



**‘The National Qualifications Framework in
South Africa: a democratic project trapped in
a neo-liberal paradigm?’**

**Stephanie Matseleng Allais
South African Institute for Distance Education (SAIDE)
E-mail: Matselenga@saide.org.za**

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ABSTRACT. Much criticism and debate about the South African National Qualifications Framework (NQF) has been about issues relating to implementation. Instead, the article argues that the problems with the NQF are fundamental to the way in which it has been conceptualised. The NQF was designed on the one hand to contribute to the drive for international competitiveness, and on the other hand to democratise and transform an elitist, discriminatory, and divided education system. The article argues that the drive towards democracy and the neo-liberal economic agenda have been incompatible, and that the pressures of the latter have been dominant. However, the location of the NQF within a democratic project in South Africa has meant that it has been seen as an egalitarian and transformative project, and has insulated its basic assumptions from criticism. Its approaches, policies, and mechanisms, which were designed to replace apartheid education, have come to be perceived indistinguishably from their mission, even when they are in fact not achieving it.

The significance of the South African National Qualifications Framework (NQF)

The NQF in South Africa was introduced as a key mechanism for creating a more egalitarian education system. Some of its stated objectives are: to facilitate access to education and training; to facilitate mobility and progression within education, training, and career paths; to enhance the quality of education and training; to accelerate the redress of past unfair discrimination in education, training and employment opportunities; and to contribute to the full personal development of each learner and the social and economic development of the nation at large (SAQA Act of 1995).

Many hopes were pinned on the NQF. It was regarded as a transformative instrument, which would 'expand the ways in which people are able to acquire learning and qualifications of high quality' (Departments of Education and Labour 2002). It was to be a mechanism for the integration of education and training. Curriculum innovation would be encouraged in response to community and industry demands (Gewe, 2001:135). Learning opportunities would be opened for the disadvantaged, and would ensure that learners could progress through articulated qualification levels and coherent career paths (Departments of Education and Labour 2002). Qualifications would transcend institutions; it would be the quality and relevance of the learning that would be important in determining a person's educational status, not the institution that she or he had been lucky or unlucky enough to attend (Ed French¹, personal communication, 2002; Departments of Education and Labour 2002:12).

The ambitious list of objectives which this single policy mechanism was supposed to achieve, however, is less daunting than the political project of the NQF. For South African educationalists the NQF was an important part of the transition to democracy, and has been symbolic of the development of a single education system for all South Africans. The idea of an NQF became a point of convergence for different groups. The

¹ Ed French is an adult education expert who was closely involved with the initial conceptualisation and establishment of the NQF.

idea resonated with organisations across the political spectrum, and obtained a high degree of support from educationalists in many different communities. It also seemed to articulate the concerns of a diverse range of contemporary thinking on education and training policy. This convergence is expressed in a recent report² on the NQF:

It was characteristic of South Africa's transition to democracy that people of different political persuasions, bodies working within the formal schooling, training and higher education sectors, public servants and organised business and labour were able to find a strategic patch of common ground ... The National Qualifications Framework was established as an emblem and an instrument of the single national high-quality education and training system that democratic South Africa aspired to create.

(Departments of Education and Labour 2002:5).

The NQF was introduced to South Africans through the education policies and debates within the trade union movement, and more broadly within the broader liberation movement. Partly because of this, many have seen the NQF as driven by a strongly egalitarian social project:

It is evident that the NQF vision is propelled by a strong version of the social project ... [for egalitarianism and empowerment] driven as it is by the major African National Congress-aligned trades union federation through the medium of the National Training Board (NTB).

(Muller, 2000:96)

Muller's assertion is based on what was a general perception or belief in South Africa—that the project of the ANC government from 1994 was a fundamentally egalitarian one. South Africans have tended to locate the NQF within South Africa's transition from authoritarianism to democracy; a transition which has captured the imagination of many around the world, and has had the support of the majority of South Africans. However, less in the public eye both locally and internationally was another transition, which happened at the same time—the transition from a highly regulated and relatively isolated economy to a neo-liberal or 'open market' economy (Desaubin 2002). While the ANC has led the democratization process, it has also the process of liberalizing the South African economy, with the consequence of increased economic inequality together with increased formal democracy.

Early critical analyses of the NQF within South Africa have focused on the competing discourses that have shaped its development. They have argued that on the one hand the NQF is driven by the goals of social justice, egalitarianism, redress, and empowerment, and on the other hand by concepts of flexibility, mobility, and re-trainability (for example, Muller 1996; Cooper 1997). The focus on competing discourses sees them, at least implicitly, as equally poised to drive the NQF in different directions. This article instead argues that while the rhetoric within which the NQF has been developed in South Africa can be located firmly within the former transition (to democracy), the content of

² This report, commissioned by the Departments of Education and Labour to investigate problems with the implementation of the NQF, is discussed below.

the NQF in fact is more derivative of the latter transition (to a neo-liberal economy). It argues that the euphoria of the transition to democracy has to a large extent disguised the real nature both of the broader economic policies of the new South African government, and also more specifically of its education policies.

The article begins by exploring the origins and development of the NQF in South Africa. It then explores some specific aspects of the NQF, and suggests that the problems with implementation are associated with a marginalisation of curriculum and pedagogic issues within the NQF approach, and its tendency to close down debate. It is argued that the specificities of the way the NQF has been conceptualized, as opposed to the broad rhetoric within which it is described, provide evidence for the assertion that the NQF is more derivative of a neo-liberal project than of a democratic one. It is hoped that this analysis of the South African experience sheds light on the broader political and economic factors that underlie the international interest in NQF-led approaches to educational reform.

The origins of the NQF in South Africa

Sedunary (1996:384), in a nuanced discussion about the relationship between 'progressive education' and the 'new vocationalism', explains the notion of a 'social settlement' in capitalist societies as 'a framework of compromise in which inevitably contradictory interests are reconciled to their perceived mutual benefit and in which attendant ideologies delimit the grounds of action and conflict'. This notion of 'settlement' offers a useful handle not only on the South African transition from apartheid, but also on the education policies that have been adopted.

Education was for a long time a major source of discontent in apartheid South Africa, and was often a rallying point in the broader struggle against it. Shortly before the African National Congress (ANC) came to power in 1994, there was a range of policy generating processes in South Africa—in the ANC and the broader liberation movement (most significantly in the trade unions), in the apartheid state, and in the business community. These apparently ideologically divergent processes all tended to converge around the idea of an NQF.

In the early 1990s, the Congress of South African Trade Unions (Cosatu) and its various affiliates, in particular, the National Union of Metalworkers of South Africa (Numsa), engaged in intensive discussions about education and training. They were primarily informed by an analysis of the poor pay and lack of career opportunities for black workers. These discussions led to a range of policies aimed at breaking down barriers to education and training, and at linking the world of education and the world of work.

Numsa's ideas were heavily influenced by their engagements with representatives of the Australian Metalworkers' Union. Influential trade unionists in South Africa became convinced that greater prosperity and better working conditions had been achieved in Australia through an industrial compact between labour, the state, and business (see the article by Keating in this issue). Like many on the left internationally, key left wing thinkers in South Africa had come to believe that the future role for the state in relation to

the economy was to attempt to make the economy more globally competitive, instead of focusing on improving the provision of welfare or on a more fundamental economic restructuring in favour of the poor. Within this paradigm, flexible specialisation was seen as the route to national economic survival, premised on high-tech, high quality production, which in turn were premised on co-operation between government, business, and organised labour leading to the creation of a highly skilled labour force (Von Holdt 1991). The strategic economic edge could be achieved through training and skills development, and the effective use of ‘human resources’ (Samson 1999, Spreen 2001). The low level of skills in South Africa and the crisis-ridden education system were seen as the major barriers to economic development.

The language used by the unions was militant—managers would be forced to seek the cooperation of workers. However their priorities, although often contested, were more limited and focused on productivity: making the SA economy competitive in the international capitalist economy; and bringing the benefits of more jobs and a greater spread of wealth, higher wages, and increased skills (Von Holdt 1991:24). The education and training policy which emerged was designed with the intention of preventing workers from getting stuck in unskilled or semi-skilled jobs. It was linked to an argument that competency-based grading would be beneficial to workers. This argument stated that workers were discriminated against because of their lack of formal qualifications, but often they had the necessary skills and knowledge. They would therefore benefit from being tested on what they knew and could do, and being paid accordingly. Numsa’s slogan at this time—‘from sweeper to engineer’ was a romantic testimony to the belief that the new education policies would enable workers to learn and work their way to the top.

Other groupings within the ANC and the broader liberation movement that were engaging in debate about future education policies were influenced by Cosatu’s approach. Many in the broad democratic movement were pushing for the creation of a coherent, nationally integrated education system, to replace the fragmented and disjointed provision that was the creation and legacy of apartheid. There was also a strong call from activists involved in adult basic education for nationally recognised certificates (Ed French, personal communication 2002; Aitchison 2002). The debates converged on the recommendation for ‘a national vocational qualifications system fully integrated with formal academic qualifications’ (NECC³ 1992:41).

³ The National Education Coordinating Committee (NECC) originated in Soweto in the 1980s to deal with very practical problems of the disruptions of schooling, and never dealt thoroughly or rigorously with curriculum issues. Earlier in the anti-apartheid struggle there had been a feeling that education could not be reformed under Apartheid, and that the broader struggle for freedom was more important; this was captured in the slogan ‘liberation before education.’ In an attempt to get students back into the classroom, the NECC developed the slogan ‘People’s Education for People’s Power’; while Bantu education was bad, education itself could be seen as something positive, and should be struggled for. The ‘People’s Education’ movement, thus, was not a pedagogical movement; it had its origins in a political strategy that was trying to get the youth back into school. There were, in the NECC discourse, notions of anti-authoritarianism, which were expressed to some extent in relation to pedagogy, and largely inspired by the ideas of Paulo Freire. However, it appears that the lack of clear curriculum approaches, and the intense hatred of Bantu education (most commonly associated with rote learning and authoritarian approaches to pedagogy) made it easy for this grouping to be seduced by

There was a tendency in education policy documents within the liberation movement to crudely counterpose a 'high skills' and a 'low skills' route. Educational activists within the liberation movement were presented with a choice between on the one hand, a successful economy driven by the export of high-quality and high-tech manufacturing, with, and caused by, continuous training, and high levels of educational attainment; and, on the other hand, an unsuccessful economy with no export base, high social stratification, and low levels of educational attainment (for example, NECC 1992:3).

In response to a number of economic crises in the late 1980s and early 1990s the apartheid state had increasingly shifted towards a greater role for the market in the economy. Various commissions emphasised the failure of the education and training systems in meeting the needs of the economy, as well as the impact of technological changes, which would further increase skills shortages. These commissions also recommended a competency-based modular approach to training, with industry-based systems of accreditation controlled by employers, and a reduced role for the state (McGrath 1996).

The common belief shared by the mass democratic movement, business, and the apartheid state, was a win-win scenario of high skills and global competitiveness. Education and training were to be the foundations of this future.

The National Training Board (NTB) set up by the apartheid state, which included organised business, organised labour, and specific government departments, was where the various groups came together, and consensus was developed around the idea of an NQF prior the election of the first ANC government in 1994. In 1995 the South African Qualifications Authority (SAQA) Act was passed—the first education and training legislation of the new democratic parliament. This act brought the NQF legally into being, with SAQA as the body responsible for developing and implementing it.

Implementation problems

Ten years after the idea of setting up a National Qualifications Framework first gained prominence and popularity in South Africa, there is much debate on how the NQF is being implemented. Problems are becoming increasingly evident. These include the time taken to register standards and qualifications, the complexity of the systems, and a general feeling of alienation from the proliferation of jargon and the burgeoning bureaucracy (Departments of Education and Labour 2002:143). Much energy has been spent trying to work out the relationships between areas of responsibility of each structure of the system; the more structures that are involved, the greater the amount of time which is needed to negotiate solutions (Parker 2001). Also significant is the slow take-up of the newly designed and registered qualifications. SAQA had generated about 258 qualifications by August 2002, but few learners in South Africa have yet, been confronted with these SAQA generated and registered qualifications (SAIDE 2002). In

the outcomes-based discourse associated with the NQF, which expressed itself as the opposite of both rote-learning and authoritarianism.

other words, the time consuming and costly processes have generated qualifications which have populated a framework, but have not, as yet, been significantly used.

In mid-2001 a Study Group was commissioned by the Departments of Education and Labour to review the implementation of the NQF. The Report produced by the Study Group refers to a 'broad malaise of discontent with SAQA and the NQF' (Departments of Education and Labour 2002:143)⁴.

However, while nuanced and carefully reasoned, the Report essentially argues for a rearranging of the various structures of the SAQA; it argues for a simplified architectural approach. The rest of this article attempts to show that the problems experienced during the implementation of the NQF have deeper origins than those identified by the Report and are in fact inherent to its conceptual assumptions which are a flawed basis for the reform of education and training.

Outcomes-based education and unit standards

The notion of an outcomes-based approach to education and training is fundamental to the NQF (Departments of Education and Labour 2002:12). In most countries where outcomes-based education has had a degree of significance, it has mainly been limited to vocational training; South Africa is the only country⁵ which has attempted to make outcomes-based education a central part of the whole education and training system (Spren 2001:82). Support for outcomes-based education in the anti-apartheid movement derived from a belief in the importance of placing the learner at the centre of the education process. This represented an important shift away from the purely input-based approach that had characterised most South African schooling under apartheid.⁶ South African debates have tended to rigidly juxtapose outcomes-based education and input or knowledge-based education, with the latter being labelled as undemocratic and untransformatory; this reflects the extent to which the previous (apartheid-based) education system was so highly input-driven, often by centrally written textbooks which

⁴ The Study Group was commissioned, to make recommendations on 'the next steps to be taken in implementing the NQF' (Department of Education and Labour, 2002, Appendix B:141); it was explicitly not supposed to question the policies themselves. The Group, which completed its report early in 2002, used the broadest possible interpretation of these terms of reference, and produced a comprehensive report examining a range of different aspects of the NQF. The Report was issued for public comment in April 2002. By December 2002, it was not yet clear which, if any, of the recommendations of the report the Ministers of Labour and of Education would support. There appears to be widespread disagreements between the two Departments. In the meantime, the NQF processes proceed with a high degree of suspicion and uncertainty.

⁵ New Zealand began with a similarly comprehensive approach to a National Qualifications Framework but was unable to sustain it (see article by Phillips in this issue)

⁶ Internationally, this kind of critique of input-based approaches can be seen in the convergence between progressive educationalists and 'new vocationalists'. Sedunary (1996) provides a useful account of the similarities.

openly pushed the narrow ideological agenda of the apartheid state⁷. There was also vehement opposition to rote learning, which was widely equated with apartheid education and contrasted with critical thinking. Thus the introduction of outcomes-based education can be seen as closely associated with the democratisation of South African society.

In South Africa many aspects of what have been referred to elsewhere as 'critical pedagogy' or 'progressive methods' have been linked to outcomes-based education; examples are the emphasis on learners being actively engaged, critical thinking, learner-centredness, relevance, and so on; this explains part of their appeal to South African educationalists in the liberation movement. However, as Ball (1990:28) has shown, in the UK the incorporation of progressive methods into vocational education schemes has not been based on any inevitable relationship between progressivism and liberation.

Internationally, the drive towards outcomes-based education, at least within vocational education and training, has been associated with the introduction of various aspects of neo-liberal economic policy; the dominant market-oriented orthodoxy has given rise to new perspectives on the purposes of education and (often implicit) definitions of what education is (Spren 2001:54). International trends in curriculum reform have been driven by the notion of world-class standards which students must perform against, and which are linked to employment, economic improvement, and international competitiveness. Interest in skills-based, or competency-based approaches to education and training, have arisen in this context. This shift has been also seen as necessary for the development of easily accessible modular courses, which are in turn necessary for a notion of lifelong learning in which the learner is under a continual obligation to 'up-skill' and 're-skill' in order to respond to shifts in the world labor market (Spren 2001:62).

Spren argues that both the adherents and critics of globalization seem to have converged on a belief that education is the route to economic competitiveness; 'Whatever their ideological stance, most educational observers recognize a global trend moving education to the center stage of ensuring economic survival and the growth of nation states' (Spren 2001:56). In this context, many of the international trends in education are viewed unquestioningly as the route to a highly skills, mobile workforce, and therefore international competitiveness. This is partly expressed in the notion of 'world class standards.' Redesigning curricula on competency-based lines has been seen as necessary in order to promote flexible specialisation (Foley 1994:124).

There is no space in this article for a discussion on the problems with and alternatives to the market orthodoxy, and the problems with notions of international competitiveness.

⁷ Outside of South Africa it is widely accepted that this type of dichotomy is not useful, and that the specification of outcomes cannot be the only driver of educational programmes. One critique, for example, emphasises the importance of key procedures, concepts, and criteria associated with different subjects or disciplines. However these are often problematic within the subjects, and are the focus of speculation and debate. They cannot therefore, be designated in a list of learning outcomes (Stenhouse, L. 2002).

The intention in this section is merely to highlight the links between neo-liberal economic policies and the growth of outcomes-based education. It is worth mentioning, however, that contrary to the ‘common sense’ story of internationally competitive industries ensuring national prosperity for all through a highly skilled workforce, it increasingly appears that the highly educated, multi-skilled flexible workers of the future will be the experience of only the minority of workers (Foley 1994:125); the majority will be unskilled and in peripheral and insecure jobs.

The technology of standards setting

South Africa policy formulators have argued that the implementation of outcomes-based education requires *national standards*, defined as ‘specific descriptions of learning achievements agreed on by all major stakeholders in the particular area of learning’ (Departments of Education and Labour 2002:77). The standards approach in the NQF in South Africa found actualization in the mechanism of unit standards.⁸ Unit standards are supposed to be the smallest unit of educational achievement that can be credited for certification.

In the policy formulation processes in which unit standards were being defined, there was much debate about the different roles of education in society, and a strong argument that a narrow approach to skills was not sufficient; education was also about acquiring knowledge. There was also a sense that education had a ‘nation building’ function— that it should attempt to bring together a divided country and help create a national identity. It was therefore eventually agreed that standards must describe outcomes in terms of knowledge to be obtained, skills to be acquired, as well as values and attitudes to be assimilated by learners.⁹ The fact that this debate took place is perhaps testimony to the fact that South African educationalists were aware that outcomes-based education had led to narrow approaches elsewhere. However, they seem to have believed that by introducing a more nuanced definition of outcomes, they would be able to control the technology they were introducing. There is no doubt that education systems teach more than their stated syllabi; it is probably useful, therefore, when designing educational programmes, to draw explicit attention to those three types of outcomes—skills, knowledge, and attitudes and values—as loose areas of learner achievement. But the South African system has separated the process of developing standards from providers

⁸ Unit standards were strongly argued against by many in higher education, and there was eventually a compromise reached, whereby ‘unit standards based qualifications’ and ‘whole qualifications’ were allowed (see also the article by Ensor (pp.) in this issue) The vast majority of the newly designed qualifications are based on unit standards, and the logic of unit standards arguably affects the whole system. It is worth noting, however, that the initial approach was supposed to be that unit standards should be located in qualifications, which should be defined first. This was seen as a mechanism to avoid narrow, atomised standards. The reverse has happened, with most Standards Generating Bodies (these structures are briefly described below) working from standards to qualifications.

⁹ There is no space to discuss here the problems with attempting to specify values and attitudes in terms of achievable and measurable outcomes, particularly at a national level. Suffice it to say that the inclusion of values and attitudes highlights one of the problems with an approach to education that is totally outcomes-based—it implies that everything valuable in education can and must be defined up front and must be assessable.

and programme development, and also has insisted that standards are developed to a high level of specificity.¹⁰ South Africans have tended to place their faith in the standard-setting technology, believing that creating outcome statements which ostensibly have a broad approach to education will ensure that broad approaches are taken to designing standards.

As discussed above, content-based curricula, or 'input-based education' was seen in South Africa as authoritarianism and as using education for ideological control. The logic of unit standards is that it doesn't matter where or how you gain knowledge; thus, it is assumed to be possible, through a national process, to clearly state in advance all the 'learning outcomes' (knowledge, skills, and attitudes and values) to be achieved through a range of different learning programmes in different institutions throughout the country.¹¹ The idea was that specifying outcomes, not content, would give providers more freedom. Policy formulators argued that associating standards and qualifications with a particular model of learning programme would be restrictive (Departments of Education and Labour 2002:78), but defining learning outcomes would not restrict curriculum content.

However, there is a tension between a notion of education as a nation-building project, important in the context of a racially divided past, and a pluralist approach which (somewhat tendentially) argues that if standards are used across the board to ensure that all learners are achieving the outcomes, different groups will be able to develop learning programmes which are consistent with their ideological approaches. This latter approach ignores the degree to which the selection of 'skills, knowledge, attitudes and values' is always at least to some degree ideologically loaded. The specification of unit standards that involves stating the specific outcome to be assessed, the assessment criteria, the 'range statements',¹² the 'essential embedded knowledge', and the 'critical cross field outcomes', cannot avoid directly affecting learning programmes. The original idea was that unit standards should not narrowly correspond to learning materials which, would be

¹⁰ Tessa Welch, the co-ordinator for the Standards Generating Body for Educators in Schooling, and expert in teacher education with extensive experience in both the standards generation processes of SAQA and programme design, argued in a personal communication that the separation of the development of standards from programme design is, in her terminology, a failure to understand the 'psychology of learning design'. She argues that it is only when you think of real learners in real contexts that you can design specific standards/programmes that are meaningful. If you are removed from the practical necessity of programme delivery, it is difficult to imagine all the diverse elements required in educational programmes in a sufficiently coherent way. If you succeed, you will be imagining a specific context and learners, and the standards you generate will not be easily applicable to a variety of contexts and learners.. It follows that standards setting will only be successful if (i) it remains at a generic level or at a programme design level, and (ii) it takes account of the practical needs of those providing education or training.

¹¹ This point is articulated in the notion that the same standards, or outcomes, can be achieved 'through learning programmes that vary to some extent in content and to a large extent in pedagogy' Departments of Education and Labour (2002:78).

¹² 'Range statements' define the scope of a particular standard.

developed separately by providers. However, increasingly it appears as if providers are attempting to translate, in a rigid and narrow way, each unit standard into a section, module, or chapter of a book or other learning material.¹³

So, while the South African model is based on the idea that qualifications and standards can be separated from curriculum, at the same time it has created a mechanism which means that qualifications specify the curriculum in a great deal of detail, while claiming not to. The actual model appears to be highly restrictive. The curriculum (and even pedagogy) is, if not totally determined, strongly driven by the specification of standards and qualifications. The fact that this process is not explicitly recognized has the effect of closing down debate about curriculum issues. Important educational decisions are taken by those whose overwhelming concern is bureaucratic—ensuring that the standards developed conform to the official requirements.

What seems to have been neglected in the conceptualization and implementation of the NQF is the relationship between specifying outcomes, and issues concerning curriculum content. A notion has developed that curriculum is a mere technical process of working out how best to get a specific group of learners to learn the required ‘skills, knowledge, attitudes, and values’. While it is recognized that these ‘skills, knowledge, attitudes, and values’ are likely to be contested, the solution was seen to be that these ‘learning outcomes’ should be agreed to by stakeholders. Providers would then design their curricula, in order to ensure that learners achieved the outcomes. This is a simplification of the relationships between the various elements of curriculum and underplays the important role of curriculum specialists and experts; in the NQF approach, providers must accept as given what should be questioned and debated within the education community and beyond.

South African educators in the liberation movement located outcomes-based education in a constructivist notion of learner-centred education. This was seen as the way to break away from the authoritarian ideology of the previous system. However, it appears as if to some extent they were misled by the theories and technologies in which they placed their trust. Muller (1996:8) argues that ‘constructivism, despite a certain rhetoric of liberation and autonomization, in the end acts to naturalise, and de-politicise, the selectivity of curricular knowledge’. Unit standards in South Africa seem to function in this way. They ostensibly define ‘outcomes’, which can be attained through a range of different learning contexts, and curricula, and they are set up as neutral vehicles against which different ideological approaches to curriculum can be implemented. In this way, they obscure the fact that knowledge is always being selected.¹⁴

¹³ The Study Group Report recognises this phenomenon and argues that questions of teaching and learning (or more generally, delivery) need to be taken into consideration when designing standards (see note 9). They do not question the need for or sense of nationally designed standards.

¹⁴ This is not an argument against selection of knowledge, which is inevitable in defining a curriculum. It is an argument against a technology which pretends to be neutral, but in fact can never be.

The fact that South Africa has arrived at this particular approach is deeply ironic, as in the anti-apartheid movement there was a debate and analysis around the ideological relativity of knowledge. It appears that in an attempt to develop an alternative to the fundamental pedagogics¹⁵ associated with the apartheid system and a highly positivist notion of knowledge as a fixed thing possessed by experts who transmit it to learners, South Africans have moved the power of determining what is knowledge to a bureaucracy, supposedly controlled by ‘stakeholders’.

Unit Standards and assessment

Examining the emerging approaches to assessment in more detail can provide insight into the technology of unit standards. Linked to unit standards, strong support for criterion-referenced assessment has emerged, located within an emancipatory rhetoric. Norm-referencing is seen as part of a discriminatory past in which some people were destined to fail; criterion referencing, on the other hand, appears to offer a more democratic alternative where everyone has a chance to succeed.

Criterion-referenced assessment highlights one of the problems with a standards-based approach to education: that it is based on ‘statements of attainment’, and is, in fact, only as good as these statements are. The more rigorous the attempts are to define a standard, the more narrow the standards tend to become. ‘The attempt to map out free-standing content and standards leads, again and again, to a never-ending spiral of specification’ in which the effort and cost involved quickly reach a point where the law of diminishing returns takes over (Hall and Woodhouse, 1999:206). This shows the problem with another key assumption of unit standards—that the language of standards is transparent and can be made to correspond unproblematically with observable practice.

A popular idea which comes across strongly in South African policy, in an extreme version of criterion-referencing, is that if outcomes are clear and transparent, assessment criteria can be developed which will always generate the same sort of assessments; provided they are trained, all assessors will know exactly what to do, and therefore results will be consistent and reliable. However, in reality, there are always different ways to test the same standard, and various studies have shown that learners’ correct answers to questions on the same standard vary depending on how questions are phrased (Wolf 1993; Department of Education 2002). There are factors that make supposedly equivalent tasks more or less difficult, but these are subject-specific and hard to predict in advance (Wolf 1993:10).

Which aspects of a curriculum should be nationally specified and which can be left to individual providers, and through which processes, is a complex issue. Different conclusions are likely to be appropriate for different levels and subject areas or fields (which tend to be associated with different educational purposes). However, the decision

¹⁵ Fundamental pedagogics was a pseudo-scientific educational ‘philosophy’ created by apartheid education technocrats, which encouraged a sloganeering approach to education (with definitions such as ‘to educate is to lead a child to adulthood’), and a notion of both teachers and learners as passive subjects. (Welch, 2002:2).

which the South African system has taken and sought to apply to all levels and areas of learning appears to be inappropriate. Attempting to state learning outcomes in advance can be a very good educational practice, particularly if the outcomes are not separated from the knowledge to be learnt.¹⁶ However to be able to do this as part of a national process, which must apply to all qualifications at a certain level in a certain area, is not only restrictive but costly and time consuming. It assumes that all learning can be defined in advance unproblematically, and that learning programmes can be driven entirely by end results. The amount of energy and effort required to reach a meaningful level of detail in the statement of desired end results means that attention has been deflected away from discussions about teaching, how learning should be organized, and what should be learnt.¹⁷

The processes of standards setting

The discourse of the democratic movement focused on participation, transparency, and democracy. Education, and in particular the creation of standards and qualifications, was to be relocated, defined, and controlled within democratic structures:

... the establishment and registration of education and training standards takes place through participatory and representative processes and structures. The answers are expected to be provided by a broad base of participants in education and training: state, organized labour, organized business, providers of education, critical stakeholders including professional bodies and research institutes, as well as community and learner structures.
(Nkomo, 2001:23)

Standards Generating Bodies¹⁸ and National Standards Bodies¹⁹ were created, the former to generate, and the latter, to recommend for registration on the NQF, the unit standards and qualifications generated in any particular field. The National Standards Bodies are comprised of 'major stakeholders', to ensure 'democratic control' over qualifications. The Standards Generating Bodies are also supposed to include various stakeholders,

¹⁶ The Report of the Study Group into the Implementation of the NQF acknowledges this when it argues that standards and qualifications must not become divorced from the providers of education and training, and that 'the generation of standards and qualifications without the adequate involvement of providers can create problems of practicability and validity' op cit p78. However, the recommendations of the report don't shift from the idea that unit standards and qualifications must be generated nationally.

¹⁷ It is interesting to note that while a fairly rigid approach to outcomes-based education, which refuses to include knowledge at a curriculum level (because it is associated with input-based education) has been adopted in schooling, unit standards and stakeholder driven structures have been rejected. This means that the large and complex machinery which was set up to integrate education and training is only really dealing with a small aspect of the system.

¹⁸ An unlimited number of these bodies can be created; over 125 have been already established.

¹⁹ Twelve NSBs were created, according to what were designated as organising fields.

although there is more of an emphasis on expertise²⁰ (these bodies are discussed in more detail in the article by Ensor in this issue (pp)).

The role of stakeholders in defining standards and qualifications has been a controversial, but strongly defended aspect of the structures and processes of the NQF. Muller (2000:4) argues that the ‘political triumphalism’ experienced during the transition to democracy in South Africa which gave power to the people though their right to vote was extended to apply to expert knowledge including science. Elites had dominated decisions on a whole range of societal matters, and this had to change. Knowledge and skills (as defined in qualifications and standards) came to be seen as appropriate domains for control by democratic structures.

The arguments in South Africa the stakeholder-driven determination of qualifications was based partly on radical critiques of epistemology, which emphasised the ideological groundedness of all knowledge, and partly on global trends which were increasingly questioning the form, character, and role of knowledge in society. There was an anti-authoritarian argument within the liberation movement, which was, justifiably, suspicious of the role that ‘experts’ had played in the past in defining the curriculum. Qualifications were seen as instruments that experts in elite groups had used in oppressive ways. The solution was to wrest qualifications from the experts (mainly in the form of providers), and instead set up stakeholder structures to define national standards.

The ease with which ‘experts’ can be dismissed from decision making over key educational decisions is facilitated by the prevalent notion that anyone can be an expert in education:

We all know too much about schools, because we have all been to school and our children go to school. The glib, the superficial, the easy observation is far more prevalent than it would be in a more recondite field—nuclear energy, say—where only the expert can comment, and where ignorance is at once exposed for what it is. (Vaizey, 1972:3)

There is also a tendency to believe that because someone works in a certain industry, or even, has been trained in a certain industrial area, they necessarily know how an educational programme should be designed for other people in that area.²¹

In the early discussions about the NQF there was a conflation between ‘outcomes’, ‘competencies’, and ‘performance’, on the one hand, and tasks in the workplace on the other. The role of workers in defining tasks in the workplace, and even in defining competency in this regard, seems reasonable and useful. However, what is less clear is

²⁰ If the Study Group’s recommendations are adopted, stakeholders will ratify, and not develop, standards and qualifications.

²¹ Alison Wolf shows how this approach is flawed, and that people in industry often have very little insight into how to design an educational programme in the field in which they work, and have some expertise, in Wolf, A. (2002). *Does Education Matter? Myths about education and economic growth*. London, Penguin.

why 'stakeholders' should define qualifications, nor does it seem clear who the 'stakeholders' should be, what their 'stake' is, and what role they should play. It is also not clear whether qualifications should be the aspect of education that 'stakeholders' should have a say over.

Two fraught issues related to the role of 'stakeholders' are the problems with 'representivity' and the inequality of different 'stakeholders'. In relation to the former issue, there often is no real relationship between individuals participating in various structures and the groups that they are supposed to represent. In relation to the latter, many commentators have pointed out that 'stakeholders' are not equal in the power they have in society, and will not be able to play equally influential roles in processes (for example, Foley 1994:137). Cosatu was initially very optimistic about its role, based on the experience of shopstewards in some unions who were involved in setting standards in the workplace (Ray 1998). However, there is evidence that union representatives more often feel disempowered from participating in the various 'stakeholder' structures that exist (eg Adler 1998:77). Where the individual has been trained or 'capacitated', they are not necessarily reflecting any meaningful positions of organisations or constituencies that they are representing²². Also important here is what the 'stakeholder' structures discuss, and what the constraints are on their discussion. Because there is a rigid and specific format for standards and qualifications, much of their discussion tends to be bureaucratic (how can we get it to fit the format/ does it meet the requirements) and not rigorous debate.

The arguments around 'stakeholder' involvement show the parallel between the transition to democracy and the transition to neo-liberalism. The 'stakeholder'-driven approach to the design of qualifications has been tied up in the rhetoric of the transition to democracy. However, it is not necessarily at heart either a democratic or a sensible approach to knowledge or qualifications. It is more likely to be an example of the trend towards neo-liberalism in which emphasis is placed on employers and parents defining and controlling the meaning of education and training like any other product (Ball 1990).

The 'stakeholder'-based structures have also served to close down debate on areas which should be the subject of contestation in education; the fact that all 'stakeholders' have agreed on something means that it is beyond criticism; criticising can easily be seen as opposing to democratically-taken decisions.

²² This problem has mainly been diagnosed within South Africa as 'lack of capacity', to be solve by 'capacity building workshops', and not as a problem with the structures and processes themselves.

Outcomes-based education and quality assurance²³

Quality assurance in South Africa has been seen as an important element in the democratisation and transformation of education. The emphasis on quality assurance in education and training was seen as emancipatory because under apartheid the education which most of the population had access to was of very poor quality (or non-existent).

Whether quality assurance is inherently a business-driven notion, or whether it can be applied to improving education, is the subject for another paper. But the approach to quality assurance underpinned by the NQF seems to show again the influence of neo-liberalism in education, and the marginalizing of real debate around curriculum. One of the newly created Education and Training Quality Assurance agencies that are integral to the NQF (ETQAs) describes quality and quality assurance in the following way:

Within the ISO 9000 family of standards, the term "quality" is used in the context of achieving sustained customer satisfaction through meeting customer needs and expectations, within an organizational environment committed to continual improvement of efficiency and effectiveness. Quality, in this sense, is critical to business success.

(Wholesale and Retail SETA Website, accessed March 2002)

Crudely put, the South Africa notion of quality assurance as realized in the bulk of SAQA 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 of evaluating 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'.

In many of the newly established quality assurance structures operating in various sectors of the economy²⁴ what appears to be happening is that individuals with subject expertise in the area to be 'quality assured' are not involved in the quality assurance processes; instead, people who are experts in 'quality assurance', who understand the 'quality assurance system' will evaluate programme delivery. Specialists, people who actually know their field, whether that is an occupational field like construction or a curriculum field like physics, are given very little responsibility within this system, and the processes for making changes to qualifications are not within their responsibility. They are treated as merely the production unit, producing qualifications according to specifications developed by stakeholders, and evaluated by other stakeholders. Key quality indicators for providers are, among others, that providers use the standards, integrate theory and

²³ It is important to note that the aspects of the quality assurance approach described below are not a description of the entire South African system. The Higher Education Quality Assurance Council is not operating in a unit standards driven approach, and there are areas of better practice elsewhere as well. This section describes the broad thrust that has been developed within many of the structures of the NQF.

²⁴ These are known as the Sectoral Education and Training Authorities' Education and Training Quality Assurance agencies.

practice, and utilise suitable processes for the prescribed learning outcomes. In this process, issues concerning technical or theoretical content can easily get lost or treated as of secondary importance.

‘Quality’ is a far more complex concept in education than it is in industry, and industrial quality assurance systems cannot easily be applied to education (Vroeijenstijn 2001:40). Industrial quality assurance systems are about the quality of the ‘product’—but in education, it is not clear what this is; it could be seen as the graduate, or the course, or a improved economy, or a better society. It is equally not clear who the client is—is it the learner, the employer, the taxpayer? Quality assurance in industry is not primarily about accountability, and industrial systems are not designed with accountability in mind.

Quality assurance based on delivery against unit standards is essentially a managerialist approach, which measures success in a circular fashion — has the target which we set been met? In other words, the question becomes, ‘Was the system applied according to plan?’, and ignores the effects of the plan on reality (Paine 1999). Focusing on measurable outputs can have the effect of suppressing learning; one often does not see that the model isn’t working, until one steps out of the paradigm. The important point here is that ‘...the achievement of planned outputs does not inevitably lead to the intended outcomes...[A]ttempts to capture delivery by breaking it down into measurable units often lead to perverse outcomes’ (Paine 1999:47).

Insulation from critique

This article has argued that the NQF in South Africa appears to be driving a neo-liberal approach to education. It was supposed to be a significant education reform which would on the one hand, make South African education, and therefore, the South African economy, globally competitive, and on the other, transform an undemocratic and elitist education system. However, the tension between these two goals appears to be irreconcilable. Much, although not all, of the underlying philosophy of the NQF, is associated with a neo-liberal form of outcomes-based education. Outcomes-based education is not necessarily or 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 concretised and ossified the approaches 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.

The policies are written and described using rhetoric about transformation and democratisation. This also has contributed to misconceptions about what the policy mechanisms can in fact achieve; as Spreen contends, stating something in a policy document tends to create the impressions that it will happen:

My own experience in educational reform in the United States has made me susceptible to the argument that when policies are put on paper with a coherent logic we are deluded into thinking fundamental change is taking place. Observers of policy reform often do not take into account what it takes to truly alter the structure of society or its institutions nor do they consider important distinctions made on the ground by those implementing the policies.
(Spren 2001:17)

This is a useful contribution to understanding the problems of policy implementation and the lack of critical debate in South Africa. However, Spren's analysis needs to be pushed further; from an analysis of various policy documents, discussions with numerous players within the system, as well as being a participant-observer in a range of NQF structures and forums, I have observed that the discourse of the NQF— the technology, approaches, and ultimately the philosophy, have become so naturalised in South Africa that they are insulated from serious critique. In other words, not only do the policies create an assumption that mechanisms have been put in place to achieve the stated objectives, but the systems have developed in such a way that they are, to many, the only conceivable way of achieving the objectives.

One of the ways the NQF discourse functions in South Africa is by appeal to 'common sense'. This does not mean that the arguments are in fact necessarily common or sensible, but rather that they are packaged to sound simple, logical, and the only possible rational choice, whether or not this is in fact the case (Crush 1995:17). This has been aggravated in South Africa by the ways in which these arguments have been linked with the democratic project of post apartheid governments. The approaches, policies, and mechanisms which were designed to replace apartheid education gained high levels of support, until they became indistinguishable from their mission.

McKensie (1997) argues that 'although workshops and conferences are designed to inform, they also provide the incentive for participants to refine their language and cartoon representations to such an extent that their meaning is only understood by themselves'. He goes on to argue that 'as we seek to achieve these objectives, we run the risk that we become more interested in the process of drawing the cartoon than in the story that it was originally designed to represent'. It now appears as if the policy mechanisms have become self-reinforcing complexities that are driven by their own internal logic, and not by their original aims.

Spaces of hope

The story of this article can be read as a sad one; the story of a bright and hopeful democratic project undermined by what many South Africans have seen as the inexorable drive of neo-liberalism in a globalising world. However, there are openings and points of leverage within the system, where the possibility of improving educational practice exists; the system is not monolithic, and there are many instances of excellent educational practice.

For people concerned with social change, there is always a difficult choice to be made about the extent to which one should attempt to improve the existing system, and the

extent that one should strive for a totally different one. In education, in particular, there is a range of crucial areas which need attention—increasing access to education, production of quality text books and materials, proper training of teachers, and so on. But in relation to the NQF specifically, there are still possibilities for good practice. There is still space to argue for a more generic level of standards setting, and a focus on qualifications and integrated assessment, to move away from the reductionism of detailed standards setting removed from programme design and provision. There are also large areas of the system which, while ostensibly part of the NQF, have not been driven by the processes and structures described above; the higher education system and the schooling system, to different extents, have not been totally absorbed within the NQF logic. This article should not, therefore, be read as a negative pronouncement on the entire South African education system, but rather as a critique of an aspect of it, which does not seem likely to achieve its objectives.

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