



***COUNCIL ON HIGHER EDUCATION***

**HEQC COMMUNIQUÉ TO HIGHER EDUCATION  
INSTITUTIONS AND OTHER STAKEHOLDERS**

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# 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:

1. Outlines of the HEQC's audit and accreditation activities in the quality assurance cycle: 2004-2009.
2. Short courses, registration of assessors and recognition of prior learning (RPL).
3. Comments from stakeholders on the HEQC's discussion document, *Proposed criteria for the HEQC's first cycle of audits: 2004-2009*.

## **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 programmes<sup>1</sup> will be accredited, in order to ensure that only programmes of good quality enter the higher education system.

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<sup>1</sup> 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 or 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<sup>2</sup> programmes 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 programmes (such as the HEQC's present MBA review), which may be linked to accreditation decisions, will be undertaken 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): 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 programmes 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 programmes.
  - (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, in the re-accreditation of existing programmes through national reviews and in level three (programme development and review; student assessment) scrutiny during audit visits. Full-scale re-accreditation of existing programmes will commence only at the beginning of the next quality assurance cycle (2010-2016). This applies to re-accreditation of existing programmes of institutions without self-accreditation status, which will be conducted by the HEQC, and re-accreditation of existing professional programmes 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 programmes 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 programme evaluation will be provided in the HEQC's final *Programme Accreditation Framework*, which will be released shortly.

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<sup>2</sup> Existing programmes are programmes 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<sup>3</sup> which are offered by HEIs to be quality assured by the relevant Education and Training Quality Assurers (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.

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

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<sup>3</sup> As defined by SAQA, a short course is any programme less than 120 credit points.

HEQC's audits will provide the opportunity to scrutinize institutional arrangements for assessor choice and training and criteria have been 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 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. Comments from stakeholders on the HEQC's discussion document, *Proposed criteria for the HEQC's first cycle of audits: 2004-2009***

### **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.

<b>Institutions</b>	<b>Number received</b>
Universities	16
Technikons	7
Private Providers	17
SETAs	0
Professional Councils	4
Individuals	1
University and technikon umbrella organisations	2

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<sup>4</sup> in the first cycle of audits. Some concerns

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<sup>4</sup> Level 1 refers to 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.

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).

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Level 2 refers to 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.

Level 3 refers to 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.

### **3.3.5 The decision-making process and consequences of audits**

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.