GOVERNMENT NOTICE

DEPARTMENT OF HIGHER EDUCATION AND TRAINING

No. 580   **6 July 2015**

DEPARTMENT OF HIGHER EDUCATION AND TRAINING

NATIONAL QUALIFICATIONS FRAMEWORK ACT, 2008 (Act 67 of 2008)

DRAFT RECOGNITION OF PRIOR LEARNING (RPL) POLICY

I, Bonginkosi Emmanuel Nzimande, Minister of Higher Education and Training, hereby, in terms of section 8(2)(b) of the National Qualifications Framework Act, 2008 (Act 67 of 2008) publish the *Draft Recognition of Prior Learning (RPL) Policy* for public comment.

The public comments should reach the Department within 30 days of publication of this notice for the attention of Dr S Lloyd at lloyd.s@dhet.gov.za.

Dr BE Nzimande, MP

Minister of Higher Education and Training

Date: 17/06/2015

DRAFT RECOGNITION OF PRIOR LEARNING POLICY

For public comment

March 2015

THE NATIONAL RECOGNITION OF PRIOR LEARNING POLICY

Table of Contents

Contents

Acronyms and Abbreviations

CAT	Credit Accumulation and Transfer
CEO Committee	Chief Executive Officers' (of SAQA and the QCs, and Chairperson of the Inter-departmental NQF Steering Committee) Committee
CHE	Quality Council for Higher Education
DHET	Department of Higher Education and Training
IDNQFSC	Inter-departmental NQF steering committee
ILO	International Labour Organization
LLL	Lifelong Learning
MTT RPL	Ministerial Task Team on a National Strategy for the Recognition of Prior Learning
NAMB	National Artisan Moderation Body
NRPLI	National Recognition of Prior Learning Institute
NQF	National Qualifications Framework
NSA	National Skills Authority
QCs	Quality Councils
QCTO	Quality Council for Trades and Occupations
RPL	Recognition of Prior Learning
SAIVCET	South African Institute for Vocational and Community Education and Training
SAQA	South African Qualifications Authority
SETAs	Sector Education and Training Authorities
ToR	Terms of Reference
UIL	United Nations Educational Scientific and Cultural organization (UNESCO) Institute for Lifelong Learning (UIL)
UMALUSI	Quality Council for General and Further Education and Training
WP PSET	White Paper for Post-school Education and Training

3

1. The Purpose and Scope of this Policy Document

The *Recognition of Prior Learning (RPL) Policy* is a new Policy document.

The National Qualifications Framework (NQF) Act, No. 67 of 2008 gives the Minister overall executive responsibility for the NQF, the *South African Qualifications Authority* (SAQA), the Quality Council (QC) for *General and Further Education and Training* (Umalusi), the QC for *Higher Education* (CHE) and for the QC for Trades and Occupations (QCTO).

This policy is subject to the NQF Act and any revision to it.

The *purpose* of this Recognition of Prior Learning (RPL) policy is to provide a strong enabling policy environment for the further development and implementation of RPL across the post-school education and training system, and across all levels of the NQF. It seeks to provide a firm policy statement to ensure that the objectives of the NQF Act are met, and especially to:

- Facilitate access to, and mobility and progression within education and training and career paths, (section 5 (1)(b) of the NQF Act); and
- Accelerate the redress of past unfair discrimination in education, training and employment opportunities ((section 5 (1) (d) of the NQF Act).

This Policy will also guide the implementation of RPL, especially as regards the roles and functions of the Department of Higher Education and Training (DHET), SAQA, the QCs, the proposed National RPL Institute and the proposed funding mechanisms for RPL implementation.

This policy is based on the report and proposals from the *Ministerial Task team on a National strategy for the Recognition of Prior Learning (RPL)* and the *White Paper for Post-School Education and Training*. It also recognizes a range of RPL-related initiatives, some that have been underway for several years, and others that are being planned for the future, as part of an integrated strategy for policy implementation, which have been developed by SAQA and the QCs. These include:

4

- The revised SAQA National Policy for the Implementation of RPL (approved in March 2013)
- A set of key actions agreed at the 2011 national conference on RPL (captured in a Working Document)
- New insights gained from the 2014 national conference on RPL which focuses on tried and tested tools and templates
- A range of strategic RPL projects being managed by SAQA.

This RPL policy is therefore built on a long developmental trajectory dating back to the proposals in the African National Congress (ANC) policy document for a post-apartheid education and training system, and the proposals from the Congress of South African Trade Unions (COSATU) in the late 1980's. The erstwhile South African Qualifications Authority (SAQA) Act, 1995 expressed these earlier policy directives and mooted RPL as a policy requirement and one of the mechanisms for transformation and redress of the education and training system post-1994.

It is recognized that SAQA initially developed a policy for RPL in 2002, and criteria and guidelines for RPL in 2003. The SAQA policy of 2002 was revised and published in 2013 to align to the NQF Act, No. 67 of 2008 that replaced the SAQA Act 1995. The 2013 SAQA RPL policy provides both a philosophical underpinning for and operational strategies for RPL implementation. This draft policy has drawn on international trends in recognition and validation of non-formal and informal learning and workplace-based experiential learning, such as expressed in the research of the International Labour Organization (ILO) and the UNESCO Institute for Lifelong Learning (UIL)

This draft RPL policy is a strategic policy which places RPL firmly on the national education and training agenda, and holds SAQA and the QCs accountable to perform their roles in relation to RPL as stated in the NQF Act.

5

The *Recognition of Prior Learning Policy* takes cognizance of the considerable RPL-related knowledge and experience gained since the late 1980's through practice and research across the education and training system.

The *Recognition of Prior Learning Policy* will have multiple users. It will be used by:

- The Department of Higher Education and Training (DHET) to:
  - Establish the national RPL coordinating mechanism;
  - Monitor and evaluate the measure to which RPL is implemented across the post-school education and training system; and
  - Ensure that funding is allocated to organizations and institutions to successfully implement RPL.
- SAQA to:
  - Provide advice, information and reports to the Minister of Higher Education and Training about RPL implementation;
  - Fulfill its overarching quality assurance oversight role; and
  - Monitor and evaluate the implementation of RPL; and
- The three QCs namely the CHE, Umalusi, and the QCTO to:
  - Ensure RPL is implemented in public and private accredited education and training institutions and workplace-based skills development providers; and
  - Quality assures the RPL processes in accredited education and training providers.
- Other Government Departments to include RPL within their human resource and skills development policies;
- Business and Industry to promote RPL as a mechanism towards employment opportunities, promotion opportunities and skills development; and
- South African citizens to gain access to further learning, have credits granted for relevant previous studies and experience, and transfer opportunities between education and training institutions.

2. Background to this Policy

6

The Skills Development Act, No. 97 of 1998 (SDA) section 26D (2) (c) and (d) recognises RPL as a route to undergo a Trade test. However, the DHET has not previously *published* a RPL policy, and has relied on the SDA, the SAQA Act and the current NQF Act to ensure that RPL policies have provided an enabling environment for RPL to be implemented on a national scale across the education and training system. This has not happened as envisaged in previous and current legislation and the White Paper for Post School Education and Training (WP PSET). It is important, therefore, at this stage of NQF development, - (especially in the light of the urgent needs of the citizens of South Africa to have previous knowledge, skills and competencies recognized towards access, mobility and career paths) - that a national DHET RPL policy can strengthen the impetus towards further development and implementation of RPL. The previous *laissez faire* approach that was adopted towards RPL, meant that RPL was not taken seriously enough and there were no incentives to implement and embed RPL in the education and training system.

DHET recognized the importance of the *National RPL Conference: Bridging and expanding existing islands of excellent practice* hosted by SAQA in February 2011. The SAQA conference brought together findings from RPL-related research and practice to date, to address the three identified themes: 'Resourcing RPL', 'Effective delivery of RPL', and 'Quality assurance of RPL'. One of the conference outputs, the *Resolution and Working Document on RPL,* included conference agreed-upon actions needed for resourcing, delivery, and quality assurance of RPL. A key resolution was the request to the Minister of Higher Education and Training to establish a RPL Task Team to conduct research and present findings and recommendations in the form of a report to him. A Ministerial Task Team on a National Strategy for RPL (MTT RPL) was established on 27 January 2012, with clear terms of reference (ToR). These ToR required the MTT RPL, amongst others, to:

- Develop a national strategy for the wide-scale implementation of RPL in the post-school sector;
- Advise on personnel, training and quality requirements of a national RPL strategy, including the feasibility, structure and function of a national RPL institute;
- Advise on the legislative requirements for implementation of the national RPL strategy;
- Advise on resource implications of the national strategy;

7

- Devise a funding model to support the national RPL strategy;

- Advise on the roles and responsibilities of all major relevant parties in the implementation of the national RPL strategy, including DHET, other state departments, education and training institutes, the National Skills Authority (NSA), Sector Education and Training Authorities (SETAs), and the QCs; and

- Advise on any other matter that would advance the systemic application of RPL in the post-school education and training system.

The MTT RPL completed its work and submitted a report, with findings and recommendations to the Minister in January 2013. This RPL policy uses the recommendations as a significant point of reference. This policy also draws on the White Paper for Post-school Education and Training (WP PSET) which was approved by Cabinet on 20 November 2013. The WP PSET clearly states that "RPL remains a key approach to redressing past injustices and recognizing competence gained through practical workplace learning and experience. There have been problems in obtaining a common understanding and approach across the post-school system" (WP PSET, 2013: 73). This RPL policy will provide the clarification and enabling environment to address the challenges and approaches to RPL implementation.

RPL, in the view of the MTT RPL and underscored by the DHET, will enhance economic, environmental, social and personal development. RPL is emancipatory, can and should provide access to lifelong learning opportunities, and to the global knowledge economy.

This policy draws on the models of the South African Institute for Vocational and Continuing Education and Training (SAIVCET), the Career Development Services (CDS) directorate and the National Artisan Moderation Body (NAMB) to underpin the model proposed for the National RPL Institute (NRPLI). This RPL policy is also informed by the SAQA RPL policy and the report from the SAQA RPL conference of February 2014.

3. A national strategy for wide-scale implementation of RPL in the post-school sector

8

RPL must be seen as a key feature of a lifelong learning (LLL) system alongside a range of related strategies, mechanisms and education and training opportunities. RPL carries specific significance as it is central to an inclusive, democratic education and training system. It is part of a national drive, under the oversight auspices of the DHET, to build a learning culture in every family, village, township and city.

RPL has a dual purpose: on the one hand, social justice; and on the other, access to or advancement through credit accumulation and credit transfer, to opportunities for lifelong learning.

For RPL to be fully expressed as part of a democratic learning system, it needs to be given concrete expression in the policies and practices of statutory bodies such as SAQA, the three quality councils, education and training organizations, institutions, and the work of RPL practitioners. Since RPL is part of the wider education and training system, and other parts of the system will impact on the success of RPL implementation, clear coordination of RPL through coordinating mechanisms, roles and responsibilities will be spelt out in this policy.

4. The legislative mandate provided through the NQF Act

In accordance with the NQF Act, section 2(b) which requires the Minister to determine policy on NQF matters in terms of the NQF Act, and to publish the policy in the *Gazette*, this RPL policy is determined as the overarching national RPL policy to frame other policies and guidelines developed by SAQA, the QCs and education and training institutions and other relevant stakeholders. The section 2 in this policy *Background to the Policy* provides reasons for the need to develop this policy.

SAQA is mandated by the NQF Act, to develop policy and criteria, after consultation with the QCs for RPL, assessment, and credit accumulation and transfer (CAT) (Section 13 (1) (h) (iii). The QCs are mandated to develop and implement policy and criteria, taking into account the policy and criteria contemplated in section 13(1)(h)(iii), for assessment, RPL and CAT.

In determining and gazetting the DHET RPL policy, the legislative mandate provided for in the NQF Act has been relied upon. Similarly SAQA's RPL policy is also published in terms of

9

the NQF Act. The QCs shall publish RPL policies which align with this RPL policy and the SAQA policy, and shall advocate their respective RPL policies to their respective education and training institutes.

5. A National RPL Institute

5.1 The NRPLI as a coordinating mechanism

A strong driver and coordinating mechanism is required to ensure that RPL is further developed and implemented on a wide scale across the education and training system. The DHET recognizes that this strategy would best be served by establishing a National RPL Institute (NRPLI). This Institute should be established in two phases, to ensure that the urgency to establish a coordinating mechanism is realized, and to ensure that there is sufficient time to legislate the establishment of the RPL Institute.

5.2 The model for the NRPLI

a) In establishing the NRPLI, the model is drawn from SAIVCET, the National Artisan Moderation Body (NAMB) and the National Skills Fund (NSF) in DHET. The NAMB model provides input into the conceptualization of the NRPLI. In the first phase, the NRPLI will be established by DHET within Branch H: Human Resource Development (HRD), Planning and Monitoring Coordination. The Branch will report quarterly about the progress made in RPL implementation across the education and training sector, the quality of RPL implementation, and barriers to RPL implementation which will require legislative amendments. The information for these reports will be provided by SAQA and the QCs.

b) It is possible that after the initial set-up phase, that the oversight of the NRPLI could be revised after a period of time, to allow sufficient time for an impact study to be conducted about the work of the NRPLI on wide-scale RPL implementation across the education and training system. The outcome of the impact study will guide the

10

second phase which will comprise the publishing of a form of legislation to be decided by the Minister.

c) The second phase should be implemented within five years of the establishment of the NRPLI.

d) The roles and functions of DHET in terms of the NRPLI are set out in section 6.1 of this policy.

5.3   The Funding of the NRPLI

a) It has been recommended by the MTT RPL that no new contributions from the fiscus will be necessary; rather the funding and resourcing model is based on making optimal use of what already exists in the education and training budget. The MTT RPL recommended that the NRPLI be primarily state-funded.

b) It is recognized that it has been difficult to quantify the costs precisely related to RPL development and implementation. In the first phase of the establishment and life of the NRPLI, state funding will be the primary source of funding and resourcing. It is also recognized that reasons given for the slow and *laissez faire* approach to implementing RPL is partly due to the costs associated therewith. The funding of the NRPLI must be differentiated from the funding required to support and drive wide-scale implementation of RPL across the education and training system. Cost estimates of the costs associated with the setting up and operational expenses of the NRPLI unit in DHET will be provided to the Minister and annually reviewed. In developing this cost estimate, DHET can draw on its experience in setting up the Career Development Services (CDS) and the Central Admissions System (CAS) and SAIVCET.

c) An allocation from the National Skills Fund (NSF) will be utilized to fund the first phase of the establishment and operations of the NRPLI as the work of the Institute is of national importance and is applicable across the entire education and training system.

d) Based on advice from the NRPLI, a funding schedule on allocation of funds to public education and training institutions will be developed and published annually by the NRPLI, under the auspices of DHET.

11

e) The NRPLI will advise the Minister annually on a funding schedule for allocation of funds to public education and training institutions to address teaching and learning gaps identified during a RPL intervention.

6. Roles and responsibilities for the implementation of RPL

As stated in section 3 of this policy, the national RPL implementation strategy relies on a number of role-players and stakeholders. The key bodies are the DHET, SAQA, the three QCs, the NRPLI and education and training providers and practitioners.

6.1　Responsibilities of DHET

DHET will be responsible to:

a) Provide the legislative and policy framework for the establishment of the NRPLI and its functions and funding mechanisms. A particular amount to be determined in consultation with the National Skills Authority (NSA) and the National Skills Fund (NSF) will be set aside to be utilized as a national RPL fund, to fund the implementation of RPL programmes and projects across the education and training system);

b) Establish an additional function within the DHET, to establish the NRPLI and to provide quarterly reports about the implementation and performance of the NRPLI;

c) Consider advice from SAQA and the QCs about all aspects related to the development and implementation and funding of RPL across the education and training system.

d) Establish a funding mechanism for the NRPLI;

e) Establish a RPL implementation fund, using a model similar to the model used by the National Student Fund (NSFAS), which will be available for RPL implementation across the education and training system; and

f) Receive reports from the NRPLI about its management of the RPL implementation fund.

12

6.2   Responsibilities of SAQA:

SAQA will be responsible to:

a) Provide bold overarching leadership to the QCs as they ensure RPL implementation takes place across the education and training system;

b) Monitor and evaluate the quality assurance of RPL by receiving reports from the QCs, and support and guide the QCs in this regard;

c) Provide such advice, guidance and support to the NRPLI as is necessary to ensure that the NRPLI becomes and remains a going concern and is sustainable;

d) Support the communications and advocacy initiatives of the NRPLI as required; and

e) Conduct a sector-wide study of a feasible and sustainable model for RPL quality assurance across the education and training institutions. SAQA must consider input from the QCs, SETAs, higher education institutions (HEIs), technical and vocational education and training (TVET) colleges, professional bodies, organized business and organized labour and other organizations and institutions in the research.

f) Ensure that the QCs develop certification policies which include statements that certification does not differentiate on the mode of assessment used to certificate. Certificates will not state that the learner has achieved the certificate through RPL.

6.3   Responsibilities of the NRPLI

The responsibilities that the Institute will perform are the following:

a) *Professionalization*: Establish a forum, which could take on the form of a professional body, and a register, through which educators, lecturers, RPL practitioners and skills development facilitators will be registered on a register known as a RPL practitioners register and will receive support, opportunities to grow technical knowledge and skills to implement and improve RPL practice;

13

b) *Management of information*: Submit such data in a format to be determined by SAQA for the recording on the National Learners' Records Database (NLRD) of registered and accredited RPL providers and RPL practitioners, plus learner records;

c) *Research:* Direct and commission research, in partnership with SAQA and the QCs, to examine new technologies that support adult learning; identify best practice across RPL implementation environments; identify and provide solutions to barriers to wide-scale RPL implementation; benchmark with international practice; and provide new and leading research into widening access to RPL;

d) *Register* as a central assessment centre;

e) *Support and Advice*: Support and guide education and training institutions and stakeholders to develop clear assessment criteria for learning outcomes resulting in credible, relevant and valid assessment tools.

f) *Policy development*: Support and guide institutions to develop RPL access policies, CAT policies and processes.

g) *Advocacy and communication:* Communicate with a wide range of stakeholders, role-players and the general South African public about the NRPLI and its activities. The Institute will also be required to conduct and facilitate activities that promote the public perception of RPL.

h) *Collaboration with the Career Development Services (CDS):* The NRPLI will liaise and collaborate with the Directorate responsible for the CDS. This collaboration can take many forms, such as partnership roadshows to advocate RPL in career path planning, CAT in career paths, and lifelong learning as part of career development;

i) *Referrals* of learners to institutions to deal with knowledge and skills gaps identified during a RPL process;

j) *Moderate* RPL implementation at education and training institution and other RPL sites of delivery, and work collaboratively with institutions to address areas of challenge; and

k) *Reporting*: Provide such reports to the Minister as are required.

6.4   Responsibilities of the QCs

14

The QCs will be responsible to:

a) Develop their RPL policies and ensure that these policies are aligned to the Minister's policy and to the SAQA RPL policy;

b) Work with DHET, through the mechanism of the Chief Executive Officers' (CEO) Committee and the NQF implementation Framework 2015 – 2019 to ensure that the NRPLI can function and remain sustainable and operational. The CEO committee comprises of the CEOs of SAQA and the three Quality Councils and support staff, the Chairperson, Chief Director of the DHET Legal and Legislative Services and secretariat of the of the Inter-departmental NQF Steering Committee ;

c) Directly work with the accredited providers to ensure that these providers have RPL policies and are implementing RPL per institution and organization;

d) Certificate learners who achieve qualifications or part qualifications through a RPL route;

e) Robustly advocate RPL as a means for access, articulation and CAT within and between the sub-frameworks; and

f) Provide quarterly reports to SAQA for inclusion in the Chief Executive Officer's (CEO) Committee about the implementation of RPL across their accredited provider base. The CEO Committee comprises the CEOs of SAQA, the three QCs and the Chairperson of the inter-departmental NQF Steering Committee, and advisory staff.

6.5 The Responsibilities of education and training providers and practitioners

Education and training providers will be responsible to:

a) Establish policies to manage access via RPL into the institution. The RPL policy should allow a minimum of 5% of students who access the institution to do so through the RPL route;

b) Establish policies which clearly establish articulation routes within the institution, through the mechanism of credit accumulation and transfer (CAT);

c) Provide reports about the progression of RPL students within the institution, which will inform further development of RPL research and future policies and legislation;

15

d) Work collaboratively with SAQA, the QCs and other education and training institutes to ensure that challenges and barriers to wide-scale RPL implementation become known, and are mitigated;

e) Consider establishing an institutional forum of RPL practitioners which will be part of the NRPLI forum, and register all RPL practitioners in the institution with the NRPLI.

7. Funding for RPL Implementation

a) The MTT RPL report, the SAQA RPL conference reports and RPL implementation reports from SETAs and HEIs have highlighted sustainable funding as a clear barrier to wide-scale RPL implementation. It is not without consideration and reflection that a solution to this issue is proposed. The NSF has been a source of sustainable funding for skills development for 15 years. The NSF currently receives 18% of the skills levy to fund diverse skills development projects.

b) It is possible that RPL implementation would become feasible and sustainable if there were a secure and regular funding source for at least the next five year period, as the first phase of this RPL policy is implemented.

c) A particular amount to be determined in consultation with the NSA and the NSF will be set aside for allocation to the NRPLI to establish and manage a RPL Implementation fund. This fund will be annually monitored and audited and will be re-considered in the second phase of policy and legislative development related to the wide-scale implementation of RPL and the NRPLI.

16