja, ja, ja, we’ve got this policy let’s just see if we’ve got everything’. So we are responding to it in the sense of complying, we’re not responding and saying ‘is this the best practice for higher education? Is it a good thing to have?’ In a sense for me this whole thing of getting to a form of education that’s really quality education it is almost discounted by the detail of the instructions that we’re getting... I’m sure the intention is very good but I’m not sure if the outcome is what the HEQC is intending...we’re not going to have successful implementation. Not because we’re not implementing it but because we won’t be reaching the outcomes that I thought were the intended development outcomes.

How do you think academics are going to respond to the implications for them of the HEQC’s requirements?

Okay how do I think they’re going to respond to the implications for them? Horror and complaints at first at what seems like a thick volume of new stuff, but I think in the end common sense will prevail and people will feel that there are things that are just absolutely necessary. Already I can hear people talking ‘Ja it’s a good thing’. ‘It’s about time someone’s pulling these things up by their socks’. So ja I think there are many academics that are welcoming the criteria and standards even if I think in the long term it’s not a good idea. There are many things we did not consider in such detail under SERTEC. So there’s a level of detail which at the beginning is not such a bad idea if you are trying to get everybody to a particular level. I can understand that it’s necessary to get the ‘fly-by-nights’ out of the system. But one would want to know that after a few years that they are going to reduce this and allow more differentiation and give us more
responsibility - and not be so focused on all the really little details. I do not support this ‘shotgun’ approach whereby you aim at everybody and hope you will catch the ones that are bad.

One can expect also that if an institution already has systems that are operating fairly well the HEQC could just say to them ‘well we think on this and this that you’re not so great’. ‘So why don’t you work on that?’ But they should not give everybody this big detailed exercise. I don’t think it’s really necessary for every institution to go down that road… I think we’re going to take out forests if we do. I take the pilot audits as an example and look at my colleagues at the Vaal Triangle and you see what they’re producing in practice and then I think ‘this is ten times worse than SERTEC’. And I’m not sure that the benefits are ten times as great. …you see people always think that it’s fine to have a new system and that it’s going to be so much better. But there are a number of things that I really wonder about, for example the focus on community development, service learning and so on. I like the focus on curriculum development and design but at the same time I worry because of the detail.

What (if any) underlying paradigm/ value / worldview clashes exist between the HEQC’s conceptualisation and operationalisation of quality in HE and your own / and those of the academics you work with?

Now I’m going to be very honest. I’m not sure that a lot of people spend a lot of time on even thinking exactly what is the philosophical basis of all these policies. I think there’s an underlying assumption that when people oppose the HEQC they’re doing so from a philosophical base. But this isn’t always so, much of the criticism is superficial. In the end there are not such big difference between us and the HEQC. We initially supported the road that they took and when the dust settles we’ll be wanting the same things. So I’m not sure that there’s really is a discrepancy between their values and the paradigm they’re working in. So I think there’s been a big academic debate about the small little differences but in the end there really isn’t such a big difference, in my view. On the whole we were rather surprised at the attitude and the broad view that the HEQC finally took. We were expecting something different because what they eventually adopted, you know the ‘fitness of purpose’, ‘value for money’, ‘transformation’, these are things that were the norms in technikons and we were really surprised to see that that’s what they’re defining quality as. This is a formal industrial approach. If I look at the instrument it’s different, it’s called by different words, but I can fit it perfectly into the excellence model or the TQM or any of those things - we have actually done that. You can fit it nicely into the input-process-output of the excellence model, it’s just the words that are different. There’s no problem in with the model. I don’t think they realize how strong an industrial model they are proposing. So ja it’s not really that different to other models. But we don’t see a problem with that. That’s why I’m saying you know I think when all the dust dies down I don’t think anybody will have a serious problem. It all boils down to the same thing - what is the quality of the leadership, the quality of inputs by staff and you want to know that you receive students that are prepared for higher education - and then we want a good process... this is not a big deal! It is a very simple way of looking at QA.

How do you intend to mediate the HEQC’s demands in the internal quality management system you are setting up for your institution?

In a sense I’m very supportive of what the HEQC is doing and I think mainly because I really believe we need to jack up education in South Africa. I really go out of my way to publicly support the HEQC. We have orientation for staff, we get people to understand the QA concepts, we write documents, we’ve already re-written our internal evaluation to fit in one hundred percent with the HEQC’s requirements, even before it was finally published. So we try to be
proactive and as you heard today, it makes people feel that they’re at the cutting edge. I’m not for a moment saying that the whole institution works like that, but certainly our HoDs are well informed. Our Senior Management note the HEQC stuff, but they don’t really engage with it. They assume that the Quality Unit will see to it and do the work.

The merger worries me. Some of the comments made by senoir managers from our merger partners shows that they really don’t understand the implications of the HEQC policies. So I suport the HEQC proposals to give merging HEIs a break in the beginning.

**To what extent do you think the HEQC’s policy instruments will fulfil their purpose – namely to ensure accountability and improve the quality of HE provision? In your own institution? Country-wide?**

The HEQC will definitely achieve accountability. People will repond to their frameworks country-wide. But I’m not sure if they will improve the quality of education in HE. Will T&L acutally be improved? I’m not convinced. An industrial model can ensure that you produce the same rubbish consistently. They are focusing on systems, even in programme accreditation, and not enough on the quality of teaching and learning. Jacking up systems will give you some improvement, but better documentation and better policies does not result in improvement of provision.

**Any other comments related to the national QA project and your institutional QA work? (If you are in a management position, please comment on resource implications).**

As a Quality Manager the backing of legislation strengthens one’s hand. A Big Brother is set up and the HEQC frameworks provide a fall-back position. So on balance I think it’s good to have them.

But I would prefer an approach in which people have to think about their practice, and how to be excellent practitioners, not just about meeting prescribed standards. We won’t reach this via the HEQC route. Accreditation becomes a matter of life and death, all or nothing. I would like to see more focus on students, I still see the focus on system rather than on students. Will students feel that there is a difference? Will there be better feedback in the system? Will individual students notice a difference?

Regarding the IT&L Resource pack. I still need to study it in depth. I feel that people will use it in self-evaluation. People, the HEQC, don’t realise that in putting it out they are contradicting their own design. It will take a lot of effort in a big HEI to get staff to engage with it in the detail that it demands. Simply the size of the big HEIs will prevent the kind of engagement over T&L that they require and size will be the death of innovation in T&L. In a big HEI it’s difficult to get the committed souls together, everyone is fending for themselves. So the best we can hope for is uneven development. I can’t have personal contact will all staff and share enthusiasm for these issues. Also the restructuring isn’t going to support improving T&L. There is too much change. People will respond via compliance mode, reflection becomes a luxury we can’t afford.

The only positive thing about the merger is our name change. Now that we are to be a University of Technology, people are enthusiastic and will try to live up to the name and their new status.

The HEQC will have to accept that the success of its QA system will be blocked by the mergers and by a lack of policy alignment.
The macro-question is: To what extent you believe the HEQC’s policy instruments (the two Framework Documents, the Proposed Criteria for Audit and Accreditation, and the proposals for self-accreditation, the MBA Review, supported by the Improving Teaching & Learning Resources) are valid, acceptable, feasible and potentially effective?

Do you think that the policy instruments that the HEQC has produced so far are based on adequate expertise?

I think the policy instruments of the HEQC are based on reasonably adequate expertise. If one looks at the capacity within the HEQC there is no way in which they can do it all by themselves. They will have to rely on their peers in the higher education sector. And I think that the policy documents that have been developed and that will be developed in future should give the practitioners in education a fair idea of what is required. And I think so far so good.

To what extent are the HEQC’s policy instruments implementable in your context/ institution?

I think the HEQC has gone to a lot of trouble to pay institutional visits to explain themselves to the fraternity at every institution and I think people have a better idea after that visit as to what will be expected from them. What I do like about the new dispensation is that it includes everybody, especially the universities, who have been excluded from these kinds of things in the past. We’ve had assessment all these years so we’re quite used to it and being an ex-teacher I’m used to inspections, so it’s nothing new for us.

What are the resource implications of implementation?

I think for implementation resources will be available. What we are hoping for at Peninsula Technikon is that we only have the one official audit by the HEQC. They can co-opt other professional bodies and enter into agreements with them. But we wouldn’t like separate audits, it should be an integrated system. In principle we are against that, but we will accept the HEQC audit. The HEQC is the overarching body to see to the implementation of Quality Assurance in higher education. So we accept that.

What are the constraints to successful implementation in your own institution? And to what extent can you overcome these?

I think we are fairly geared up for the HEQC in the sense that we’ve been involved with our own internal quality processes for the last three four years now. We’ve got a quality manager he has been involved extensively internally with quality assurance.

How do you intend to mediate the HEQC’s demands in the internal quality management system you are setting up for your institution?

How do you think academics are going to respond to the implications for them of the HEQC’s requirements?
As you know different individuals are at different levels of preparedness and I think as the occasion draws nearer I think people will prepare themselves in such a manner so that they can comply with the HEQC requirements. They have been briefed on what is going to happen in terms of audits already. They’re fully aware. And that has been happening on more than one occasion. We also have at the institution a Curriculum Committee which is a Committee of Senate. All these requirements of the HEQC and the expectations have been put forward to people in the Committee as well as the Senate and everybody is aware that the HEQC is around.

And the general response from Senate is it a positive response?

Yes! The documentation I think it’s really thorough and unlike what we had previously we didn’t have this kind of documentation. We simply had the evaluation instrument, in terms of which departments were evaluated. But we didn’t have this kind of Resource pack that HEQC has produced.

So in a sense you feel the HEQC has been giving more of a helping hand for preparation?

Yes!

What (if any) underlying paradigm/ value / worldview clashes exist between the HEQC’s conceptualisation and operationalisation of quality in HE and your own / and those of the academics in your institution?

I think the HEQC has a fair understanding of what quality is in an academic sense. I’m not always happy with our own quality process because I think there’s a strong industrial link, they use ISO 9000 and those kinds of things, which I’m not fully familiar with. But I think as far as teaching and learning and research are concerned you need a special touch and a special feeling for you to be able to assess the real quality of these practices. And I think the best people to assess the quality of academic work are academics themselves and people who have gone through the mill. So what I’m saying is that I think the HEQC is fairly on the ball as far as that is concerned. And the simple reason is because they have used academics to develop of their documents. Quality managers sometimes come from a different angle and they don’t always seem to bring the two together.

To what extent do you think the HEQC’s policy instruments will fulfil their purpose – namely to ensure accountability and improve the quality of HE provision? In your own institution? Country-wide?

Accountability yes definitely, you know we have to be accountable because we are publicly funded. So it makes sense to check out the accountability issue. Quality improvement, I guess is a dynamic process and you know if you have been evaluated in year one and you were found to be good enough that doesn’t mean that in year five you’re still good enough. You’ve got to keep up with it you know, and constantly try to improve. But I think there are also limits, as somebody mentioned here yesterday, some of the old practices that we had, you know, some of the younger generation seemed to want to throw the baby out with the bathwater and we need to hold onto some of those practices at least those ones that have worked over the years. But I think it’s only the people who’ve been in the teaching profession who can talk like that. It’s very different for someone who hasn’t been in the job long enough to understand the kind of statement that I’m making now. And as has happened in the school sector they tried to throw out everything. They also think they could teach outcomes-based education without content, you know all those misconceptions - now you can’t do that! Now you have to be in it long enough to be able to
understand that particular issue and that there was quality previously. It might not have been assessed in the same manner as it is today, but we did have quality and therefore I would suggest that we don’t throw the baby out with the bathwater. There’s heavy involvement from practitioners in higher education I think that’s the crux. We’ve got a lot to tell the HEQC also and advise them. And I think they must take our advice because as these people are sitting here they are the people who are actually working at the coal-face and hence they will be in a very good position to come up with good suggestions.

Any other comments related to the national QA project and your management of quality at your institution?

I would like the HEQC at some point in the future to try and do in South Africa what England has been doing to develop websites at different institutions, say one site per discipline and actually put on those sites best pedagogical practice in that discipline. I think the HEQC from their office will have to manage that particular process. Now I’m referring to the English Teaching and Learning Support Network. When I was there they had twenty four of those sites developed already. The Institutes of Teaching and Learning in York showed me their central room from which they operate. But if you want to go into best pedagogical practice for say any engineering discipline you will go to the site at a particular university. So one university will man that site. Those sites have been built by practitioners themselves… I did mention it once to the HEQC people but they’re not there yet. But it’s something I think we need to think about. The other important issue is the fact that we need to move towards professionalizing our higher education practitioners. Many of them are not and those sites will help with that process. As I said yesterday, higher education in South Africa is the only education sector that is not professionalized. And developing these websites and professionalizing higher education practitioners are the two things that I see as next steps. I think this should be part of HEQC mandate because they’re in the best position to do that. You see I don’t want to see the HEQC only as auditors or creditors because both processes will make demands on practitioners. I feel that something else should be provided for practitioners in higher education in terms of professionalizing them and making available best practice in the various disciplines. I think we’ll be at a disciplinary level still for a long time. Trans-disciplinarily is being spoken about but it’s not so easy to realise. And also I think there’s a great eagerness on the part of practitioners to be better equipped professionally. They are equipped in terms of their disciplines, that’s fine, but I think professionally they are yearning for assistance and capacity. I would include senior academics in this as well. Especially those old professors who think they don’t need to teach as much and to leave students to their own devices. Our student population is too diverse and too under-prepared to adopt that kind of attitude. We can’t let people read for their degrees like the old Oxford terminology, they can’t even read! You’ve got to help them to read! And I think the old folk would be more resistant to it but somewhere they need to fall in line. Surely if I were the HEQC I would insist on that. You know there already is a move towards that with a Post-graduate Certificate in Higher Education which has been running at different institutions countrywide. But the numbers are still small in terms of involvement. I think we need to have those numbers increased. Institutions must also reconsider their own position in terms of their staff because generally speaking staff are overloaded with teaching responsibilities. And then people neglect other academic pursuits in terms of research and professionalizing. So I think we’re talking here about resources once again. And here I would make a strong appeal to the government to look at rewarding institutions that are doing good work with better resources. The New Funding Formula (we don’t know what it’s going to look like in terms of rands and cents) we were told that it will be a change to the old formula, what we’re hoping for is that it is just a top-slice of the existing cake, but we’ll have to wait and see. I’m saying these things because if I listen to my colleagues
and also my own trips that I’ve undertaken overseas, and you look at the human resources that are available compared to teaching and learning centres in our institutions it’s like a minuscule attempt by institutions to just say yes they’ve got a centre like that, but really it’s under-resourced. There’s too much to do in terms of developing teaching and learning expertise. What I think is also lacking a great deal in our academics is the fact that a very few of them understand what teaching and learning is because they are discipline people and maybe it’s not much of an interest to them. But I feel to be able to do good teaching you need to know how students learn, and those teaching and learning support networks could be of great assistance to academics.
The macro-question is: To what extent you believe the HEQC’s policy instruments (the two Framework Documents, the Proposed Criteria for Audit and Accreditation, the proposals for self-accreditation, the MBA Review, supported by the Improving Teaching & Learning Resources) are valid, acceptable, feasible and potentially effective?

Do you think that the policy instruments that the HEQC has produced so far are based on adequate expertise?

Well the only reference that I have is the list of names in the beginning of the Resource pack just after the introduction. It’s the only reference point that I have at this stage. I have some concern about the absence of open distance learning representatives in that group. In that group I would have liked to see P, Q, the new merging P representatives more involved. Distance education as such could be regarded of its own nature. And then the question again would arise to what extent does the resource pack apply to open and distance learning. I am sure that it will apply to a large percentage of what’s going on in open and distance learning, and will it be applicable to every part of it. If it’s formulated as if it’s formulated and integrated with the existing material ODL practitioners will recognise which is more applicable to their institution than to more face to face institutions. Especially P, now also the new P, which is doing only. Ja, it could be integrated and they would recognise what is applicable.

Probably we should get an ODL person to come in and have a look?

Indeed. Not only one, a panel of ODL specialists. This whole ODL thing in South Africa is still new to a certain extent. We are moving from the correspondence to ODL so we would also like to see international best practices included.

To what extent are the the HEQC’s policy instruments implementable in your context/ institution?

Well speaking of my own institution, which is a large institution, this may result in more work, more structures, more bureaucracy within the institution to implement whatever has been suggested in this document. Existing structures may be employed to do the job but yes I think it should be incorporated into existing transformational structures and not be an add on or an extra committee or an extra dean of learning and teaching or something like that. It should blend in with the transformational structures in existence to keep it streamlined and to keep it part of the core business, not an add-on.

What are the resource implications of implementation?

Well the main resource that I can think of is time. Expertise is there. Experience from the lowest to the highest level would be there. But time, time, time! It’s people…with their time. The constraint that I see and that I’ve experienced is the willingness to change the willingness to give teaching and learning its rightful place within the institution, to make teaching and learning part of the core business in the minds and in the hearts of those on the ground - the lecturers, the academics. From my academic experience and background I think that the main constraint is
people not buying into a lot of teaching and learning stuff that is being initiated by a body such as the HEQC.

I just want to push you a bit more on that what do you think it will take to get by or to change hearts and minds?

I think there’s a lack of understanding regarding the bigger picture. The failure rate impacts on subsidies. Subsidies impacts on the brand name the brand name impacts on… you can go on and on and on. That’s why I love this background to each of the focus areas giving the bigger picture in the Discussion and the Rationale. That’s very important. To my mind academics, the people who should implement this on the ground, are so busy with their own stuff that they don’t see the big picture. And that I think should be one of the transformational goals to give them the bigger picture. What is going on in the country, what is the need, where did the need for transformation of teaching and learning start and what would be the outcomes of it.

How do you intend to mediate the HEQC’s demands in the internal quality management system you are setting up for your institution?

I’ve seen this on the micro level, I’m busy with internal quality management systems within my own job on the micro level… Working with course teams, and working in course design and quality assurance in study materials, on that level. Basically face-to-face with academics. Mediating the HEQC demands would be to my mind devising a teaching and learning strategy on that level. With not only study materials being revised but making that part of a bigger picture. It’s not an add-on, it’s not a band-aid approach, but it’s a strategic approach, a systemic approach to give them the bigger idea of what is going on. Aligning it with the institution’s goals in the Faculty the School’s and the department’s goals, but on the most basic level is devising a teaching and learning strategy. We do have an institutional teaching and learning strategy but how does that filter down to Departments and Faculties and Schools and Committees? I think a personalised academic teaching and learning strategy per academic is what will be our strategy to improve learning and teaching. It must be a strategic approach otherwise it’s just a band-aid.

How do you think academics are going to respond to the implications for them of the HEQC’s requirements?

Well you have a core of academics who are motivated for teaching and learning who see themselves as educators, educational practitioners. They will find the Resources very helpful because it’s clear it’s not legalistic. The communication to them is not one of more laws, it is suggestions, it is processes, procedures, guidelines which I think the motivated academics will find very, very helpful. And the wonderful thing about these guidelines is that they are so abundant you can select and start small with your own priorities and then extend it to include more guidelines as you go along. So there’s a wide array of possibilities and procedures that you can follow, even on a small scale and that will lead to improvement. Even the smallest intervention will improve your teaching and learning! That was my impression of these guidelines.

Each of them even individually will make a difference I’m sure about that. And then the larger majority of academics I think at my institution will say ‘another policy’, ‘more work’, ‘we’ve being doing stuff for so long it works more or less’. It’s a culture change, many academics need to change. Really I am positive with the twenty to thirty individuals that I have been working with in the last eighteen months, people are really catching up. They are seeing the benefits of this for
their own professional development, their own profession. Improving one’s teaching and learning approaches gives one a new lease on professional life. It gives you a reason to come to work and do something that you can see works.

**Do you think there are enough incentives for staff to develop themselves professionally as educators?**

Well in the last few years at my institution people have been doing some sabbatical work and research projects on their own teaching and learning. Yes even academics in some departments write their theses and dissertations on what they are doing in the field of the teaching and learning of their discipline. So things are catching up. Incentives? Well P has been talking about a Chancellor’s award for best teachers. It hasn’t yet been realised but there’s talk, so it’s there will be incentives. And in the departments, one sees the recognition of individual academics who are real educational practitioners. You see the reliance on their knowledge and expertise and experience with regard to, for instance, filling in the SAQA forms. Those with experience are called upon to help other members of Faculty.

**Does good teaching practice count for promotion?**

Not formally but I think the impact of real good practitioners is understood by the Committee for selection and promotion. It’s still informal unfortunately.

**What (if any) underlying paradigm/ value / worldview clashes exist between the HEQC’s conceptualization and operationalisation of quality in HE and your own / and those of the academics in your institution?**

Well my idea of quality is very rudimentary. It’s working in terms of what you have planned, it’s more a ‘fitness for purpose’ approach, there is one of thee definitions of quality in the document. And I think the fact that quality is defined in a variety of ways and not one rigid definition opens up possibilities for people to see quality in a variety of ways. But for me it is quality for a purpose. What did you achieve in terms of what you set out to achieve. That is the basics. And I can live with this document in terms of that.

**So do you see yourself as being able to use this document in internal QA processes?**

Absolutely. I will have to let it run through my filters - my personal filters, the filters of my institution, of my department but the possibility is there to make this work at any level. Absolutely. What I want to say is that it’s not high faluting stuff. It is basic stuff. It is practical. Its best practices. It’s not best theories. But it implies a lot of theory. There was an interesting comment from one of the private providers yesterday that they feel there’s a lack in their minds regarding theory teaching and learning theory. And there is something I made a comment on p. 728 on the cognitivist approach. I think one should expand on the philosophy underlying this document, just flag it a little bit more, highlight it, explain what it means clearly and explicitly and say that this is the underlying theory and philosophy that we adhere to at this stage.

**Then moving onto what your institutions already doing about quality and whether you think this will contribute to self evaluation or whether there’s a mismatch.**

I was part of an audit was it a self-evaluation exercise in 1998 at the P Faculty of Theology. I was part of that with Mr Prem Singh in those days. There was a lot of thumb sucking, there was a lot
of wondering what we should put on the table. There were no external guidelines, there were no procedures in place. They distilled from our experience some guidelines. It was in the early days of auditing and I think this is now one big step forward! This could be the manual, the guide, the Bible as it were. And let me just say the key word is accountability. We should also develop in each of our institutions a culture of accountability. It’s not me in my corner and you in yours anymore, we are accountable to many stakeholders and that’s part of the bigger picture. We are not there for our own sake but we are there mainly for others’ sake. Accountability.

**To what extent do you think the HEQC’s policy instruments will fulfill their purpose – namely to ensure accountability and improve the quality of HE provision? In your own institution? Country-wide?**

I think I’ve covered number eight more or less.

**Any other comments related to the national QA project and your management of quality at your institution?**

As an instructional designer I looked at a couple of things starting with the structure the lay out of the whole document. I found the document well structured and clear from the Table of Contents and the basic layout. It did not take me long to figure out how the thing has been structured. After the second area the focus area I knew what was coming in each of those areas. So it was well structured as a study guide if I had to learn this as a student it would be easy because I could anticipate the structure is coherent and consistent. Focus Areas, Rationale, Discussion (and as I said earlier I like the discussion just to give a bigger picture where this all fits into). Secondly I would like to comment on the Introduction which gives a broad overview and I think there it lacks a section on the current learning theories that are adhered to in the document. What is the theoretical basis and how internationally acceptable is what we are doing. The benchmarking of our philosophy to other success stories across the world, the existing material is very good on constructivism p.7-8. I think that ought to be flagged a little bit maybe in a block or a shaded block just to let it stand out. To give an academic something to go on to open discussion with colleagues. What is constructivism and good teaching practice and how does that relate to the theory current learning theory. It should just be flagged a little bit and emphasised more. Thirdly I have remarked on my feelings on the absence of ODL representation and I think that P and Q should have been there. And then I would like to suggest two improvements to the structure. There’s one of the Focus Areas on p.67 following, there is a Glossary of Terms which is the only one that has it. I would love to see a Glossary of Terms after each of these Focus Areas because this is ‘new speak’, this is a new vocabulary for many people and we would like to see something about that. And then something, maybe artificial, but still it’s important to me, regarding the Evaluative Questions the first focus area if I remember correctly discusses these evaluative questions on the institutional and the program level and I would love to see these same levels of discussion within the other Focus Areas. If it comes to assessment is the institution assessing is the programme manager assessing and is the local academic assessing? It may be artificial, but it will improve the structure and the readability of the text because I can go to my level immediately, if I’m not the Vice-Chancellor or a manager, but an academic, then I can go to the program level or the individual level immediately and see how this impacts on what I have to do.
APPENDIX 9.10

Interviews with Academics
A1 5/11/2003

The macro-question is ‘To what extent do you think that the HEQC’s policy instruments and processes are acceptable, legitimate, feasible and potentially effective’?

What is your position, in principle, with respect to being accountable to the government for the quality of the programmes you teach on? To what extent do you agree with the idea of an external quality assurance agency, established by the Department of Education, assuring and maintaining quality in the higher education system?

In principle I support the idea of an external QA agency. This should allow for better steering of the system by the government. On the other hand there is a danger that politics will play a role and that the process of QA will become ideological. But I think that the HEQC has tried to keep as autonomous as possible from the DoE.

What was your experience of the HEQC’s workshop?

I found the workshop helpful. It was an opportunity to give feedback to the HEQC and to make a contribution. This helps buy-in from academics. It also helped us to contextualize the IT&L Resources, and I think these will be useful.

What did you learn from it?

It helped to show me where the national QA system is at. It also helped foster discussion on the distinction between the Criteria and Standards and the IT&L Resources. I’m now aware how much work needs to be done. These workshops also help to stimulate debate inside HEIs on QA, it helps us to see that the HEQC and QA are for real and not something abstract that will go away.

To what extent do you think that the HEQC’s Improving Teaching & Learning Resources will be used and have an impact on teaching and learning at your institution?

The IT&LRs have great potential as a tool and as a catalyst for good discussions on quality and T&L. They have huge potential to do this if the final version is properly introduced to the system and the distinction between minimum standards and ideal standards is made quite clear.

Do you think that the HEQC’s policy instruments and processes adequately take into account the interests and concerns of academics on the ground?

My criticism of the policies is that they are in a continual state of flux. So whilst the parent document remains a draft the next policy is produced on the basis of it. We get no feedback on our previous comments, but must now comment on the next policy instrument. It doesn’t appear that he HEQC is taking the consultation process seriously, we don’t know how much of the consultative feedback is taken into policy finalization. But at least consultation is happening, consultation is difficult because people are not always well informed about QA issues especially.

Also I think that the HEQC has started off too ambitiously, but as the process goes on they may become more realistic, for example we hear they are revisiting the Accreditation Criteria document. They don’t necessarily consult those who know a lot and have experience, they choose who to consult, maybe for political reasons. They have stimulated some debate around their documents, but not enough.
What are the consequences, costs and risks of the HEQC’s policies for you and your academic work?

Positive implications are that the HEQC and QA could move us to have discussions on best practice and towards improvement. At the moment this only happens with a small minority. The threat of audit trails to departmental level and programme accreditation could bring most in on this.

Negative implications are that it will lead to more administrative duties, the creation of documentation, which takes time. People like me who are pro QA run the risk of getting into conflict with those opposed to it – we have already had debates on academic freedom and autonomy issues. The time issue is serious, it will take away time that could be spent on research. Generally HEIs are taking strain because we are losing our experienced academics and with less experienced staff we now have to deliver better with diverse students. Having said this, to say that QA can only make your life worse is to speak from ignorance. Doing something better can be related to do it more efficiently, innovation can be efficient.

The ground for growing QA will always be difficult. Some academics say ‘I do my work well, so I’m not changing’. Others will whinge on principle. So it’s difficult to know where the complaints are coming from and how seriously to weight them. We should expect a negative reaction, no one likes to be evaluated and external evaluation is always threatening.

Do you have any recommendations for the HEQC in terms of winning legitimacy or ‘buy-in’ for its external quality assurance requirements from academics?

Firstly, the HEQC should lead from research-based expertise. This will help to ensure that we don’t repeat international mistakes. The HEQC should be reflective on what has gone wrong elsewhere, many mistakes are kept in the shadows. To show that their proposals have scientific rigour and haven’t been made up by some arbitrary group will help to bolster legitimacy.

Secondly, they should focus on QA through critical self-evaluation. This model is closest to what good academics know and focusing on this would help address the perception of overload. The HEQC should show academics that they are already doing a lot of good things and that good academics already use the self-evaluation cycle. We should focus on self-improvement, this would be the best way to do QA.

With respect to expertise, I think that the Accreditation Criteria document is a well-conceptualised document and Mala’s presentation on this and on eventual self-accreditation made a good impression. But the criteria are too many and they are not sufficiently differentiated – there is not enough distinction between good practice and minimum standards.

What criteria would you set for yourself to measure improvement in your own teaching programmes? How do you think quality assurance should be carried out in order to effect improvements in teaching and learning?

I would use the IT&L Resource pack to evaluate my own practice, but always within the resource constraints and tie constraints that I work in. I couldn’t meet all the criteria listed there, this would be unrealistic. The document should be understood as something to aspire to, we can’t do all of the criteria 100%. We also have to deal with other policy implementation issues. We also have to deal with a diverse student group which means that things like our throughput rates and the quality of our students research proposals are not
acceptable. It is dawning only now on some academics that we will have to do things differently.

When it comes to evaluation, I would prefer peer-evaluation where I tell peers what I do, how I do it and how I plan to improve or have improved. I feel comfortable with trusted peer review internal to my School with a reporting mechanism upwards that is linked to staff appraisal. I would like the opportunity to explain and discuss my work, and what are the consequences of the evaluation and how I should implement improvements. I don’t want to have to defend myself as in a viva. So this process should be a sub-set of an internal QA system. The HEQC could look at audit trails down the levels, but they should be looking at the HEI’s QMS. Anyway, resource-wise they should not be attempting to judge the quality of our work, they will never pull that off.

**In what ways, if any, do the values and assumptions that underpin the HEQC’s policy instruments differ from your own with respect to the quality of higher education provision?**

I agree that academics should be accountable, responsive and strive for good practice. Academic freedom without academic responsibility has no meaning. Academics need to question their freedom in relation to responsibility and accountability. Currently I’m busy studying the nature of universities historically and my interpretation is that accountability and responsiveness are not at odds with why we exist. So I support that the system should make us accountable. Of course many academics are anti-managerialism and government control. But, as a researcher, I’m not convinced about the alternatives to a managerial approach. We need good transparent management and clear structures and reporting. I’m not clear on exactly what collegialism means for modern universities, what are its structural implications? Chaos and conflict? Our issues are complex and I don’t think collegialism can deal with them. It is usually too informal and just creates noise and conflict. If collegiality means having a good discussion on what has worked and what hasn’t worked within an internal QA system as I described earlier, this makes sense to me. For me the managerial approach brings clarity and structure, I can’t see how this can be bad, give our scale of operation and the levels of complexity. Maybe I’m just a pragmatist, but I remain unconvinced that arguments about academic freedom, autonomy and collegiality can provide real alternatives for running an HEI. I don’t think it’s any longer an alternative just to do your own thing.

**Any other comments?**

Next year the HEQC should focus on stimulating self-evaluation in HEIs. It should acknowledge publicly the importance of self-evaluation and it should revise its audit document and put self-evaluation at the centre. The crucial question that the HEQC needs to deal with is the tension between accountability and development. If it puts self-evaluation as the foundation of its system, this will be dealt with.

For QA to succeed in HEIs there needs to be management capacity to deal with the difficulties of implementation and evaluation – there will be conflict, tension and stress and staff also need to be trained in QA practices. If the HEIs don’t align their institutional HR management systems to QA and if those who improve aren’t given incentives and rewards, QA will fail.
A2  3/11/2003 (by e-mail)

The macro-question is: To what extent do you think that the HEQC’s policy instruments and processes are acceptable, legitimate, feasible and potentially effective?

What is your position, in principle, with respect to being accountable to the government for the quality of the programmes you teach on? To what extent do you agree with the idea of an external quality assurance agency, established by the Department of Education, assuring and maintaining quality in the higher education system?

The principle is fine but I am apprehensive about implementation.

What was your experience of the HEQC’s workshop?

More interesting and useful than expected.

What did you learn from it?

Partly to be suspicious of mixed signals about university autonomy in QA initiatives expected from the HEQC.

To what extent do you think that the HEQC’s Improving Teaching & Learning Resources will be used and have an impact on teaching and learning at your institution?

They will probably be used constructively but will be taken up to varying degrees in different parts of the university.

Do you think that the HEQC’s policy instruments and processes adequately take into account the interests and concerns of academics on the ground?

Not really, academics haven’t really been involved in the consultation process and the documents are too long and dense to expect them to decipher them.

What are the consequences, costs and risks of the HEQC’s policies for you and your academic work?

If they are applied in a managerialist way they pose a serious threat. Particularly in terms of the time and effort that they will demand which will have to be taken away from our core functions.

Do you have any recommendations for the HEQC in terms of winning legitimacy or ‘buy-in’ for its external quality assurance requirements from academics?

Allow autonomy and variation in uptake of policy. Turn the big guns on the obviously lousy institutions. Don’t treat all of us on the assumption that we are all incompetent and lazy.

What criteria would you set for yourself to measure improvement in your own teaching programmes? How do you think quality assurance should be carried out in order to effect improvements in teaching and learning?

Having more of my higher degree students publish their work. I think that tougher action should be taken against lazy unprofessional staff.
In what ways, if any, do the values and assumptions that underpin the HEQC’s policy instruments differ from your own with respect to the quality of higher education provision?

HEQC’s values and assumptions are probably similar to my own, though I think quality in education is a long-term project that is not amenable to managerialist interventions.

Any other comments?

There is too much policy, too much interference, too little of the intellectual enterprise left.

THANK YOU
A3  14/10/2003  (by e-mail)

The macro-question is: To what extent do you think that the HEQC’s policy instruments and processes are acceptable, legitimate, feasible and potentially effective?

At the foundation of my dismay is the realization that the type of discourse in the HEQC has become pandemic in South African education at the national level and is steadily insinuating itself into every fact of higher education as well. It is a discourse of centrally controlled management (based on dated and increasingly obsolete ideas borrowed from the real business world that is steadily abandoning them, mixed up with a lot of Soviet era planned economy stuff that some of our exiles learned but did not abandon when the actual centrally planned economies went down the tube.) It has one fixed idea ‘control’. It is a discourse that has not the slightest real interest in any idea of the university in relation to thought and knowledge. It is the discourse of managers and of education as a (state-controlled) business. Many of our managers have already accepted the terms of the discourse, namely, the central government bureaucrats can interfere with and control the inner life of the university and, indeed, tell the university what its mission is (the important issue of the ‘fitness for purpose’ versus ‘fitness of purpose’ change.)

There is, however, one glimmer of hope. The overweening lust for central control allied to intellectual technology of outcomes, criteria, etc. of mind-boggling bureaucratic complexity and crassness all managed and implemented by staff who are the apotheoses of mediocrity can never work. It will collapse under its own bloated weight. Universities are one of the great creations of humanity. They are great because they are allowed to be, in a certain sense, wild. It is only as free institutions that they flourish. Freedom is the price you have to pay for real universities. There is no other way.
APPENDIX 9.11

Interviews with MBA Academics
MBA 1.1  10/6/2003

The HEQC claims that its conceptualisation of quality is based on the following understandings of quality:

- fitness of purpose (HE must contribute to national development and reconstruction and social justice and equity)
- value for money (HE must become more effective and efficient, although not just market driven)
- transformation (HE must contribute to the transformation of the individual learner, HE systems and the nation)

Do you support this conceptualization of quality and the values on with it is premised?

I think I do, although one of the areas I feel is lacking in their definition, it’s not so much that their values are inappropriate – and I’m not sure that I know the exact terminology that is appropriate for this – but that it doesn’t include appropriateness as an educational qualification from the point of view of achieving academic standards. The ‘fitness of purpose’ seems to relate more to ‘do we provide the skills that are necessary for individual as well as social, community and economic development?’ But you can provide that at a lower level and it is not necessarily appropriate to a Master’s qualification. And I’m not sure that that element of quality is built into these values.

What is your initial response to the HEQC’s operationalization of these values and this understanding of quality in its policy instrument for the Re-accreditation of MBAs 2003?

In retrospect, I do think it’s actually been quite a valuable process. I have my reservations about how it is going to be used and to what extent the HEQC is in a position to be able to say, ‘that is good quality and that is not’; on the basis of our own submissions. To a large extent, I think that when you submit a narrative, how good you are in writing the narrative will determine the extent to which that is perceived as quality. And I don’t think that has anything to do with the actual quality of the programme itself.

I believe in August we’re due for site-visits. But again, they can’t possibly interrogate that entire document. I’ve just signed off the copies of the document itself, with its appendices. The document itself is about 90 pages and that’s 90 pages of narrative then the rest are appendices. So, really how much of this is going to be used? And I just feel we put in an awful lot of effort into it because there is the chance that we might not be accredited. And, for what? You know, you kind of feel, if I put that amount of effort into it, then it must have the same amount of effort given to it from the other side in terms of using it to make that decision. And I can’t believe that that kind of time investment is going to be put into it. It’s not humanly possible! Do they have the capacity to deal with that? I doubt it.

But you did say that it’s quite a valuable process. In what sense did you mean that?

I think from an internal perspective, being a new programme, a lot of the supporting documentation that knew was around but had never really consulted. And, having been forced to find it, I read a few things that I didn’t know existed! But I don’t think they’re things that affect the programme quality. You know, it’s more things like Human Resources policies, which we don’t actually get involved with in our particular situation, because we’re not an autonomous unit, unlike most of your Graduate Schools of Business, where they do their own Human Resource Management. They do their own selection, recruitment, they have full-time staff, and so they get involved with performance appraisals, whereas we don’t have that. Our staff are employed mostly by the University through the University’s Human Resource policies. We fall under the School of Business in the Faculty of Human and Management.
Sciences. So, we really are just a programme within the School of Business as opposed to a separate unit, even the B one is a separate School – still under the Faculty but as a separate School, whereas we’re under a School.

**Do you think this instrument and the surrounding re-accreditation processes will really, in the long-run, result in the improvement of the quality of MBA programmes across the country?**

This might sound a bit big-headed – but I think having been through the process – I think we’re doing a very good job compared to B, for example, and considering that we’re new. Just little things, like we’ve had student evaluations from day 1 and they’re documented. And we have external examiners’ reports for every single exam, so we’ve got the external as well as the internal quality assessments taking place. Those sorts of things I assumed everybody would have. I came from the Business School at A and so I think that was just my assumption that that was how you run a programme. There certainly wasn’t anything from the University’s side to say, ‘do this and do that’; from an undergraduate level they just don’t exist at all, it’s a voluntary thing, if you want C to get involved in your evaluation of programmes, but it’s certainly not something that is required. But at A we did it for all courses. I’m not sure to what extent the external evaluation of the programme was done there, it was internal, it was student evaluations. But it was a while back. I can’t remember having external examiners and external examiner reports. And I think also because there we ran a lot of short courses and business-oriented courses and it was really a selling tool more than anything else because you would use that to say, ‘our programme gets four out of five on the student assessment’. And it was used as a marketing tool.

So, sorry, to come back to your question, yes, I think the re-accreditation of MBA’s will lead to improvement and there are definitely areas for improvement, for example, I think peer assessments are really important and we haven’t got around to doing those yet. So from that perspective, yes, it will be beneficial to our programme. And then in terms of programmes across the country, I hope it will screen out ‘fly-by-night’ MBAs if the paper-work is backed up with proper site-visits and it is interrogated thoroughly. My concern is that – and I’ve heard stories about certain institutions hiring people to write their document – you can get somebody who’s a very good writer to get you by. I feel that I’m not a particularly good narrative writer and that, while we may be doing something well, if I haven’t put it across sufficiently well some institutions may be seen as being better quality programmes because of that. So it really requires the back-up of the site-visits.

**What criteria would you set for yourself to measure improvement in your own MBA programme?**

I maybe misinterpreting your question here, but I would say that you would need to have internal indicators, in other words, student indicators, in terms of assessment of both programmes and modules and the lecturers. So I think student opinion data would be the first indicator. And I think particularly at an MBA level because they are more informed and they are looking at it in terms of changing their business performance. So, unlike undergraduate students who can really only look at it from a knowledge perspective, these people are applying it everyday and so if it’s not applicable they’re going to let you know. But, I think that’s not all. I think peer assessment is necessary, and this relates more to the quality criteria, which I don’t think is represented in that first question on the HEQC’s values, that is ‘quality as an academic standard’. So that’s the peer review. And then thirdly, I think business review, in other words, employing other organisations to evaluate our programme and our graduates. We don’t do this yet because we had so few graduates at this stage. We did include as part of our document feedback from students a question on what’s happened in their careers since they’ve been involved in the programme, for those who haven’t yet graduated. Obviously for the few graduates we ask ‘have you had any promotion since?’, or ‘how has the programme
added value?’ And we have a letter of support from the Chairman of the Pietermaritzburg Chamber of Commerce endorsing the fact that we have been involved with them since the inception of the programme and we talk to them and we worked quite closely with them in terms of the curriculum design. But we haven’t got specific employer feedback at this stage. We plan to use alumni as a major source of input into programme development and assessment in the long-term. I also think the external examiner system is also part of that peer review aspect and we are currently doing that.

What values drive your academic work?

I agree with the values that the HEQC has. The ‘fitness of purpose’, I think, is critical in education generally, but particularly in management education. The ‘value for money’, I think, needs to be market-driven, in other words, if we’re not adding value we’re not going to get the students. So, I think you’re forced to provide value for money in business education kind of as a demand and supply operation. I don’t think you need the government to help with that. I think if you leave it up to market forces, you’ll be providing ‘value for money’. I don’t believe we need government interference for that. And in terms of ‘transformation’, I think that’s critical too. I think we need to look at that at different levels – at individual and societal levels. Are we adding value, are we changing the way society operates or the way the individual operates in their management capacity? So I think those are all important. But in addition to these, the academic standards issue comes back in. Academic excellence is not represented there, I don’t think. At the end of the day, I want to know that the students who graduate from the programme generally and from my modules in particular are excellent, academically. That we’re maintaining those standards, in addition to providing ‘fitness of purpose’ and ‘transformation’.

I don’t really think the government has the right to intervene so intrusively. My concern is how the evaluation report is going to be used. I think it’s a very useful document and I think the process is very useful. But what are they going to do with it? For example, one of the concerns that I have at the moment, and this is purely a personal opinion, is that I believe that the result of this process is going to be that the government says, ‘Right, those programmes are not at the required standard, they should not be allowed to operate’. And I believe that is going to impact predominantly on the ‘fly-by-night’ institutions that are not related to universities. However, I also believe that, because we are about to go into a merger and we’re in fact offering 3 MBAs, they are going to choose one of those, at least, if not two, to say, ‘right, you can’t offer those’. And that’s going to serve as a sign to the rest of the market that they’re not just picking on the small institutions, that they’re not biased. But I don’t believe that the rationale would be honest. Now, I don’t know if they’re going to do that, but I have a concern that that might happen, because they know we’re going to offer only one programme at the end of our merger process. There’s no ways we’re going to offer three. So, this is an ideal opportunity to say to two of them, ‘you don’t meet the standards’, irrespective of what those standards really are. In other words, they’re not applying the criteria to make that decision, there’s another political motive behind it. I mean, I know, from seeing parts of the B submission, that our programme from a quality perspective is better. But their numbers are double ours. We’ve got about 180 students and if you take the distance students into consideration as well, they’re over 1000. They’ve got about 300 full-time students. So, for example, if they were to say, right, the B programme fits the bill better than the Pietermaritzburg programme and therefore we allow them to continue. Then what are they basing that on? Just going on P’s comments, as the only other external person who has looked at it, she says we’ve done a thorough job of it, as opposed to B who hasn’t. But then B had to contract managers running that programme and they don’t actually have a vested interest in whether that programme runs or not.

What do you think are/ will be the key concerns of academics who teach on your programme in meeting the HEQC re-accreditation requirements?
We had a very mixed response. What we did was only give them the sections that required input from academics, they were requested to input there. So they didn’t ever really see the full document. Certain academics like Head of School did, but more in Head of School capacity than in an academic capacity. I think if we’d given people that whole document we wouldn’t have got anything back at all. But then we also had very mixed responses. We had some people who were fantastic, for example the CV document was required in a particular format, which is totally unlike any normal submission of a CV. So everybody was required to change their CV format and submit. Now, a lot of staff bent over backwards and did it for us. Then we had staff who said, ‘forget it, I don’t have time, I’ll just send you my CV, you do it’, which we did. Then we had one member of staff in our school that said, ‘why should my credentials be used to get accreditation for your programme?’ He happened to teach on the program for one semester when we first started and he refused to send us his CV. So you know, that’s why I say, we had the full range of responses! And a lot of the stuff we needed was not from the academics, it was from support departments. We had the same range; some were fantastic, really fantastic, whereas others were just uncooperative. The problem I think also was that we were not on the CHE mail-list. So we only got this document a month ago. I did not go to the workshops, because I wasn’t on their list. I only heard about the workshops after they occurred. So literally we sent stuff and said, ‘listen we needed it yesterday’. And we only heard about it by chance. I happened to meet Marvin Kambuwa from UDW who said to me, ‘how is your submission going?’ So that was the problem. And I think that’s an internal problem, you know, you can understand the CHE not expecting two MBAs from one place. So I presume that the Registrar just forgot that we existed. But then we had two submissions for this, because we had a summary submission that was done at the end of last year, which went directly to CHE and they communicated directly with me to say that this particular section hadn’t been completed properly. So we communicated directly with them then. So they did know that we existed, but obviously on their official database we don’t. So I think we may have had a much better response from staff generally if we’d given them a bit more time. And those who did help us really did it at an inopportune time. So perhaps the non-compliance is understandable. But I think from an internal perspective the process will lead to better QA policies and procedures being put in place. And perhaps working better with C as well. We’ve never actually worked with C, not because we haven’t wanted to but because our original evaluation forms we actually did as part of an exercise through our Human Resource Management module. So we worked with the students to design that. You know, I have experience from three different MBA programmes so that was incorporated. And the guy who teaches on our HR module has extensive experience in performance assessment and evaluation. So we didn’t refer to C because we didn’t feel that we needed to. But I think having worked with C now, it just makes more sense to have it endorsed by the unit that works in that area.

How would you want to interpret/ adapt / ignore the HEQC’s requirements in order to make them acceptable and manageable in your School?

I think it will depend on what the HEQC feedback is. In other words, if we’d said that something is adequate, do they agree that it’s adequate, and if not, what are they going to require us to do? I think that question one can only really answer after the site-visit. I think we have a slightly unique situation in that if you were running a Business School and the MBA programme was part of that, so much of the information required would have been a lot easier to get hold of. For us it was a lot more difficult, because we don’t run our own induction program and we don’t have our own recruitment policy, so you had to keep going to other departments in the University, over which you had no control. So I think in that situation it was a little bit different to other organisations, but I’m not saying that I don’t think that that information was necessary. Another concern that I did have though, is that a lot of that information is quite confidential, look, the sort of policies that you have for recruitment and selection, for example. P and I did discuss it at one point. You know, this is real internal,
inner-web stuff. Who else is going to see this document? Is it going to be treated confidentially? I mean, our entire promotional campaign, for example, is in there. The billboards, the ads, the content of the ads, the reasons behind the ads, what we’re trying to achieve, all of that kind of information, which is really quite confidential. Admittedly it’s retrospective, but still…And then things like student evaluations, I mean you’re providing information on the good and bad points that come out of your assessments. Those could quite easily be used by your competitors if they were to get into the wrong hands. Self-critical documents usually don’t go out to your competitors. So we did it from a self-assessment perspective in that we have given a lot of information, and we didn’t hold anything back for fear of it being used elsewhere, but then there is that concern.

This predicament highlights the tension between accountability and improvement.

Ja, and as you say, those two objectives are in conflict. I think it depends on how they use the information that comes through. And the CHE can’t possibly be in a position to internally assess all of these. So they’re going to have to use external people and who do you use? Will you use experts in the field? And that’s going to be our competitors. And so from that perspective, it has to be intentional. If they have a huge staff of people who had experience with MBAs, then maybe it wouldn’t be a tension. But I don’t believe that’s the case. But those consultant panelists are invariably going to be from your WITs and your A and your top MBA programmes.

What conditions and resources are necessary for you to meet the HEQC’s requirements?

A lot more time and a lot more resources both human and financial. I’m quite nervous about the site-visits, for example. Just the photocopying alone, is astronomical. And as I say, with documents that size and you have to submit 5 of them and that’s without us having a copy and then C will have a copy as well. So that’s 7 copies. And then that’s not all the ‘guff’ that you copy in the meantime. And then there’s the time. We took about a month in the end, because we had two extensions. And it was during exam time – during exam preparation time. I had two staff members, I had marking to do and I had two staff members who were trying to compile exams – you know, put marks together and get DPs out and all those sorts of things. It was just horrendous. As it was, we had one exam slip through with a page missing, which obviously they took an enormous amount of ‘flack’ for, but it actually wasn’t their fault. We were so busy at that time. And then, with the site-visits – what are the requirements going to be? Are we going to have to have proof of what we’ve submitted and how do you provide that? I’m supposed to be at Sweden at that time setting up a staff exchange programme, so I’m going to have to cut that short because I can’t hand this over to somebody else. So…what are the requirements going to be? Is it a full day of running around to other departments getting stuff or are they going to send us something beforehand to say, these are the things you will need to provide proof of? Those sorts of resources we don’t have a budget for or human capacity for, really. Probably six months down the line, it would be quite a different assessment because we would have at least been through the site visit reviews and know what is happening with the information that was cited. But then their headlines, presumably those have been set up for them, they’re unrealistic. I mean, effectively we’re supposed to be told by the end of the year whether we’re accredited or not. I can’t believe that they can do the job properly in that time and I think that’s my concern. Apparently, Marvin Kambuwa actually asked at their workshop whether we couldn’t have an extension to next year because we were merging, and wouldn’t it make more sense for us to get together and put together one programme, which we believe takes the best parts of all three programmes and then get that accredited. And the HEQC said, ‘no’. I think it’s unfair. I’ve met with Marvin, because I taught on the UDW MBA when I first came to Pietermaritzburg, and so I’ve known him for a long time, and UDW are fully aware of the fact that their MBA program is not the best and that there are elements of our
programme that they would like to incorporate. I think he and I would like to sit down and look at what works and what doesn’t. I mean, our group work doesn’t work at the moment; it’s an absolute nightmare. We insist that every module has a group component because to me that’s a critical learning skill. So it’s a compulsory element of every module and yet we have such difficulties with it…Getting people to pull their weight and assessing group involvement and an individual’s involvement in a group. So, I’d love to chat to UDW and if they’ve got a better system, we’ll incorporate that. And I understand the student complaints about group work, you know, they’re in a situation where ‘do I do all the work to carry the rest of the group to ensure that my marks are high enough’ or ‘do I teach them a lesson and allow them to submit stuff that’s absolute rubbish, pull down the group mark and take the ‘flack’ in terms of my own marks?’ But then they shouldn’t do that again, you know. And then you’ve got different levels – I mean, you’ve got people who are coming in with a Masters degree who just don’t really meet the grade. And I don’t believe in testing alone as a screening device, I know top MBAs do use it but I’ve read many studies that say it’s culturally biased. So how do you screen? You can’t say to somebody, I don’t think you’re capable, when they’ve got a Masters degree. So, then there are lots of things that I think we could learn from the other programmes.

To what extent are these in place already and what extent do you have the power to put them in place?

(No response)

Any other comments with respect to this exercise or to the quality assurance of academic programmes in general?

What worries me is that they accredit one, now, of the three, and then we’re actually stuck with that programme. Yes, we can change it and develop it over time, but that doesn’t seem the right way to go about it. We can’t be the only one facing that merger situation. In a way, I think it’s going to be detrimental in the merger process, because I don’t think we are going to sit down and compare our programmes and put together a really good one out of the three. We’re going to go with the one they accredit. And that’s not necessarily the best one that we could have as an institution. They’re going to force us to skip that process of evaluating the three internally and putting together something that suits everyone. I just have this horrible feeling that they’re going to use it as an opportunity to say, ‘look, there were some top university’s programmes that we didn’t accredit’. And it gives them an ideal opportunity to do it. And do you kick up a fuss and say, ‘we want to know why or how and on what basis?’

Another thing I would appreciate from this process is some examples of good practice, that kind of information, I think, would be very useful. We’re never going to get that out of this either. All we’re going to have is our own assessment of what we don’t do right and we have to put into place our own action plans as to how to improve that. There’s no comparison with the top programmes, or those programmes that have been assessed as being good programmes, we won’t get that kind of feedback. The guys who are involved in the assessment might, but and again, that just reinforces the top ones. Maybe that should be a recommendation at the end of all of this, that they should put together a ‘Best Practice MBA’ document, which gives you guidelines and suggestions. At least then you feel that you’re getting something back that’s not critical, that’s developmental. And I think particularly with new programmes. We acknowledge that we don’t have everything right. But short of the knowledge I have and the experiences I have with being involved with other programmes, there’s very little out there that says ‘MBA programmes in South Africa should do x, y and z’. I mean, for example, how do you deal with group work in South Africa? It’s very different to your American environment. They also have a multi-cultural thing but it’s still a different ball game. And this is a government thing so why can’t they initiate that? I also think that it would encourage those who’ve also been involved with this process, to see that they’re getting something back. Then you’re not going to be quite so reluctant the next time. You never
really expect to get anything back from this thing. If they’ve been through this process, well then they could facilitate setting up a forum. You know, in my field in Marketing we have a Marketing Educators’ Conference every year and we get together and we share and we research and we discuss problems that we face as teachers and lecturers, that sort of thing. It would be interesting. And if it was facilitated by an external body from the point of view of not being one of the competitors, it could be a useful forum for feedback on this sort of thing and for showcasing the companies that you want to benchmark against.
What is your overall impression of the HEQC’s site visit to re-accredit your MBA programme? What was useful and valuable? What was irritating or unhelpful?

It was a very stressful experience because it was our first one and also because of the way it was handled. It felt like an interrogation, the approach of the panel and the HEQC in particular was not constructive or developmental, For example their starting point was that our PG Diploma is illegal, that its not on the NQF, This is actually inaccurate, their records were not up-to-date, but we had to find proof of this, we could show that the PG Diploma was interim registered by SAQA in 2000. And when we proved that it was registered on the NQF they didn’t even apologise. The HEQC official was very aggressive, both our staff and students said that the rest of the panel appeared annoyed with her. So it wasn’t very useful. We didn’t learn from the process, neither the re-accreditation site-visit nor really the self-evaluation beforehand. They didn’t even give us a decent feedback session at the end. Instead it was a drilling session. Their manner was unhelpful and they didn’t serve our purposes or assist us.

Please comment on the following aspects of the HEQC site visit:
- organization of the process (HEQC)
- professionalism and training of the panel (HEQC)  - did you feel that the information you had submitted had been adequately processed and understood?
- fairness of the process (HEQC)
- interpersonal relations, attitudes, etc. (HEQC)
- support from the UN’s QPU and senior management (UN)

Regarding the organisation of the visit: we received a letter demanding how it was to be organised, for example ‘a vegetarian lunch will be provided’ and so on. We passed this on to our QPU and they did very well in setting things up. Then the HEQC changed plans at the last minute, even on the day, they cancelled certain session and people, staff and students, making things very messy.

Regarding professionalism: the HEQC official was very thorough, she had certainly gone through our document carefully and cross-checked documents, etc. Most of the panelists seemed to have had adequate training, they knew what they were talking about and looking for, although they played a minor role, the HEQC woman dominated. So overall I felt that the information was adequately processed.

But it was the manner or attitude problem that really upset me, it was really the HEQC official that upset me. She was very aggressive, a few of us felt this. The rest of the panel were OK. Regarding fairness: I felt really aggrieved because I was allocated a preliminary slot to give a presentation on what we though was positive about our programme and also what the weaknesses were and our plans for improvement. I had put a lot of work into this and then the HEQC just said they didn’t want this session, it would be a duplication and they would use it just for questioning. So we weren’t even allowed to say our piece and there was time on the programme for this.

Regarding support: the QPU gave us excellent support and so did the Executive. The Dean volunteered to come into the session to explain about the PG Diploma but they said they didn’t want him. As the DVC (Academic) left he said to us ‘enjoy the rest of the interrogation’, so I don’t think he was very impressed with their manner.

In your previous interview you said that in retrospect the self-evaluation in preparation for the visit had been quite a valuable process and that it would lead to improvements. But you also expressed some reservations:
- you were concerned that the huge effort expended would not be adequately rewarded
- you were unsure what the HEQC would do with all the information submitted and how it would be used
- you were anxious that competitors would have access to information that they could potentially abuse.
How have these views changed since the HEQC visit?

Well the self-evaluation was useful in that we did identify some things for improvement. But we as yet we have had no useful or constructive feedback. But we will be getting the report later.
Well they did go through all the information that we sent and asked us to clarify some issues. I’m still not sure what they will do with all the information and whether it was all necessary. I’m not so worried about competitors now. But I am worried that the process was biased towards the big institutions. For example the credit-rating for the MBA was based on UCT’s model of 2 years, not on the SAQA system.
My major fear as a result of the visit is that the pending merger may cloud their decision. The merger came up often in the questions, they were concerned about our different models and different MBAs with the same names in an institution about to be merged. We said this would be sorted out via an internal process. They seemed to have a re-structuring motive, they were talking as though they had a brief from the DoE to rationalise our programmes. This shouldn’t be the HEQC’s brief, they should rather be measuring our quality against set standards and criteria.

Do you have any recommendations for the HEQC in terms of improving the process?

Their approach was too aggressive, trying to catch us out. They should be more constructive and developmental. They made it a stressful experience with no positive feedback. So the end of the visit was an anti-climax, we still don’t know the results and will only get the result and report at the end of December. So we have to assume that 2004 will be business as usual and that the report will only have effect from 2005.

Do you have any advice for the UN/colleagues on how to handle an external evaluation?

Well coordination by the QPU is necessary. The accumulation of so much institutional information should be gathered by one unit and be available to everyone when needed. We had fantastic support from the QPU and I’m sure they have learnt from the experience. One problem is that our Registrar’s office is a shambles.
What were the results of your MBA Re-accreditation application?

The recommendation from the CHE re-accreditation panel was that accreditation of our MBA should not be granted. C has received the same judgement. What is curious is that A have been granted conditional accreditation and yet in 2002 A were planning to close their programme down, because of its poor quality.

So for 2004 the D will only be offering one MBA from the A campus. We will be able to accept new intakes for our PG Diplomas on the B and C campuses and also continue with our current MBA students who are still in the pipeline.

Will the D appeal against the CHE’s judgment?

No, there was a meeting of the Executive, Dean of Management, Deans and MBA Directors recently at which it was decided to acknowledge receipt of the letter but not to appeal. Basically the Executive are saying that there is no point in appealing as the criteria for appeals are very restrictive – you may not submit any new information and can only point out factual inaccuracies. There were some of the latter, and these will be noted in the response.

What were the reasons given by the CHE for refusing accreditation?

The reports are not publically available and thus details can't be given. However broadly speaking they didn’t like any specialised MBAs, they only seem to have accredited the general ones, although this is against international trends. In fact I think that they didn’t really understand our MBA properly – we have a generalist content which is then geared to a particular sectors or contexts, such as Water and we were planning to launch one for Conservation and also Forestry. However all that will now be put on hold until the new institution is ready to take this argument forward to CHE.

We were also criticised for having mostly part-time staff, but again this is typical of international trends. This is a high priority for rectification during 2004 so that we can run the D's generalist MBA from the B campus for 2005.

1. How have your staff re-acted to this news?

Many feel that the whole HEQC process has been politically loaded and that the result was politically determined. Fortunately most are part-time so there won’t be any job losses in the immediate future, but they will loose income. The judgment has inevitably escalated the internal politics relating to the merger.

In the long-term we hope to develop a new programme at the B and C campuses which will be politically correct as well as of high quality. Personally I’m committed to this, although in the short-term we will have to live with the political fall-out of this judgement which we don’t feel has been a fair one. For example, students have told us that the former A staff are now claiming that their Management Development Access Programme is equivalent to our PG Diploma. Students also tell me that our PG Diploma is of a higher standard than the first year of the A MBA.
The HEQC claims that its conceptualisation of quality is based on the following understandings of quality:

- **fitness of purpose** (HE must contribute to national development and reconstruction and social justice and equity)
- **value for money** (HE must become more effective and efficient, although not just market driven)
- **transformation** (HE must contribute to the transformation of the individual learner, HE systems and the nation)

Do you support this conceptualization of quality and the values on with it is premised?

Ja, I would have thought those were fair enough ideas as they stand, you know, in a sense that, I suppose you’ve got to say to yourself, ‘how will the learner perceive the quality of the programme?’ And I think there are two aspects to it, and one of them is what they can do with it – so, in other words, what leverage it gives them. And I suppose the second thing would be to say, does it appear to be comparable with other products that exist in the world. In other words, do they feel as if they’re getting a ‘fair deal’ from doing the programme here, as they would have at Cape Town, WITs or Pretoria or wherever? Academically, are they of a similar nature? And I would’ve thought those were key issues.

I’ve got no problem with education forming some part of the kind of ‘national psyche’, if I can put it that way, a lot of people drive it like that. I’m not perhaps enough of an academic, really, to know that entirely, but what I do know, as a practitioner, or somebody who’s been up there employing people for the last 25 years, is that at the end of the day, you know, it’s like any situation: if your components are no good, your system will be no good. So if your individual learners are not up to scratch, it doesn’t matter how laudable your overall objective may be, that’s not going to help you to add value to an economy. That means learning, that means knowledge...Having these laudable philosophies of growth and development of people, and transformation, and all these buzz words is great, but at the end of the day one must ask to what extent is the education going to add value to the ability of the individual to contribute to the economy, in his own self-interest and in the interests of the organisation and thereby in the interests of the nation? So I’d say there’s nothing wrong with their assumptions, providing that the emphasis is not on national issues to the detriment of what happens to the quality of individual learners.

I accept that political realities have to be dealt with and that if education was simply about educators and learners it would be a very different process. But the fact is, it is a political issue, it is funded by the state and therefore the politicians love them or leave them, have an opinion about how these things should happen. So I accept that fully. I mean, the fact that the politicians may have objectives, which miss the point, is a separate question. I think the whole transformation of the tertiary education sector is a perfectly good example of that. I mean, if Kader Asmal is prepared to waste what could be hundreds of millions of Rands worth of revenue effectively trying to fix something, which isn’t really broken, while the secondary system is a shambles. I’m amazed that he gets away with it. Because, if I was Thabo Mbeki, I’d think, ‘hang on a minute – you’ve now got to spend 3,4,5 hundred million on transformation costs for mergers like UND and UDW and we’ve got a secondary system that clearly doesn’t work.’ The vast majority of the population of South Africa are never going to go beyond matriculation, nor should they. But who’s going to remember, ten years down the track, that Asmal drove this merger? Who’s going to remember that he screwed up the secondary education system?

What is your initial response to the HEQC’s operationalization of these values and this understanding of quality in its policy instrument for the Re-accreditation of MBAs 2003?
Well, my initial response is that I think it’s a little ‘pinnickity’, to be quite frank about it, if that’s the right word, I think it ‘nit picks’ a lot of things, I think it identifies a lot of stuff which doesn’t really have an impact on the quality of the process. I mean, I think whether or not you’ve got formalised policies in place, for example, on issues like examinations – it doesn’t mean that the examinations don’t run successfully, it just means you don’t have a written document to drive them. The argument that they would run better if you had the written document is clearly fallacious. So that’s the one side of it. I think it’s a little bit pinnickity.

I think maybe it’s reflective of the fact that here you have what are really quality control people trying to be something more than that and maybe they shouldn’t. Maybe they should be happy with what they are. We had a meeting with [HEQC Official] and I was just a little concerned, and I told him so, and I don’t know if he liked it too much, but I said ‘Frankly I have to tell you that I’m not at all comfortable with quality controllers trying to be regulators. It’s not your job nor is it the Ministry’s job to regulate what the market will bear. It’s your job to set quality standards. Anyone and everyone who gets over that standard or reasonable threshold is entitled to operate in the market, whether you like it or not’. Then, having established a threshold, anybody who gets over it is entitled to offer their product in the market place. It’s not for the Ministry to decide that 52 MBAs are too many. That kind of interventionist logic is not right. He responded with some sort of silly remark about, ‘oh well, it’s part of transformation’ I said, ‘don’t talk rubbish about transformation’. What about transformation? It’s about supply and demand in a capitalist economy. It’s for the market to decide. Your job is to ensure that the product is worthy of offer. He then said, ‘you know, we don’t want institutions because they’ve got a good reputation overall to think that reputation is going to stand them in good stead’. I just said to him, ‘well I think that’s suspicious also. The market will decide. You know, you just do what quality controllers do, establish a quality control threshold’.

Ok. So having said all that, I’ve got no quarrel with the idea of a quality process. I think it’s right to have some guidelines, I think it’s right that orthodox institutions, like this one, should be required to justify themselves. As [HEQC Official] was suggesting in a sense, we shouldn’t just be saying, ‘oh well, we’ve got an excellent reputation, this is great’. I mean, if I look at the criteria, for example, there are certain areas, in fact, in which I believe we come up short. In terms of formalities, in terms of having policies and strategies in place. But the core things, the academic programme, the monitoring of that side, you know, the assessment of assignments and examinations, like all big universities, is very well done. It’s a good system and it works. But there are things that can be fine-tuned or where we could do better.

**Do you think this instrument and the surrounding re-accreditation processes will really, in the long-run, result in the improvement of the quality of MBA programmes across the country?**

Ja, I think it certainly could do. I think it depends on what your approach is going to be. If your approach is going to be one of compliance rather than conviction, well then the answer is ‘no’. But if you approach it with conviction rather than compliance then the answer is ‘yes’. The problem is, you see, and I think they’ve realised it, is setting tight time deadlines forces people to think ‘compliance’. And I said to [HEQC Official], the problem is that the tighter the deadlines are, the greater the likelihood that people will respond with compliance rather than conviction. That’s the danger. And he took the point, I think, sort of. It’s hard to tell whether he was sincere, if he came to the realisation at all. I think he’s self-centred. He runs around the country talking shit about education all his life and gets paid for it. They’re kind of UDF types, the guys one used to meet in the 1980s as activists of the UDF.

Having said all that, you know, let’s get beyond the personalities, you have to say that I think QA is a good idea. For example, guys like UCT are running around saying ‘we’ve got the best MBA in the country’. I think even the RAU people are running around saying that. But the market will decide, Kathy. So you send this stuff into the Financial Mail and they rate you
number one, big deal. So first of all, you’ve got trial by the media and then second of all
you’ve got the situation where it becomes a ranking process. Since when is it meant to be a
ranking process? I mean, who’s not going to see it that way? Again, I understand the problem
of trying to manage this process but at the same time, I think you’ve got to separate the two.
The rankings is not the issue, the market decides the ranking in the end. I mean, even the
Financial Mail ranking really is rubbish, isn’t it? I mean it’s completely unscientific and yet
students put great store by it. For example, in last year’s ranking, we were ranked fifth
overall, I was absolutely delighted. But if you consider how long the School’s actually been
going. It’s ridiculous. I mean, at that stage we’d had something like 75 graduates, it’s
ludicrous. And then you’ve got institutions like Gibbs, for example, with no graduates at all,
who are ranked at the top of the tree. Who’s bullshitting who, Kathy? I mean, how can you
demonstrate that these people are churning out quality graduates? I mean, this institution has
churned out quality graduates in 50 different topics for the last 85 years. Does it know a thing
or two about higher education? You would assume so! How does a School like this go from 0
to 1254 students in 5 years? You know how? Reputation, that’s how, students came here
because of the University of Natal’s reputation.

**What criteria would you set for yourself to measure improvement in your own MBA
programme?**

I don’t know if you would call these criteria, but I’d have to say, there would be two
significant defining principles. No, three, actually. The one would be to try and benchmark
our structure, which is based around the speciality MBA concept rather than the generalist
MBA, to benchmark that structure against the best international examples of speciality
structures. And I don’t think you can compare a speciality degree against a general one.
You’re not comparing like with like. So that would be the first one.
The second one would be to benchmark our School against relevant local competition. And I
use the word ‘competition’ advisedly, because we do compete – well I do. The fact is, every
student that WITs gets is a student I don’t get. And every student that I get is a student that
Stellenbosch doesn’t get. And if they don’t think of it like that, that’s too bad for them. You
know, when people say, ‘oh well, you only take the quality of the programme’ and numbers
have got nothing to do with it, they’re talking rubbish. If that were the case, if there was really
some correlation between quality and low numbers, how would a mass manufacturer get
anywhere? It’s possible to generate at a maximum the same level of quality as you might
provide for specialised products. There’s no reason why it shouldn’t be so. Quality is an
attitude and a process. It’s got nothing to do with numbers, really. What reason would it be,
that you could achieve better quality producing 30 products a month as opposed to producing
30 million. Why should it be easier to produce quality with only 30 products? You know, it
isn’t necessarily the case. I’ve proved that here.
And then the third one is to benchmark student perceptions. What do the students think? In
their terms, is our product good enough? For example, Denyse Webstock’s coming here to
do a School evaluation and the reason I’m doing that is because I want to do that before the
HEQC gets here, because I don’t want there to be a discrepancy between what I’ve submitted
and what they see. The fact that they might say, ‘Ah, look, you’ve got this here but you didn’t
report it’, I’d be very happy about that. What I don’t want is them saying, ‘you’ve reported
this, where is it?’ But that’s a private sector approach, isn’t it; I mean that’s how private
sector businesses operate. You know, sooner or later, if there’s a gap between you and your
customers, you’ve got to fall in it. It’s quite simple!
There are the people here at this university, who, if I was their private sector manager,
would’ve been canned years ago, because they are useless, that’s it, plain and simple – useless
- useless at the primary thing, they’re just teaching. Any person that is not a dedicated
researcher, any person that purports to be a teacher who cannot teach, has no place to be here.
Anybody that students complain about consistently has no business to be here, that’s it, as
plain as that. And if it were a private sector institution, they wouldn’t be. And increasingly,
even in public organisations this will happen, these pressures will continue.
So I suppose that would be my response, to say, ‘look, I think benchmarking is the way to go’. I mean, I think there is a huge contribution made, you know, by guys like you, who are looking at the kind of models that drive this process. But fundamentally, the bottom line is benchmarking – comparing yourself against something that is worthy of comparison. What the hell do the HEQC know? What I’m saying is at the end of the day, I’d much rather compare with a decent competitor. For example, if you were a large-scale software manufacturer, whom would you want to compare yourself to? Microsoft or Mickey Mouse KPIs? I mean, it’s quite clear, isn’t it? Which is not to say that’s it’s the only legitimate comparison. It’s not. There is a place for this. I’ve got no qualms with it. But it’s not the-be-all-and-end-all. What [HEQC Official] thinks of this programme is of no relevance to me, actually. I’m not interested in what he thinks. But if Harvard Business School came here or Princeton came here and said, ‘your programmes are not up to scratch’, I’d listen. Why would you want to compare yourself with someone who is not as good as you? Rather compare yourself with people who are doing better than you.

So, I don’t believe in peer review. OK, ask yourself this question: ‘Do you think Apple would invite Microsoft to come and peer review them? They’d die first. Do you think Pepsi would invite Coca Cola to come and review them? They’d die first, they’d think, this is madness. So these guys are operating in a different paradigm…a wrong paradigm. Time will tell whether it’s wrong. Maybe it’s not wrong. Maybe, as [HEQC Official] argues, academics are different. Maybe they can be distant and take an objective view, maybe they can. I’d be interested to see it.

What values drive your academic work?

Well, if you look at the job as Head of School then you have to say that Head of School is a management job, mostly. You know, the academic part, in my estimation, is actually not the difficult part, not conceptually. Practically it is, but conceptually it’s the easy bit. Because if you’ve got a programme on international economics and you’ve got and you’ve got an expert on international economics, problem solved. But the management of the school I think is quite difficult, because, again, academics are accustomed to working in a certain environment, which doesn’t lend itself to the sort of ethos in a private sector, for example.

That’s one of the reasons why I think running this School is probably easier in some ways than running a School from WITs or UCT, because we don’t have an academic infrastructure. I deal with them as contractors, which means it’s an ‘arms length’ thing. So if I don’t want to deal with you I tell you to bugger off and that’s the end of it. There some guy in first semester gave me some shit and I said, ‘go, you’re out of here. I don’t need this crap from you’. So, I’ve got an alternative – goodbye. I wouldn’t be surprised if these guys run off and complain to the Dean, tough luck. I’m saying, every Graduate School in the world runs autonomously from its main university. Both physically and in other respects; it must. Look at whom you’re dealing with. You’re dealing with people out of the private sector. You’re dealing with working people and experienced people. You’re dealing sometimes with very rich people and well-established and well-connected people. You’re not dealing with children, like under-graduates, under-graduates are children! You know, you’re dealing with people who understand what it takes to get a service, who understand the difference between good service and bad service. And you’ve got to behave accordingly.

But there is a limit to how far the actual market will go. A mature capitalist market system will tolerate wide variations in behaviour, wide variations in ethics and morality. But these things cannot be tolerated entirely within a public institution subsidised by the fiscus. It’s different in a public institution. If we weren’t being subsidised by the fiscus it would be a different matter. We could tell Kader, we want him to go and shoot himself. But the fact is, the national treasury supports these services and they are in their rights to want to know how taxpayers’ money is being spent. But at the same time they’ve got to do that within a free-enterprise system and in a free-enterprise system the market will decide what their offerings should be and how they should be made available. And that’s as it should be. So therefore, what is the HEQC’s job? It’s quite simple. The HEQC’s job is to say, ‘if you want to operate
in the MBA market, there is the bar. And if you want to operate in that market you must get over it’. Think of it like this; think of the Olympics, the high jump final in the Olympics, here comes Hestrie Cloete…over she goes, grazing the bar, it rattles up and down, and settles. Does she win or doesn’t she? She wins. How you get over the bar is not the issue, getting over it is the issue. So therefore, their job is to make sure that the bar is pitched right, not too high, not too low, that it’s right and that it has components that are right. And if an athlete, as it were, hits it hard enough, it’ll fall off, just as it should. But it’s got to be the right threshold, not the lowest common denominator, or equally, the highest common denominator. Now you see, that might suit the likes of the guys at UCT and the guy from Stellenbosch in fact expressed exactly that concern, that the bar is too low. But they’ve been in the market forever. Also they’ve had sight of this, they’ve been involved in the HEQC process, WITs has been involved in this for 18 months, they’ve had 18 months pre-sight of this before I even got near it. And he’s trying to tell me that it won’t influence the shape of this thing and he’s trying to tell me that that influence hasn’t been determined by what they do. WITs and Gibbs and Pretoria have been involved in it. Smart hey?

Are you quite happy for the government’s system of quality assurance to operate as the same instrument to be designed for both the private and the public sector? Do you think that’s a good idea?

It’s difficult to tell…I’ve always thought, broadly speaking, yes. But there are certain aspects of that which we find quite difficult. You know, support structures like library systems, like online subscriptions…These are quite difficult for private sector people. Unless you’ve got a considerable academic connection and linkage. I think that’s quite difficult, you know. You see, part of the argument private sector people make is that if you follow this logic, maybe what you’re really saying is that you don’t want private sector operators at all. It could be interpreted that way. I mean, if you looked at this, Kathy, who, but the big institutions like ourselves, can really comply with this fully?

What do you think are/ will be the key concerns of academics who teach on your programme in meeting the HEQC re-accreditation requirements?

OK, I think they might see it much like I said in the beginning. They might see it as a bit pinnickity, a little bit of nit-picking perhaps here and there…I guess they probably see it as intrusive, I suppose, in a way that I might not. Because I’ve been accustomed to this – I’ve worked in the private sector in big companies, so I don’t see those things as intrusive, they have a place. But it’s new to academics, I think. Also I would think there might be some concern about the general approach and the extent to which people at the HEQC are qualified to do any of that, really. And there may be some concern about this peer review. I mean, I don’t know, as I said, I’d be concerned about it, but other academics, you know, life-time academics, may not be so concerned about that, perhaps. It’s a bit hard to know that, really, because I’ve never in my life been a full-time academic, and I haven’t been a lifetime academic. I think public institutions, if they are to continue making worthwhile contributions, have got to be seen as civil institutions, not political institutions. And I think the partial politicisation of the process right now with these mergers is not clever. I mean, I’ve spent 5 years with merger acquisitions in business, whereas this one is laughable, actually. The whole process is completely laughable. Can you find 10 people on either side that could give you a cogent reason, even a vaguely cogent reason, why the merger should go ahead? Any process which is going to pitch UDW more or less in equal with this institution can never be a winner. I mean it’s just ludicrous. To see this as a merger of equals leaves any reasonable person to draw the conclusion that the management of both these institutions have got no common sense at all. I mean, a mouse cannot be an elephant, no matter how ambitious it is. I think that the University of Natal has got to behave properly, model behaviour. I don’t mean sitting around and being pushed and made to do that. I think, let’s be clear about where you want to go and let’s be clear about the realities. We have 30 000 students, they have 7. That’s the
reality. And let’s behave accordingly. We have 9 000 students in our Faculty, they have 2. Let’s behave accordingly. I have 1 250 students, he has 40. Let’s behave accordingly. You know, if this was a promotional process, the only basis that I would have to even consider the opinions of UDW was for me to be a ‘nice guy’. What other reason would I have? Why would I need to take any notice of somebody whose students’ amount to 46?

**How would you want to interpret/adapt/ignore the HEQC’s requirements in order to make them acceptable and manageable in your School?**

I think in terms of a general response my approach would be: I’m very happy to take the best out of this and use it to improve the management capacity and the competence of the School. I think some of it is a bit silly, I think some of it is a little misdirected, but I think there are some things in it that are worth asking, ‘How good is your programme?’ ‘Does it make sense?’ ‘Does it have policies that support it?’ ‘Does it have the support of the institution?’ I mean these are valid questions. So my approach is a pragmatic one, ‘I’ve got to take the best out of it’. I think any other approach is going to invite the authorities to do things that we might not want them to do. It’s a bit like affirmative action. You know, I’ve been saying to my clients for years and years, embrace affirmative action, because the sooner you do it, the sooner it will go away. Once the politicians feel there is no justification to make an issue of it anymore, they won’t. You’re not going to escape it. You may be able to influence it a bit, but the key issue is to respond…And there’s very little in that about which you can say, this is mischievous or whatever. I don’t think they are mischievous people.

**What conditions and resources are necessary for you to meet the HEQC’s requirements?**

It has been a bit difficult, because the time scale’s been a bit short. But then, you know, if they’d given me longer I probably would’ve taken a bit longer. But the problem is that there are certain things that are actually not in place. Like for example, the way we manage student perceptions of our programme. We don’t do it well. Let’s highlight that again, we don’t do it well. You see, you might have drawn the conclusion that your numbers continue to work, 20% increase in student numbers per year, I mean, who’s complaining? Why bother with the detail? Whereas in fact we could be making our product considerably better by taking cognisance of some of the detail. So I’m not prepared to take an arrogant approach to the whole thing, of saying, look at my numbers, I’m great. This School and this programme doesn’t run as well as it could. And I think if we’re going to get anywhere in the long run, we’ve got to make sure that it does. And that means making adjustments, taking criticism, that means taking even what we might regard as unfounded criticism. And even worse, unwelcome criticism. In fact, unwelcome criticism is often the best of all.

**To what extent are these in place already and what extent do you have the power to put them in place?**

If you’re saying to me, is this reasonably cohesive, and does the organisation have the infrastructure to be able to meet these requirements, the answer is, it does. Also, because the School runs the way it does, some of the questions, for example, on academic staff development, aren’t my responsibility. But I know and you know, that while I may be able to get away with it for the purpose of the submission, it’s really a weak argument, isn’t it? And it’s a perfectly legitimate question. How do you know that these people are actually good enough to teach the module that you are actually asking them to teach? Well, the answer is you know because they do it elsewhere. It’s not actually a legitimate argument. So I’m happy to take instruction in that area and to say that there’s work we can do in this area to improve our situation. I have to say that if you look at the 13 areas, one of the concerns I have is that it could be depending on how stringently they’re going to apply the so-called ‘standards’, and if you look at the standards, you will see that some of them are a bit vague. So depending on
how stringently the Review Committee are going to apply them, the concern that I have is in one or two areas we fail to comply, or as they say, ‘it does not meet the standard’. In which case, that might mean that the initial assessment of the whole process could be either a conditional accreditation or in fact, non-accreditation. So it’s a bit difficult to know. In the end I don’t think it’s going to happen, but if I look at it myself, if they took it really stringently, I could end up with non-compliance in that area, easily. I get the sense that the HEQC would think seriously about giving a non-accreditation evaluation to an established, well-known institution. I think they’d think twice about that. So to conclude, I’m not against the QA process, but I am suspicious of politicians because politicians work from self-interest.
1. I hear that your MBA programme was not accredited by the HEQC, what is your comment on this?

Well, I do not believe that the criticisms taken together add up to de-accreditation. They lack critical mass other than in terms of using the circumstances to drive the Department of Education’s agenda. I may be biased and defensive, but in my opinion it was a very sloppy and amateurish report. If we wanted, we could go through it and pick holes in it. It was a cut and paste job, we could pull it apart. The feedback was also cursory, it doesn’t help us know where we went wrong. There are no guidelines or weighting. In the light of the outcome, looking back, I would say that the manual or template with its 13 criteria was confusing. I was never clear to me what they were looking for, I didn’t know how to interpret it, and the visit process didn’t help me. Perhaps we didn’t present ourselves strongly enough, perhaps we were too open and self-critical, I don’t know. Also, we may have come across as a little condescending. I know that I myself give little credit to paper-pushers, although I tried to be as nice as possible.

So I can’t say that I felt that the process was fair – it was alienating and baffling, but then this could be seen as sour grapes. Also, I’ve seen most of the A report and they are criticized for many of the same things as we are. In fact I know that A were expecting to lose their accreditation. They were already talking to us about how they could fit into our programme. After all we had 1300 students and they have about 40.

The HEQC’s big complaint was that our PG Diploma (the first year of the MBA) is too generalist and doesn’t articulate well with our 2nd year, the MBA, which is made of various specialisations. They thought this part of the MBA was too specialist. But I don’t get their argument because most MBAs across the country, including the A one consist of a collection of modules with no obvious links or sequencing between them. A has 20 odd modules and about 50 students. If you look at international trends you will see that specialized MBAs are what the international market wants. But the HEQC had some spurious argument about us being a developing country that can’t spread its resources too thin. They seem to think that they have the monopoly on how to conceptualise an MBA. Yet we had 1300 students, I don’t believe that we could have managed to hood-wink 1300 mature, working students into remaining on a sub-standard programme. So we lost the battle on both specializations and also on mixed mode learning.

What are the views of your staff on this?

They are varied, some are very angry and annoyed, others irritated, some wanted to encourage the students to protest, but I put a stop to that. Others like myself are not too surprised. I expected conditional accreditation, but not this. I attended several HEQC meetings before the re-accreditation process and we all had the impression that there was already a pre-agenda to the exercise. For example last March [HEQC Official] almost threatened us, saying ‘some of you are not going to survive this process’. I questioned him then on how he could make such statements and then claim that it was an independent process. So there was definitely a pre-agenda, perhaps even a witch-hunt planned. Some believe that the whole P affair meant that the HEQC or DoE were determined to close us down anyway. They feel it’s been a political triumph for those in power.

Then I felt that the visits were unfairly influenced by Ms. Menon. What baffles me is that there was very little correlation between what was raised by the panel in the interaction and interviews with us and what was eventually raised in the report. They didn’t raise their concerns directly with us in the visit and so we had no chance to defend ourselves. For example, in the report a key issue is the patchy quality of our DE materials, but this was never raised in the interviews. Another issue that I pre-warned them in my submission was the
virtual nature of our staffing, and I explained that we were deliberately waiting to address this through the merger, as the other HEI has too many full-time staff. Yet the report went on about this, but we knew about this and explained it to them.

**Are you planning to appeal against the HEQC’s judgment?**

No, it has to be an institutional appeal and because of merger politics, it has been decided to let the matter rest. Personally I would very much like to appeal, to let the HEQC know what we think of Kirti Menon and their process and for the sake of our pride. The trouble is that if you look at it politically, it has all been done so smoothly. If we were still the UN, then we would have wanted to defend ourselves, but now as B we aren’t a lot worse off than before. I think they deliberately left us with one programme, A’s, to strengthen the under-dog and to force a programme merger. But we all know that the A programme is by far the weakest of all three. Before the HEQC interfered, Marvin (Director of A’s MBA) had come to see me and confided that he didn’t expect to get accredited and that he would accept our MBA in full. He clearly recognized the strength of our programme and simply wanted A to become a part of it. We also know that Kirti Menon and the big guns at the HEQC are all ex-A, so politically it sort of figures. You should speak to Debbie, she has actually taught on the A MBA and she was appalled at what was going on there, so the process is absolutely ludicrous, as far as I’m concerned the HEQC have not lost all credibility. Unfortunately Debbie has taken the thing very personally. …. I’m just angry that a very good business model and opportunity with huge potential, has been lost.

**What are your future plans for the programme now?**

Well we have had to inform those students whom we have accepted that the MBA programme is no longer accredited. We have 650 students accepted for 2004. I’m not sure how many of these will register now. We told them in the letter that they can either register for our PG Diploma, which now doesn’t lead anywhere, or they could register for the A MBA. Many have objected to registering at A, but indications are the more than 50% will still register with us anyway. We have a further 650 students in the pipeline and we will continue to teach these. We also have MAP, an access programme and we expect about 100 to register on this. Last week we had a meeting to discuss all this. We asked A if, in order to protect our new intake, they would agree that our PG Dip could articulate with their accredited MBA programme. But the A people are now very cocky and refused, saying that they need to protect their programme. Instead we will spend this year designing a generic programme for 2005. Later we will have to take the CHE on again and try to register a joint programme that offers various specializations off a generic core.
The macro-question is: To what extent do you think that the HEQC’s policy instruments and processes are acceptable, legitimate, feasible and potentially effective?

What was your involvement in the MBA re-accreditation process?

P: My role was very small and Q drew up the report. I was just really in a supporting role and a sounding board for some of the issues. But I did sit through the panel, which I think gave me a particularly interesting role in that I could view it without any emotional bondage to it. Also not having been part of the past history here as well. So perhaps when we come to some of the other questions it may shed that light on it.

1. **What is your position, in principle, with respect to being accountable to the government for the quality of the programmes you teach on? To what extent do you agree with the idea of an external quality assurance agency, established by the Department of Education, assuring and maintaining quality in the higher education system?**

Q: I think two things. I think the first is this is a public institution funded predominantly by public money and therefore I don’t think we can argue that we don’t have a publicly orientated duty in this respect, I think that’s quite clear. We have the duty of trust. If we’re going to have access, in the way we do, to public money, I think that’s the first thing. I think the second issue is, if that’s true, then we can hardly object to dealing with an agent of government whoever that agent might be with regard to these particular issues. The concern that I’ve got in this regard is that this agent, in this case the Department of Education and the HEQC, should be rational and competent in this area. After all this is a market-driven process. You know the MBA is a market-driven process in a much more obvious way than a typical undergraduate or postgraduate programme. I think that’s quite clear. And we wonder whether the DoE has the appropriate attitude, you know, if they’re rational enough to help the process, to be able to see it in perspective and not be driven by whatever ideological colouration that might be behind that process. And I think the other side of that is ‘are they competent enough to carry out a process of this kind?’ given the fact that as a developing nation we don’t nearly have significant quality assurance infrastructures in many parts of society and equally so in education. And you see if the question is ‘should we then make an effort to develop those processes?’ Then I must say that clearly we are competent enough as a society I think to have a reasonable expectation that this can be done in consultation with models that have been used perhaps in North America or in Europe. So I think that would be my view. You know competence is very important I think. I don’t know if I mentioned this to you in our earlier interview, that I thought in the dealings I have had with the CHE, but I thought that the CHE was ideologically skewed and they weren’t clever enough to hide it, or maybe they deliberately exposed it I’m not quite sure. Either way they didn’t do it very cleverly. And so that’s the other concern - is that this process is driven by ideology and I made it clear to everyone and if you had seen what has taken place in the last week or two you would have seen that the process was horribly hamstrung ideologically. And I think equally you have to say that the intellectual leadership of the DoE is not great. If it were, then by now they should’ve worked out what an official secondary school system should look like. They haven’t! You know you have to say, to a very large extent, that’s a failure of intellect. A failure of commitment and of understanding what needs to happen.

So I don’t think the Department have done enough to establish their bonafides and that this process is an entirely rational, objective, hands-off process. I think the private sector providers have every reason to be nervous that they are going to be targeted for exclusion from the MBA process. Now I’ve got no problems with standards, but my attitude is and I think this is
a typical private sector attitude, once you’ve established the level of the bar; everybody who gets over the bar is entitled to be on the other side. Anyone! No matter what you may think of them. If an institution bamboozles the parents and steals their money but manages to crawl over the bar, they have every right to be on the other side. Just like we do, just like UCT does. I’m not sure the Department’s done enough, and the CHE and the HEQC have done enough, to secure that idea. I’m not saying that there’s a hidden agenda here. I’m saying there’s no significant proof that there isn’t a hidden agenda. I don’t think it occurs to the government. You know governments have a duty to society at large to establish that they don’t have hidden agendas and if it has an agenda at all it should declare the agenda, publicly. Now I don’t think that they’ve done either of those things in an adequate fashion. Is that a fair comment?

P: I go along with everything that Q said there. I’m just wondering whether to read into this question a role for a professional body as engineers, medical practitioners, accountants do their own quality assurance.

Q: Ja I think P’s point is right I think the MBA definitely becomes a professional area. The professional bodies benefit in the sense that they are voluntary collectives. In other words the engineers band together voluntarily because they believe it’s in their best interests so there’s an element of trade union mentality about the whole thing. The MBA is different for two reasons. First of all because the people who provide MBAs are, at this stage, very clearly competitors in the way that engineers are not necessarily. You know for example you can have two separate consulting firms who are members of the same engineering society and they compete with each other, but many engineers are not directly, given the fact that there’s a gross shortage of engineers, in any event competition doesn’t even come into it. That’s not the issue. But in this instance I think competition is very much the issue. I mean I have to say it doesn’t fill me with delight that somebody sat here from Potchefstroom and somebody sat here from WITs, who compete directly with us. I have to say that didn’t fill me with delight. The argument was put forward by the HEQC that this is by way of peer review but the point about academic peer review is that competition doesn’t come into it. It’s about academic standards. It’s about bodies of knowledge. But the MBA is not about bodies of knowledge, it is about your ability to attract students and have them pay your fees so that you can generate a top-line and ultimately a bottom-line out of that process, quite difficult.
You know, having said that, in fairness I also have to say as a kind of capitalist, I have to say that any advantage that anyone may gain is relative at best. So if WITs come here and have a look at our situation and think they identify weaknesses and think they can capitalise on that weakness, good luck to them.

P: I got the overwhelming sense that certainly the fellows from WITs and Potch were here to learn some of the good points rather than to exploit the weak points. But maybe that was just in the nature of the individuals who were here. I didn’t have a feeling that they were out to exploit any weaknesses and trumpet them outside.

Q: The only leading questions that were asked at all, throughout the entire process, were asked by the HEQC not by the professional panel. There again I have to say that I have some concerns about that. One of the panelists has been involved with Graduate Schools and the MBA for thirty five years, his whole working life and he knows more than the CHE may ever know about MBA programmes. So I’m interested in his opinion, not in the CHE’s opinion. The difficulty is that the CHE opinion might very well be the prevailing one.

Were you informed and could you have a say on whom the panelists were?

Q: Yes, we were informed and we could’ve objected to a panelist. I discussed it with Martin and in fact on balance there wasn’t really any great point in objecting. It would’ve started things off on the wrong foot, but I do know that some people objected. And I know that in
other accreditation processes, not specifically related to the MBA, I know of institutions that have objected strongly to the involvement of certain people. Really to be honest we felt that the panel, in terms of status, was relatively weak, weak in the sense that none of them represented a major institution. Neil, from WITs, is now semi-retired. So we felt in fact the panel was lightweight, which indicates to us that they probably didn’t expect to find anything particularly untoward over here. It may not have been so, but that was the conclusion we drew. And so therefore we thought to ourselves by objecting we could end up with a panel, which is worse than the one we got.

In practice, did you gain anything useful or valuable from the self-evaluation process undertaken in preparation for the HEQC’s site-visit?

Q: We didn’t do it in the end. We couldn’t get to grips with the time period but we do plan to do it before the end of the year. You know the submission itself was a self-evaluation exercise. And I have to say the submission was useful. The submission certainly crystallised a number of issues that while in themselves are immaterial to the quality of the programme, there are a certain number of issues, management issues, structural issues that should be dealt with. And in the visit itself these issues were mostly identified by the panel, not because they were smart, but they were told already. So the submission was in that sense relatively open. I didn’t really try and conceal an awful lot. I didn’t see that there was any point. If not from the CHE’s point of view, but certainly not from our point of view there would be no benefit to us. You know self-delusion is the worst of all delusions.

What was your experience of the HEQC’s site-visit?

Q: Look I have to say that I thought that the discussions were very cordial. And I think that Martin and P would go along with that. There was a very cordial atmosphere, especially when you consider that Martin was present at the A site-visit where at times apparently the atmosphere was less than cordial, the atmosphere was a good deal less cordial in A. And that is confirmed by reports that I’ve had on the site-visit at the Business Studies Unit at DIT. It seems the atmosphere there was very fraught.

P: I think Q’s observation is correct. I just want to offer one possible explanation for that. Because of the events at the end of last year, here you have the de facto Head of the School who isn’t emotionally bound up in the history, in the making of the programme, in that sense of ‘my creation is being attacked’.

Q: I think that may be part of the problem that occurred in A. I don’t know if you want to talk about personalities or not, but my other observation was that the reaction that A had, if you like, tells you as much about their views as it did the process. Whereas you know I think I’m a very different kind of person. We kicked off very well! I mean for example I stood at the front on the first morning and as they came in, I stopped them. And we stood in the courtyard for five minutes and we talked. In fact probably ten minutes and we stood in the courtyard and talked, and we had a sort of banter back and forth and we talked. And I think that helped.

P: I think that the marked difference between this one and the A one was there was far less nervous tension. But the A one, it seemed to me, was driven by anxiety, whereas we didn’t have the same experience here. I think A was advantaged by the fact that this was the very last site-visit.

Q: We were speculating as to how they might respond, whether they would have site-visit fatigue and they would want to wrap this thing up as quickly as possible, or whether they would say let’s gather our resources together for one last crack at this thing. As it turned out the fatigue factor was very much the prevalent one. From halfway through the first day it was quite obvious that they were trying to wrap this thing up as quickly as possible. And I think in
fact some of the detailed issues that came out in the afternoon of the second day were, I think, derisory, frankly. I think they were looking to give us something to do. You know to give an indication that something had been going on here. In fact there were a number of issues that I thought they should’ve picked up on which they didn’t, which were mentioned in the submission, which they simply ignored. You asked the question as to whether how I thought they were prepared. It’s a bit hard to tell judging by the questions they put to me and then to others. It would appear as though they’d obviously worked through the material but I don’t know how well they understood it and I don’t know how genuinely interested they were in clarifying it, actually. When I made the submission I tried to make it as plain spoken as possible. So you know much of what I wrote I think didn’t need to be interpreted. But there were a number of other areas where they could see what the situation was and they just either ignored it or simply didn’t notice it. But if you say did they notice our most glaring weaknesses, then they did. But it wasn’t as if they had to go and hunt for it, you know, we told them that we’ve got a problem in this area and this area.

P: Ja. I think again you know I didn’t read any of the other submissions but right from the word go Q was quite upfront about the fact that he would be candid about our weaknesses as well as our strengths. I think there’s nothing more frustrating for an investigator than to have to dig for stuff and sort of feel that people are trying to hide stuff. They then get a bit aggressive. But if you just come upfront as Q did and say ‘well you know’, they’ll relax and go onto the next thing. So I think there was an element of that in the report, which also helped.

Q: I’m a great believer in candour here, it’s part of the ethos here. P and I have worked at it to try and be candid with each other, with the staff, with our Dean, with the University … candour is extremely important. And what you’ve got to have in a process like this, you could end up being hoisted with your own petard. I think that’s a risk we were taking. We couldn’t tell how bureaucratic the process was, just what the influence of CHE would have on the expert panels. And so under those circumstances you know I think P is quite correct in saying bureaucrats can smell a concealment a mile away. I think had the HEQC official got the sense that there was concealment going on here, she would’ve been a very unpleasant individual.

What did you learn from it?

P: One of the things that the HEQC official gave me was a list of things to check up on at about 11 o’clock on the second day. For a start a cap on the total number of students is something I didn’t know about. There were a few things buried in our rules that I didn’t know, that were dug up, for example the issue of exemptions, going from a B-Com undergraduate degree to a post-graduate degree. We had just been working off a list of exemptions and this is the way things are done here. We hadn’t really given it any deep thought. And that question generated discussion amongst us, which is something that wouldn’t have surfaced.

Q: Ja. I think P’s right. You know I think what we also learnt was in terms of the wider things. I mean the DVC (Academic) has been a full time academic all his life, but I haven’t and so there are things about broader University structures that was quite useful. And what was interesting I think was that some of this was news to him too, which is quite intriguing. The DVC (Academic) actually got quite irritated, to be honest, with some of the nitpicking around the issue of the cap on DE students. It’s his job as the DVC (Academic) he should’ve known that, you have to say he should’ve know that. But it also tells you the firmness of the organisation. It tells you that most organisations in fact day to day run anecdotally. They don’t run by written rules and procedures they tend to run anecdotally. And that’s the way it works. And I mean that’s true here, I mean, for example, if you asked the question ‘what policy governs the examination processes in UND?’ would you know where to find it? It
probably doesn’t exist and if it did it exists in such a fragmented form that it would take you forever to find it. And yet the fact is, we do know how to run examinations, you bet your life, we do. We’ve been running examinations for ninety years we know how to run examinations. Could we prove it? If this is part of our policy we probably couldn’t. Is that significant? Well, if you’re from CHE, it is. If you’re an academic you don’t give a damn, if you’re a student you think to yourself ‘Does this organisation ever justify its reputation in the market place?’ And do we? We have 190 000 graduates to prove it.

P: And I think for me one of the questions this raises is what are they accrediting now - policies or practice? We can have policies in place and still be useless, or we can have brilliant practice but useless policy.

Q: You want an appropriate balance of practice and protocol you might say. Now what I’m saying is in certain areas our balance between practice and protocol, say in the area of external examinations, is not good enough. You know if somebody came along and said ‘show us in documentary fashion what P thinks as the external examiner’, of this examination we couldn’t do it, other than the fact that he’d signed off the marks. But we wouldn’t know what he thought about that P range because we don’t have a report on it. In fairness, one of the panelists, Neil Duffy said to us, you know he’s been an external examiner for thirty five years, I said to him ‘When was the last time you filled in an external examiners report?’ He said ‘No, I can’t remember’.

P: I think certainly the protocol that I’ve picked up over the years is that you report by exception, that if you don’t say anything it’s assumed that it’s all fine. But if you do say something then obviously it needs to be taken notice of.

Q: The danger with that is I think, particularly in the modern world, is this is a public institution. This organisation has been funded by public money for I don’t know how long, but the fact is the public interest is seen in a very different context by government than it might have been fifty years ago. And so we can’t ignore that. There’s no question that it’s only a matter of time before a university somewhere gets sued by a student for lack of performance. It’s scary but it’s only a matter of time. I think the HEQC are too bureaucratic, but it’s hard to tell. We haven’t seen the report, we don’t really know…but it would appear so. For example it does not fill me with delight that the CHE representatives spoke more than any other panelist, asked more questions than any other panelist, that shouldn’t be the case. If this is generally meant to be a peer review, she is not one of our peers; the CHE is not one of our peers. Her questions were mostly about nitpicking, technical issues. You know I can imagine that if she were in a bad mood. But here she wasn’t that way, she smiled.

P: It was very noticeable to me that she prefaced almost all of her technical questions with the statement that ‘this is a technical one …excuse me’, apologetic, ‘I’m duty bound to ask some questions of this nature’.

Q: That’s quite true.

P: Which again re-emphasises the tone of positive cordiality. You know I think on reflection it doesn’t do us any harm now and again to get a bit of a wake up call in terms of those sorts of issues. To say ‘look, it is important that these rules are documented and they are validated’. Now and again it’s not a bad thing.

Q: I’d go along with that. I think it would be it’s arrogant to assume otherwise. It’s arrogant to say that we are so good, we are so superior or we are so established that no one can tell us anything of any value. I dare say that they may have had that response from some of the institutions round the countryside.
Do you think that the HEQC’s evaluation instrument and process adequately takes into account the interests and concerns of academics on the ground?

Q: Look at the fact the submission that was written by me and was referenced to no one, that’s the first point. I think for two main reasons. First of all because I think any involvement by anyone else, frankly, would have been a waste of time. If that in itself doesn’t sound like arrogance, I hope it doesn’t. I think that’s the first point given the nature of our staff structures here, where we have this so called ‘virtual staff structure’. There’s really not enough to be gained, the majority of people are part-time even the full-time academics on the main campus are part-time here. So that’s the first point and then I think the other point is that I don’t know to what extent there’s any great value in including the wider academic team in a process like this. After all the submission was simply describing what they do. There may have been some value perhaps in their having seen the report, Martin I don’t know? The CHE asked the lecturing group a question in that regard, they were asked ‘To what extent were you involved in generation of the submission?’ And of course they said ‘Well we weren’t’. I wouldn’t have thought it was a problem. The CHE might have but I’m not sure. And my justification would be to say that had the School possessed full-time academics they would’ve been included in the process. Whether that’s a justifiable distinction could be open to debate.

P: Just a point there. Q has just raised it and it’s triggered something that we perhaps should’ve chatted about earlier in terms of people’s thoughts on issues that hadn’t been discussed as much as it was discussed there, and that’s the issue of the ‘virtual School’, the fact that there is a different dynamic at a virtual School as opposed to one with a body of academics.

Q: For example, you know, from a practical point of view, the Director’s job is different. I mean, for myself, I spend a lot of time interacting with a whole range of people, in a way that somebody running a School structured in a more orthodox way wouldn’t do. So the job, and I think P will re-enforce this idea, is as much about traffic control as it is about anything else. You know you’re controlling traffic, dealing with publishers, you’re dealing with couriers, you’re dealing with academics, you know you’re even dealing with students. It has a very strong service component, the job, in a way that wouldn’t be so in a typical Graduate School. I doubt if the person who runs WITs or UCT spends half the time doing the sorts of things that I do.

P: If one of the aims of the submissions was a self-evaluative process, I think there would’ve been space, even in a virtual School, where that could’ve been valuable. However I think that what is a very concerning factor was the limited time allotted. I don’t think there was enough space and time to run through the self-evaluative process that would end up with this bureaucratic document.

Q: Management, and QA is a tool of management, a value process, Kathy. You know management is a value-driven process. Value in the sense of value with a Rand sum rather than a principle. It’s value-driven in the sense that, in any organisation, the things management take seriously are the things that happen and the things that work and the things that management do not take seriously are the things that do not happen. It’s as simple as that. And the same is true here. It’s a bit more convoluted here but it’s the same basic logic. It’s that the top structures don’t think that QA should be used fundamentally. It’s on the periphery. It may exist, they may spend quite a lot of money on the periphery but it remains on the periphery.

P: It’s a management tool, I think we’re also sit in the twilight zone between the red pencil tick and cross syndrome of academic marking and proper management and learning from our mistakes. So I think depending, on which way you look at the quality process, you either look
at it as ticks and crosses or going for high percentage and feel bad if you don’t. Or you look at it with some degree of relish and say ‘what can we learn from that process?’

Q: The pain for privates is if they make the wrong choice they feel the pain very quickly. In academic institutions you’re either going to take a long time to feel the pain or under the right circumstances you may not feel any pain at all in the sense that the pain has a Rand value. In the private sector pain always has a Rand value. In fact you could argue that a public institution has a greater obligation towards its stakeholders in this respect than a private institution. Because a private institution’s only linked to a limited number of shareholders. The public institution is linked to the entire society, which makes use of its services. And we’ve got students everywhere in the countryside. And elsewhere. So it’s a very, very widespread stakeholder influence.

**What are the consequences, costs and risks of the HEQC’s policies for you and your academic work?**

Q: I have to say on balance whatever you may think of the HEQC and their choice of criterion and the priorities they place on that criteria, you have to say that there’s far more good than bad. I think you’ve got to see it that way. For example as P mentioned earlier ‘is it a good idea to have a clear sense of what our strategy is?’ Of course it is. ‘Is it a good idea to have clear sense of what our learning programme is based on and how it’s structured and how it works?’ Of course it is. Even some of the tricky issues like redress and access and so on and so forth I mean in a country like this where eighty percent of the population was previously disadvantaged, can we afford to not give serious consideration to these principles? Clearly not! So in that sense it seems to me they do impact on us to some degree.

P: I think we’re talking about two different models of access, one of very stringent access control that WITs and UCT use and their virtually hundred percent pass rate versus our much broader funnel and then the process itself filters students in. That was discussed a lot at the CHE evaluation, and also amongst ourselves with the DVC and the Dean.

Q: It’s quite clear that so many of this governments policies are populist in nature in the broad sense of that term. It’s a legitimate concept if populist doesn’t mean worse or bad or low quality. But the fact is we’re not going to solve the management problems in South Africa with 50 or a 100 graduates every year, that’s not going to do it.

Q: We offer a populist qualification, WITs and UCT offer an elitist qualification. Now you have to say without being too cute that if you look at the DoE’s broader social objectives you’re not going to solve this country’s management problem by churning out fifty elite MBAs every year. But you might by churning out 500 a year. So in an institution like this one, you’re getting ninety percent of the quality at fifty percent of the cost. I think the panel understood this, I think the CHE understood it, I’m not sure that the CHE are convinced. The HEQC person also said to me, ‘Well you’re going to need to convince me that specialisation is a good idea’ and I said ‘On the contrary, I don’t need to convince you of anything’. I said ‘You’re not here to establish whether specialisation is a good idea, you’re here to establish whether our specialisation offers good value to our students. So therefore I’m not going to justify anything to you’.

**To what extent do you think the HEQC’s instrument and process will be effective in assuring the quality of MBAs around the country? And in improving the quality of teaching and learning on MBAs?**

Q: I think the answer is they could and should, I think the instrument is fundamentally sound enough, but I think it needs to be worked on, there’s lot’s of repetition. It’s not as clear as it might be, but I think the basic fundamentals are right. I mean you can’t argue if you looking
at the 13 main principles. As principles you can’t argue that they’re not relevant to the
corns of an MBA service provider. Whether that process will lead to the establishment of
acceptable provision or standards or service provider standards for the purpose of customer
protection, if you want to call it that, is a bit hard to tell. I think much will depend on how the
HEQC decide to interpret these criteria. And just what they regard as sufficient to achieve
compliance. So the first time round they’re probably going to have a standard but once you’ve
got a benchmark, then you can fiddle around with that. And so you see the benefit of the way
this structure works is on the assumption that you can achieve a decent general benchmark for
the whole process and thereby benchmark each School against that. You can go forward then,
and benchmark each School against itself, not against anybody else. So assuming that they
meet the minimum criteria, you’ll then lock everybody into a self-assessment, which is
exactly the way it should be. But first they need to get clear what the bottom line is. My
ambivalence was reflected in my submission. In the submission you were required to do self-
assessment on each criteria with four grades to the self-assessment. One was exceed the
requirement, second was meet the requirement, the third was meet the requirement but
conditionally and the forth was not meet the requirement. Okay! Now most of mine I marked
‘meet the requirement, but needed improvement’. They initially saw this as a kind of bullet
and I explained to them that it precisely reflected that I felt that in most instances we met the
minimum standard but we needed improvement and therefore I was trying to tell them that I
wasn’t ambivalent about putting in a standard. I was saying that we definitely needed
improvement. We’ve got the criteria, but we needed improvement. Now they might decide on
balance that when it comes to the assessment evaluation, as it were, that that equates to
conditional accreditation. Okay and that may well be, as I said to you at the beginning if we
are not being conditionally accredited on the assumption that the conditions are what I think
they might be, then I’m not sure I will be entirely unhappy with that. Okay I don’t know that
our School is in fact good enough really, certainly compared with the best like WITs and
UCT and Stellenbosch. I’m not sure whether our school is good enough to be accredited in
full if they are accredited in full. I’m not convinced of that.
The general benchmark will be the starting point that will be what sets you off. And from then
on it becomes self-evaluation so you’re effectively comparing yourself against yourself and
the progress you’re making. So essentially you know it’s a bit like the quality is indexed in
other words. Your quality becomes indexed doesn’t it? So the HEQC says ‘Okay you meet
the requirements’, and then the index clock starts ticking. So you start at a hundred or you
start at one and you develop the process then you can see how far you’ve come. That’s how I
would view it and I think that would be quite useful. I’m not sure you want a set of criteria,
which are entirely based around a completely independent set of criteria because who
determines what that criteria are? And for example on that basis then, how are you going to
compare a product like ours and a product like UCT’s or WITs’s? They’re completely
different! You’re not comparing like with like. I think the HEQC are hoping the minimum
benchmark will emerge. And in other what will happen is they will look at the list of twenty-
eight, let’s say they’re hoping the top ten or twelve will get through without too much trouble.
I think they’re hoping that the top ten or twelve will typically be WITs, UCT, UNISA,
University of Pretoria, Gibbs, Potch, RAU, a few others and us, it’s not complicated. It’s the
guys like maybe the BSU or Riviersonderend College. You can drop them through the
trapdoor and nobody will notice. There was a question at one of the meetings I attended from
the private providers, they actually said to Prem Naidoo, ‘If there’s a target number tell us
what it is’. He said there isn’t one, but he’s lying. You can see he’s lying. So some are going
to fall through the trapdoor and there are bound to be one or two that weren’t expected, who
will drop through the trapdoor. But you have to say, I think, it’s highly unlikely that it will be
one of the big ones like us. Because if it did happen, I mean take the size of a School like
ours, the HEQC simply could not justify that. They’re trying to tell us that over the past five
years a total of something like 4 000 students have gone wrong here. You just couldn’t
marshal that argument.
P: I think just to add to what Q said. I think the process has got two stages and we’ve seen the first half or the tip of the iceberg - the submissions, the interview process and that sort of thing. I think a great deal depends on what they do with it from here on. And in that sense, in my mind, the jury is still out. They could take what they’ve done thus far and make a great job of it or they could make a dogs breakfast of it. So I think we need to I’ll wait until reading the full report and seeing where they’re going with the whole thing to get a better judgement. But so far I think it’s been a good start.

Q: I think they would probably cull half. We have to say that that half will include UDW. Not because UDW is a bad School but because you know I don’t know if you could get them in the right place. You see one of the differences at UDW you see Marvin has been a panelist so you might find in fact in the scheme of things that their evaluation comes out better than ours. It could easily be. But the markets telling us it’s unlikely - they only have 40 students. Now they claim they only take 40 but the fact is they’ve only got 40. They couldn’t get 400 if they wanted 400.

P: I think that they’re suffering from the image of the University or the behaviour there and I don’t know it may be a very good programme, I don’t know. But they certainly are walking in leg irons from the mother institution.

Q: And you have to say that UDW has achieved what it’s achieved despite its problems not because of them. But there’s no doubt that the University of Natal’s reputation has had a big impact on the School. We didn’t realise it until we got going. This institution really does have a good reputation.

In what ways, if any, do the values and assumptions that underpin the HEQC’s policy instruments differ from your own with respect to the quality of higher education provision?

Q: I think there could be a clash. I think there certainly could be. It’s hard to tell from the documentation or from the instruments and from their conduct, but I think there could easily be. A clash because what I’ve seen of the HEQC, which hasn’t been a lot. I think they’re bureaucrats. I think they’re quite typical bureaucrats in many respects. I think what’s worse is they’re self-opinionated bureaucrats, Prem Naidoo certainly is. Now you know that man he’s self-opinionated. And this is not useful. You know he might think he knows more about tertiary education than anyone else, but that’s irrelevant actually. That’s perfectly irrelevant in the scheme of things. You know from the institution’s point of view I couldn’t care a hoot what Prem Naidoo thinks of this programme. The only opinions that I care about are the customers’. Okay and we’ve had approaching 4 000 customers come through these gates in the last five years. They didn’t come to have someone steal their money. So I have to say again that I don’t care what Prem thinks I don’t care what Kirti Menon thinks about this programme. I don’t really care what the CHE thinks about this programme, that’s not relevant. What’s relevant is what the customers say. Now the question then becomes, because we’re a public institution, how do we therefore establish that the offering meets reasonable and plausible standards, in terms of the expectations the students can reasonably have of postgraduate management education. And I think that’s the challenge from the HEQC but I’m not convinced that they’re up to it. But they could be, time will tell, I think. I think having said all that you know from the little bit I’ve seen thus far they’re doctrinaire in nature. And I think that’s a pity. I think that doesn’t help anyone. I think they place too much store by ideology generally. I think the HEQC are no different in that respect…I’ve met three or four people from the CHE so far and I haven’t been taken with any of them.

Monitoring student opinion is an area in which I think we’re very weak. I think we can do much better in that area. In terms of trying to assess what our students want. Now I’m not suggesting that we should bend with every student’s wind because students, even postgraduate students, they can be relatively ignorant about what needs to happen. And we can’t
be driven entirely by customer expectations and customer preferences because those very same customers are also our product. And therefore there’s a limited extent to which we can respond to what they claim they want.

And I think equally that’s a quandary for the CHE. This is particularly true with an MBA. Why? Because MBAs impact directly on an individual’s ability to progress through life, that’s why they do it, only for that purpose. Very few people do an MBA simply to get clever or simply to make themselves feel better. For that you might do an undergraduate degree. I feel the majority of people who do advanced management education don’t do it for that reason. They do it because they see it as having a direct correlation to who they are and what they would like to become.

P: Ja that’s why their opinion has more weight than it would have in an undergraduate degree.

Q: But it’s limited because they remain our product. And let me tell you that while many of them might say to you in a moment of levity, ‘lower the standards, let all the stones fall through’. Once they’ve graduated it’s precisely the opposite that they will tell you then, because their expectations are different once they graduate. When they graduate they want us to close the quality door behind them not leave it open. They want us to slam it firmly shut. But in order to do that, we’ve got to try and create the right kind of relationship with them while they are in process, as it were. That’s why MBAs are different. I think are kind of unique in a sense as educational offerings.
MBA 4 (Focus Group)

The macro-question is: To what extent do you think that the HEQC’s policy instruments and processes are acceptable, legitimate, feasible and potentially effective?

What was your involvement in the MBA re-accreditation process?

P: Okay, I assisted Prof R to get some of the documentation together, for instance the quality assurance policy and also gave him some direction where to get the information from the various management structures like the library, IT and so on. So I assisted as to how to collate the information and so on. But it was all from a quality assurance perspective. We worked very closely and it was not an easy task, we met every third day. And we did have two other meetings, where both of us chaired, and we brought in all the other people who were going to be interviewed or were part of the entire process – we had library people, HR people, we had finance people there and staff members and we just alerted them to how we’re going to have the implementation and how we’ve reached our goals, and it was well attended, even the IT people attended that and their input was quite valuable. But I think, there are common problems that everybody faces, we don’t have the capacity. This was a rush, the time frame it was too sudden to get all of this information because the major problem was we have a new executive management on our campus and we have a number of new people also assuming new roles as School Directors and Heads of Finance and so on. And they were also feeling their way at this stage. So I hope the HEQC took that into consideration.

Q: My role was actually to stand in for P who at the last minute couldn’t make the actual two of the site-visit sessions where QA was required to be present. The first one S can give you more details but in one I came as representing QA, as one of the support units and the second one was I think a more general one, where I came, as part of a wider group which included mostly academics who were teaching on the programme. It turned out to be an exercise on thinking on your feet because there turned out to be a helluva lot of questions on quality assurance…six major questions on Quality Assurance. A lot of them focused on the staff evaluation process because I’d been involved in running student evaluation questionnaires - we ran a whole series for S covering all of the lecturers and I think practically all of …the MBA programme.

Q: There are two things if I can just point out two things. One was that there was a lot of questioning about the fact that we believed that the evaluation report should be kept confidential. We send these reports to the individual who’s being assessed and the question was raised why don’t they go to S as School Director. And I was sort of talking about the legal aspect of that and I kept getting pressed on it. I believe that they do play kind of devil’s advocate as the people who were actually pressing me on questions turned out in conversations afterwards not to believe that evaluation reports should go to the School Director, but they were just doing that to see what the response would be. The second thing was that the HEQC the panel seemed to have a kind of split between the academic people and the corporate people, so the person who was representing the corporate world and the World Bank raised the question about the way in which we conduct these evaluations and the whole quality assurance of the MBA, whether that shouldn’t be different to what’s done in the rest of the academic Faculties and more geared toward the corporate world, for example the use of employer surveys. I actually disagreed with that and said that ultimately the MBA is a programme that’s part of the University and we can’t move too far away from the academic culture. The whole idea behind the student assessment was that it would be universal across the institution. If we started moving in that area then all the professional degrees would want something different where their professional Boards had a role to play and then they wouldn’t
be commensurate across the institution. It was basically those the two areas where there was some discussion and debate.

Our evaluation is half a course evaluation and half a lecturer evaluation, but primarily it’s a lecturer evaluation. If we’re doing say an evaluation of a course where there are two lecturers, we use two separate questionnaires. So the primary focus has been the lecturer evaluation, mainly because it’s been used for a promotions and a tenure exercise which focuses on the individual rather than the particular course. When what has happened is that certain Heads or School Directors asked for what we might call an executive summary of all of those done in their area and their discipline. We then send them one, which has got a kind of horizontal comparison which doesn’t use names of individuals but looks at individual areas in the questionnaire and makes an assessment of how things look in terms of the course. So you can see where in general the strong areas are in your lecturing compliment.

S: I can say that I basically put the submissions together. But in terms of the involvement in the process itself, I attended the initial HEQC workshop where I was invited as one of the potential evaluators and so that gave me an insight into what was being planned. And also I think for me that was a special experience in the sense that what I saw in terms of the initial criteria that we had proposed and how they were derived you know because I did understand that the HEQC had done an international study, you know, to benchmark the accreditation process here with international best practice. Looking at the way they started with national imperatives you know, and emphasising transformation, starting from that which is the local imperative and then doing an international benchmark. Then they came up with the initial criteria, I think there were over 30 at the time. Over 30 criteria, which were then reduced to 13. We then gave some feedback. But looking at international and national imperatives at international benchmarking and then contextualising this within the South African environment and then thinking of having a national benchmark and then institutionalising the whole process of self-evaluation, I could resonate with that. So you know I saw this as an opportunity because even looking at the criteria that came up, the 13 criteria, I found that’s more the way that we in the GSB tended to look at our MBA programme. If you look at quality assurance, I think very often there is sort of a narrow view of quality assurance in terms of looking at the programme in isolation. But you know even prior to this whole exercise we have been saying in the GSB that as a Business School we are judged by our clients in terms of how we operate our business. I know we operate within an academic environment, but as far as our corporate clients are concerned, they want us to practice what we preach. Now we cannot only do that in terms of the programme delivery but it has to be a holistic approach.

So even going back to 1998 when we decided we wanted to move away from Hillcrest to a new facility a new location we had a list of some of the key requirements that would meet our needs and determine whether we moved and where we moved to. So firstly we were looking for a facility, which is self-contained as a Business School so we can create a corporate identity. We looked at minimum standards, for example having a certain compliment of full-time academics, matched with a certain compliment of part-time academics. We looked at minimum standards in terms of the kind of instructional aids and equipment you know, whether you’re looking at flip-charts and stuff like that - our students were very concerned about the use of overhead projectors for example for teaching and they were saying ‘We come from the corporate sector we are now using data projectors, you as the Business School should always be at the cutting edge and not taking us back to overhead projectors’. We looked at the whole packaging of our course material, we were looking at how we market ourselves, asking what were the key elements of a Business School and very often we compared ourselves with other Business Schools, you know the top Business Schools because, whether one liked it or not, comparisons were always made whether it’s in the PMR (Professional Management Review) magazine or Financial Mail and so on. Often people come to us and say ‘How come you’re number ten or number forty and not number one?’ So you need to go and see how the top Business Schools are structured and how they’re financed and how they’re resourced and to see how to see whether or not we can obtain the same
results. In other words, what I’m trying to say is we have tended to look at ourselves as a product package, at the programme, the staffing, the academic qualifications of your staff, the infrastructure and how you manage the School itself. So what the CHE came up with was consistent with the perception that we had of quality all along. When I started I did the first strategic development plan for the Business School and we were always ranked as one of the best programmes in the country. The academics that we had were also excellent. However there was a marked decline in enrolments and when we looked back to see what had happened, we found that in 1996 the business school had moved from here in Westville to Hillcrest which is like 30 kilometres away from here. At the same time B had come up with their own MBA programme and another one in Pietermaritburg. So our GSB was caught in between almost in no-mans land. And then you had MAKOSA coming up with their MBA programme. So we had to do a SWOT analysis and see what was happening here. And out of that we determined that we had to find a new location, which is accessible and more central. We had come up with infrastructure that would support the MBA programme as well as other programmes. We had to look at our staff compliment in terms of full-time/part-time and also support staff. And then we had to look at the instructional aids that we needed. We decided that we needed to have a library, as a Business School we didn’t have a library; we didn’t have a computer lab. We decided we needed a facility, which can be easily identified as a Business School; we can create a corporate culture, which is acceptable to the type of students we get. It has to be secure, centrally located, and well resourced and that’s basically what we got when the Music Department was closed.

In terms of our market, we’re saying that we’re looking at people not younger than twenty-five years old; they must have a first degree, a Bachelors Degree or similar professional qualification. They must have at least five years of work experience at managerial level. And we put them through an admissions test, there’s a test that we administer, so they have to pass that. In some cases we require references from employers and other people. We might even look at a portfolio of evidence to see what they have actually done. We’re very selective.

What is your position, in principle, with respect to being accountable to the government for the quality of the programmes you teach on? To what extent do you agree with the idea of an external quality assurance agency, established by the Department of Education, assuring and maintaining quality in the higher education system?

R: I think my position on this is one is very clear, that we need to be accountable. You know obviously we get subsidy from the government, we are a public institution and there are a series of national imperatives and I think, in the case of our GSB, because of the historical background, you know A was initially an Indian University, so it was created for a specific purpose, I think over the years it provided business education to non-whites who wanted business education but they couldn’t get it anywhere else, and I don’t think that that has changed. You know it’s still regarded as a Business School that is sensitive to the requirements and the peculiar circumstances of people who are historically disadvantaged. We have a core of teaching staff who have been with the Business School for the past 17 years, people like Prof. T and them and they have learnt to shift from lecturing to actually tutoring and teaching you know which would be very unusual for a Masters programme. But I think because they have learnt to deal with people who have got certain disadvantages they are used to that. Now that sort of conforms to what government wants in terms of this whole thing about transformation etcetera. But also I think government has a duty, as I said when our Business School moved to Hillcrest, not only did we have B coming up with their own
MBA programme both here and in Pietermaritzburg, but you also had the private providers coming onto the market. Now some of those MBA’s are very questionable because we’ve had people actually shifting from other MBA programmes offered by private providers and coming to our place. We normally ask them ‘Why did you decide to join us?’ and the answers range from things like ‘We think that you, as a public provider, as a University, symbolise endurance you know, I don’t want to have a qualification today and then come tomorrow and find you’ve disappeared’ if ‘you provide an MBA that will always be recognised by government, then we can be assured that, at least within South Africa, that qualification will be recognised’. So they have this kind of confidence in us and therefore government has to live up to that. I also feel that this particular exercise (I don’t think anyone else say in the private sector would actually undertake it in the way that it’s being done) I think it’s a massive investment in getting the international best practice, in getting people trained and also in being able to enforce compliance with certain quality requirements. But more than that, it’s not punitive, you know. I think the message all along has been that ‘we want to inculcate a culture of self-evaluations and a culture of quality within the institutions, so we will do the initial benchmarking, we will tell you where you are and then we will tell you what you need to do. For example if you don’t comply, if you don’t meet certain standards, what you need to do. We will come and visit again and if we find that you’re complying and you’ve got the systems and structures and procedures in place, if we comment then, we’ll leave you or give you the time to do this on your own.’ I think that’s it’s very positive and so really I have no problem with it. I think over and above the fact that the GSB at A is government initiated, the HEQC process has given it legitimacy and compelled senior management to take it seriously. For once it’s not the GSB, which is saying we need a certain level of academic staff, we need a certain level of budget, and so on, it’s now standards minimum standards so take it seriously.

In practice, did you gain anything useful or valuable from the self-evaluation process undertaken in preparation for the HEQC’s site-visit?

What was your experience of the HEQC’s site-visit?

S: I think for me you know given that I rely mostly on part-time teaching staff and therefore I’m the guy that’s normally associated with the GSB, because I’m there if you want anything you’ll phone and you’ll find myself, I think for me it was a very opportune development in the sense that basically the whole idea of understanding quality and the importance of quality and having a guideline which is internationally benchmarked but also conforms to national requirements (this was made in August, I mean the document that we were given …you remember the document that we were given in terms of the 13 criteria) it very clear what to expect, what guidelines we should have. Now it was revealing because it tried to get information relating to each one of the criteria, whether it’s Human Resource or Finance, enrolment, throughput votes. It took me out of the confines of the Business School to come out to the main Admin Block. One assumes, I guess sometimes wrongly, that all systems are now in place and everything is there, you can get it, whatever you want. So moving out there and looking for particular information, whether it’s our information relating to our budget position or whatever, what happens in exams in terms of security of exam papers, it was an eye-opener because in some cases I found that Departments either didn’t have the information or didn’t know how to put that information together or didn’t even appreciate how important they are to the quality issues of the Business School. And so it was a question of really sitting down with people and saying to them ‘you know the whole exercise which is taking place will determine whether we’ll be either conditionally-accredited or accredited fully or our application will be withdrawn, so it’s not the GSB’s baby only, the whole University needs to be involved.’ And I think people responded. We got information where they couldn’t they did find it and certain information was there, some information was not there, but we were able then to sort of link up. I think that to me was an eye-opener. And then of course putting the submission together the document itself. For us this was the first time that we had to go
through this. And also the involvement of colleagues within the School, suddenly everybody understood that our MBA is at stake and with that also even our jobs. So even colleagues in the School that would not normally show an interest in this, I think they did try to chip in and find out exactly what this is all about and more than that even students came out and said ‘Can we help?’ A lot of them are concerned you know, and they still are concerned, they’re saying ‘What happens if we’re not given the accreditation? Does it mean that our MBA programme or certificate is useless?’ So it’s a worthwhile exercise.

P: From the QA side, people now saw that the HEQC is serious and people started looking at us in a rather more serious light, also realising that the quality audit is coming. I spoke to the Deans at the Deans meeting and told them what are some of the serious implications and it seems that people are now really concerned about quality. So it was a good experience that somebody from the outside came in because there were a lot of documents floating around, there was a lot of talk and I think this exercise really made people aware that the HEQC is serious, whether they did a good job or not, but I think for the first time there was outside scrutiny into academic work. The support structures also realised that they have some impact on our programmes. I think this was a very positive spin-off for people that now we are bringing the librarian into the system, we’re bringing the Finance people, because…sitting in their own offices they didn’t really understand the bigger picture. And I think the other area we realised, we were able to identify some of the strengths in the system and some of the so-called gaps. I felt very pleased that people now are taking the Quality Assurance officers seriously. You know because we’ve been telling them, we’ve been doing all this, but now we said ‘Right the MBA people are coming in and we’ve got everybody on board and they must be on the alert.’ As S indicated earlier, it’s not that punitive exercise we’re saying ‘Right we’re doing this to improve.’

S: Good point because I think it’s very critical for us, it was always at the GSB, that this was a quality exercise. You know it’s a Quality Assurance exercise. And so even in the first meeting that we had when the you know the communication came you know that this exercise would be undertaken and so on we specifically pointed out to our Dean that this is a Quality Assurance exercise and therefore the Quality Assurance office is looking to be at the fore of it.

Q: If we had been left out of the loop, you know, things could go a bit awry in terms of what the HEQC are expecting of us. If a different School decided that they can take charge of their internal quality mechanisms and they don’t need the QA unit, I think there would be problems somewhere along the line. Just in terms of coming in for those meetings I think what it emphasised to me is that I was playing very much a supportive role almost like a witness for the defence in a way. It seemed to me that we act under suspicion because we play a critical role in many ways and the supportive and the critical go hand in hand because the fact that we are critical and objective in our student assessments and running the student assessments bolstered the case of the GSB. And so in the sense of being in a cooperative relationship with the Schools this is important.

R: Through the self-evaluation we did identify quite a number of weaknesses. I think the first one and the more glaring one in terms of the programme was the absence of a research component because in the criteria that we were given I think it’s very clear that at least twenty five percent or so of your credit points should be based on research that’s done independently by the students. Now we’ve always recognised that and we’ve said that we want to rectify that when we merge with B so that’s area number one. But there were reasons for it. I think the dependence on part-time staff makes it difficult to have people who can supervise student research. And the MBA is so specialised, each module, you know if it’s a Finance module, it’s completely different from a Human and an Organisational module. So the difficulty is getting sufficient numbers of people to supervise unless you limit students to certain areas. So in a way that made our case because we were saying that at the moment to go into an MBA
with a significant research component would mean that we increase the number of academic staff at the GSB. I think happily now I understand that the GSB will have between 15 and 20 full-time academics, that’s been agreed between A and B. So that’s a positive spin-off because B doesn’t have any full-time academics you know, it’s a virtual Business School. So that’s been recognised.

I think the other weakness that we’ve identified was that in terms of our selection criteria, there’s a whole range of instruments that you need to use. We so far administer an admissions questionnaire that students have to complete and then on the basis of that we decide whether they should come to the admissions test. And basically that’s bad because we’re now thinking that we’re need to references because we insist that people should have five years of work at managerial level and so we need to have interviews where possible, and even short essays where people tell us why they want to do the MBA. Because we have people that are running into grief, they complete the MBA and then come to us and say ‘You have to find us jobs, now we’ve done the MBA’. Now if we knew upfront what their intentions were, you know it’s very difficult to look for jobs for these people because most of them are sponsored by companies and we undertake to train them and then they should go back to their companies. So the companies are saying ‘Now you are looking for jobs for people that we have sponsored to go onto your programme, what’s this?’

The other thing is that we don’t have significant input into curriculum development or any changes by our part-time lecturers. We really should be getting an input from our Alumni who are out in the work world, some are very senior people, and also from our corporate partners - it’s possible to go to them and find out what they really want from an MBA, ‘What should our graduates be able to do when they come back?’

And then also we don’t have an Advisory Body and we do need that. Previously I think because of where we were and the declining intake we didn’t think that it was worth pushing but I think now we have reached a stage where we’re looking at more than thirty Doctoral students. So we feel that we need to have another Advisory Body.

And then also we need to establish local and international linkages. In the past we have tried but I think also because of our size we were almost like a joke, but we have expanded fast and we need to look at this more closely, especially when we think about the merger. So we have the linkages but we also have staff student exchanges. We also discovered that we were severely short-staffed, in terms of full-time academics. And that’s something that is being looked at. So we hope that will be taken care of.

And then in terms of communication and engagement with students and lecturers we have tried to develop a web site, which we have but it’s not interactive. So I think we need to go to Web City so students are able to chat with each other and also so that lecturers can put information on there for students so that’s an area that we need to look at. We do have a computer lab, which we didn’t have before, but I don’t think we have exploited that resource fully.

And then our operational autonomy, you know I think that we are very much caught up in certain bureaucratic requirements, which may not necessarily be of benefit to the GSB in terms of being responsive to students and able to capitalise quickly. What we realised is that we still need to maintain the links from the academic perspective, there’s no way you can run away from being part of the University. So your academic programmes whether there are changes of rules or new programmes, all that has to go through the University structure. But once your budget has been prepared and given to you, I think you need to be allowed certain degrees of freedom to operate within that. Every semester now it seems like we’re spending a lot of time every semester recommending people that need to be hired by the University to teach a module for that particular semester and next semester … a whole set of new people are coming in and it takes a lot of work because we have to prepare the contracts we have to prepare everything and then send it to Human Resources who sometimes make changes without consultation with us and then we end up in grief. So there are certain areas where we should be allowed a certain autonomy.

What did you learn from it?
S: The HEQC team were fine, I don’t think that there was any unnecessary aggravation I didn’t experience any. And again this really is not just a GSB or MBA thing it’s a University-wide perception. So I think for us it was a positive experience.

Q: In the sessions I was at where the support staff was being interrogated by the HEQC and not treated sympathetically. You know they can ask searching questions, …leading questions and push on them. I don’t think it’s actually fair to adopt that kind of attitude with support people coming in for who the GSB is not their own responsibility. I don’t think that was really fair, I know that I was interrogated quite sternly, but then I had the benefit of chatting to somebody afterwards and discovered the human element, you know. But some of the support staff who had been there felt that they had been through a meat grinder and I don’t think that was actually fair because the HEQC should realise that the GSB is just part of their responsibilities. Their tone and style was inappropriate.

S: During the sit-visit the panel asked questions, which are relevant but also to interrogate and find out the accuracy of the information in the submission. So they kept saying ‘according to page so and so of the submission, it says here’ and they would read and then ask follow up questions to that. So it was quite a detailed check that the evidence was valid. I mean the one that I would’ve thought would be kind of difficult was the finance one because you’re looking at figures and so on. And the chap from the World Bank asked very specific questions and I think our Finance guy was also able to respond.

Q: We’ve learnt from the visit. I have the feeling that if a similar process takes place with other Schools and they don’t go the extra mile like S did; we’ll be in real trouble. It requires so much preparation and they wouldn’t have the capacity to do it.

P: And you know the other problem that I faced for the visit was that it was an expensive exercise and we didn’t have the resources. And because S wanted to provide the best of lunches and special diets and so on it was not easy for the QA office because we don’t have the budget for it, and if this is going to happen in more than one School per year we won’t have the finances or time to cope.

Q: Can I just say something here? Just on the question about the demands on academics. I think my suspicion is that it is something that the HEQC never bring to the forefront. They never come here saying ‘we’re aware of all the problems that you have, or the constraints, or the difficulties.’ It’s a given that the panels are composed of academics who are aware of these things, but it’s something they keep in their back pocket and I think for strategic reasons. They’ll never come and speak to the academics and say ‘we know that the academic life is tough’ and so on. And I think maybe the situation is that the HEQC as an organisation and the individuals on the panels are aware of these issues that affect academics, and I don’t think they could possibly not be, but it’s not something that they would raise to the forefront or even bring out or put on the table in any kind of interview type process.

S: I have a double edged answer I think the first part I gave away when we looked at the criteria that we’re going to use to measure our MBA because some of the concerns of academics were in terms of numbers and so on we’ve talked about already. You know being able to participate in the curriculum design and development …that’s one thing. But there are certain concerns and maybe they’re more like perceptions. The first one that I can come up with is the perception of privatisation of academic enterprise. You know there’s a feeling that now things are going to be very bureaucratic because you need to conform to certain minimum standards and to do that you have to do a lot of paper work. So now we’re going to be spending a lot more time on bureaucratic aspects that relate to quality when what we as academics would like to do is spend more time in the library to read and so on. That’s one perception. Then the second one is the standardization of knowledge, knowledge and
programme delivery. You know academics feel that now everything is going to be standardized. I’ll give you an example; in our GSB we don’t have our course packs or modules that are packaged. If you go to the distance learning outfits very often they’ll have a module on strategic planning a module on operational research and so on. At one point I had suggested that we go into that we have each module pre-packaged and I was approaching these from a managerial or research perspective because I was saying it’s difficult for me we contact a part-time lecturer to lecture a module for a semester. And then after that they decide we’re not coming again next time so I have to get somebody else. I get somebody else, very often you get approval to hire somebody very late, and they don’t have much time to prepare. Now if they come and they deliver something for me and students say ‘you know this lecturer is terrible’ ‘the previous one was okay, they gave us handouts.’ I don’t know what standard they’re using. So I have suggested this, but it was strongly opposed because people said ‘This is a university, I’m coming with a wealth of experience and there’s certain things that I want to impart.’ So there is that fear that when you’re meeting certain criteria, setting standards and so on if you’re going to be objective, then maybe you have to have standardised modules and material that the lecturer is obliged to cover. So there is that fear that with resource packs, we’re going to standardise.

Now for part-time academics there is a fear that because we’re now saying research should be something that all of us should be involved in, they won’t manage to publish. And the part-time lecturer are saying ‘I come here as a subject specialist, I’m a finance guy or a chartered accountant. I’m teaching, I don’t need to be doing research, I’m not full time and therefore I’m not looking for promotion or anything.’ So that may be their concern and yet when the HEQC look at the School they’re saying ‘what’s the research output here?’ The other aspect is the emphasis on accountability to students. Students are supposed to have a say they’re supposed to be involved in your governance structures within a School and there’s a feeling by some academics that students will hijack the whole administration. I mean we are used to imparting, we decide, ‘Now you want to bring in the students it will be a protracted wild debate.’ So there is a bit of concern about accountability.

And then this whole idea of access, where up to ten percent of your places on the programme should be allocated to people on the basis of RPL and so on. People are saying if you do this then you might be bringing in students who are not really well prepared. When the programme starts, they’re in deep trouble, but you’ve already got them on stream and therefore you expect us to be spending time or tutoring them and so on. And then there’s a general concern that there’s too much transparency. It’s like students, lecturers, everybody has to be involved in governance they take equity too far. People from outside now have to make an input into the curriculum so who is in control now? You know it’s too open, the mystique of being in the University on a Masters programme suddenly disappears because now we have to justify why we are using certain assessment criteria, we have to justify why we have done this, a student can demand this or that. So those are some concerns that I have as a Director.

Q: I think personally that the business model for QA works only at the basic level, that the students are in some sense clients and deserve protection of their rights. But then if you persevere that model, you get into all sorts of problems and you would move into that area where the education they receive doesn’t explore anything or develop anything it just gives them the pre-packaged stuff. And that would be fatal for the whole future of higher education in my view.

P: Even student evaluation we realise is just one of the tools. Because I think pupil praise is an unreliable quality indicator. A lecturer may be good, demanding with good throughput rates, but unpopular with students. So student evaluation can be problematic and if people are using that as the only tool to evaluate any programme. I see a danger if we don’t have other instruments. I also think that you need peer review and student evaluation. I think peer review on its own is equally problematic. In some ways they act as a check on each other.
To what extent do you think that the HEQC’s instrument for the Re-accreditation of MBAs is realistic and feasible in terms of the demands it makes on academics?

P: Are we accountable to the HEQC or accountable to students, the School or the institution itself? All this accountability can be a threat to academics’ freedom and autonomy.

Q: I also felt, that the relationship between the individual offices of quality assurance and the HEQC is a bit weird. The HEQC, when they come down here have got a slight oppositional flavour, paternalistic and condescending. The timing of this evaluation especially with merging institutions was problematic. Now there are only a few days left before we actually merge. So when they give feedback what’s the status of that feedback and what are the implications because you are no longer a A GSB?

R: I think you’ve got certain institutions that are merging I think what they probably would say ‘Your MBA has been provisional accredited, we know there are certain shortfalls that you need to address but also we are aware that you’re going into the merger. So you go ahead and come up with whatever programme you can to address the shortcomings, then after one year we’ll come and visit you.’

Q: I’m just wondering now what would happen, they’re writing the reports for the three MBA programmes right? And each of them has got shortfalls. Now knowing that the institutions are going to merge what one should do then is a SWOT analysis and see if the strengths at one institution are not covering the shortfalls of another. But if they’re simply going to combine the list of shortfalls that’s ridiculous because you want to assess the strengths of A shortfalls when it’s combined with the strengths Pietermaritzburg and the strengths and shortfalls of Durban.

P: You see the HEQC’s timing of that visit it has its benefits and it has its disadvantages especially with merging institutions. How serious are the reports that are going to come out? There will be serious implications if they close us down without understanding the historical context the transformation agenda, and so on. Student profile, access and so on. So if they don’t take all that into consideration and they’re not sensitive to that part of it they could easily close us down if their intention is to close down certain MBA programmes and to offer it at different sites. I don’t think the HEQC really took all of this into consideration. We raised this in one of our Quality Assurance workshops that any audit or any accreditation that results in the ranking of institution’s programmes, there is always going to be a ranking somewhere, will not help the merger process.

What are the consequences, costs and risks of the HEQC’s policies for you and your academic work?

S: I think first and foremost you have what I call the ‘Hawthorn effect’ because the companies are watching your performance …we’re doing well because we know that Big Brother is watching or at least paying attention to the Business Schools and the MBA’s. But for me it’s also an instrument for advocacy because I’ve always talked about our deficiencies in terms of our staffing and you know a whole range of other things, so suddenly now you’ve got the CHE coming up with an instrument that basically prescribes what are the minimum standards, which management buys into. So when I formulate my strategy along the different criteria, it’s not like I’m coming with my own ideas because actually, according to these minimum standards, this is where we fall short. So we actually use that as a checklist, as a minimum, ‘we need to be at this level’. It doesn’t preclude Business Schools pursuing excellence. And I think they made that clear, ‘if you want to go beyond this, feel free to do that, but these are the minimum standards that you need to meet’. So we do have flexibility and degrees of freedom to implement it. So I have tended to look at it positively.
P: I think the other positive spin-off of this re-accreditation is we all know and we are all aware that there are certain MBA programmes that really don’t match up. And I think by painting a broad brush across privates and publics I think this exercise will address that. I know that there are MBA programmes offered from houses, I mean just you and I in a cottage set up two weeks ago. This exercise will identify and close down those and give conditional accreditation to certain programmes. And I think those people who are really committed and have pushed their resources; they will be coming out at the top. I think this exercise will definitely protect the learner. Once our MBA programme is reviewed at A and we have been approved and accredited we will have a rubber stamp. We should all be proud and market it.

S: I think this kind of accreditation because it says now, first and foremost, any MBA offered here has to be accredited by the HEQC, and then it levels the playing fields. So you can tell students even if it were internationally recognised, if it were not accredited here, it would be worthless. International recognition now becomes a cherry on the top and it’s very expensive, you’re looking at R500 000 to apply for international accreditation. You know it would cost us a bomb.

**To what extent do you think the HEQC’s instrument and process will be effective in assuring the quality of MBAs around the country? And in improving the quality of teaching and learning on MBAs?**

Q: I’m just worried about the process and S, I know as a panelist; he’s sworn to silence but the debriefing process that they’ve put into place? Now one would think that after they’ve done this exercise, okay this was the first time for them, so I think they needed to have an exhaustive debriefing process so that they will know how it worked you know all the nuances of things so that next time they would have really learnt from what they did the first time round. I don’t know if they’re going to do that but one would think they should.

P: The other thing is also the Quality Assurance Managers, we are asked to facilitate and make sure that everything’s going OK but we just get notices you know ‘you do this and you do that’. I mean we weren’t given any briefing on the MBA programme re-accreditation process. So we have been used as scapegoats. They come in here and they expect us to do everything, you know they have set all the schedules and everything, why don’t they debrief with the QA Managers, get some input from us? Because they don’t realise what we go through, there’s a lot of constraints that we’ve got to deal with. I think they take a lot for granted as well.

**Do you have any recommendations for the HEQC in terms of improving the process?**

P: Now while we believed that the HEQC with its Founding Document that we’re going to have a ‘light touch’ approach and a developmental approach but the way they have now approached the MBA is tick-box, evidence based. The message is going to go out that these guys like accountability more than improvement and development. You know they don’t realise that we have come from the Apartheid era and everything is not equal, you know they’re using the same criteria for the publics and the privates, which I think is very problematic. With the privates you can have this big stick approach but I think with public providers they must be more sensitive. And I mean this exercise to me was that they were not sensitive to where we came from and the transformation agenda.

S: But I thought the process was fair because really it was based on what we had submitted. You know in terms of being thorough and fair and sticking to what was submitted you know I think Kirti kept referring to our submission page so and so. So you know I think they were fair.

But coming back to …did it improve the quality of teaching and learning? I don’t see that. Because there’s no mechanism or follow up mechanisms within institutions or even from the
HEQC. I mean we’re still waiting for the report. Now even when the report comes how much can you do?

P: So if you look at the entire MBA re-accreditation exercise and the rationale to have these exercises, some official of the DoE are taking the decisions without realising that we’re doing this exercise for improvement and the improvement of the quality of education in higher education. That’s not even their criteria; they’ve got other criteria and other agendas. The HEQC’s doing this from a quality perspective, but not to improve quality not to improve what is happening in education. They’re doing the DoE’s dirty work for them, because the DoE thinks there are too many MBAs in the country.
I hear that your MBA programme was granted conditional accreditation by the HEQC, what is your comment on this?

Well I felt that it was a fair decision. It was a fair evaluation and a worthwhile exercise for us. It helped us understand where our strengths and weaknesses were, we knew this already and we were as objective as possible about this. I think that the HEQC understood that we are trying hard despite the constraints on our resources. They also pointed out what the management needs to do to support us. And despite this lack of support they saw that overall the quality of the programme has not been compromised. If you look at the 1st page of our Prospectus, the Director’s message, written in 2002, says that we value quality over quantity. I think that approach has held us in good stead.

You know when we were putting our submission together at UDW, some people said to me, ‘they can’t de-accredit you’. Well, I’m pleased that the HEQC has been tough and that they will now be taken seriously! Country-wide I think that about 24 out of 54 programmes will be de-accredited. But the HEQC’s formal report will only be released in March. I expect there will be an outcry and some legal action.

[Prof. X then read out the recommendations from the HEQC on each of the 13 criteria. But requested that I do not quote these are there are not yet official. The recommendations ranged from major issues such as getting intermediate exit qualifications approved, up-dating library resources, the need for professional training for staff and the need for a compulsory research component in the programme to minor ones such as changing the time-table.]

We have to look at these conditions and devise a plan to show the HEQC how they will be met. Within six months of the HEQC receiving this plan they will a second site-visit to check for compliance. Many of the conditions are issues that have to be dealt with by senior management at the institutional level, for example resource allocation and staffing. For example, the new Exec have just granted the A MBA 15 full-time staff! This will be the MBA for the new university! I have to head up the integration of the three Business Schools and come up with a strategy for meeting the HEQC conditions. I have just been informed that this has been approved by Council.

Of course this is quite awkward at the personal level. In November we had a meeting with our B colleagues. We wanted to move our programme to their site. They said that we could come to Francois Road only if we taught their curriculum. If we insisted on teaching ours we would have to stay where we are. The irony now is that our programme is the only one that is allowed to continue, so we will have to spend 2004 designing an integrated programme under the Westville programme’s umbrella. Our structure is quite different, it is a two year part-time programme, whereas B’s is a one year PG Diploma followed by a one year MBA. B, when they heard the results from the HEQC, called an emergency meeting and wanted us to take over their pipeline students from their PG Diploma – and give them an MBA after only one year. We felt that we couldn’t do this. Since then we have had a deluge of students coming here from B wanting to continue with our MBA. They are furious that they will have to do a further two years, although they have already completed the B PG Diploma. We are not interested in the fact that they already have a PG Diploma, our programme is two years part-time, we can’t change that over-night. Also they all have to write our admissions test before we will take them in. So for this year we are the only MBA programme that runs, and on our old model. By 2005 we will have an integrated MBA to offer, and we will apply to the HEQC for the PG Diploma as an exit point.
So I have an interesting challenge ahead of me. I was planning to leave the University, but now with all these changes I have been persuaded to stay on and lead the development of the new MBA for C.
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The macro-question is: To what extent do you think that the HEQC’s policy instruments and processes are acceptable, legitimate, feasible and potentially effective?

P: I have no knowledge of this MBA Re-accreditation document; this is the first time I’ve set eyes on it. I’m worried now will they have one for the MBAs and all the degrees eventually? Because getting that amount of work you know it’s just unbelievable if they’re going to come up with one of these every year. R and S and all the other staff at the MBA unit did all that work on the submission. It was huge. If we actually had to put personnel hours together it would be quite frightening. And the problem there is it’s going to take away time from the teaching, research and everything else you should be doing. When you could be doing something else, something constructive.

What was your involvement in the MBA re-accreditation process?

P: Well I’m Head of Business, I’m head of the School, so I actually sat with R right throughout the whole of the first day and part of the second day as a lecturer on the programme.

Q: I was fortunate only to be involved as a lecturer on the programme. So it’s just the one session. I also simply attended the briefing session with T from the A. We ran through what they were looking at or probably going to be looking at.

P: I had to prepare. I mean I spent about a week and a half. I did a power point presentation, which basically looked at how the University operates in our particular region and so they had a good background of industrial development here and the strengths of the region. And then basically what the University was doing and what business in particular was doing to attend to the demands of the region, basically upliftment and empowerment. Yes that’s what I did. Oh yes! R actually covered the goals but I mean both of us did part of our mission and part of our objectives. And I also pointed the way forward, which they were a little bit uncomfortable about more MBAs, water conservation management and things like that. I’m personally very worried, they are very conservative.

What is your position, in principle, with respect to being accountable to the government for the quality of the programmes you teach on? To what extent do you agree with the idea of an external quality assurance agency, established by the Department of Education, assuring and maintaining quality in the higher education system?

Q: I’ll start and say that I have very mixed feelings about the process. I think the specific case of the MBA proliferation in South Africa means that there’s certainly substantive grounds for some measure of review or control. So on the one hand I can see the need for the process. On the other hand I have a major problem with the idea of an external body that is, in my perception, largely driven by bureaucracy and having the power to decide what is or what is not a suitable programme. So if it was a case of ‘let us review the MBAs and either give them our stamp of approval or not’ so that they can advertise that they have been passed or not that would be one thing, but if it’s a case of them coming in and telling the University that their MBA programme doesn’t conform to what the bureaucrats think an MBA programme should look like, I think that challenges academic freedom, I think challenges innovation. They don’t necessarily know what’s best, so if it’s a case of enforcing a template and saying ‘this is what an MBA must look like’ then I think that there’s a problem.
P: I agree about the proliferation and I think that the Minister should have done this just to say that only universities can offer MBAs. Outside of the universities each organisation, be it the Institute of Management Science or Damelin, should have to apply to offer an MBA. And I think that would have solved a lot of the problems. They’ve gone about this the wrong way round, but that’s fairly normal. Well the whole thing is that they don’t look at the big picture, they internalise everything. So I just think that would have been a very quick solution to the problem - which the universities can carry on. I am very worried about the rank interference with our programmes and programme content. And it’s just becoming more and more controlling. Kader Asmal lost the plot, lost the script. And I really believe it’s very serious, I mean everything from the ground to postgraduate is being interfered with, and it’s very worrying for anyone in education. I do believe that there’s just rank interference.

Q: Absolutely.

P: With no thought given to what the real world wants.

Q: I mean my sense is that the Minister or the Department of Education are wanting to introduce a nation-wide education system, which has centralised control, which goes against everything, every principle, that universities were founded on. And so while there may be an immediate need to address the situation regarding MBAs, I think there is a broader issue that’s at stake and that is control. Interference dictating what universities can do, how they must do it and I think that that is a very negative trend, a dangerous trend.

P: Quite simply, it’s an assault on academic freedom.

In practice, did you gain anything useful or valuable from the self-evaluation process undertaken in preparation for the HEQC’s site-visit?

P: No I don’t think there was anything to talk about. Other than the fact that I prepared something that the Dean said might be quite useful for other purposes. It was just a scurry to get ready and didn’t serve our purposes at all.

What was your experience of the HEQC’s site-visit?

Q: I think commenting generally, my experience was actually - I wouldn’t say positive, but it wasn’t negative. I thought the panel with the staff was fairly open-minded and it went fairly well. I must comment though on the fact that when the panel arrived, they changed schedules and suddenly they had a water specialist and he could only be he was there for the first morning. So we had to, you know, we’d gone to a lot of trouble to arrange that people would be available at certain times and then suddenly they arrived and then turned the whole thing upside down which I thought was very unprofessional and potentially puts our evaluation in a negative light - if we can’t deliver the people that we’ve organised at a designated time. S the secretary was phoning around B trying to track down students …

P: I think from the outset you might say their hallmark was one of arrogance. They started with the first letter that arrived … ‘lunch will be served’, you know, the whole attitude. I mean you would never do that in business! I think in business they would’ve got a very curt rejoinder. Besides what Q’s just told you about just changing the schedules, there are two other points: R and I both put a lot into our presentations and I did my presentation during which, by the way, one of the panel members, the Chairman in fact, actually nodded off and slept. I’m very worried. What really upset me was the representative from the Council for Higher Education, in fact R had just started her presentation and she just cut her straight off. R had put in an incredible amount of work into it and the representative said ‘No, the panel were just asking for the power point presentation.’ That is unacceptable. There were no questions and answers or anything for R in that session. Then on the second day they
cancelled the lunch and we had all been invited to a lunch with them. It had all been set up and it was cancelled, sorry! That’s unacceptable! It is actually pure bad manners; you can happily quote me, and the whole way it was done. It was run like an inquisition. I found here again the CHE representative - she was almost a mission as far as R was concerned, she was just aiming question after question at her … It was a witch hunt! And I don’t know what or where she was coming from. It was as though R was in the dock, her and me, we were in the dock, on a criminal trial and she was the prosecuting council, (I was there on the lesser charge). It was a very unpleasant experience… I’ve never experienced anything like that in my entire working life. Maybe it will only happen when you work for the government. I’m sorry to say I can’t see it happening anywhere in the private sector.

There’s another big concern too. We found out also that there’s no common thread apparently, in fact I found out from a colleague of mine who is now retired, one of his friends in their Business School is having this accreditation taking place right now. And it would appear to be a totally different team, so there’s no common thread, no one person going through this whole thing. Now I mean you can have totally different standards. You know I would’ve certainly expected, certainly for the major universities, to have the same panel around for all the universities. Possibly Eon Smidt would pop up at Stellenbosch and stay as the common panelist through the whole thing. So you feel that maybe we’re going to be unfairly treated if you just happen to get a tough panel.

Q: I think there was definitely a sense that they were looking for non-compliance with their criteria. The HEQC official made a very big deal about our Postgraduate Diploma in Management we had an exit qualification halfway put of the programme. And she accused R of making up her own rules and suggested that we should only issue qualifications that are legal. She used that word! As Denyse Webbstock pointed out, to her it was legal. At the time it was registered it was totally in compliance within SAQA’s framework. But the whole time the attitude was ‘Why are you doing it like this, justify yourself’ as opposed to ‘Tell us what you do and why you do it that way. Let’s hear about your philosophy and you know…what’s good about your programme.’ Instead we were constantly on the back foot and being interrogated.

P: The second day was better than the first, to some extent. It was a turning point when Charles O’Neil, I’m sorry you’re not going to interview him, because he actually said - and really from that moment it changed totally - he said to Eon Smidt (Charles is from Stellenbosch), ‘Eon I know your MBA programme at Stellenbosch, I know all the other MBAs in the country (because he has taught widely) …he said in his opinion the MBA programme offered on this campus is the best one he’s ever seen, and … from there things changed quite rapidly after that. Maybe that’s why they cancelled the lunch. But this is a very good point that Q’s raised, because Professor U who is now Special Advisor to Professor V, he got involved and went around and found the documentation to show in fact that it had been documented and that our PG Diploma was not illegal. He wanted to go in and see the panel but he was sort of barred at the door and not allowed in. I think at the very least she could have let him in and apologized. The whole thing is just appalling.

Q: I think just from comments from other academics, it does seem to have been different in the staff evaluations where the other academic members of the panel were more involved. She actually didn’t ask as many questions and so the thing went better. On the first day she seemed to take a more active and prominent role in terms of discussing … the bureaucratic side of things - the rules, regulations, compliance with government policy, guidelines, things like that. Whereas with the academic staff they were looking at more academic issues and so she took a back seat.

What did you learn from it?
P: Nothing! In fact I would say rather than being constructive it was destructive. It’s actually done damage!

Q: I think to be honest, I think there was one positive aspect. Just a reminder that we do templates, we set certain criteria and sometimes, year after year, I think it’s just a reminder that possibly we don’t reflect enough on the courses we teach. But I must agree with P it is counterbalanced by a real feeling that you make an effort to be progressive, you make an effort to deliver programmes that you believe are meeting a need, you put a lot of effort into researching and preparing your programme structure and then you are literally put on the dock for it. And you actually find, that you have to defend yourself for doing your job. And I think that was quite demotivating to the point that you think ‘If this is the way education is moving, and I’ve got another twenty years in the profession potentially, if I’m going to have to deal with this kind of interrogation and second guessing for the next twenty years do I want to be part of that? So I think there’s certainly a major demotivating element in the whole process.

Do you think that the HEQC’s evaluation instrument and process adequately takes into account the interests and concerns of academics on the ground?

Q: Let me just comment on this…there were 40 minutes set aside in the evaluation and there were eight to ten academics teaching on the programme – we were all in one session. Which I think says something about the weighting given in the process. They spent far more time going through management structure and documentation and a lot of the questions that they posed to the academics were again relating to things like meetings and schedules.

P: They were looking for weaknesses all the time, you know, they weren’t interested in strengths, like they probed about research but they wouldn’t take into account the fact that we now are moving rapidly in research. They weren’t interested. It was all about history, they’re not interested in the position now and where we are moving forward. There was no looking into the future. They were actually behaving like accountants and only look at the past. There was no sort of discussion about good practice or what they’d seen elsewhere …no feedback! Nothing!

KATHY: Nothing, like would this be a good idea? Or maybe that?

Q: There was I mean a brief discussion about entry and gap tests.

P: Oh! Ja! Okay!

Q: It was more a comment, how we do it, why don’t you do it the same way? Then you have to again defend your procedures and say why are we different from…

P: There was the one guy, all he wanted to know was why we … or why we …not some other textbook…

KATHY: So obviously you weren’t privy to what sort of training the panelists had?

P: I knew nothing!

KATHY: You knew nothing! And in terms of their professions I mean did you sort of feel properly qualified to…

P: Oh! They must have been …so we didn’t know anything. Certainly from the other business schools there was Potch, Free state, Eonn Smidt I knew of from Stellenbosch because he’s quite a well-known person…
Q: We didn’t get any useful feedback from the panel either. It was a pity because apart from the lady from the CHE I think everyone else certainly in terms of their CV’s and all their experience were appropriate on the panel and could have given us useful feedback. Also there was no post visit review, from their side or from ours.

**To what extent do you think that the HEQC’s instrument for the Re-accreditation of MBAs is realistic and feasible in terms of the demands it makes on academics?**

**What are the consequences, costs and risks of the HEQC’s policies for you and your academic work?**

P: Well I think we’ve covered that to some extent already. It’s really the time! It’s an erosion of a very finite resource, you know, unnecessarily so.

Q: I think that, and maybe I’m straying a little bit, we’ve identified the potential for an MBA in Conservation and Forestry. And you know certainly I believe, as a matter of principle and as proponents of the free market, that if there’s a demand and we can provide a product that people are prepared to pay money for, we’re obviously meeting that need, and if it continues then it’s obviously succeeding and meeting those needs. And what’s happening now is this intrusion of bureaucrats. I mean you see the mountain of documentation that they require and that they went through it and it’s all fine tooth-combed, through budgets and structures and templates and they now have the capacity to say ‘Your MBA in Forestry doesn’t conform to what we think an MBA should look like, you can’t offer it’. And we really are at that place. They have that power! And so I’m not convinced that the review process that we undertook in any way comes close to capturing questions like ‘What are your local needs?’ and ‘What are your local strengths?’ I suspect that they have generic template in mind that they believe an MBA should look like and that we don’t necessarily conform to that because we have local requirements in terms of what our local economy needs. We have local strengths and expertise that we’re trying to leverage. And I think this process threatens our work and I think that that’s a grave problem. We’re being compelled to subscribe to a template that is being imposed by these external bodies.

P: I don’t think that the DoE or the CHE have the faintest clue of what is needed outside. They don’t know, I mean here we are in South Africa with frightening needs with respect to managing our water resources. An MBA in Water Resource Management is an obvious choice especially as Umgeni is the biggest water resource authority in Africa. You sit with one of them in Pietermaritzburg and they ask why are we going onto Conservation? There’s a huge need for it. And no one else has seen it. Well we are businessmen as well and there’s an opportunity here, but not for individual gain, I must stress. But we feel very strongly about our campus, I don’t need to tell you about that. But there is uniqueness in this campus that I don’t think the big city universities enjoy. The point I actually made is that we are one of the three university cities in South Africa, the others being Rhodes and Stellenbosch - and Alice, Fort Hare - that’s about it. I mean you’ve got this regional identification that others don’t have. I also think we’re going to get international students, if we offer Conservation and Water, we’re going to bring in a tremendous number of international students and that’s what we thought. Cross-pollination, discussion and they hadn’t even thought about it. They clearly were not keen on our innovative specializations for the MBA. But we will go ahead with our plans, because it still comes under the MBA programme. And you know Deneys (the DVC (Academic)) at the end was really good because just after his session he actually said he said to this young official that it was an interrogation and she took strong exception to it. He just gave her a look, in a way that only Deneys can look like this. And he just walked out without saying goodbye or anything. And outside he called R and I and he said ‘At the end of the day we will have an MBA and it will be the academics at the three different Schools who will decide what that MBA is, not those people!’ So there’s going to be a dust up, conflict is looming.
To what extent do you think the HEQC’s instrument and process will be effective in assuring the quality of MBAs around the country? And in improving the quality of teaching and learning on MBAs?

Q: I think that’s a difficult question to answer because I suspect that the whole process, whilst I think there’s a need for it, I think it’s a bit like trying to stem a flood, quite frankly. We’ve heard stories or anecdotal evidence of people who are offering programmes, ‘MBAs’ in inverted commas. So they’re all calling it an MBA but it’s not really. And even if the government could successfully prosecute that kind of behaviour then they would just call it something else and carry on. Now if you call it Master in Administrative Business, we have people, students, who dropped out of one of our courses who went to do a MBA through the University of Edinburough. It sounds very illustrious but the whole thing is done over the internet. How is the DoE going to combat that kind of behaviour? So I think, you know, there has to be a real question mark about it. I think the intent is good, I must admit I think there are many fly-by-night MBA programmes, but I seriously question the approach. I think a positive approach would be to let people apply to be evaluated, and if they meet those criteria they get accredited. But it’s their choice whether they want to or not and we will allow them to put it on their advertising and their documentation that they have CHE approval.

P: That would’ve been a positive way of doing it.

Q: So then you could market yourself as having that approval.

P: I do believe that the Minister should have interfered with the Technikons … The Technikons have lost direction, they’re also not offering MBAs and everyone is ignoring first line management, I really worry about that.

Q: Well possibly Charles is correct in that if we get a positive response that says ‘These aspects of your programme we felt were very good and we did feel that there were areas of weakness particularly here, here and here doing this and this would help strengthen your programme.’ And if that is positive and helpful then, yes, potentially I mean, there is potential benefit. I think maybe we are being cynical, but I think the chances of that kind of response are remote. But you know I’m prejudging it. I mean we’re all a bit bitter at the moment because we’ve put a lot of effort into submitting programmes, particularly the Postgraduate Diploma in Entrepreneurship which we believe there’s a crying need for in this country and it hasn’t been approved.

P: I think maybe we should discuss it … because I think this course has become a huge motivating factor, certainly in the Management Department. So I’m furious I’ve been carrying on about for days.

Q: Every new qualification that was submitted to the CHE by the Natal University was refused, was turned down.

P: Except the Jazz one.

Q: And that was because they were coming across from the Technikon.

P: And we can reapply, please note only in June or July next year.

Q: And this is supposedly a new transparent way of governing. So it comes from the Minister’s office, that they’ve refused. You may resubmit in July 2004, you may not advertise or offer any of the programmes, and there is not one word of explanation. There’s no – ‘it’s been refused on these grounds, it doesn’t meet these criteria’. It was just a blanket refusal.
Now the reason I raise this is that there’s a lot of reason to expect that the product of this process will be similar. It will be ‘you’ve been approved’, ‘you’ve got provisional approval’ or ‘you’ve been turned down’. And, if that is what we encounter, then I have to say ‘What a waste’. It’s certainly a negative and not a positive process.

I’m just staggered that we’ve come to the place that we as a University have to get the permission of some probably middle-level bureaucrat to offer a programme. I’m not sure how far or close to the Minister this decision process actually gets. I mean even if it is the Minister himself, a politician or a government bureaucrat is deciding what universities should be offering - whether it’s all right for them to offer a Programme in Entrepreneurship - is totally unacceptable.

I mean one of the programmes that were turned down was a Masters in Development. So it’s not even as if they are saying these are not relevant, they are. It may have to do with the merger and they’ve taken this decision. But it’s not explained. At least if they said ‘In light of the merger we don’t feel it appropriate…’ But you still can’t escape the fact it’s also about an academic freedom. I think this idea belongs to the past, I think it’s history. And I view this evaluation process and the way it was conducted as part of that same broad assault on academic autonomy. What’s happening? We had a situation where the Minister decreed that we couldn’t offer an MBA via distance learning. Durban currently does in defiance or in the hope that it will be changed. They haven’t been brought to heel or challenged, as far as I’m aware - to the best of my knowledge there’s no formal Ministerial approval for that programme. Why not? Is it to protect UNISA? You see if UNISA was the best distance provider in the country, they would be able to compete, it wouldn’t be a problem. So if you are maintaining a monopoly, by definition, it means their product is sub-standard.

P: Can I just give you a little bit of background just quickly? The greatest need, we believe, the greatest need is economic growth (and Trevor Manual is berating everyone saying economic growth in this country is static at 2.9%, we need a minimum of three and a half to at least not loose anymore jobs and we would preferably want four). I mean India’s getting what six point four percent economic growth. India, and they’ve got a lot fewer resources than we have. So something’s wrong. And the thing that’s coming out is you need to generate more growth. I hate saying the word ‘job creation’ because job doesn’t mean work. So let’s say ‘business creation’. And what we want to do is, we came up with this unique programme for our Science, not Commerce, students to give them all the skills and motivation needed to go out and have them start their own businesses, to go into their job with a very good understanding of business and entrepreneurship. It’s a winner! It’s unique! No one else has it. Yes I know the Technikons have an entrepreneur type thing … it’s over two years and it’s geared particularly to that. But we’re looking at a postgraduate qualification. It’s a winner and now you get this, the government chucks it out.

The best thing is that we submitted in February, if you remember, then we get thrown out later in the year because it was on the wrong form which only came out in May! So we had to redo it on a new form.

Q: And this is what an academic’s life is becoming. It’s becoming form filling.

P: They keep changing the forms. Some time ago we grabbed with glee the idea that there would be an exit at each completed year. Certificate, diploma degree! We embraced that we brought it into the MBA; we passed it through the Faculty, the AAB, and Senate. Everyone did it even with the B.Com and in the MBA. There was great excitement outside because this is what companies want. You know each year you complete…and they can tie it to your annual increase and things like that. So we set this all up then they say ‘you can’t have a Diploma’, so then we bring in an ‘Advanced Certificate’ then they say ‘No you can’t have any of this at all’. What the hell do they want?

Q: So it’s an evening course the MBA, you know some of these people spend four or five years and they could be one credit short and they have nothing to show for five years.
I know P is very entrepreneurial and he has very close contacts with industry. He knows what they’re looking for. So we had this great idea! Businesses like the idea because if they’re funding someone for a year’s study they like the fact that there’s something to show for it they can see that they’re making progress. We, a country that is trying to compete internationally, we’re supposed to be, we know that our education levels are a factor that holds us back. A pro-active dynamic tertiary education higher education system is a requirement and we are shackled. That we can’t respond to the needs as we see them. You know if we get it wrong, the programme doesn’t work, people don’t come, it goes, and we try something else. That’s what being dynamic is about. Instead bureaucrats in government are driving it now, half the time they’re competing over turf. Half the time they don’t know what they want to do and if we can’t go and run with an idea and see if it works, how can we compete with a country like India where rules are there if they help, but new ideas, successful ideas are more important? They’re running ahead we can’t keep up because we’re fiddling around with reports, it’s madness.

**How do you think quality assurance should be carried out in order to effect improvements in teaching and learning?**

P: Well I think we have here the A here which works on voluntary self-evaluation. It’s a very good model; other universities have a similar model. I think what they could do is rather do rounds of benchmarking. We could then benchmark ourselves with some of the top universities in say India, America and elsewhere in the world and that’s how it should be done. But it should be universty with university; it should not have the government dictating. And I think Q’s idea is also good. When the government wants to come and give a SAQA recognition, that’s fine, you know if you want a job in government then you have to have an approved MBA or something like it. That’s something I suggest this country should have done a long time ago. 1 509 000 and there’s no reason why not. We want something that’s controlled by ourselves. I mean the whole idea would really be self-regulation or self-monitoring.

Q: There are two things that I really question about the current approach, as it seems to be evolving which is documentation; regulation sort of scorecard and if you don’t you’re in trouble. I think firstly it overlooks the moral of the market that to a large measure quality is measured by what whether people are prepared to pay for your products. And I think promoting a greater entrepreneurial experience at university is giving students more scope to explore opportunities. Those programmes that are good people, will pay for them they will…if you want to talk about quality, arguably the quality of the MBA programme in Cape Town for example is evidenced by the fact that people are prepared to pay three times the level for the MBA programme there as oppose to here. You know that says something about quality.

P: And on the other hand look how many people are coming from other countries and not just Africa onto our MBA.

Q: Absolutely! I mean apparently we’re getting our first four Chinese students.

P: We’ve got people coming from Ghana we’ve got several Ghanaians here all over Africa. Kenya we’ve had a couple from Kenya. We’re about one third no about forty percent of the students are international students. Now some of those are going to be our MBA students. And also about a third of our MBA’s go into government or bureaucracy. So we become a fairly important feeder and make it self-sustaining.

Q: And if there’s sufficient demand and these fly-by-nights with very little track record can make money that is permissable, it shows the demand and what the DoE should be doing is actually encouraging University MBA programmes and try to encourage them to expand
because obviously there’s a need for it. As opposed to making you feel like some kind of criminal because you dare to offer an MBA programme. And I don’t think I’m overstating the case I think that has been the impression that we’ve had to explain ourselves.

P: Trying to justify something that’s successful you know. Ja I think the important thing is when they don’t give you feedback. R wanted to know. She went to them. One of them said to her ‘have we got accreditation or not?’ and she said ‘well, we’ll know in November’. R said ‘That’s no use I’ve got to advertise now’ and very very reluctantly she said we had; I think the word was ‘conditional accreditation’. I think it’s not provisional it’s conditional.

Q: Which could mean anything, which could mean in November they pull the plug.

P: There’s a total lack of logic.

Q: I mean I can understand if they need to go back and review their process and stuff but we’re talking three months in the time of review. Now and we sit in limbo until then. So what happens is that you have to go on in faith and this is exactly what happened with the Diploma in Entrepreneurship. You expend time and energy, and it can be significant, in faith that it’ll be approved, but you don’t know. And as Charles said, the time you put in to put together - that thirty-page proposal - you could have written three papers. So increasingly an academics job seems to be filling in forms. You know you’ve got to be rated with the NQF. I’m not saying it’s a bad idea but again it is it’s more documentation it’s more record keeping. You’ve got to get your templates in place; you’ve got to get your programmes in place. It would be very interesting to do a work study and compare how much administrative time is spent, not course administration, not university administration but on national bodies’ administration. How much time is spent tied up with that as oppose to doing your core functions.

I would make a concluding comment. It would be that these bodies SAQA the HEQC could be supporting bodies. Then say you have an important job to do as the university, we are here to facilitate, and you are here to help people. But we get the converse that they are here to police you, they are the enemy and if they catch you out they’re going to hit you with a big stick. And that is the dynamic that is evolving as opposed to what it should be. I think that really sums up for me exactly what it’s all about.
MBA 7  7/10/2003 (Focus group)

The macro-question is: To what extent do you think the HEQC’s policy instruments and processes are acceptable, legitimate, feasible and potentially effective?

KATHY: Well I’ve been to the meetings about institutional re-accreditation but just to listen to what’s going to happen. The Business School sent me because I am the only person who takes an interest.

What is/ was your involvement in the MBA re-accreditation process?

P: I prepared the submission on our MBA programme. And it was clearly on the programme rather than the institution, but there were a lot of institutional questions asked as well. You know, the relationship with A, the financial arrangements and soon, in the end it just didn’t end up being the two MBA programmes I had to talk about HR etc. Where we thought we were looking at the quality of the programme, inevitably you also had to look at the people teaching, what are their terms and conditions of employment, what is happening with the administration staff, how were they developed etc. So it was very encompassing, I must say I was impressed at the depth to which they wanted to go. And I think it actually took the academics at this institution by surprise when they were suddenly questioned at the site-visit as to their involvement…And you know they hadn’t actually thought about what it was, I think there was a slight complacency on the part of A is well, ‘What’s the problem? We’ll get re-accredited’.

KATHY: P will you be speaking as part of the panel as well or would you rather not?

P: I did sit on three panels but I wasn’t a chair because I’m not a Professor. You had to be a Professor, but I had to keep on advising the Professors! Because I’m in the engine room of the programme, literally I am, and I mean that’s what happens when you’re in the engine room. So you know exactly what’s not being done and what’s being done and the quality assurance issues are the ones that actually start with you. But unless you ask somebody for an external examiner’s report or detailed feedback on their assignments or make sure that they look at the student feedback, it won’t happen. There doesn’t seem to be any other level of accountability and responsibility here and I think that’s what I think is great about this process because it was a real wake up for our academics when they were questioned on those things. ‘How do you respond to student feedback?’ And they looked at me and said ‘What do you do?’ And I find it very interesting, I think that obviously we have all the right processes in place - external evaluations, students evaluations and so on, and we meet as a team or Faculty to discuss the quality of the curriculum, quality of assessment etc. but we are by no means perfect.

What is your position, in principle, with respect to being accountable to the government for the quality of the programmes you teach on? To what extent do you agree with the idea of an external quality assurance agency, established by the Department of Education, assuring and maintaining quality in the higher education system?

P: On the MBA a lot of people will say ‘Well the market will decide, you know, we don’t actually need the government to intervene’. And I think, for the students on our programme, whether the Council for Higher Education in South Africa accredits us or not isn’t an issue, they’re more concerned about how the world feels about us. But I think the naivety of the South African market and the plethora of MBA programmes being offered, I think it became important that somebody takes charge. You know so many people in this country think ‘MBA, we’ll do it’ they want ticket to promotion, they don’t really care about the
programme. So I think our market is naive enough that we needed some kind of intervention. So I think it’s the right thing to do.

What was your experience of the HEQC’s site-visit?

P: As a recipient I was impressed by the detail that had gone into analyzing the documentation that was submitted. I was very impressed by the HEQC because they did the first analysis and alerted the panel to what they should focus on. And I thought that was very impressive the detail to which they’d gone to. And I don’t think it would’ve been that successful if they hadn’t done that because as a panelist I sensed that on some of the panels, some people hadn’t read the documentation. And we were given very clear instructions that you had to have read the documentation otherwise you should go home. And it was difficult because it was often the high level people who hadn’t read the documentation. So I was very impressed by how they set it up. Obviously the logistics for them must have been a nightmare. But in terms of … I think they focused on the right things and …they didn’t get bogged down in the wrong aspects. They pretty much looked at our quality assurance system particularly, rather than worrying about how much research our academics were producing, what their qualifications were, because those weren’t at issue. But I think the issues that they picked up on were OK: our relationship with A and they found that our description of the programme in our Handbook was very weak. But I think that’s irrelevant, our students don’t look at that, they look at what we give them when they come to the programme …So for them they were anxious about that. So it was a big focus on quality assurance and the actual delivery. They asked me a lot about feedback from the students and what I do with it. There was quite a lot about the performance management of academics. So they actually picked up correctly what the issues were at this Business School, I think. And I think one of the tensions in a Business School is between teaching, research and consulting, our academics need to be part of the business world and so they consult. We need to monitor how much practical business experience they have, how much research are they producing and how much time they spend with students. So I think that is a challenge for a Business School.

KATHY: I was impressed by how much they had picked up from my submission and I didn’t intend to put up front what the issues were. And I think they found it problematic that we don’t keep copious records of every single meeting we have, they didn’t like that. And I thought that was interesting because we do have a lot of informal discussion. We just don’t record it.

What did you learn from it?

P: We haven’t received their feedback yet so I don’t know what it’s going to be. But they asked for extra meetings with academics and the Faculties. The problem was that they hadn’t been involved, they hadn’t been involved with me enough. But that was their choice. I sent them drafts till the cows came home. So it was a case of ‘can they do it?’ I think they were mostly unprepared. I think after the first day they were surprised at what was expected from them, so I was glad that the HEQC shook them up a bit. It was a huge spin-off benefit from the process. The fact that the government was asking us to be accountable was fantastic, it was a real wake up for the academics and the admin staff had a wonderful time talking about their difficulties and they loved it, because they said it openly with me sitting there. And I just thought ‘Well that’s great because they’re often in the firing line’. And they have now decision-making responsibilities. So it was a very interesting, but I think that will come through in their feedback. I was really impressed by the admin staff because in a sense they really are the engine room and they spoke about the difficulties they have with not having any kind of power and yet the students think they’re in between the students and the academics. The call to our academics is that there’s a constant need for looking at what we’re doing and asking ‘is what we’re doing the right thing?’ At the moment we’re about to embark on looking at assessment and we will be asking ‘is it fair?’ ‘are there
clear guidelines for people on how to assess?’ and that sort of thing. So this is my position basically as someone who’s trying to manage a programme you know it’s difficult to get academics to support what you’re trying to do.

**To what extent do you think that the HEQC’s instrument for the Re-accreditation of MBAs is realistic and feasible in terms of the demands it makes on academics?**

**What has been the response of institutions to the instrument and to the site visits?**

**KATHY:** Well I think it just makes them (academics) accountable for what they do. They’re not here to just sort of sit here and dream you know they’re here to teach, to develop and to research. And they have to account for the time that they’re spending. And I think it’s a good thing. It’s a very, very free work environment and yet it requires a lot of self-discipline and it can actually go very awry if you’re not delivering.

**P:** And I think it’s a good thing because in the end, especially in this environment were dealing with really serious customers, I mean people have paid serious money to be here, it’s quite different in the undergraduate world, but I think in any Graduate School and post-work experience Graduate School you actually have to deliver.

**Do you have any recommendations for the HEQC in terms of improving the process?**

**P:** I think the only thing where it could be improved, because it’s very much a peer review mechanism and I think what they have discovered this themselves according to the fax I received yesterday is that peers have been too lenient on each other. You know either a standard is a standard or it isn’t. I say what I think and if I think somebody hasn’t met the minimum requirements and needs improvement, I say so. But what they were tending to do was to try and say ‘Okay it meets the minimum requirements’. Every submission I saw, everybody said they met the minimum requirements. For our programme, I said we didn’t meet the minimum requirements for diversity and I think also for staff development. And I’ve been perfectly honest and where I think we’ve exceeded the requirements in terms of resources which is IT and our library for we had way beyond the requirements, and yet every other submission I looked at ticked ‘meets the minimum requirements’. And I was absolutely intrigued. When we received the submissions then when we had to evaluate them against each criteria. There was a huge tendency to give everybody a tick at ‘minimum standards’. And I was just saying ‘what is this process about?’ But fortunately not being a Chair it was very difficult. So I think their assumption that Professors are in touch with the realities of programme delivery is a huge assumption, and that they’re in touch with student learning.

**KATHY:** I think there were a lot of assumptions made about a lot of things. And if I can comment. Not all the members of those panels were there because they have a genuine commitment to improving the quality of MBA provision in South Africa. There was a helluva lot of ‘Can I achieve some personal cudos out of this, or credibility for my institution?’ and I suspect, particularly from the private institutions. There was a rush to be part of this and I mean there were some people who were on several panels and looking to do wheeling and dealing as well to get competitive information.

**P:** Obviously it helps to be a panelist, I mean they get the full documentation and they keep the documentation. We signed a non-disclosure sort of thing which I absolutely stick by but I know other people don’t - you know they’ve used the information the fact that you could get to keep the documentation is one thing, so I think there was a lot of trust from the HEQC. So I think it would have been better for them to appoint a panel of real experts to do this for them. Ja, who really understand what an MBA is and don’t have money-making in the background. But obviously they would have had to pay such people to do it. You know you
would’ve had to employ somebody like Kathy and I might even suggest myself who’s worked with this to actually do an honest review and possibly to have no conflict of interest as well, which would have been the difficulty. Well we did have training, we went to a workshop, but it wasn’t really adequate. I mean EQUIS obviously has the resources that the HEQC hasn’t, it’s a financial problem. You know if you are going to do this properly, you actually need a panel of experts who’re going to be experts in QA and MBAs. I mean they just don’t have the resources to do that so that’s why they depend on inexperienced peers. One of the big issues in the first workshop I went to was ‘Should they pay us?’ and I just said ‘Absolutely not’. This is something we should be doing because we need to get this right. So the panelists weren’t paid.

KATHY: The HEQC reserves the right to appoint people to those panels who were not seconded from the Business Schools.

P: Well they did get some people from business. So there were business people and each Business School had to identify people who they thought would be willing to do it, which we did as well. We had business people on there.

KATHY: Look at the costing. We paid R160 000 for the expert accreditation and membership from EQUIS. Whereas what did we pay for this? Nothing! They don’t charge for it at all, they just cover their costs.

P: I thought there was a charge, if you look in the Manual for the MBA Review.

KATHY: How much do they charge?

P: They sent an invoice to the Business School.

KATHY: Well I assume I haven’t seen it. I should actually check that out.

P: But certainly, you know, some Business Schools employ professional Project Managers but the HEQC were very adamant that you shouldn’t have a consultant doing it for you. But I think people did employ extra Project Managers. I think that the HEQC have done a remarkable job, given the financial constraints they have and the fact that this is probably the first time they’ve done anything in quite such detail. And that they’re dealing with public and private institutions who have completely different. But I mean you just look at the States as well. There there’s an MBA at every institution you could think about. We, in South Africa, are falling into the same trap. You know the meaning of an MBA has completely diminished. I mean I have at the moment exchange students from ten different Business Schools around the world and I look at them and I think ‘Hey you know they’re a…different product….and you feel it in the maturity level, some have only worked for two years and they’re twenty six if that. Whereas our students …we’re closer to the American model and I’m talking about Columbia, Stern, serious Business Schools. I was utterly amazed at the level of debate and discourse of our students. We mustn’t think that our top Schools are delivering a product that can’t compete anywhere. We’re much tougher from an academic rigor point of view and examinations. There, in the US, it’s very simple, they tell you what they’re going to give you, and examine you on it.

KATHY: Just look at the time and commitment that our students make to the programmers here. We’ve got someone on the Executive MBA this year, the Director of the Academic MBA programme at Rotterdam School of Management. She has said that there is no way that they could ask their students to work the hours and put in the effort and deliver the kind of projects that the GSB demands of its students.
To what extent do you think that the HEQC’s instrument for the Re-accreditation of MBAs is realistic and feasible?

P: I think for me because we had gone through it we for EQUIS. So I had something, a base, to start with. So I can’t imagine what it must have been like starting from scratch. But I must admit getting together all the documentation on all our procedures and policies which didn’t have to be done with EQUIS (because with the HEQC, the emphasis was more about the institution rather than detail on each programme). But that was fine, I got help from A, I linked with the Planning Office who were helpful in ensuring that I had all the right documentation. But it would’ve been an enormous task if I had had to start from scratch in terms of writing about the School Programme. There was a lot I had to update it but for me and you had a month to do it in, it was manageable.

KATHY: We spent six months on the EQUIS self-assessment in 2000.

P: And even then my document had mistakes in it, because things had been updated. I tried to delegate certain chapters to the Director of the School, the Director did two chapters and so there were thirteen criteria and he did the first two. Resources were done by the library and the IT Division and pretty much the rest was done by me, but using the initial documentation and then input from every course. But it would have been unmanageable in the time that I had to do it and the fact that I was doing my job at the same time if we hadn’t had EQUIS. So I worked right through the night three nights in a row. Their time framework was unreasonable. And I think that the amount of documentation required was unnecessary. I think we had given what we needed to give and at the site-visit people could look at EQUIS documentation which was what the site-visit was for, it was an evidence thing. I just about broke my arms carrying all the stuff. Ja, I think we had the advantage of being experienced.

To finish off, I think I salute the HEQC. I think it’s great, I think it’s a very important process and I hope that it will make even the top institutions jack themselves up and stop being complacent. But it was a very big task.

KATHY: I don’t know if there’s anything here that you want to pick up from where we left off? Ja but if you don’t we can just focus on…

Q: No! I couldn’t answer that and I don’t have any exposure to academics that have been affected by this directly.

KATHY: Look these are sort of off the top of my head questions okay I mean obviously I know you were involved in the formulation of the instrument but I’m not really sure to what extent and how. And I don’t know to what extent you’re public …to speak on that. Well I am interested just for my own research purposes even if I don’t write it up …background sort of formulation of the instrument. So I think as you talk you should say this is for the record and this is not.

Q: Well the process started in 2001 I think or actually in 2000. Where I started having contact with the CHE and they were thinking then about tackling the MBA and I have an idea that it came about because someone one of the private schools had taken the minister to court about a decision on preliminary accreditation of an MBA or it may have been accreditation … And then during 2001 I was commissioned by the HEQC to research the potential for accrediting the MBA in South Africa. And what I did was I looked at two things the one was international accreditation systems and that piece of work I did shortly after I had completed being the project manager for the EQUIS self assessment here. So I had had experience of preparing a self assessment submission to EQUIS…

Q: …system. And it is a label that is awarded by the European foundation for management development which is a body it’s a membership body it has an accrediting unit if you like which runs this EQUIS process. But EFMD attracts membership from across educational and
business sector. But its focus is on management education and development. And it does all sorts of things so it also has an interest in executive education and MBA programmers.

KATHY: Okay Sorry so this is 2001 you come from this you're doing this study you said there were two things you looked at.

Q: Yes! I looked at international accreditation systems and where they had come from and where they currently focus on and what the implications are for business schools of the sorts of criteria that they use to assess business schools and MBA programmers. Eq UIS and the ASUSB which is the American body look at business schools. But ASCSB, No ASCSB I think also accredits MBA’s and programmers in financial management. So I looked at that and I gave an overview of those systems and what they’ve had on MBA provision internationally. And I also looked at what was going on in terms of the design and delivery of MBA programmers and what the trends were. And that document was meant to be a proposal to the HEQC for a review of MBA’s but the brief that I received and I’m sure you’ll be quite empathetic with this the brief evolved over time and it started out rather vaguely.

KATHY: Were you the only researcher?

Q: I was the only researcher. So that document was submitted to the HEQC and they sat with it for about oh I don’t know it was more than six months. And then they came back and asked me to formulate and I had put forward a proposal I think it was with that document for a review process that would use the services of a number of very experienced people from the business school sector in South Africa and Internationally. And I came up with a budget and it was quite an expensive process. And I think that may have scared them off and there were other things that they were dealing with. And they came back the following year and I think that was when you had put in your proposal for the teaching and learning project and they asked me to come up with something similar for the MBA. And I did!

KATHY: …good practice.

Q: Ja! And a proposal of how to do it. And when I submitted that proposal they got into a big twitch because I talked about standard setting and criteria setting and they said because of the relationship with SAQA and all the sensitivity and politics around standards generating they could not be seen to be setting standards for programmers or for qualifications. And so we went to and fro about that for some time I was trying to I think they understood that we couldn’t review MBA programmers without having a set of criteria. So I think they had to chew over that one and come to terms with it. And eventually we came to an agreement whereby we invited a number of people to come to a to constitute a working group which is pretty much on the model that you used for the T and L project. And through my contact and my network I put forward some names and they were very concerned because those names were all white men. So they managed to dig out of the system some black people and some people from I put forward one person from the private sector whom I knew and we had a meeting and I think for that meeting I had already, they asked me then to distill out of the criteria for the international accreditation agencies or foreign accreditation agency’s a set of criteria for South Africa. And I did that. And I must say that it was largely based on EQUIS but drawing from AMBA and ASCSB some aspects which I thought were good practice. That document was then put into their internal system and Currie Manon came up with a variation of it and that was put forward to people from a variety of different schools so there were Wits, GIBBS, Stellenbosch, I went on behalf of A with the then MBA director Tom Kubla and there was someone who was brought in from Demodfids and that’s Kuties connections because she did her MBA at Demondford.
KATHY: They are here aren’t they?

Q: Yes. And we invited someone from UNISA they didn’t pitch and I had invited someone from Henley who also declined. And we had a meeting at which oh no there was someone from P E Technikon, in fact he was the most active member of that group and we then discussed those criteria. We had a whole days meeting and we set some standard. Such as the minimum number of contact hours, qualifications of academics teaching on the programme, basic content some sort of basic ground rules. And I then went away and I documented that and I sent it out to this working group for comment. I received comment from two people. And then it kind of went into the doldrums and then the HEQC came back to me and said look you set the criteria. So I set the criteria for the review for the MBA. They then took that back into their internal system and I have an impression that Curtie may have worked on it again and revised the criteria that I set. Initially they weren’t happy with the criteria because I had set the criteria and I had also described some more detailed criteria or standards that should be used to measure performance. And initially they just wanted to send out a set of very open-ended questions. And I pointed out to them that if they did that they were likely to get a lot of marketing speak and a lot of irrelevant information because people don’t understand the questions so they don’t know how to interpret them. And that was based on my own experience as an evaluator of other programmers for the HEQC. So what they did eventually send out was a very detailed document. I was then meant to project manage this whole process. And in August last year I decided based on other opportunities that were coming up for me, but primarily because I was concerned about their own capacity to resource it, and also the caliber of person they were offering me to help me to do this. That I wasn’t going to do it so I withdrew. So then my contact with that process came to an end. And I don’t know who ran it for them internally but I have the impression that Kirti was quite an important player.

KATHY: Yes! I’m pretty sure it was.

Q: And in a sense she wanted to do this from the very beginning and I think she was very upset that they approached me to do it. So she’s probably very happy. But essentially the criteria they added things related to diversity and access and redress which were obviously not part of the foreign criteria. Well EQUIS does have a section on service to the community which I think they just adapted to local conditions. But I would say that the process for formulating it has been, I suppose it was the best that they could do with the resources that that they had, and the access to expertise that they had. Whether it will stand up to scrutiny I don’t know. I believed that they have been criticized for being too reliant on the European the EQUIS system. And I think it was the former director of the Wits business school who said why should we have to fill in a questionnaire based on the EQUIS system when we could just apply to EQUIS for accreditation. And as you can hear here the fact that they’ve been through the EQUIS and the same applies to Stellenbosch made it much easier for them to deal with this.

KATHY: So do you think that’s a valid…

Q: I think it was definitely conceptualized. You know the reality is that MBA’s are an international product. A good MBA and so a good MBA should be scrutinized in terms of international criteria. That’s my belief. And they seem to have accepted that. At one point in fact they were talking about the possibility of entering into agreements with the foreign accrediting bodies whereby any MBA programme that’s been accredited by for example EQUIS that the HEQC would simply accept that. But I think they walked away from that one.

KATHY: …think it was a mistake…?
Q: I think politically they would’ve had a huge problem with that in South Africa. They have to make everybody jump through the same hoop. Now there may be arguments that the criteria from the foreign bodies are designed to accommodate MBA’s in the developed world and so there may be people who want to argue that are those criteria appropriate in South Africa. But I think for an MBA programme to be worth it’s salt a local accrediting body cannot afford to dumb down on it’s criteria primarily for the top end of the market because those people for example with EQUIS one of the first questions they ask is are you accredited by your local accreditation agency and if you are they won’t even look at you….You know so you asked do I think that the policy instrument is credible and based on adequate expertise well I have to say yes. And that’s not just because I was involved with it but I think that it is based on well researched criteria from a number of different sources. Has it been sufficiently locally contextualised I don’t think, I think the local consultation process could’ve been more comprehensive. But then one has to look at the willingness of the local MBA providers community to participate in that. And I think that possibly they would be more willing now having had to jump the hoop because then it was a bit of a black box for them and I think that many of them particularly at the top end of the market thought that this is kind of a necessary evil that they had to do for legal purposes but their real focus was on the foreign accrediting bodies. And I suspect at the top end of the MBA market here that will still be the case but they may be more willing to take the HEQC seriously. And I can comment on that from the providers side because I did help to two local MBA providers and to prepare their submissions for this process.

KATHY: Public or private?

Q: One public and one private. And the private was a foreign business school as well. So it was a very complex process that involved not just the HEQC accreditation but also applications from the DoE and SAQA for registration of the programme.

KATHY: Is that registration institutional?

Q: It’s institutional registration with the DoE and registration of the MBA on the EQUIS with SAQA.

KATHY: …qualification?

Q: Ja. So it was a very complex and messy business which had it’s own politics and problems which were quite separate from the quality of the MBA which is actually very good MBA’s it’s the Henley MBA it has four accreditations. It has [a] CSB EQUIS and the it’s the UK quality assurance authority. Formal accreditation from all four.

KATHY: Sorry what was the forth one?

Q: The UK QA. So I think when you say credibility probably credibility to the local market would be improved had there been wider consultation had it been possible. And I think that there were two issues around HEQC’s resource base to do that and the willingness of people to participate. I don’t think the HEQC can be blamed for it. They could be taken to task for it especially by those who are not satisfied by the outcome of their review. And there may be a case to be made for how representative was the process or how inclusive was the process of compiling the criteria. The strength and weaknesses I think the strength is that it is a very comprehensive look at the programme and its context. And for those who stand up to that scrutiny I think would be able to say with confidence that they are providing quality MBA programmers that are properly resourced. And for those who don’t it sets the benchmark however it depends on whether HEQC draws the line and that is I think the question that everybody has and it will be very interesting to see what drives that decision inn the end. Whether it will be educational or political. Who’s going to get full or conditional
accreditation and who’s not going to get accredited I’m very interested to see the outcome of that because that will they will be taking a stand and they’ll be taking a stand in the most hotly contested programme that is offered. You know they couldn’t have chosen a hotter potato to start with because there’s huge amounts of vested interests there’s institutional credibility institutional branding and lots of money at stake especially in the private sector.

KATHY: Do you have any indication that in fact …political factors…?

Q: [Off the record]

KATHY: I thought that with the programme accreditation some of that balance between general and specific was uneven.

Q: Ja. But I think that one of the HEQC’s intention with this process was that it would also refine the instrument. So that I mean I think is a valid…so they said that they would ask the providers for feedback. Whether they will do that or not I don’t know. So response of the institutions to the instrument I mean my exposure has been to A, to GIBBS, to Henley and then right at the beginning it did involve …technicon and I seem and Wits officially they saw it as a good thing. The top end of the institutions were kind of the view that it was a necessary evil and didn’t take it too seriously. But I think once the process started rolling out and they got to grips with the nature of the instrument and the amount of work it was going to take to respond to it then there was a sharpening up. Certainly here and I think that’s also a function of …taken very seriously. She’s not your normal MBA programme director. She has a very deep sense of social commitment so that would be informing her response. But I got the same view at GIBBS and for Nick Bernadell for whom I’ve got a very high regard as a business academic initially having discounted it and said oh they just have to go through the motions you know but he was going to focus elsewhere. He took it extremely seriously. I was asked to read the I didn’t write the submission but I was asked to read it on a number of occasions as if I were an evaluator and to give them feedback. He flew me to Jo’burg for a full days briefing to prepare for the site visit working strategically through what are our weaknesses how are we going to address it. What are we going to say where are we genuinely weak and what are we need to do and to say to the panel to give them an impression you know and what do we need to do to make sure that we will look credible in the longer term. He took it extremely seriously.

KATHY: So I mean in that sense it was really working in the way intended?

Q: Ja. With Henley I think there was a bit of a disjunctive between the UK people and the people in South Africa and the people in the UK thought that the people in South Africa could fill in this form. And it was only when I arrived on the scene and we started the telly conference and I started saying to him this, this, this and this that they woke up to the fact that they had to contribute that they were the actual that it was Henley that was being evaluated and not Henley southern Africa. Well it was their MBA. And I don’t know how that site visit went I’ve actually been meaning to phone and find out. I mean it maybe not worthwhile talking about it cause I think it is a fairly unique case. There are others like them but I have no contact with them. But I think there again there was a sense that they had been through this hoop on so many occasions in the UK it was almost like a piece of old takkie to them. And I don’t think they thought the South African accrediting agencies were people they should take seriously. But I think for them it’s …capacity to continue their business here. But that was not a HEQC issue it was a DoE issue in terms of their registration.

KATHY: The actual site visits of the institutions that you know were people quite positive about the panel and the way they conducted …
Q: I just heard comments from P and I think you heard what she said that not everybody had read the documentation. Other comments here from professor R … I mean he’s the Director of the executive MBA and he’s the immediate past director of the MBA so he was part of the panel for that programme. He said one of the panel members who was from one of the private institutions questioned the validity of the research done by the students on the executive MBA programme because it’s qualitative and said that qualitative research is an easy option. And Tom just went ballistic. He said who are these people. How can they come here and judge us when that is their level of understanding of research. I looked at the panel you know there was a gentleman from a private institution and this is definitely off the record…

KATHY: Do you think the HEQC …

Q: …politically because I think they had to be representative so again they were driven by politics…I mean my view is that the people who should be on this panel should be people who have a track record of teaching on credible MBA programme and directing. And that the chair’s of the panels should’ve been people who direct MBA programme or have been people who have been directors of substantial business schools. Now then the HEQC would have problems …

KATHY: White males.

Q: How could they say to someone you know from an EDUCOR stable that you’re not credible?

KATHY: Can the institutions do they get consulted can they object?

Q: Yes they could. I mean I looked at the panel for the GIBBS it was so lightweight it was ridiculous. And it went through I think they had three different people coming forward to chair the panel. And there was someone from the HEQC as a doctor was it Greyling…

Q: And maybe also they were not happy with me because I withdrew from the project.

KATHY: Ja no I have also found like with the audit panels like I was initially asked I mean it’s very odd I mean heard anymore about the actual basis…

Q: You’ve fallen by the way side.

KATHY: …I know Durban …was very lightweight.

Q: Well I think Nick Bernadell chaired a panel in Natal with this guy from MANCOSA and you know he just commented about the panel being very unwielding that he had a very hard time keeping them focused. So he said he had to be quite authoritarian. He’s not a man who likes to have his time wasted. So I mean problem wise I mean I think the biggest problem is where they draw the line. Who gets through? And on what basis? Who gets through with full accreditation who gets through with conditional and who doesn’t get accredited? And that is going to place the HEQC under an enormous amount of pressure. And I don’t know whether they got to grips with that.

KATHY: Ja it could lead to court cases…so they need to be very, very careful.

Q: And so my concern is that we might end up exactly where we are now, with all of these MBA’s you know the sort of rats and mice that with a nice report on the state of the MBA in South Africa that will gather dust on everybody’s shelf. And I think the HEQC have got to earn a lot of credibility for that to happen. So they are really between a rock and a hard place
and I feel for then. And it’s one of the reasons I didn’t want to be associated with this from their side I wanted to be on the provider side so that I could sort of choose which providers I could work with. And I was quite careful. Academics no I think it’s just burdensome and as you can see it gets delegated to in this instance the programme director who is more of a although I think P sort of undersells herself she’s more of an academic than she likes to think. But she doesn’t do research, she does teach and she does have a very good understanding of MBA programmers and of business education in general. It is very onerous and hence you know the instrument definitely needed to be leaner and more focused. And then the review process needs to have much more credibility to balance it out so that the kind of scrutiny itself stands up to scrutiny.

KATHY: Ja I mean we don’t know yet until the feedback in terms of adding value I mean in terms of the time and effort put into the submissions …institutions …back…

Q: I mean …back in terms of?

KATHY: In terms of the findings and recommendations …sharing good practice You know things that help with approval.

Q: I mean I would hope that any institutions that is given conditional accreditation would want to make sure that they deal with the gaps that have been found so that they would eventually get full accreditation. Because the implications of not doing that is that they will be closed down. Again it gets back to where the HEQC draws the line. But ja I mean I think certainly this business school and it’s EQUIS accreditation is very serious about the requirements that were set by EQUIS. And there’s serious discussion going on in the school at the moment because it comes up for renewal next year about taking action to plug the gaps. I think though you know the question is when do people wake up to the fact that this is a serious process, that the authorities mean business and that people see this as a strategic exercise rather than a compliance sort of tick box thing. And I don’t know I think the chickens will come home to roost when the people are told whether they’ve been accredited or not. And that is when people will really get serious. And the institutions that I’ve dealt with would not, are not at risk from a programme quality point of view the only one that is at risk is Henley and that’s got nothing to do with the programme quality it’s got to do with their status as a company in South Africa in terms of the higher education act technicality. I mean there are issues in it’s programme as well because it’s a foreign MBA but they have indicated a willingness to address those things. You know contextualising the programme. So I don’t know it’s hard for me to say I think there’s definitely a sense of let’s use it in terms of bringing about improvement but it’s very much because there are individuals in place who take things very seriously.

KATHY: Great! Just a last comment Kathy I’ll sort of run you dry! Advise to the HEQC you’ve mentioned where improvement could be brought about…instruments need to be revised…

Q: Well I think that if they do grant conditional accreditation to institutions those institutions should account on an annual basis for progress in relation to the …I don’t know whether the HEQC has…to deal with it. And that would indicate the degree of seriousness about this but I think the other advantage to the HEQC is that they need to lighten up on the attitude towards business education and try to understand it in its context upon its terms. And not be so, you know they’re very resistant to hearing that MBA ‘ds are different and business schools are different. And in a way I agree with them that we can play the difference to the point where you can’t apply any uniform standards and I don’t agree with that. But I think one of the things that the HEQC really get to grips with is that there is a market and that market has power and they cannot legislate the market away and the market will judge and their accreditation will become one factor in that market. And it will be an important one
especially at the top end but I think at the bottom end as well. In fact maybe even more so at the bottom end because it will be the only accreditation. At the top end it’s not so important if you’ve got EQUIS or AMBA accreditation to have the HEQC accreditation is just a legal requirement. So it’s not about your standing in the market. And I think they need to just accept that and accept it graciously and live in the global world of business education and it’s not just business education anymore it’s increasingly we’ll see it coming with other disciplines …engineering all those sort of highly professional highly mobile professional disciplines. It’s just that the MBA is leading the way again.

KATHY: I mean it almost parochialism the South African …we tend to think…

Q: Yes definitely you know if you look at who’s exporting education into South Africa it’s all distance education. And they’re worried about that and the regulation of it and to some extent they must accept that South Africa’s membership of the global market and then they must take responsibility for insuring the quality of programmes but in a way that is enabling of the market rather than trying to control the market.

KATHY: And Kathy this issue of the one size fits all instrument for public sector private sector are you I imagine you’re happy I just want to check out.

Q: Ja I think so. I mean I think if a private institution cannot properly resource an MBA curriculum they should not be offering an MBA. And I would say the same about a technikon. They need to show evidence of research even if it’s applied research, or it’s contract research their academics can’t be teaching hundreds and hundreds of students on the B-Tech and the national diploma programmes at undergraduate level and lecturing to MBA students and therefore not producing any research even if it’s contract And my exposure to the Technikon MBA’s is that there’s nothing there.

KATHY: You know what’s interesting they’ve cut across the different area types.

Q: So if the research is arriving as a result of consulting work to industry or to business. That’s fine they must do it…well even if those documents are sort of confidential documents for a client and the research is then being applied in the insights of business they must be able to produce that as evidence at a site visit but they don’t have those reports. They must show that their academics are not just teaching machines.

KATHY: You know what I’m picking up generally not just with respect to the MBA there’s huge complaints that the HEQC is using…approach and that the reason that the rationale particularly someone like prem gives to the public meetings the meetings with the public is that you know the private sectors so terrible that they have to impose this very harsh fear accreditation…to try and control the privates. And politically it’s unattainable …two different standards.

Q: I mean the thing is that the private providers if they can’t provide a properly resourced masters of business administration then they must provide something else. A diploma in business administration whatever they want to do but not an MBA.

KATHY: So you’re quite happy with the rationale?

Q: Absolutely. I think the other area where they need to do some reflecting is to consult very widely with the provider communities on the research component on the MBA. Initially I was quite supportive of them up in the anti but actually the international trends are away from a heavy research requirement but heavy theoretical research you know it’s much more towards applied and action learning. And in terms of the programme being turning out practitioners rather than academics I think that the HEQC needs to start working towards
finding ways to accommodate those kinds of research and setting standards. Proper standards for the measurement of that kind of research. And not just to reject it cause it doesn’t fit other kinds sort of standard university based research. We have this problem here how do we really assess action research action learning. And I think the sector could do with help from the HEQC in setting those standards. And if they could do that it would be wonderful.
What background knowledge can you share on the process of production / policy formulation of this policy instrument for the re-accreditation of MBA programmes?

Well the process started in 2001, I think, or actually in 2000, when I started having contact with the CHE and they were thinking then about tackling the MBA. I have an idea that it came about because someone, one of the private Schools had taken the Minister to court about a decision on preliminary accreditation of an MBA. And then during 2001, I was commissioned by the HEQC to research the potential for accrediting the MBA in South Africa. And what I did was I looked at two things, the one was international accreditation systems and that piece of work I did shortly after I had completed being the project manager for the EQUIS self assessment here at A. So I had had experience of preparing a self-assessment submission for EQUIS. It is a label that is awarded by the European Foundation for Management Development, which is a membership body that has an accrediting unit, which runs this EQUIS process. But EFMD attracts membership from across the educational and business sector. But its focus is on management education and development, and it does all sorts of things, so it also has an interest in executive education and MBA programmes.

I looked at international accreditation systems and where they had come from and where they currently focus and what the implications are for Business Schools and the sorts of criteria that they use to assess Business Schools and MBA programmes because not all of them assess both. The second system that I looked at was AMBA, which is British. AMBA stands for the Association of MBAs and it accredits MBA programmes. Then there’s EQUIS and the ASCSB, which is the American body that looks at Business Schools. But I think also accredits MBAs and programmes in financial management. So I looked at these and I gave an overview of these systems and what they’ve had on MBA provision, internationally. And I also looked at what was going on in terms of the design and delivery of MBA programmes and what the trends were. And that document was meant to be a proposal to the HEQC for a review of MBAs. But the brief that I received, and I’m sure you’ll be quite empathetic with this, the brief evolved over time and it started out rather vaguely.

So that document was submitted to the HEQC and they sat with it for about, more than six months. And then they came back and asked me to put forward a proposal for a review process that would use the services of a number of very experienced people from the Business School sector in South Africa and internationally. And I came up with a budget and it was quite an expensive process. And I think that may have scared them off and there were other things that they were dealing with. And they came back the following year and I think that was when you had put in your proposal for the Improving Teaching and Learning Project and they asked me to come up with something similar for the MBA. And I did, and a proposal of how to do it. And when I submitted that proposal they got into a big twitch because I talked about standard-setting and criteria-setting and they said because of the relationship with SAQA and all the sensitivity and politics around standards-generating they could not be seen to be setting standards for programmes or for qualifications. And so we went to and fro about that for some time. I think they understood that we couldn’t review MBA programmes without having a set of specific criteria. So I think they had to chew over that one and come to terms with it. And eventually we came to an agreement whereby we invited a number of people to constitute a Working Group, which is pretty much on the model that you used for the IT&LP. And through my contacts and my networks I put forward some names and they were very concerned because those names were all white men. So they managed to dig out of the system some black people and some people from private sector whom I knew and we had a meeting. I think from that meeting, they asked me then to distill out of the criteria for the
international accreditation agencies or foreign accreditation agency’s a set of criteria for South Africa. And I did that. And I must say that it was largely based on EQUIS but drawing from AMBA and ASCSB those aspects, which I thought, were good practice. That document was then put into their internal system and Kirti Menon came up with a variation of it and that was put forward to people from a variety of different Schools so there were Wits, GIBBS, Stellenbosch, I went on behalf of A with the then MBA director P and there was someone who was brought in from DeMontford and that’s Kirti’s connections because she did her MBA. And we invited someone from UNISA but they didn’t pitch and I had invited someone from Henley, who also declined, and there was also someone from P E Technikon, in fact he was the most active member of that group. We then discussed those criteria. We had a whole day’s meeting and we set some standards, such as the minimum number of contact hours, qualifications of academics teaching on the programme, basic content, some sort of basic ground rules. And I then went away and I documented that and I sent it out to this Working Group for comment. I received comment from only two people. And then it kind of went into the doldrums and then the HEQC came back to me and said ‘Look you get on and set the criteria’. So I set the criteria for the Review for the MBA. They then took that back into their internal system and I have an impression that Kirti may have worked on it again and revised the criteria that I set probably based on the work that the IT&LP was doing at the time. Initially they weren’t happy with the criteria because I had also described some more detailed assessment criteria or standards that would be used to measure performance. Initially they just wanted to send out a set of very open-ended questions. And I pointed out to them that if they did that they were likely to get a lot of ‘marketing speak’ and a lot of irrelevant information because people don’t understand the questions so they don’t know how to interpret them. And that was based on my own experience as an evaluator of other programmes for the HEQC. So they did eventually send out a very detailed document and I know they used the early work of the IT&LP to add meat to my criteria. I was then meant to project manage this whole process. But in August last year I decided not to, based on other opportunities that were coming up for me, but primarily because I was concerned about their own capacity to resource it, and also the calibre of person they were offering to help me to do this. So I withdrew. So then my contact with that process came to an end. And I don’t know who ran it for them internally but I have the impression that Kirti was an important player.

But essentially they added things to the criteria related to diversity and access and redress, which were obviously not part of the foreign criteria and checked them against the IT&LP’s Guides to Good Practice. EQUIS does have a section on ‘service to the community’, which I think they adapted to local conditions.

1. **Do you think that the policy instrument is credible? And based on adequate expertise?**

I would say that the process for formulating it has been a bit haphazard. I suppose it was the best that they could do with the resources that they had; and the access to expertise that they had. Whether it will stand up to scrutiny I don’t know. I believe that they have been criticized for being too reliant on the EQUIS system. And I think it was the former Director of the WITS Business School who said ‘Why should we have to fill in a questionnaire based on the EQUIS system when we could just apply to EQUIS for accreditation?’ And as you can hear from A, the fact that they’ve been through the EQUIS system (and the same applies to Stellenbosch) made it much easier for them to deal with this. But you know the reality is that MBAs are an international product and so a good MBA should be scrutinized in terms of international criteria, that’s my belief, and they seem to have accepted that. At one point in fact, they were talking about the possibility of entering into agreements with foreign accrediting bodies whereby any MBA programme that’s been accredited for
example by EQUIS, that the HEQC would simply accept that. But I think they walked away from that one.

I think politically they would’ve had a huge problem with that in South Africa. Here they have to make everybody jump through the same hoop. Now there may be arguments that the criteria from the foreign bodies are designed to accommodate MBAs in the developed world and so there may be people who want to argue that are those criteria are appropriate in South Africa. But I think for an MBA programme to be worth it’s salt, a local accrediting body cannot afford to dumb down on it’s criteria, primarily for the top end of the market, for example with EQUIS, one of the first questions they ask is ‘Are you accredited by your local accreditation agency?’ and if you aren’t they won’t even look at you. So I also think that the policy instrument is credible and based on adequate expertise. And that’s not just because I was involved with it, but I think that it is based on well-researched criteria from a number of different sources. Has it been sufficiently locally contextualised? I don’t think so; I think the local consultation process could have been more comprehensive. But then one has to look at the willingness of the local MBA provider community to participate in that. And I think that possibly they would be more willing now, having had to jump the hoop, because then it was a bit of a black box for them. I think that many of them, particularly at the top end of the market, thought that this is kind of a necessary evil that they had to do for legal purposes, but their real focus was on the foreign accreditation bodies. And I suspect, at the top end of the MBA market here, that will still be the case but now they may be more willing to take the HEQC seriously. And I can comment on that from the provider’s side because I did help to two local MBA providers to prepare their submissions for this process.

So I think when you say credibility, probably credibility to the local market would be improved had there been wider consultation, had it been possible. And I think that there were two issues, one HEQC’s resource base to do that and secondly the willingness of people to participate. I don’t think the HEQC can be blamed for it, but they could be taken to task for it, especially by those who are not satisfied by the outcome of their review. And there may be a case to be made for how representative was the process or how inclusive was the process of compiling the criteria?

2. **What in your opinion are the instruments strengths? Weaknesses?**

I think the strength of the MBA re-accreditation instrument is that it is a very comprehensive look at the programme and its context. And for those who stand up to that scrutiny I think would be able to say with confidence that they are providing quality MBA programmes that are properly resourced. And for those who don’t, it sets the benchmark. However it depends on whether HEQC draws the line and that is I think the question that everybody has. It will be very interesting to see what drives those decisions in the end, whether it will be educational or political - who’s going to get full or conditional accreditation and who’s not going to be accredited. I’m very interested to see the outcome of that because they will be taking a stand in the most hotly contested programme that is offered. You know they couldn’t have chosen a hotter potato to start with because there are huge amounts of vested interests in MBA, there’s institutional credibility, institutional branding and lots of money at stake, especially in the private sector.

Another weakness is that they are relying on a volunteer base of peers for the panels. I’ve worked on the panels and some of the panelists couldn’t use the instrument properly. They had difficulties interpreting the questions and making decisions. Regarding the instrument, it
should be fairly robust and be able to discriminate, but it is repetitive and in some places too vague in others pinickety.

I think that one of the HEQC’s intentions with this process was that it would also refine the instrument, so they said that they would ask the providers for feedback. Whether they will do that or not I don’t know.

3. What has been the response of institutions to the instrument and to the site visits?

My exposure has been to A, to Gibbs, to Henley and then right at the beginning it also involved PE Technikon, WITS and Stellenbosch. They all saw it as a good thing, at least officially. The top end of the institutions were of the view that it was a necessary evil and didn’t take it too seriously. But I think once the process started rolling out and they got to grips with the nature of the instrument and the amount of work it was going to take to respond to it, and then there was a sharpening up. Certainly here and I think it’s beginning to be taken very seriously. One business academic for whom I’ve got a very high regard having initially discounted it and said ‘Oh they just have to go through the motions you know’. He later took it extremely seriously. I was asked to read the submission on a number of occasions as if I were an evaluator and to give them feedback. He flew me to Jo’burg for a full day’s briefing to prepare for the site-visit working strategically through what are their weaknesses how are they going to address it. What are they going to say where are they genuinely weak and what they need to do and to say to the panel to give them an impression and what do we need to do to make sure that we will look credible in the longer term. He took it extremely seriously.

What about the response of institutions to the site-visit?

I just heard comments from R and you heard what she said that not everybody had read the documentation. Other comments here from Prof. Q, he’s the designer of the Executive MBA and he’s the immediate past Director of the MBA so he was part of the panel for that programme. He said one of the panel members who was from one of the private institutions questioned the validity of the research done by the students on the Executive MBA programme because it’s qualitative and said that qualitative research is an easy option and Tom just went ballistic! He said ‘Who are these people? How can they come here and judge us when that is their level of understanding of research? In my opinion some of the HEQC panelists were very lightweight and just not credible. Some of them reminded me of SAQA’s SGBs, they were just there to earn brownie points for themselves, opportunists. But I think the HEQC’s hands were tied politically…politically because I think they had to be representative, so again they were driven by politics. I mean my view is that the people who should be on this panel should be people who have a track record of teaching on credible MBA programmes and directing. And that the Chairs of the panels should have been people who direct MBA programme or people who have been Directors of substantial Business Schools. But then the HEQC would have problems because they would all be white males.

What problems have you noted or do you anticipate with respect to implementation of the HEQC’s policies?

Problem wise I think the biggest problem is where they draw the line. Who gets through? And on what basis? Who gets through with full accreditation who gets through with conditional and who doesn’t get accredited? And that is going to place the HEQC under an enormous amount of pressure. And I don’t know whether they have got to grips with that. And so my concern is that we might end up exactly where we are now, with all of these MBAs you know the sort of rats and mice MBAs and with a nice report on the ‘State of the MBA in South Africa’ that will gather dust on everybody’s shelf. And I think the HEQC have got to earn a lot of credibility. So they are really between a rock and a hard place and I feel for them. And
it’s one of the reasons I didn’t want to be associated with this accreditation process from their side, I wanted to be on the provider side so that I could choose which providers I could work with, and I was quite careful.

**How do you think academics will respond to the requirements that they will place on them?**

For academics, I think it’s just burdensome and, as you can see, it gets delegated, in this instance to the Programme Director, although I think R undersells herself, she’s more of an academic than she likes to think. But she doesn’t do research, she does teach and she does have a very good understanding of MBA programmes and of Business Education in general. It is very laborious and hence you know the instrument definitely needs to be leaner and more focused. And then the review process needs to have much more credibility to balance it out so that it stands up to scrutiny.

I mean I would hope that any institution that is given conditional accreditation would want to make sure that they deal with the gaps that have been found so that they would eventually get full accreditation. Because the implications of not doing that are that they will be closed down. Again it gets back to where the HEQC draws the line. But I think certainly this Business School and it’s EQUIS accreditation is very serious about the requirements that were set by EQUIS. And there’s serious discussion going on in the School at the moment, because it comes up for renewal next year, about taking action to plug the gaps. I think though the question is ‘When do people wake up to the fact that this is a serious process, that the authorities mean business and that people see this as a strategic exercise rather than a compliance sort of tick box thing?’ I think the chickens will come home to roost when the people are told whether they’ve been accredited or not. And that is when people will really get serious. And the institutions that I’ve dealt with are not at risk from a programme quality point of view, the only one that is at risk is Henley and that’s got nothing to do with the programme quality, it’s got to do with their status as a company in South Africa in terms of the Higher Education Act a technicality. There are issues in its programme as well, because it’s a foreign MBA, but they have indicated a willingness to address those things, for example, contextualising the programme. So it’s hard for me to say, I think there’s definitely a sense of ‘Let’s use it in terms of bringing about improvement’ but it’s very much because there are individuals in place who take things very seriously.

**Any further comments?**

Well I think that if they do grant conditional accreditation to institutions those institutions should account on an annual basis for progress in relation to the gaps identified. But I don’t know whether the HEQC has the capacity to deal with it. And that would indicate the degree of seriousness about this. I think my other piece of advice to the HEQC is that they need to lighten up on their attitude towards Business Education and try to understand it in its context and on its terms. You know they’re very resistant to hearing that MBAs are different and Business Schools are different. And in a way I agree with them that we can play the differences to the point where you can’t apply any uniform standards, and I don’t agree with that. But I think one of the things that the HEQC really needs to get to grips with is that there is a market and that the market has power and they cannot legislate the market away. The market will judge and their accreditation will become only one factor in that market. It will be an important one, especially at the bottom end, because it will be their only accreditation. At the top end it’s not so important if you’ve got EQUIS or AMBA accreditation, to have the HEQC accreditation is just a legal requirement. So then it’s not about your standing in the market. And I think they need to just accept that and accept it graciously and live in the global world of Business Education. And it’s not just Business Education anymore, we’ll see it
increasingly with other disciplines as well, Engineering, all those sort of highly professional, highly mobile professional disciplines. It’s just that the MBA is leading the way.

You know if you look at who’s exporting education into South Africa it’s all distance education. And they’re worried about that, and the regulation of it. But they must accept South Africa’s membership of the global market and they must take responsibility for insuring the quality of programmes in a way that is enabling of the market rather, than trying to control the market. I mean if a private institution cannot properly resource an MBA curriculum, they should not be offering an MBA. And I would say the same about a Technikon. They need to show evidence of research, even if it’s applied research, or its contract research. Their academics can’t be teaching hundreds and hundreds of students on the B-Tech and the National Diploma programmes at undergraduate level and lecturing to MBA students and therefore not producing any research, even if it’s only contract research. My exposure to the Technikon MBAs is that there’s nothing there if the research is arriving as a result of consulting work to industry or to business. That’s fine they must do it, even if those documents are confidential documents for a client and the research is then being applied in the insights of business, they must be able to produce that as evidence at a site-visit. But they don’t have those reports. They must show that their academics are not just teaching machines.

I think the other area where they need to do some reflecting is to consult very widely with the provider communities on the research component on the MBA. Initially I was quite supportive of them upping the requirements, but actually the international trends are away from a heavy research requirement, heavy theoretical research, you know it’s much more towards applied research and action learning. And in terms of the programmes churning out practitioners rather than academics, I think that the HEQC needs to start working towards finding ways to accommodate that kind of research and setting standards for it, proper standards for the measurement of that kind of research. They should not just reject it because it doesn’t fit university-based research standards. We have this problem here ‘How do we really assess action research and action learning?’ And I think the sector could do with help from the HEQC in setting those standards. If they could do that it would be wonderful.
APPENDIX 10

Table of Institutional Types in South African Higher Education (pre-2002)

Source: Cooper & Subotsky (2001)
## Appendix 10

### Institution Types in South African Higher Education (pre 2002)
(adapted from Cooper & Subotsky (2001))

#### Universities

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<th>Type</th>
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#### Technikons

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APPENDIX 11

Letter of Thanks
Ms Kathy Luckett  
Senior Lecturer  
University of Natal  
School of Education  
Pietermaritzburg

Dear Ms Luckett,

I am writing to express our appreciation for your work on the current phase of the Improvement of Teaching and Learning Project. In particular, I would like to acknowledge:

- The role you played as coordinator of the project in 2002 and as editor of the first drafts;
- Your valuable assistance with a number of the regional workshops held in the last quarter of 2003, and your feedback from those workshops;
- Your editing of the Resources that you completed by the end of April 2004, in the light of inputs received at the workshops.

On a conceptual level, I have found our interactions in the course of the project rewarding and look forward to exchanging views and ideas in the future.

Yours sincerely,

Dr. John Carneson  
Acting Director  
Quality Promotion and Capacity Development